

EXHIBIT 1

Communications

communications@metmuseum.org

Contact

Nancy Chilton

Mika Kiyono

Exhibition Dates:

Part One: September 18, 2021–

September 5, 2022

Part Two: May 5, 2022–September

5, 2022

Exhibition Locations:

The Met Fifth Avenue—

Anna Wintour Costume Center

(Part One) and American Wing

Period Rooms (Part Two)

www.metmuseum.org/InAmerica

#MetInAmerica

@metcostumeinstitute

For Immediate Release

Costume Institute Two-Part Exhibition to Focus on American Fashion

(New York, April 12, 2021)—The Metropolitan Museum of Art announced today plans for The Costume Institute’s next major exhibition: a two-part show on view from September 18, 2021 through September 5, 2022. Part One, *In America: A Lexicon of Fashion*—opening in the Anna Wintour Costume Center on September 18, 2021—will celebrate The Costume Institute’s 75th anniversary and explore a modern vocabulary of American fashion. Part Two, *In America: An Anthology of Fashion*—opening in the American Wing period rooms on May 5, 2022—will explore the development of American fashion by presenting narratives that relate to the complex and layered histories of those spaces. Parts One and Two will close on September 5, 2022.

The exhibition is made possible by Instagram.

Additional support is provided by Condé Nast.

In celebration of the first opening, a more intimate Costume Institute Benefit (also known as The Met Gala) is scheduled for Monday, September 13, 2021, pending government guidelines. The Met Gala for Part Two will be on May 2, 2022. The Benefit provides The Costume Institute with its primary source of annual funding for exhibitions, publications, acquisitions, operations, and capital improvements.

“Fashion is both a harbinger of cultural shifts and a record of the forces, beliefs, and events that shape our lives,” said Max Hollein, the Marina Kellen French Director of The Met. “This two-part exhibition will consider how fashion reflects evolving notions of identity in America and will explore a multitude of perspectives through presentations that speak to some of the complexities of history with powerful immediacy. In looking at the past through this lens, we can consider the aesthetic and cultural impact of fashion on historical aspects of American life.”

Andrew Bolton, the Wendy Yu Curator in Charge of The Costume Institute, said: “Over the past year, because of the pandemic, the connections to our homes have become more emotional, as have those to our clothes. For American fashion, this has meant an increased emphasis on sentiment over practicality. Responding to this shift, Part One of the exhibition will establish a modern vocabulary of American fashion based on the expressive qualities of clothing as well as deeper associations with issues of equity, diversity, and inclusion. Part Two will further investigate the evolving language of American fashion through a series of collaborations with American film directors who will visualize the unfinished stories inherent in The Met’s period rooms.”

Exhibition Overview

Part One—*In America: A Lexicon of Fashion*

The Costume Institute’s Anna Wintour Costume Center galleries will feature a fictional American home constructed of transparent walls that intersect and overlap, blurring the boundaries of the interior rooms. Examples of 20th- and 21st-century fashion will populate the rooms, reflecting the customs and behaviors of the imagined occupants. Designs by pioneers of American sportswear will be displayed alongside works by a diverse group of contemporary designers to illustrate a shifting emphasis in American fashion defined by feelings of fear, delight, comfort, anxiety, well-being, loneliness, happiness, belonging, self-reflection, and self-representation among other qualities.

Melina Matsoukas will create a specially commissioned, open-ended film to project in the galleries, the content of which will evolve over the course of the exhibition.

Part Two—*In America: An Anthology of Fashion*

Opening May 5, 2022, Part Two of the exhibition is a collaboration between The Costume Institute and the American Wing. It is the final installment of The Costume Institute’s trilogy of period-room shows, which began with *Dangerous Liaisons: Fashion and Furniture in the 18th Century* (2004) in the French Period Rooms, followed by *AngloMania: Tradition and Transgression in British Fashion* (2006) in the English Period Rooms.

Part Two of the exhibition will feature women’s and men’s historical and contemporary dress dating from the 18th century to the present in vignettes installed in select period rooms. The interiors present a survey of more than 300 years of American domestic life and tell a variety of stories—from the personal to the political, the stylistic to the cultural, and the aesthetic to the ideological. The exhibition will reflect on these narratives through a series of three-dimensional cinematic “freeze frames” produced in collaboration with notable American film directors. These mise-en-scènes will explore the role of dress in shaping American identity and address the complex and layered histories of the rooms.

Spanning the years 1670 to 1915, the interiors include a Shaker Retiring Room from the 1830s that explores the defining characteristics of American sportswear, such as utility, simplicity, and practicality, through the work of Claire McCardell. A 19th-century parlor from Richmond, Virginia, will feature the intricate designs of Fannie Criss, a highly regarded local dressmaker active at the

turn of the 20th century. John Vanderlyn's panoramic 1819 mural of Versailles will set the stage for a re-creation of the historic 1973 "Battle of Versailles" that pitted American designers against their French counterparts. A 20th-century living room designed by Frank Lloyd Wright will highlight the architectural gowns of Charles James to examine notions of creative genius and the tensions between artist and patron.

Credits

Part One is organized by Andrew Bolton and Amanda Garfinkel, Assistant Curator of The Costume Institute. Part Two is organized by Bolton and Jessica Regan, Associate Curator of The Costume Institute, and Amelia Peck, the Marica F. Vilcek Curator of American Decorative Arts and Supervising Curator of the Ratti Textile Center, with the support of Sylvia Yount, the Lawrence A. Fleischman Curator in Charge of the American Wing.

LAMB Design Studio's Nathan Crowley and Shane Valentino, film production designers who have worked on past Costume Institute exhibitions, will oversee exhibition design with The Met's Design Department. Cinematographer Bradford Young (whose film projects include *Selma*, *Arrival*, and *When They See Us*) will work with Crowley and Valentino on the sets and lighting. Franklin Leonard, a film executive and founder of *The Black List*, will be an advisor on the exhibition.

Related Content

A publication by Andrew Bolton and Jessica Regan, with Amelia Peck and others, will accompany the exhibition. Available in May 2022, the book will be designed by Willem Van Zoetendaal and include new photography by Bradford Young. It will be published by The Metropolitan Museum of Art and distributed by Yale University Press.

A special feature on the Museum's website, www.metmuseum.org/InAmerica, provides further information about the exhibition. Follow us on [Facebook.com/metmuseum](https://www.facebook.com/metmuseum), [Instagram.com/metmuseum](https://www.instagram.com/metmuseum), and [Twitter.com/metmuseum](https://twitter.com/metmuseum) to join the conversation about the exhibition and gala. Use #MetInAmerica, #CostumeInstitute, @MetCostumeInstitute, and #MetGala on Instagram and Twitter.

About the American Wing Period Rooms

In 1909, The Metropolitan Museum of Art hosted the Hudson-Fulton Exhibition, in which early American decorative arts—glass, silver, ceramics, and furniture—as well as paintings were featured together for the first time in an American art museum. An overwhelmingly positive public response led to the creation of the Museum's American Wing, which opened in 1924. Conceived as three floors of decorated rooms surrounding central furniture galleries, the wing was intended to transport visitors back to a certain time and place—the term "period room" was used to describe the immersive interiors. The architectural elements of the 15 original rooms, removed from 18th- and early 19th-century houses along the Eastern seaboard, provided an innovative framework for The Met's growing collection of American fine and decorative arts, tracing a chronological progression of design in the United States from the Colonial to early Federal period. Today, following several expansions, the American Wing houses 21 period rooms spanning some 300

years, now interpreted through more expansive and inclusive narratives that foreground gender, race, and class.

###

April 12, 2021

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Fifth Avenue**

1000 Fifth Avenue
New York, NY 10028
T 212 535 7710

**The Met
Cloisters**

99 Margaret Corbin Drive
Fort Tryon Park
New York, NY 10040
T 212 923 3700

[metmuseum.org](https://www.metmuseum.org)

EXHIBIT 2

On file with the OCE

EXHIBIT 3

To: Rebecca Rodriguez[REDACTED]
Cc: Kiernan, Eaddy [REDACTED]; Concetta Ciarlo[REDACTED];
Jessica Nichols[REDACTED]; Pape, Sophie[REDACTED]; Brittany
Daulton[REDACTED]
From: Holloway, Jenae
Sent: Thur 5/13/2021 11:00:28 PM
Subject: 2021 Costume Institute Benefit Invitation | Rep. Alexandria Ocasio-Cortez
[CI2021+2022Announcement Release.pdf](#)

Dear Representative Alexandria Ocasio-Cortez,

I am writing about the 2021 Costume Institute Benefit at The Metropolitan Museum of Art, which I am delighted to say will be back this year to celebrate the new exhibition and the 75th anniversary of The Costume Institute. We are doing things a little differently this year, and the show will be in two parts.

Part One will honor *In America: A Lexicon of Fashion*, which will be on view in the Anna Wintour Costume Center beginning September 18, 2021. The show will explore the modern vocabulary of American fashion.

Part Two will be *In America: An Anthology of Fashion*, and will open in the American Wing Period Rooms on May 5, 2022. The show will use the galleries' interiors to present narratives that explore the development of American fashion and the complex and layered histories of those spaces.

To celebrate the first opening, we are planning to hold a slightly smaller Costume Institute Benefit — or Met Gala, as we all know it — on **Monday, September 13, 2021**. Our Honorary Chairs for September are Tom Ford, Adam Mosseri, and Anna Wintour, and our Co-Chairs are Timothée Chalamet, Billie Eilish, Amanda Gorman, and Naomi Osaka. The gala for part two will take place on May 2, 2022.

Anna would be thrilled to have you and Riley Roberts join us at the gala this September, as guests of Vogue.

While this year's gala will naturally look different in some ways, pending government guidelines, we are eagerly anticipating a chance to safely come together, and to celebrate with you one of the most important events on the New York cultural calendar. We are looking forward to honoring a vision of American fashion which is both deeply creative as well as diverse and inclusive.

Please let us know as soon as possible if you are able to join us this fall, as space is extremely limited this year.

Thank you,
Jenae

Jenae Holloway
Special Events | VOGUE
[REDACTED]

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metmuseum.org

EXHIBIT 4

To: Rebecca Rodriguez [REDACTED]
Cc: Kiernan, Eaddy [REDACTED]; Concetta Ciarlo [REDACTED];
Jessica Nichols [REDACTED]; Pape, Sophie [REDACTED]; Brittany
Daulton [REDACTED]
From: Holloway, Jenae
Sent: Thur 6/24/2021 7:47:15 PM
Subject: Re: 2021 Costume Institute Benefit Invitation | Rep. Alexandria Ocasio-Cortez

Hi Rebecca,

Thank you so much for confirming that the Congresswoman will attend -- we are so thrilled to have her. Will you please kindly confirm if she plans to bring Mr. Roberts as a guest or if she will be attending alone? We will be in touch in the coming weeks with the celebratory digital invitation, health and safety procedures, as well as guest entry details.

However, if there are any other questions we can answer for you more immediately, we'd be happy to set up a call with you to discuss more!

Thank you and we look forward to hearing from you,
Jenae

On Thu, Jun 24, 2021 at 9:06 AM Rebecca Rodriguez <[REDACTED]> wrote:

Good morning all, apologies for my delay! The Congresswoman would like to attend and sends her appreciation for the invitation. Can we get on a call to discuss details?

Best,
Rebecca

On Fri, Jun 11, 2021 at 2:37 PM Holloway, Jenae <[REDACTED]> wrote:

Hi Rebecca,

I hope you're having a lovely week! I'm kindly reaching out to follow up on the invitation for Rep. Ocasio Cortez and Riley Roberts.

We look forward to hearing from you,
Jenae

On Mon, May 24, 2021 at 5:50 PM Holloway, Jenae <[REDACTED]> wrote:

Thank you, Rebecca. I'll standby to hear from you.

Best,
Jenae

On Mon, May 24, 2021 at 4:40 PM Rebecca Rodriguez <[REDACTED]> wrote:

Hello Jenae,

Thank you so much for the invitation and the follow up; please expect a response from me within another day or two.

Best,
Rebecca

On Mon, May 24, 2021 at 3:03 PM Holloway, Jenae <[REDACTED]> wrote:

Hi Rebecca,
I hope you had a lovely weekend. I'm kindly following up on the invitation below. Will you please let us know at your earliest convenience if Rep. Ocasio Cortez and Riley Roberts may be available to join us this year? We'd be thrilled to confirm them for the event!

Thank you,
Jenae

On Thu, May 13, 2021 at 7:00 PM Holloway, Jenae <[REDACTED]> wrote:

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Thank you,
Jenae

Jenae Holloway
Special Events | VOGUE


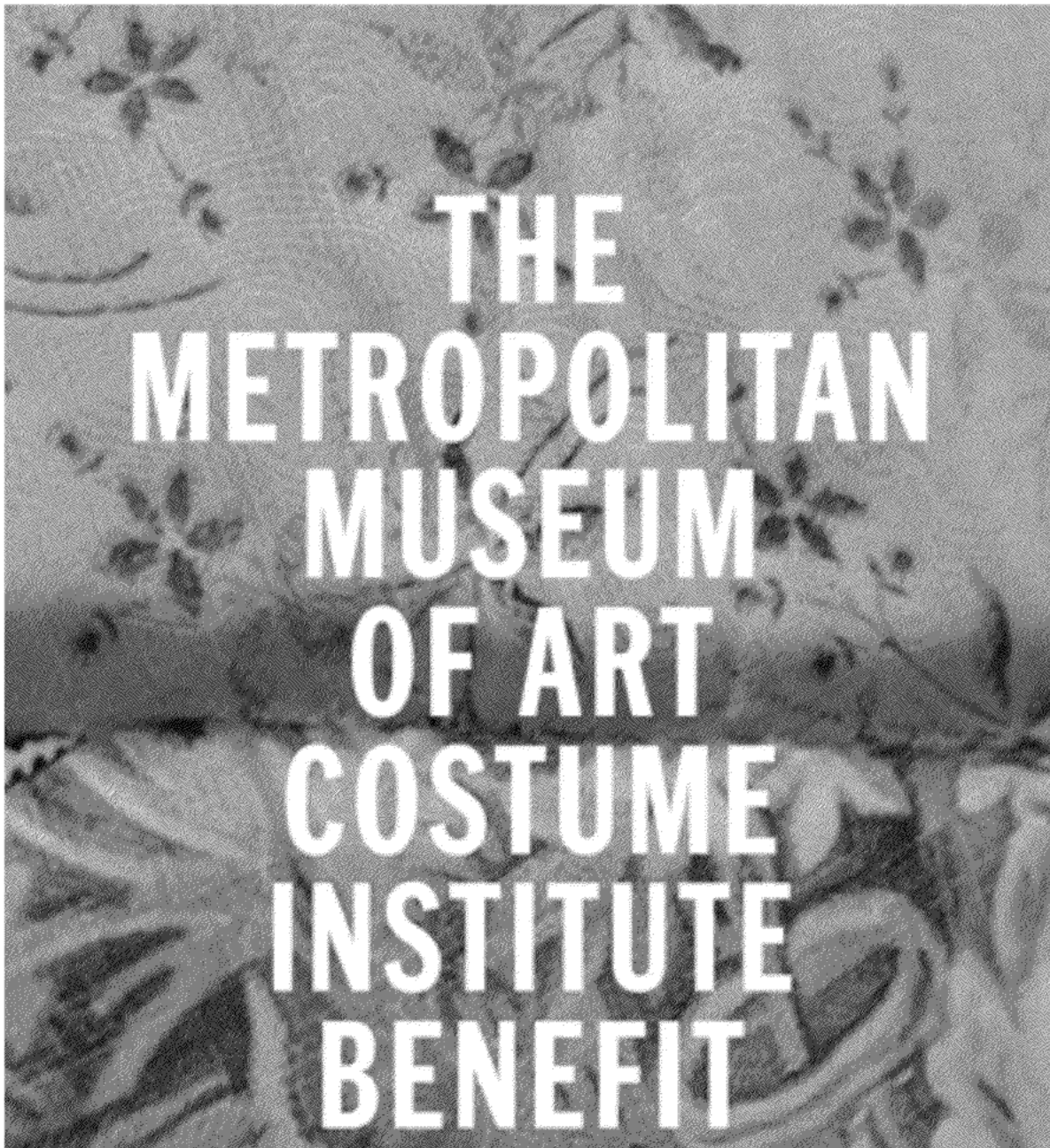


EXHIBIT 5

Subject: Fwd: 2021 Costume Institute Benefit Invitation | Representative Alexandria Ocasio-Cortez
Date: Monday, March 7, 2022 at 6:36:34 PM Eastern Standard Time
From: Rebecca Rodriguez
To: David Mitrani (Sandler Reiff)

----- Forwarded message -----

From: The Metropolitan Museum of Art <events@metmuseum.org>
Date: Thu, Aug 5, 2021 at 1:57 PM
Subject: 2021 Costume Institute Benefit Invitation | Representative Alexandria Ocasio-Cortez
To: <[REDACTED]>





THE METROPOLITAN MUSEUM OF ART COSTUME INSTITUTE BENEFIT

IN AMERICA: A LEXICON OF FASHION

MONDAY, THE THIRTEENTH OF SEPTEMBER
FIVE-THIRTY IN THE EVENING

DRESS CODE
AMERICAN INDEPENDENCE

COCHAIRS
TIMOTHÉE CHALAMET, BILLIE EILISH,
AMANDA GORMAN, AND NAOMI OSAKA

HONORARY CHAIRS
TOM FORD, ADAM MOSSERI,
AND ANNA WINTOUR

THE EXHIBITION AND THE BENEFIT FOR THE COSTUME INSTITUTE
ARE MADE POSSIBLE BY INSTAGRAM.

ADDITIONAL SUPPORT IS PROVIDED BY CONDÉ NAST

PROCEEDS FROM THE BENEFIT SUPPORT THE COSTUME INSTITUTE
AND OTHER MUSEUM ACTIVITIES.

THE HEALTH AND SAFETY OF OUR GUESTS AND STAFF IS OUR MAIN PRIORITY.
ARRIVAL GUIDELINES AND INSTRUCTIONS WILL BE SHARED PRIOR TO THE EVENT.

ENSEMBLE, RALPH LAUREN (AMERICAN, BORN 1939), AUTUMN/WINTER 1982-83; COURTESY RALPH LAUREN CORPORATION

Rebecca Rodriguez, Campaign Manager
Alexandria Ocasio-Cortez for Congress

www.ocasiocortez.com



EXHIBIT 6

To: Aurora Kiernan Jenae Jessica Alexandra Virginia[rebecca+track [REDACTED]]
From: Rebecca Rodriguez
Sent: Mon 7/26/2021 5:01:40 PM
Subject: Re: Met Gala x Aurora James

Aurora,
Thank you, thank you, thank you for accepting and being a part of this experience with us - we are honored and excited!

In discussing this with the Congresswoman last week, she mentioned she was very familiar with your work especially with regards to Brother Vellies, and she would like to understand a bit more about your style with apparel. Is there anything your team can share with me in advance of a conversation with you and the Congresswoman? I think it would help her get a better sense as to your style, which would be helpful in the discussion around the Met Gala.

The Congresswoman will be in NY this weekend, if at all possible maybe we can arrange something in person?

Best,
Rebecca

On Mon, Jul 26, 2021 at 10:13 AM Aurora James <[REDACTED]> wrote:

Good Morning Rebecca,

Its a pleasure to meet you and I have to tell you I am truly honored to have the opportunity to be working on this for the Congresswoman.

Please let me know when might work to connect, I would love to get a sense of anything she might be gravitating towards so I can be sure to design around that and present things she's excited about.

All my love,
Aurora

-
Aurora James
Creative Director

Brother Vellies
71 Franklin Street
Brooklyn, NY
www.brothervellies.com

[@BrotherVellies](#)
[@AuroraJames](#)

On Jul 23, 2021, at 9:58 AM, Kiernan, Eaddy <[REDACTED]> wrote:

Dear Rebecca,

I'm delighted to introduce you to Aurora James. We are all so excited about this partnership, and know that Aurora will make something truly incredible for the Congresswoman.

Please let us know if we can help to coordinate next steps.

All the best,
Eddy

EXHIBIT 7

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

Transcript of Interview of Representative Alexandria Ocasio-Cortez

Review No. 22-8546

Date: May 12, 2022

1 P R O C E E D I N G S

2 MR. BROWN: For the record, this is Jeff
3 Brown with the Office of Congressional Ethics.
4 With me is my colleague Omar Ashmawy. We are
5 undertaking a remote video interview of the
6 congresswoman. It is May 12, 2022. We are just a
7 couple minutes after 2:00 p.m. The congresswoman
8 has been provided with a copy of 18 USC 1001,
9 signed an acknowledgement noting that it applies
10 to today's conversation, and with that we will get
11 started.

12 BY MR. BROWN TO THE CONGRESSWOMAN:

13 Q Thank you, Congresswoman, for being with
14 us today.

15 A Thank you for having me.

16 Q We will probably spend the majority of
17 our time talking about the 2021 Met Gala. I'm
18 sure that's what you are anticipating we will be
19 talking about, but I did want to start by asking
20 you a couple of questions about invitations that
21 you received to prior Met Galas.

22 So my understanding is you were invited

1 to the 2019 Met Gala, couldn't attend for either
2 scheduling or some personal reasons so declined
3 that invitation but that you were invited to the
4 2020 Met Gala, and I would like you to walk me
5 through how that invitation came about.

6 A I think a lot of it was just an extension
7 of the fact that we couldn't attend the 2019 Met
8 Gala, so we were invited, we couldn't attend the
9 first time, and it -- you know, the invitation
10 stood for the next year and then the year after to
11 2021 when 2020 was canceled.

12 Q Tell me about that. When you say the
13 invitation stood, what do you mean by that?

14 A I had spoken with a journalist at Vogue
15 at an event, I don't recall which one, and they
16 had communicated to me that the invitation still
17 stood and they had communicated that to me
18 verbally, and that's my interpretation.

19 Q Okay. Do you remember who the journalist
20 was or when that conversation occurred?

21 A Well, there were several journalists who
22 had communicated it over a time period. I

1 remember one of them was Bridget Reed at Vogue,
2 but I don't remember if she was the one who had
3 communicated the 2021 or the 2019 one. And these
4 were kind of like chance encounters at other
5 events. So I don't remember specifically the
6 2021. It could have been her, it could have been
7 someone else.

8 Q I realize it has been a little while so
9 let me show you a couple documents and see if
10 these jog your memory at all. You are not on
11 these documents, but I would like you to see them
12 and then I will ask you a couple questions about
13 them.

14 MR. BROWN: Ian, if you could, could you
15 pull up Exhibits 1, 2 and 3 and give me control of
16 those.

17 A/V TECHNICIAN: Yes, counsel. Please
18 stand by.

19 MR. BROWN: Thank you.

20 (Exhibit 1, Exhibit 2 and Exhibit 3 were
21 marked.)

22 Q Congresswoman, let me direct your

1 attention to this first exhibit up here.

2 MR. BROWN: Just let me, for the record,
3 say this is Exhibit 1, THAOC_0196.

4 Q I want to preface this with these couple
5 of e-mails I am having you read are February 8,
6 2020, communications with individuals who I
7 understand to be on your staff to folks at Condé
8 Nast or Vogue. I'm going to let you read these.
9 Let me know when you are done with each one and I
10 will move you on to the next one.

11 A Uh-huh. Okay.

12 Q Moving onto Exhibit 2, and I will blow
13 this up for you a little bit here.

14 MR. BROWN: For the record, this is
15 Exhibit 2, THAOC_0184.

16 Q Congresswoman, I just want to direct your
17 attention to the February 8 e-mails right here, if
18 you want to read those. You are more than welcome
19 to read the rest of the e-mail string, too, if you
20 would like, but I'm just going to focus on the
21 February 8 communications.

22 A Okay.

1 Q And now this is Exhibit 3. I will zoom
2 in for you a little bit here.

3 MR. BROWN: For the record, this is
4 THAOC_0182.

5 A Again, I'm just going to scroll down to
6 the February 8 communications right here.
7 Congresswoman, if you want to read those and let
8 me know when you're done.

9 A Yes, that's correct.

10 Q Okay. These are all, like I said,
11 e-mails from February 8, it looks like the
12 afternoon, February 8, 2020, from, as I understand
13 it, individuals on your staff to individuals at
14 Vogue. Does this help jog your memory at all
15 about how the invitation to the 2020 Gala came
16 about?

17 A Yes. It says here at the last e-mail
18 that the event was the Little Women premier. And
19 I do remember after the premier two journalists or
20 employees affiliated with Vogue had approached me
21 about attending the Met.

22 Q And tell me, what did they say? What are

1 your recollections of what you discussed?

2 A I mean I remember it was something
3 loosely along the lines of, you know, we know you
4 couldn't make it last year, we would still love to
5 have you, please reach out, you know, to our team
6 because we would love to still have you come.

7 Q My understanding is the Little Women
8 premier occurred somewhere around like December of
9 2019. Does that sound about right?

10 A I think that sounds about right. I
11 remember it was cold outside.

12 Q And I see these e-mails are from February
13 8 of 2020. So talk to me about how these e-mails
14 come about. It looks like you have a sitdown with
15 some staff members and direct them to reach out to
16 Condé Nast. Is that how it happened?

17 A I remember right after the event I had
18 passed along the communication from Vogue, what
19 they had told me at the event, to my staff and I
20 had asked them to follow up. And, you know, this
21 may have been in response to sometime later I may
22 have asked them did you follow up after that

1 initial conversation, perhaps they just followed
2 up a little late, but that's what I imagine, yeah.

3 Q So when you were talking about following
4 up after this event, you mean following up after
5 the Little Women premier?

6 A Yes, yeah.

7 Q So your recollection is asking someone on
8 staff to follow up on it sometime in December and
9 then these e-mails may be in response to you
10 following up with your staff to see sort of where
11 things stood?

12 A Yeah, because -- so basically our
13 office -- if it happened around December 2020, our
14 office and most of Capitol Hill is closed for a
15 decent amount of time during the holidays. So if
16 it happened during December, it could have
17 happened like right before Christmas and New
18 Year's, which leaves the office closed for several
19 weeks. And so, you know, right after in January
20 everything opens up. I imagine this wasn't the
21 most urgent thing that we were dealing with and so
22 this was probably one of those tasks that had been

1 pushed a few weeks and so it kind of makes sense
2 that they had followed up in February because we
3 probably had a lot of other top priorities to
4 contend with in January.

5 Q Do you recall sitting down or having a
6 phone call with Campaign Staffer or Corbin about
7 the Met in or around February?

8 A I don't. I mean, I have had so many
9 phone calls with them. But I don't recall. It is
10 entirely possible, but I just don't recall.

11 Q It does seem to me -- and I just want to
12 make sure I am not misinterpreting this. It looks
13 like there were probably some communications
14 between you and staff on February 8 that would
15 have led to these communications.

16 A Well, again, it is entirely possible. We
17 do weekly -- we do weekly -- I do check-ins with
18 my directors and my campaign manager once a week.
19 So that gives us after the holiday season, after
20 the office reopens, that puts like maybe four
21 meetings between -- or four check-ins between the
22 reopening of the office and around the time of

1 this e-mail. So I could see us just -- you know,
2 it very well could have come up on a check-in
3 where I asked like have we done this, did we
4 follow up with those folks, and they -- that could
5 have been what prompted this.

6 Q Does the name Vogue Entertainment
7 Director mean anything to you?

8 A No. (Name) means something to me because
9 that's my father's name.

10 Q I don't think that's who I'm referring to
11 here.

12 Let me direct your attention then back to
13 Exhibit 2 here. And I will scroll up and give you
14 a chance to read this. Was staff keeping you up
15 to date on their correspondence with the Met? And
16 in particular I would just like to draw your
17 attention to this February 11 e-mail. You are not
18 on it, but it is an e-mail from Condé Nast to
19 Corbin Trent and it looks like it occurs on
20 February 11. I will let you read these e-mails.

21 And my question really is: To what
22 extent is staff keeping you apprised of their

1 communications with Condé Nast?

2 A I mean they really weren't. It was one
3 of those things that I remember it was just like a
4 yes/no item. I didn't really get any details
5 about this at all. It was just I really just
6 remember kind of it being like -- I remember
7 asking about it at some point. I imagine that was
8 probably around this time. And then hearing a
9 decent amount of time later saying like yeah,
10 you've been -- they've -- you have been invited.
11 And so I wasn't really apprised of any of it
12 extensive back and forth. I mean, honestly, I had
13 the impression that it was a pretty simple
14 exchange, but I'll read the e-mail. I apologize.

15 Q No, go ahead. Take your time.

16 A Okay.

17 Q I will scroll up there for you so you can
18 see the last part of it.

19 As you mentioned, at some point it is
20 confirmed, you see here in this Friday, February
21 21, e-mail from Met Gala Organizer, "We are
22 delighted to confirm Ms. Ocasio-Cortez as a guest

1 of this year's Met Gala."

2 At some point your partner, Riley
3 Roberts, gets invited as well. How does that come
4 about?

5 A I remember asking if he was invited as
6 well, if it was like a plus-one.

7 Q You didn't ask anybody at Condé Nast,
8 though; you probably would have asked that of
9 Campaign Staffer, who would have asked that of
10 Condé Nast?

11 A Yes.

12 MR. BROWN: Ian, you can take down these
13 exhibits for me.

14 Q Congresswoman, I'm going to shift gears
15 to the 2021 Met Gala. Probably a little easier to
16 remember stuff associated with this one. That's
17 the last Met Gala you went to. You didn't go a
18 couple weeks ago, did you?

19 A No.

20 Q So my understanding from the documents
21 that your counsel provided to us is that you get
22 invited somewhere around May 13 and at some point

1 thereafter you and your team decide to hire
2 counsel, Dave Mitrani. I would just like to know
3 when do you hire Dave and why do you hire Dave in
4 connection with the Gala?

5 A Well, I mean when I have -- I've worked
6 with Mr. Mitrani a very long period of time. He's
7 generally our general counsel for the campaign.
8 You know, one of the reasons I asked him is
9 because I had a conversation with Campaign Staffer
10 and I really wanted to make sure that we were in
11 compliance with ethics rules. It is a very
12 visible event. It is one that features a very
13 prominent cultural institution in New York City
14 and I just really wanted to make sure that we had
15 all of our Is dotted and Ts crossed and so I
16 wanted to make sure that we conducted all the
17 steps of this in compliance with ethics rules.

18 And given all of the technicalities and
19 logistics involved in the event, you know, I -- it
20 was just the responsible thing to do to bring in
21 counsel to make sure we could very easily vet this
22 event. This is also a pretty routine practice for

1 myself and the team. Just, I mean, due to the
2 visibility of my office, I try to steward the
3 responsibility as best as I can.

4 Q Okay. That certainly makes sense from
5 the documents that we saw and I just -- without --
6 I'm not going to ask you the advice that Dave
7 provided to you in your campaign, but I do want to
8 get a sense for Dave and Sandler Reiff were hired
9 to address some of the compliance-related concerns
10 that you had in anticipation of the Gala and I'm
11 assuming that meant things like can you attend in
12 the first instance, you know, and how are you
13 going to pay for these services associated with
14 the Gala. Is that fair?

15 A Yes. I mean everything under the sun. I
16 mean it is really not just about can I attend. I
17 mean, if I can be candid, you know, I can't have a
18 hair out of place without somebody noticing, and
19 so the instruction to my counsel is, you know,
20 literally anything, any conceivable situation,
21 anything at all, to just vet as many details as
22 possible.

1 Q And who is Dave's primary point of
2 contact on these sort of things connected to the
3 Gala? Are you and Dave having these conversations
4 or is it --

5 A No; it is Campaign Staffer, Campaign
6 Staffer and Dave.

7 Q So aside from Campaign Staffer and Dave,
8 in terms of staff who are involved with the Gala,
9 it looked to me maybe one of the key people in
10 this is Lauren, your comms director, and she
11 handles comms-related stuff for the Gala?

12 A Correct. The day of the event we also
13 had a campaign photographer on staff by the name
14 of Corey Torpey, and she was present the day of.

15 Q Just walk me through pre-Gala and as you
16 and your team are thinking about attending this
17 event and paying for the things, services that are
18 going to be provided to you along with this event,
19 are you guys thinking of this as is this a
20 campaign event, is this a personal event, is this
21 an official event? What's the thought process
22 there?

1 A Well, in terms of compliance, you know,
2 the resources, the payment is personal. I pay for
3 the event. It is handled outside without any
4 official capacity staff present. So costs of the
5 event are personal. And facilitation is -- you
6 know, official staff and government resources are
7 explicitly prohibited from facilitating details.

8 MR. BROWN: Dave, did you want to jump
9 in?

10 MR. MITRANI: Jeff, I want to just say,
11 as we stated in our response, this was generally
12 thought of as an officially connected event that a
13 campaign could assist upon.

14 A Yes. And there are several examples of
15 this within House rules. For example, campaign
16 travel. In terms of travel to officially
17 connected events, unofficial staff, and in some
18 instances campaign resources are allowed to pay
19 for travel to officially connected events. So the
20 event itself was officially connected, but the
21 conduct of execution and the costs of attending
22 were personal and unofficial.

1 Q Yeah, okay. I wasn't trying to ask a
2 tricky question there. I just realize, as
3 Campaign Staffer said, yes, this is a bit of a
4 non-traditional event so I was trying to get a
5 sense of how you and the team were thinking about
6 it in advance. So I appreciate that. But that is
7 helpful to understand.

8 Q So the thought process going into the
9 event is the cost of this you will be paying for,
10 you would be bearing personally, and that campaign
11 staff would be assisting with the staffing of it
12 for lack of a better word.

13 A Uh-huh.

14 Q Okay. What I would like to do now is
15 just walk through and sort of tick off the
16 services that you received in connection with the
17 Gala and make sure I and we have a full and
18 complete understanding of what was provided to
19 you. And then after we get that straightened out,
20 we can kind of go back and talk about how
21 everything was paid for. Okay?

22 A Uh-huh.

1 Q So my understanding is that the morning
2 of the Gala you received some sort of
3 transportation that Condé Nast paid for originally
4 from your home to the Carlyle Hotel and that would
5 have been in connection with this Vogue video that
6 you guys were partaking in?

7 A Correct.

8 Q You also received a manicure and a
9 pedicure while at the Carlyle in anticipation of
10 the event?

11 A Correct.

12 Q Your hair was done by Stylist 1?

13 A Yes, correct.

14 Q And makeup by Stylist 2 ?

15 A Correct.

16 Q And then I know Brother Vellies and
17 Aurora James, I might use those terms
18 interchangeably, provided you with the dress, the
19 shoes, the bag, and the jewelry; right?

20 A I rented from them, yes.

21 Q And then Brother Vellies or Aurora James
22 also provided you space to both do a fitting on

1 Saturday at the Carlyle and space to get ready at
2 the Carlyle on the day of the Gala?

3 A Correct.

4 Q Okay. And then Brother Vellies also
5 provided transportation from the Carlyle to the
6 event?

7 A Correct.

8 Q And Brother Vellies also provided
9 Mr. Roberts with shoes and a bow tie?

10 A Correct.

11 Q I understand from some of the documents
12 that Mr. Roberts also had purchased a tux from
13 Suitsupply, had some tailoring done at Suitsupply,
14 and it sounds like Aurora James had coordinated
15 him getting some additional tailoring services
16 with a friend or colleague of hers. Is that
17 accurate?

18 A It never happened, but she extended that
19 offer, yes.

20 Q Okay. So Mr. Roberts, he never had
21 tailoring services done by anybody besides
22 Suitsupply?

1 A No.

2 Q Thank you. That clarifies that.

3 That, as I understand it, is sort of the
4 list of things that were connected to the Met
5 Gala, services that were provided to you, but am I
6 missing anything?

7 A I think that's -- I think that's
8 everything. There was so much going on that day,
9 but, you know, someone brought pastries to the
10 room. I didn't eat one, but they were brought.

11 Q We don't have to delve into the pastries.

12 A Okay.

13 Q Any other more substantive services? I
14 think your counsel has provided us with some
15 details about this. I think that covers it, but I
16 just want to ask in case anything else comes to
17 your mind.

18 A No, nothing that I recall, no.

19 Q Let's shift gears and talk a little bit
20 about payment for services.

21 You said previously your understanding
22 prior to the Gala is that you were going to have

1 to pay for these services personally out of your
2 own funds?

3 A Yes.

4 Q I take it after the Gala that same
5 understanding applied?

6 A Yes.

7 Q Okay. And were you aware that the House
8 Ethics Committee, so not this office but the House
9 Ethics Committees, reached out to your office the
10 day after the Gala about the Gala?

11 A Yes.

12 Q And were you aware that your counsel had
13 communications with counsel over at the Ethics
14 Committee?

15 A I am aware there was communication, but I
16 don't really know what the detail of the
17 communication was.

18 Q Were you aware that they were
19 communicating the day of -- sorry; let me rephrase
20 that.

21 MR. BROWN: Dave, I will let you jump in
22 first.

1 MR. MITRANI: The extent of our
2 conversation with Tom Rust was that e-mail that
3 they had sent and we thanked them for reaching
4 out. I don't believe there was significant
5 substance to that.

6 MR. BROWN: Yeah. No, I just wanted to
7 know if the congresswoman --

8 Q Were you aware that the committee reached
9 out and that your counsel had communications with
10 counsel over at the committee?

11 A I knew that it had occurred, yes.

12 Q And did you know that it occurred in or
13 around that time or did you learn that it occurred
14 as a part of this OCE review process?

15 A I think I -- I believe it was around that
16 time.

17 Q Okay. I just wanted to verify because
18 your counsel says in that e-mail to the Ethics
19 Committee, "The congresswoman will be paying for
20 all of these things personally." I just wanted to
21 make sure you were aware that that was being
22 conveyed at the time to the committee.

1 A We had all agreed on it prior, yeah.

2 Q Okay. So the Met Gala comes and goes.
3 It is a couple days after. You have to pay for
4 all of these services. How do you decide or who
5 is tasked with sort of documenting and
6 coordinating payment for the services received in
7 connection with the Met Gala?

8 A Campaign Staffer.

9 Q And who is ultimately going to -- I know
10 you are ultimately going to pay for it. Who is
11 ultimately going to get on the computer, plug in
12 the credit card numbers, and hit the purchase
13 button?

14 A She was.

15 Q I want to talk to you a little bit about
16 your awareness of when payments occurred. And so
17 were you aware that between the time of the Gala,
18 so September of 2021, and the time that this
19 review got opened that the services that we talked
20 about, the hair, the makeup, the dress, the
21 transportation, that they weren't paid for?

22 A I was not aware. I mean really what I

1 remember in that time was that Brother Vellies was
2 supposed to invoice me and they were having
3 trouble pricing it because they don't normally
4 make dresses, they make accessories, they make
5 shoes and purses. So this was one of the first
6 ever garments that they were going to make and
7 design. And so there was a delay while they tried
8 to figure that out. And so what Campaign Staffer
9 had communicated to me was that they were trying
10 to figure this out for themselves, it is the first
11 time they have ever had to do this, and then price
12 a rental on it on top of that but that they were
13 going to get an invoice over.

14 Q And so do you become aware of this
15 because you are talking to folks over at Brother
16 Vellies or Aurora James or do you become aware of
17 this through Campaign Staffer?

18 A Through Campaign Staffer.

19 Q To what extent is Campaign Staffer
20 keeping you informed between these early days
21 after the Gala up until more recently about the
22 delays associated with this invoice or the fact

1 that we need to pay for the hair, the makeup?
2 Like to what extent are you guys communicating
3 about payment for these services?

4 A You know, we are not communicating with
5 much detail. I usually ask if something has been
6 taken care of or I will follow up on something.
7 And so I wasn't really given much detail. I
8 remember following up after the Met and basically
9 hearing -- like having her tell me like they are
10 still trying to figure things out and following up
11 maybe once or twice and still kind of getting that
12 holding pattern kind of answer. But I did not
13 really have any specificity in logistical detail.

14 Q Okay. So you are aware that things
15 aren't being paid in the sense that you have not
16 gotten the invoice that you are expecting?

17 A Yes. What was communicated to me was
18 that we haven't received from them -- we were
19 waiting on them essentially to receive what was
20 necessary to pay.

21 Q So that, I understand, is primarily with
22 respect to Brother Vellies. How about with

1 respect to the other vendors?

2 A So the manicurist I had paid in cash day
3 of. But in terms of -- I mean, honestly, I really
4 was not apprised about the specificity of the --
5 how the line items were going to be billed. So I
6 didn't know in terms of how it was structured if
7 we were paying each vendor individually, if it was
8 Brother Vellies covering the cost and then us --
9 you know, of all of these things because we hadn't
10 shared, or, you know, same provider, same vendor
11 and that we were reimbursing them. I also was
12 under the impression it was the latter, that we
13 were reimbursing Brother Vellies for the cost, but
14 I really did not know the details at the time of
15 how things were itemized.

16 Q So you follow up with Campaign Staffer a
17 couple times somewhere in the weeks or months
18 after the Gala. None of this gets paid, though,
19 until more recently; right? This review got
20 opened up in March. So walk me through. In more
21 recent months does it just get put on the back
22 burner, does somebody drop the ball? You know it

1 has not been paid because it hasn't been withdrawn
2 from your account.

3 A Yeah, yeah. I remember I continued to
4 follow up on this thing because it was stressing
5 me out and I genuinely do not know what had
6 happened. I had continued to get this kind of
7 holding pattern response. And I continued to
8 follow up and, you know, it's -- I mean clearly
9 with what I have learned since, it just really
10 seems like there was a ball that was dropped.
11 But, I mean, I remember following up several
12 times, hey, what's the deal with this, I need
13 to -- I need to pay this out.

14 Q Yeah. Okay.

15 MR. BROWN: Ian, could you pull up
16 Exhibits 5 and 6 for me.

17 (Exhibit 5 and Exhibit 6 were marked.)

18 Q While he is doing that, is Campaign
19 Staffer -- what is she telling you when you are
20 like this is stressing me out, Campaign Staffer?
21 What is she telling you at the time?

22 A She was telling me that it is just that

1 it has been very -- it has been challenging to get
2 a hold of Brother Vellies and that they had been
3 waiting for things from them for -- I don't know.
4 Yeah.

5 Q Does she have everything she needs in
6 terms of having access to your personal credit
7 cards to be able to pay this?

8 A Yes, she does.

9 Q She does, okay. Because at some point --
10 you have probably seen this in the documents --
11 like the makeup artist or the hair artist is
12 threatening to file a lawsuit.

13 A I had discovered this for the first time
14 yesterday. Yeah.

15 Q All right.

16 MR. BROWN: Ian, you can take down
17 Exhibits 1, 2 and 3.

18 Q Congresswoman, I would like to focus on
19 payments and how these things eventually do get
20 paid and so I have up here on the screen -- Ian,
21 do I have control? Thank you very much -- I have
22 on screen some documents that your counsel

1 provided to us. The first document here is this
2 Business Platinum Card. It looks like it is in
3 your name. And the second exhibit I have up here
4 is another American Express gold card. You know,
5 this is an account ending in [REDACTED].

6 Can you walk me through real quick, is
7 this American Express gold card, is this a
8 personal credit card of yours?

9 A Yes.

10 Q So things that are put on this credit
11 card will be paid with your funds personally?

12 A Yes.

13 Q What is this AmEx Business Platinum Card?

14 A This card is a card that is opened on a
15 personal -- you know, my personal credit is
16 connected to it, but it is a way to organize my
17 finances. So sometimes expenses that could be
18 campaign related or potentially reimbursable will
19 go on there. Or this is -- this is the card that
20 my scheduler has access to. So if she needs to
21 make a payment in order to facilitate -- in order
22 to facilitate anything that the schedule may need,

1 daily logistics, he scheduler has access to this
2 card so that if someone makes a charge that I'm
3 not familiar with, it should be in that separate
4 card. The gold card is generally -- with the
5 exception of my campaign manager -- my scheduler
6 doesn't have -- generally doesn't have access to
7 it unless there is some really I don't know --
8 yeah, but -- yeah, I mean it's a way that people
9 use business cards to organize their finances,
10 have them in buckets.

11 Q Some of these expenses were put on the
12 gold card and some of these expenses were put on
13 the platinum card. Is there a reason why certain
14 things go on the gold card and certain things go
15 on the platinum card?

16 A I mean my campaign manager is the only
17 one that has access to both. Generally, you
18 know -- well, actually at this -- I'm sorry. I'm
19 trying to make sure I have the timeline because
20 they were opened up at different times. But the
21 gold card was opened later than the -- no, maybe
22 it was -- I don't want to get into it because I

1 don't remember the timeline of it.

2 But in general it is a way to organize
3 finances. My campaign manager is the only one
4 that has access to both. But any other staff such
5 as my scheduler, they have access to this Business
6 Platinum Card so that I can see and organize what
7 charges were put on it.

8 Q Okay.

9 MR. BROWN: Dave, did you need to jump
10 in? No, okay.

11 Q Easier way to go about this,
12 Congresswoman, maybe let's walk back through the
13 expenses. I'm going to ask you a couple brief
14 questions about each one of them and I think we
15 can go at it this way.

16 So the manicure and the pedicure, you
17 said that you paid for those personally in cash
18 that day; is that right?

19 A Yes.

20 Q So that was with your own personal funds?

21 A Yes.

22 Q The transportation from your home to the

1 Carlyle the morning of the Gala, I think that was
2 for about \$180 or so, that was put on the [REDACTED]
3 card, the AmEx gold. Was that charge -- or was
4 this expense paid for by you personally with your
5 personal funds?

6 A If it's -- yes, yes.

7 Q You hesitated there.

8 A Well, I mean, if it is on that [REDACTED] card,
9 like nothing -- I basically consider nothing on
10 that card is ever something that I would ever pull
11 for reimbursement. So it is not even something
12 that would accidentally happen. It is not just
13 something that even comes up.

14 Q And so the Business Platinum Card or the
15 one that several folks on your staff have access
16 to, this is a way of you sort of organizing --
17 this is a card, in other words, that you go
18 through the charges at the end of each month and
19 pick out personal, personal, personal, campaign,
20 personal, personal, personal. Is that correct?

21 A I mean once a month is aspirational. I
22 wish. But yes, that is the goal.

1 Q Let me just go back to the services, and
2 I want to confirm that you paid for each one of
3 them personally with your own personal funds.

4 So the transportation day of, the morning
5 of, to the Carlyle from your home, you paid for
6 that personally?

7 A Yes. I mean, as you mentioned, I
8 discovered a lot of the itemization of these items
9 in very recent days due to the withdrawals that
10 happened at -- you know, late. And so I was not
11 aware of the way that these items were itemized
12 until very, very recently. So the answer is yes,
13 but at the time the answer was no.

14 Q In other words, as we have gotten to the
15 end of this review, you guys have gone back
16 through and kind of tried to double-check, make
17 sure that everything was being paid for personally
18 by you with your personal funds?

19 A Yes, yes.

20 Q So let's just walk through them real
21 fast. I realize that was the case then and I just
22 want to know as of now, today.

1 A Okay, yes.

2 Q So payment to Great Bowery, which would
3 have been for the hair services, that has been
4 paid for by you personally?

5 A Yes.

6 Q And payment to The Wall Group for the
7 makeup, that has been paid by you personally?

8 A Yes.

9 Q And same thing on both the Brother
10 Vellies invoices? I know there was an early -- an
11 original invoice and then a second one that came
12 from their counsel. You paid for both of those
13 personally with your own funds?

14 A Correct.

15 Q Okay. I have one other thing I want to
16 talk about, Congresswoman, and I think we can wrap
17 up. I want to talk a little bit more about the
18 Brother Vellies, you know, the shoes, the dress,
19 the bag, the jewelry. You said this before, but I
20 just want to confirm. You rented all of that
21 stuff and then returned all of that stuff?

22 A Correct.

1 Q Because one of the invoices says "shoe
2 purchase." I just want to make sure that is not
3 correct, you didn't keep the shoes?

4 A No, no. I mean if they didn't receive it
5 back, but I returned everything.

6 Q You don't have those in your closet right
7 now?

8 A No, they are not. I will not wear them
9 to a hearing, you won't find them anywhere.

10 Q That is consistent with what Campaign
11 Staffer told us but, like I said, the documents
12 look different so I wanted to confirm that.

13 How did you end up deciding what the
14 rental cost of these items was going to be?

15 A I mean I didn't decide. I just waited
16 for the invoice.

17 Q Did you have any conversations with
18 Aurora James or anybody at Brother Vellies talking
19 about what you thought rental costs should be?

20 A No.

21 Q Did anybody on your staff have that
22 conversation that you are aware of?

1 A I'm not privy, but that I'm aware of, no.

2 Q Did you ever suggest anything to your
3 staff like this is an acceptable amount of money
4 that we could or I could personally pay for these
5 items?

6 A No. I really was just waiting for the
7 invoice.

8 MR. BROWN: Ian, if you could pull these
9 exhibits down, please, and if you could put up
10 Exhibit 11.

11 (Exhibit 11 was marked.)

12 Q Congresswoman, you are not on this
13 e-mail. This is an e-mail from a Janna Pea to
14 Campaign Staffer with a copy of the invoice from
15 Brother Vellies. I'm just going to scroll down to
16 that so you can see it. So this is a September
17 19, 2021 invoice from Brother Vellies for the
18 gown, handbag and shoe rental. I will give you a
19 chance to look at it and let me know when you're
20 done.

21 Have you seen this invoice before?

22 A I saw it for the first time yesterday.

1 Q So you did not receive a copy of this
2 invoice on or around September 19, 2021?

3 A No.

4 Q Because this invoice is significantly
5 higher than the ultimate invoice, so I'm wondering
6 did you talk to Campaign Staffer around the time
7 this came in about this invoice?

8 A No. I never saw it.

9 MR. BROWN: Ian, you can take this
10 exhibit down, please.

11 Q Congresswoman, we covered a lot of
12 ground. I just want to ask a final question here
13 at least on my end. Given the questions I asked
14 you, the ground that we have covered here, is
15 there anything that you felt like we didn't talk
16 about that you wanted to talk about or questions
17 you thought I would ask that I didn't ask and you
18 would like to share something? You don't have to.
19 I just wanted to give you the opportunity.

20 A Really just that, as you mentioned, you
21 know, as a member of congress, especially one that
22 I really try to conduct myself ethically

1 especially -- and that includes even things that
2 are permissible under ethics rules that I
3 personally disagree with, and that's one of the
4 reasons why retaining general counsel was so
5 important to me because it was extremely,
6 extremely important to me that every detail of
7 this was done in accordance with ethics.

8 There were a lot of these documents that,
9 as mentioned during our conversation, that I saw
10 for the first time yesterday. And I learned about
11 the extent of the nonpayment and the way things
12 are itemized really yesterday in preparation for
13 this hearing. And I just never, ever, ever would
14 have allowed that to happen knowing what I have
15 learned, but that I wasn't privy to the invoices,
16 I wasn't privy to the ones that had been sent. I
17 wasn't privy to the dates that they were sent.
18 And it is just a deeply regrettable situation. I
19 feel terrible for especially the small businesses
20 that were impacted.

21 But everything that I try to do and I
22 hope is communicated is the fact that we took

1 every step in retaining general counsel, vetting
2 with the event, speaking with the Met Museum
3 itself in order to make sure that everything
4 possible was in compliance with ethics.

5 Q I appreciate that, Congresswoman.

6 MR. BROWN: Dave or Omar, did you have
7 anything you wanted to chime in on?

8 MR. ASHMAWY: No.

9 Thank you very much for your time,
10 Congresswoman. We sincerely appreciate not only
11 your cooperation and your time today but just
12 overall everything. Thank you.

13 THE CONGRESSWOMAN: Thank you very much.
14 I appreciate you both. Thank you for giving me
15 the opportunity.

16 MR. BROWN: Dave and Joe, before we go
17 off the record, is there anything else that we
18 needed to cover?

19 MR. MITRANI: No.

20 MR. BROWN: I will just ask that we wrap
21 up these proceedings and go off the record.

22 (Off the record at 2:51 p.m.)

EXHIBIT 8

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

Transcript of Interview of Campaign Staffer

Review No. 22-8546

Date: May 11, 2022

1 PROCEEDINGS

2 MR. BROWN: This is Jeff Brown with the
3 Office of Congressional Ethics. With me is my
4 colleague Omar Ashmawy. Today we are undertaking
5 a remote video interview of Campaign Staffer. It
6 is May 11, 2022. It is shortly after 10:00 a.m.
7 Campaign Staffer has been given a copy of the
8 False Statements Act and signed an acknowledgment
9 in advance of this interview. With that we will
10 get started.

11 BY MR. BROWN TO CAMPAIGN STAFFER:

12 Q Thank you again for being here today and
13 answering some questions for us. I'm going to
14 start hopefully with some of the easiest questions
15 you will get all day.

16 What is your current title and roles and
17 responsibilities with the congresswoman.

18 A My current title is campaign manager for
19 Alexandria Ocasio-Cortez for Congress. The main
20 duty tied to that is to manage her campaign
21 operation, which the congresswoman operates
22 year-round, and so our focus shifts depending on

1 whether we are in the electoral cycle versus not.
2 So obviously during the electoral year the goal is
3 to and my duties are focused on reelecting -- her
4 reelection campaign.

5 In the off year, if there is such a thing
6 as an off year, we focus on supplementing some of
7 the organizing work in the district and we will
8 handle things that don't fall under her like
9 federal hat but are appropriate for a campaign to
10 manage.

11 Q So currently the campaign manager. Have
12 you had any prior titles or prior roles and
13 responsibilities with the congresswoman?

14 A In her first campaign in 2018 I operated
15 as a fundraising director and then during 2019 is
16 when I shifted over to campaign manager. So that
17 was the only other previous title I have had.

18 Q So since 2019 you have been campaign
19 manager for the campaign?

20 A Correct.

21 Q Okay. Do you do any work on the official
22 side of things?

1 A I do not.

2 Q We will get into this in some more
3 detail, but with respect to the Met Gala, can you
4 describe for me what your role and
5 responsibilities were with respect to the
6 congresswoman's participation in or attendance at
7 the Met Gala?

8 A Like with events that the congresswoman
9 may do, there are things that if she gets an
10 invitation to something, we will decide where it
11 might fit best. And given that this was sort of
12 new for all of us, it seemed like a good fit to
13 operate on the campaign side. And what's typical
14 for us with events, is that we will connect with
15 the host, figure out what her participation would
16 be, try and understand the focus of the event, the
17 parameters around it, whatever information would
18 be helpful to us in aligning with a goal to an
19 event, and also understanding what her role would
20 be there.

21 So there is a good amount of
22 back-and-forth conversation that we have when we

1 are working with the congresswoman to participate
2 in an event and of course her input as well. And
3 so we put that together, we package it, try to
4 make sure we understand it as a team. And that's
5 primarily done on the staff side. And then we
6 will staff her for the events themselves.

7 Q Okay. All right. We can get into that
8 in a little more detail as we go through this
9 interview.

10 MR. BROWN: Let me ask, Joshua, can you
11 pull up Exhibit 1 for me.

12 (Exhibit 1 was marked.)

13 Q I will just note we are going to start
14 with the 2020 Met Gala.

15 A Okay.

16 Q Which I know did not occur, but we are
17 going to start there.

18 A Okay.

19 A/V TECHNICIAN: Mr. Brown, just click
20 your screen and you will have control.

21 MR. BROWN: Thank you very much.

22 Q So I'm going to give you a chance to

1 review this e-mail, and just let me know after you
2 have had a chance to look at it.

3 A I have looked at it, thank you.

4 Q Okay.

5 MR. BROWN: Just for the record, this is
6 an e-mail, Exhibit 1. The Bates is THAOC_0196.

7 Q Can you tell me what prompted you to send
8 this e-mail?

9 A Yes. So this was I heard from a staffer
10 that the congresswoman was at an event that I was
11 not participating in, was not sort of the -- the
12 campaign did not run her participation in this
13 event, where it was brought up to her that there
14 was interest in having her be a guest at the Met
15 Gala. And so this seemed to be something that
16 would fall under the campaign side to do. So I
17 was given the e-mail that you see there and was
18 told to reach out so we could find out more, and
19 that's what prompted that.

20 Q And who asked you to reach out?

21 A This was done through our comms director
22 at the time, Corbin Trent.

1 Q And when you said earlier that you had
2 heard from a staffer --

3 A It was Corbin, our comms director.

4 Q Corbin Trent, okay. Tell me more. What
5 did Corbin say to you?

6 A He said she went to an event and she
7 spoke to someone there who said -- who mentioned
8 the Met Gala to her and that there would be
9 interest in having her participate as a guest, I
10 think gauging to see if that would be something
11 she would be interested in. And he -- I don't
12 know if he spoke to her directly, but what was
13 communicated to me was that she would be
14 interested, and so this was my follow-up.

15 Q And that was communicated to you, her
16 interest in attending the event was communicated
17 to you, through Corbin?

18 A Correct.

19 Q Okay. Did you ever have any
20 conversations with the congresswoman about the
21 2020 Met Gala?

22 A We did talk about it. I did let her know

1 that I sent the e-mail just kind of sort of
2 handing it over for me to manage and that I would
3 keep her updated with whatever we found out.

4 Q In this e-mail when you say "she has
5 expressed an interest in participating in the Met
6 Gala," that interest that she expressed was
7 expressed to you by Corbin?

8 A Correct.

9 Q Okay. Did you get any reply to this
10 e-mail, either a phone call or a reply e-mail?

11 A I believe I did get a reply. I don't
12 recall exactly when and I don't remember how the
13 reply came. It could -- I believe they probably
14 reached out to my phone number through text.

15 Q Okay. And you think those texts were
16 with Ms. Amatya? I'm probably messing that last
17 name up, but the individual that is on this
18 e-mail?

19 A Yes. That was my -- she was my first
20 contact.

21 Q Okay.

22 MR. BROWN: You can take Exhibit 1 down

1 and put up Exhibit 2.

2 (Exhibit 2 was marked.)

3 Q This is another e-mail here, which I'm
4 going to start here at the beginning. And let me
5 zoom in a little for you. I would like to just
6 start by asking you some questions about the first
7 e-mail down here that is Saturday, February 8,
8 4:02 p.m. So I will give you a chance to read
9 that, but, just for the record, the Bates is
10 THAOC_0183.

11 Just let me know when you have had a
12 chance to look at that.

13 A Yes, the e-mail that says on Saturday,
14 February 8, 2020?

15 Q Right.

16 A Yes, yes.

17 Q Who is Tommy Alter?

18 A Tommy is someone who works in
19 entertainment. I don't know his exact role, but
20 he has been a contact for us for some time now and
21 he -- because he has a connection to us, when he
22 hears stuff around the congresswoman, he will

1 routinely reach out either through e-mail or text.

2 Q What prompts this e-mail by Tommy?

3 A I don't know what prompts it. I can tell
4 you he probably heard it in conversation somewhere
5 and thought to reach out to facilitate.

6 Q Did you reach out to Tommy at any point
7 in time to prompt this e-mail?

8 A I did not.

9 Q How about -- am I saying this right,
10 Tanushiri?

11 A Tanushiri.

12 Q Tanushiri.

13 A That was pretty good.

14 No.

15 Q No, okay. Let's move up to the second
16 e-mail in this string, so just above. You respond
17 and say "Thank you Tommy! Moving you to bcc.
18 Nice to meet you, Jill and Remi! Alexandra is
19 interested in participating in this years' Met
20 Gala. I know there is a process around designers,
21 so we're hoping it is not too late. We are
22 looking to find out how to proceed."

1 When you say the congresswoman is
2 interested in participating in this year's Met
3 Gala, where do you get that information from?

4 A I was going off of what I had heard from
5 the team, that she was interested.

6 Q And this is what we talked about earlier,
7 Corbin Trent had conveyed to you that the
8 congresswoman was interested in attending the
9 gala?

10 A Correct.

11 MR. BROWN: Joshua, if you could give the
12 campaign staffer control.

13 A/V TECHNICIAN: Just click your screen
14 and you will have control.

15 Q I'm going to let you scroll back up
16 through that e-mail and take your time reading it.
17 I'm going to ask you a question about some e-mails
18 on the next page, but I will let you get through
19 the string first.

20 A Okay.

21 Okay, ready.

22 MR. BROWN: Joshua, can you give me

1 control again.

2 A/V TECHNICIAN: One moment.

3 Q So let me just take you through this real
4 quick. It looks to me like that last e-mail we
5 went over, you dropped Tommy into the bcc, you
6 expressed the congresswoman's interest in
7 attending, and then you get an e-mail back from a
8 Remi Berger at Condé Nast who says we are going to
9 loop you in with Jessie and Jenae.

10 You respond on February 11, "Thank you
11 all! Looking forward to connecting." On the 17th
12 you say "Hi all, just checking in here." What
13 prompts this e-mail? Is it just a lack of
14 response from the folks you were looped in with?

15 A It was a lack of response and I think I
16 indicated in connection with them, since I wasn't
17 familiar with the timelines that they would need
18 or were involved, I wanted to make sure that we
19 were kind of on it. So yeah, it was just a lack
20 of response.

21 Q Okay. And then this last e-mail here, it
22 looks like Met Gala Organizer finally responds to

1 you and says, you know, "We typically sell out in
2 November so we are in a difficult spot in terms of
3 space right now, but we would be happy to discuss
4 with Anna Wintour..."

5 You mentioned earlier that you were
6 keeping the congresswoman updated. Is this
7 something that you conveyed to the congresswoman?

8 A Yes, I did.

9 Q And what was her reaction when you
10 conveyed that?

11 A She said okay.

12 Q Okay. Did you guys have any substantive
13 discussion about it?

14 A No. The reason why we didn't have a
15 substantive discussion about it is because
16 there -- I don't think there was much to talk
17 about. If it was possible for us to go, then I
18 think we would kick up more conversation, but it
19 didn't seem guaranteed at that time, so I just
20 shared with her an update.

21 MR. BROWN: Joshua, if you can take down
22 Exhibit 2 and please put up Exhibit 3.

1 (Exhibit 3 was marked.)

2 Q Exhibit 3 is another e-mail that starts
3 on February 8. You are not on the initial part of
4 the string, you are on the later part of the
5 string. Before we get to the e-mail, let me just
6 ask you a couple quick questions.

7 You mentioned previously Corbin Trent was
8 a part of the campaign at the time and I think you
9 said he was involved with comms. Is that right?

10 A Correct. He had a campaign and
11 congressional role.

12 Q Can you tell me more about what his roles
13 were, both campaign and official?

14 A He operated as the communications
15 director on the congressional side and had a
16 similar role on the campaign side. And so I think
17 where things were best handled under the campaign
18 side, he would move it over to there, and just to
19 kind of create that separation.

20 Q And with respect to the Met Gala, the
21 2021 Met Gala, can you give me a better
22 understanding for what his role would have been

1 regarding the Gala?

2 A His role would have been -- I think he
3 would have just participated with me in helping us
4 shape the event, to know the event, understand the
5 press parameters around it, since that was his
6 expertise within the team, and I would probably
7 handle things more like logistics and coordinating
8 with the different parties that we would be in
9 touch with.

10 Q You mentioned earlier that Corbin was the
11 one that told you the congresswoman had expressed
12 an interest in attending the Met Gala. I would
13 note that the previous e-mails we looked at were
14 all from February 8, the afternoon of February 8.
15 They started there; excuse me.

16 This e-mail here at the bottom if you
17 look at it -- and let me zoom in on it. I will
18 give you a chance to read it -- is another e-mail
19 on February 8 from Corbin Trent to somebody at
20 Condé Nast. I will give you a chance to read that
21 and let me know when you have finished.

22 A I have read the e-mails on February 8.

1 Q Okay. Do you know what prompted Corbin
2 to send this e-mail?

3 A No.

4 Q Okay. Would it be safe to assume that
5 this e-mail was likely prompted by the interest
6 that the congresswoman had expressed to Corbin
7 about attending the Gala?

8 A Potentially.

9 Q It looks to me like -- and, again, I
10 realize you weren't the one having the
11 conversation with the congresswoman, but I'm just
12 trying to get a sense of things here. It looks to
13 me like on February 8 the congresswoman had a
14 conversation with someone on staff, and it sounds
15 like that is Corbin Trent, about the Met Gala and
16 then these e-mails emanated from that
17 conversation.

18 A Yeah. It looks like someone had
19 approached her, like Tommy had indicated, at the
20 Little Women premier, and that is kind of where
21 this started. And she might have expressed an
22 interest in following up with the team to Corbin

1 and he looped me in.

2 Q Okay.

3 MR. BROWN: Joshua, let's give her
4 control here and let her review this screen.

5 Q And let me know when you are done and I
6 will have some questions about the last e-mail in
7 the string.

8 A Okay, read it.

9 Q Okay. Thank you.

10 With respect to the last e-mail here, so
11 I'm looking at the top e-mail in this string, it
12 is sent on Friday, February 21, 2020, at 2:15 p.m.
13 It looks like it is from Met Gala Organizer to
14 you. She says "Of course-just rang you on my
15 cell." And that is in response to a series of
16 e-mails here just below where she indicates that
17 we are delighted to confirm the congresswoman can
18 be a guest for this year's Met Gala. Corbin loops
19 you in and says you would be the one to be in
20 touch with.

21 You say "I have a few questions. Can we
22 connect via phone?" And it looks like she rang

1 you. Did you guys have a conversation?

2 A Yes, we did.

3 Q What did you guys talk about?

4 A I wanted to learn more about the Met Gala
5 itself. You know, I think like most of us have
6 heard of it but wanted to sort of wrap my head
7 around the theme for it, wanted to get her to kind
8 of frame it for me, what does participation look
9 like. So it was kind of a broad conversation but
10 it was more just to help me start to understand
11 what this is.

12 Q Okay.

13 MR. BROWN: Joshua, if you can go to
14 Exhibit 4, please.

15 (Exhibit 4 was marked.)

16 MR. BROWN: If you can give her control
17 of this, that would be great.

18 Q I will give you a chance to scroll
19 through and look at this, but just let me know
20 when you've finished.

21 A Finished, thank you.

22 Q For the record, this is THAOC 0190. This

1 is an e-mail from Met Gala Organizer to you on
2 Saturday, the 22nd of February, 2020. It says
3 "Pleasure speaking with you. Please find a press
4 release attached. Will be in touch soon on the
5 other points."

6 It does look like from this e-mail
7 consistent with what you just told me, you were
8 having conversation about the Gala generally and I
9 assume that is why she sent you the press release
10 announcing the Gala?

11 A Correct. And in there is like the theme
12 of it.

13 Q She mentioned some other issues that you
14 wanted to discuss. Can you walk me through what
15 those were?

16 A Yes. The other points I think because --
17 so a lot of -- and I think this still goes along
18 with sort of framing and trying to understand what
19 this participation in the Met Gala looked like.

20 So one piece here which you see has to do
21 with the theme of the event. I did ask how does
22 it work in terms of working with designers and

1 just in my understanding that the Met Gala, aside
2 from its theme and its presentation, is a way for
3 designers to like spotlight and feature their
4 work. And that's completely absent from our world
5 and so I was asking Met Gala Organizer how do they
6 help their guests who aren't in entertainment and
7 fashion, how do they work with supporting them to
8 get ready for it or at least to understand what
9 would be included in that. And those were the
10 other points that she was referencing.

11 Q Did you guys also have a conversation
12 about Riley Roberts attending?

13 A At the time, no, I don't think -- I don't
14 think Riley was -- at least not a core part of the
15 conversation. I think I was still kind of trying
16 to set my footing on the framing of it first.

17 Q Did you guys ever have a conversation
18 about whether or not -- you got the e-mail the
19 congresswoman is invited. Did you ever have a
20 conversation of whether she gets a plus-one or she
21 can bring somebody?

22 A I think at some point there was -- I

1 think it was through e-mail Riley came up. I
2 don't think it was at this time, though.

3 MR. BROWN: Joshua, you can take down --
4 actually, leave up Exhibit 4 and if you can pull
5 up Exhibit 5, I'm going to jog your memory a
6 little bit.

7 A Thank you.

8 A/V TECHNICIAN: One moment.

9 Q I will give you a chance to read this.
10 You let me know when you're done. But I will just
11 note the first e-mail down here at the bottom --
12 and this is THAOC_0177 -- is that prior e-mail we
13 were just looking at. "Please find a press
14 release attached" and "will be in touch soon on
15 the other points." So read that and just let me
16 know when you're done.

17 A Can you zoom in a little bit more,
18 please?

19 Q Sure.

20 A Thank you.

21 Okay.

22 Q Does that jog your memory at all about

1 how the conversations with Riley Roberts
2 developed?

3 A I think -- I think in my trying to figure
4 out how this works she may have mentioned that a
5 plus-one was allowed. I don't think I brought it
6 up is where I'm -- I don't think it was in my
7 awareness at the time. She might have said that a
8 guest was allowable and asked me if the
9 congresswoman -- about the congresswoman -- who
10 the congresswoman would potentially have. I think
11 at this time I was not sure that Riley would go.
12 I had not had conversations around that yet. But
13 I may have said who her partner was in our
14 conversation.

15 Q When I read these e-mails, you know, it
16 is Saturday, February 22, you know, it was a
17 pleasure speaking with you. Clearly you guys had
18 a conversation.

19 A Uh-huh.

20 Q She attaches the press release and says I
21 will be in touch on the other points. I read that
22 as I will be in touch with the other points that

1 we discussed.

2 A Yes.

3 Q And then the reply says Anna would be
4 delighted for Riley Roberts to join the
5 congresswoman as our guest. That would suggest to
6 me some conversations about whether or not Riley
7 could attend, that you guys had that conversation
8 on that phone call.

9 A Yeah. I don't think -- what I want to
10 clarify here is it became apparent to me that a
11 plus-one could be there. I did not expressly ask
12 if Riley Roberts could participate there. It was
13 is it customary for a guest to be able to attend?
14 Yes. And then we had a conversation on who -- and
15 then she asked me if the congresswoman has a
16 partner. I said yeah, she has a partner, Riley
17 Roberts, but if memory is serving me correctly, I
18 did not expressly ask if Riley Roberts can attend
19 because the congresswoman had not shared that with
20 me. And, also, she could take somebody else. It
21 doesn't have to be Riley.

22 So since I didn't have like enough

1 direction from her on where she wanted to go, I
2 don't think I asked expressly for Riley Roberts,
3 but his name probably came up.

4 Q Did you ask Met Gala Organizer about
5 plus-ones or did Met Gala Organizer volunteer that
6 information?

7 A I think -- I don't remember. I think --
8 I mean I could see that I would ask her like what
9 is -- just in them going into the framing of this,
10 what is customary. I could see myself asking that
11 and she could have also just offered it, in which
12 case I said okay, I'm going to bring that up to
13 her and see. It wasn't a focal point of our
14 conversation.

15 Q Okay. After folks at Condé Nast
16 indicated that the congresswoman was invited, at
17 any point in time did the congresswoman ask you
18 whether or not she could bring somebody?

19 A At some point it came up.

20 Q Was it in advance of these conversations
21 with Met Gala Organizer?

22 A No, no. I had barely spoken to her about

1 this at all because -- I think, just going back to
2 some of the e-mails we just reviewed, we were
3 still going back and forth if she was actually
4 going to attend. There are questions that I ask
5 when we are entertaining something and there are
6 questions that I ask when we are like set on yes,
7 we are going, and so I think at this point I was
8 still exploring. So it was more sort of the first
9 for me. I don't think I -- I think after this
10 point I might have mentioned to her at some point
11 in time that a plus-one could come, but I am sure
12 she wasn't settled on who that would be because
13 that didn't become apparent to us until later.

14 Q Eventually the Met Gala is postponed and
15 this 2020 event does not occur. But let me ask
16 you a couple more questions about the 2020 Gala.
17 Does the name Vogue Entertainment Director mean
18 anything to you?

19 A It does not.

20 Q Okay. Then I want to transition to a
21 conversation about the 2021 Met Gala if we can.

22 MR. BROWN: Joshua, if you can take down

1 the exhibit, that would be great.

2 Q As you heard me mention to your counsel
3 earlier, I'm going to ask a couple of questions
4 about him and his involvement. I'm not trying to
5 get at specific conversations that you have had
6 with your counsel. So just bear that in mind when
7 I ask these questions. But at some point Dave
8 Mitrani was hired to assist with planning in
9 preparation for the Met Gala.

10 MR. BROWN: Go ahead, Joe, Dave. Did you
11 want to jump in?

12 (No verbal response.)

13 Q At some point Dave is hired to assist
14 with the planning, preparation for the Met Gala.
15 I would just like to ask you to let me know when
16 does he first get involved in preparations for or
17 assisting the campaign with Met Gala-related
18 activities?

19 A I can answer that initially more broadly.
20 Mitrani has been our counsel -- for as long as I
21 have been involved he's been involved. I think he
22 has been involved before me. Actually I'm sure

1 before me. And our process in involving counsel,
2 because, as you know, that like I have a good
3 enough broad understanding of compliance, but it
4 is not like I engage directly with House ethics.
5 I'm on the campaign side. So we rely on counsel
6 for that. We typically would loop in counsel once
7 we felt like things were a more concrete
8 possibility.

9 So obviously counsel was looped in at
10 some point. I don't think, outside of maybe
11 mentioning this maybe, they were looped in for the
12 2020 conversation because it was still very
13 preliminary.

14 Q We can just focus on 2021.

15 A Oh, 2021, okay. Yeah, we looped in
16 counsel there once it was like, okay, this is a
17 possibility to happen. The interest is still
18 there on her part and we might be able to make
19 this work on the schedule. So once I have sort of
20 an understanding of like a more likely certainty
21 of those three, I would engage counsel.

22 Q Okay. And you guys produced to us -- I'm

1 sure you have seen some of these documents. We
2 received from you guys a string, an e-mail string,
3 in which Dave is looped in with folks at the Met
4 and Condé Nast. I think that is in late August.
5 August 27 I want to say is the date. And then I
6 think the invite to the Gala occurs sometime
7 earlier in May.

8 Do you know when roughly you reached out
9 to get counsel involved in this; in your words,
10 sort of like when this felt more real or like a
11 possibility?

12 A I know that counsel was aware of this,
13 aware of it as a possibility, in 2021 I think
14 likely shortly before you see activity from them
15 on it.

16 Q You mentioned you have an understanding
17 of compliance issues but obviously you have
18 counsel that you are close with to get involved
19 when things, you know, get more serious or some
20 advice may be necessary. Without again getting
21 into the advice that is provided to you, I would
22 like you to walk me through the issues that you

1 were as a team focused on, the potential ethical
2 concerns or issues surrounding her attendance at
3 the Gala in advance of her attending or getting
4 ready to attend.

5 A I think so if I go through the checklist
6 of things, I wouldn't say that anything was
7 obviously like a strong concern. It was more we
8 engaged counsel to make sure we are following
9 through and that the actions the congresswoman is
10 taking are allowable. And I don't always have a
11 good sense as to what that is, so pull in counsel
12 for that. And I think we view it less of like
13 addressing concerns and more like how should we
14 frame this. This is all going to how do we frame
15 our participation in a manner that will meet
16 requirements that have to be there.

17 So on the checklist is, one, can she go.
18 So we started with that. And then the second
19 question, which is where some complexity developed
20 because of the nature of the event, is how can she
21 go and what we as a team need to do in terms of
22 doing our own sort of due diligence to be able to,

1 if anything is called into question, understanding
2 that we have done our homework, if you will, in
3 our proceeding in a good faith manner and in
4 meeting what she would need to meet to be there as
5 a member.

6 Q And these are issues that you as a team
7 are thinking about and are concerned about in
8 advance of her attendance at the Gala.

9 A I would say this applies to the Gala and
10 at anywhere that is sort of one where we
11 understand that there's layers to it.

12 Q Okay. I heard you say you guys were --
13 and I'm not trying to say concerns as in you are
14 worried she's doing things the right way, but you
15 are trying to be cognizant of the fact that there
16 are rules and issues that you need to work through
17 around these things.

18 So you have mentioned rules and concerns
19 are surrounding her attendance. How about with
20 respect to payment for services that she may be
21 provided in connection with the Gala; are those
22 issues that came up in advance of her attendance?

1 A Certainly an awareness, sure.

2 Q Okay. How about payment for the dress
3 and the other attire that she was going to wear;
4 are those things that the team was focused on in
5 advance of the Gala?

6 A So I think with that, yes, I would say
7 that is also how, that falls into the how can she
8 participate, because it is understood that when
9 you look at folks who attend the Met Gala, these
10 are like design showcases. So dresses aren't
11 normally purchased. They are, whatever they do,
12 borrow, barter, whatever. I'm not as familiar
13 with like all the options.

14 Q You haven't attend the Gala previously is
15 what you are saying?

16 A Correct, or know anyone who has, frankly.

17 And so we know it is an event that like
18 there is a ticket price to attend but do these
19 folks pay that to go there? Probably not. And is
20 what they are wearing something they have paid to
21 wear? Probably not. And so I think for us that's
22 where the how is, like understanding where we are

1 at here, how can she participate here and be a
2 part of it without causing something that would --
3 because for us it is we have no idea how much
4 market rate for prices for dresses are, but we
5 would say it is untenable to buy a dress for this
6 event, as an example.

7 Q So, in other words, Dave is engaged for
8 compliance-related concerns with respect to if and
9 how she can attend this event and that would
10 involve her actual ability to attend, you know,
11 what she can wear, what she needs to pay for, how
12 she needs to pay for it, and it is fair to say
13 these are issues that you guys were aware of and
14 working through prior to the Gala?

15 A Working through, yes; and we worked
16 through with the design team on this.

17 Q Okay. I'm going to walk through now some
18 communications that you provided us in advance of
19 the Gala, so communications you had in advance of
20 the Gala.

21 MR. BROWN: Joshua, if you can pull up
22 Exhibit 6, please.

1 (Exhibit 6 was marked.)

2 Q I think the next couple of questions will
3 relate to a series of text messages that you had
4 with Aurora James and that you guys provided to
5 us. I should say I have done my best to put these
6 in date and time order.

7 A I know that was tough. Thank you. That
8 was tough.

9 Q So bear with me here.

10 A Are these all the text messages between
11 her and I?

12 Q These are. They are in order. I don't
13 plan on going through all of them obviously.

14 A Okay.

15 Q Just for the record here, these are text
16 messages between yourself and Aurora James; is
17 that correct? Is that what these look like?

18 A Yes.

19 Q I am on Page 10 right now and I will zoom
20 in so you can see. It looks like this series of
21 text messages that I want to talk to you about
22 first appears on Monday, August 30. I'm going to

1 scroll down a little bit here. Stop me if you
2 need me to, but I'll go to Page 10 to show you
3 that it is the 30th and now I want to ask you
4 about -- here we are on Page 11. If you look at
5 those texts on the right-hand side in the blue --

6 A Yep.

7 Q Forgive me; one up from there. I believe
8 Aurora James is asking you did you have any luck
9 with the Carlyle?

10 A Yes.

11 Q What prompts that message from her?

12 A So the Carlyle is a central location for
13 a lot of the folks who are getting ready for the
14 Met Gala because of its proximity to the Met, and
15 so Aurora had suggested if we were looking at
16 hotels that we look and see if the Carlyle had
17 availability. I think this was her often
18 suggestions.

19 Q And these would be hotels for getting
20 ready in advance of the Gala?

21 A Correct.

22 Q I want to turn to your response, which is

1 "I have nothing reached out." I think you --

2 A Have not.

3 Q Have not.

4 A Auto correction doing its work.

5 Q Very familiar with that, obviously. I
6 have not reached out yet. Since this is a
7 non-traditional, I'm working things through
8 congressional ethics to see what our parameters
9 are.

10 When you say this is non-traditional,
11 tell me what you mean by that.

12 A I meant it is not common for us to get
13 ready for an event that has so many components to
14 it, non-traditional for us because I have not had
15 to participate or to help the congresswoman get
16 ready for an event of this class and these many
17 layers to them.

18 Q What do you mean when you say "layers"?

19 A Because it is like, frankly -- like when
20 you talk about the Met Gala, it's in many respects
21 a different world so understanding what is
22 customary there and having us sort of pause at

1 every step as to what that means for the
2 congresswoman's participation was something that
3 we worked closely with counsel on, but usually,
4 you know, it is like getting to the location. So
5 like I will say one thing that is not traditional
6 is where she would have to get ready outside of
7 her home. That's not something that typically we
8 have to deal with. Or understanding that since
9 she is working with a designer that they would
10 have to be in proximity to each other, that it is
11 common to book a hotel right next to the Gala,
12 that transportation was going to be a thing
13 because the dresses are beautiful but you can't
14 really walk in them, so like that's a thing. I
15 would put all of that and probably more under
16 non-traditional for us.

17 Q And then you say "I'm working things
18 through congressional ethics." What do you mean
19 by that?

20 A That was my way of telling her I was
21 talking to counsel, but I thought it was important
22 for her to understand like ultimately, you know,

1 the ethical guidelines that we are looking at.

2 Q In other words, when you say there were
3 all of these layers we need to work through with
4 respect to transportation, the dress, attendance,
5 these are things that you are needing to or
6 feeling like you need to get guidance on from
7 counsel?

8 A Absolutely.

9 Q Okay.

10 A I also, just on the second bullet there,
11 I wanted to, just for consideration for the
12 congresswoman, wanted to avoid having her in a
13 situation where she wasn't aware she would have to
14 personally pay for something and then find out
15 after, which I don't think we were completely able
16 to avoid, but just in understanding that in an
17 ideal world she would know ahead of time and then
18 would be able to say yes, I want to move forward
19 with this or, no, I would want to do something
20 differently.

21 Q So again this is August 30 so this is a
22 couple weeks in advance of the Gala which I think

1 was the 13th.

2 A Yes.

3 Q What's your understanding at the time of
4 how things are going to be paid for?

5 A I was still exploring that at the time.
6 And I would say at this point in time they had
7 just had their first meeting. I wasn't a hundred
8 percent convinced that this was a go yet
9 completely. So yeah, I was still exploring that.

10 Q When you say, you know, I don't want to
11 do anything you find out later will need to be a
12 personal expense, did you have a conversation with
13 the congresswoman in advance about how to pay for
14 things associated with the Gala?

15 A I think she reached a point where she
16 understood there would have to be that personal
17 expenses was going to be a factor. We just didn't
18 know to what extent or how much and I just think
19 it is a courtesy and also just understanding that
20 the congresswoman has expenses, that it would be
21 appropriate to provide her something where she
22 would have to -- where she would kind of plan and

1 make that conscious decision of this all factors
2 into do I want to move forward with going. So I
3 was trying to have a picture of like what that
4 would mean for her personally so she could make
5 that decision.

6 Q Did you guys have a conversation at any
7 point in time where she said or she discussed, you
8 know, I am treating this as a campaign event, I
9 want this to be put -- I want to try to pay for
10 this with the campaign or I'm going to treat it
11 officially, let's try to have it be paid for with
12 official funds, or I recognize that this is
13 personal stuff, I'm going to have to pay for it
14 personally? Did you have that conversation? Did
15 you have it in advance of this text message or at
16 some point after this text message?

17 A I think the conversation was not around
18 necessarily like what she would like. It was more
19 around if we were going, this is what it would
20 have to be. So not directed by her. And so I
21 think in this we leaned to -- this is where I
22 think I leaned more heavily on counsel and their

1 advice.

2 Q But at this time and at the point where
3 you send this text message, she has not said to
4 you, like, I don't want to pay for any of this
5 personally?

6 A No. And I would say she never said that.

7 Q I'm going to stick with the text chain
8 but I'm going to move down in time here to Page
9 17. So if you look here, I'm a little further in
10 time here, I'm on Wednesday, September 8, 9:44
11 a.m.

12 You send a text message that says
13 "Morning, Aurora! I spoke with our lawyer. He is
14 free at 1 to 2 p.m. or after 5."

15 She says "Awesome. Can we do 1 p.m.?"

16 I'm going to keep scrolling here. We are
17 still on Wednesday, September 8, but, for the
18 record, I'm now on Page 18 of Exhibit 6. It looks
19 like you schedule a call between 1:00 and 2:00
20 p.m. on Wednesday, September 8. What is this
21 meeting?

22 A This meeting is -- I think it is part of

1 our understanding that a lot of our -- well, I
2 think there were two things: One, Aurora needed
3 to understand what our parameters were because
4 just like me defining that this is a different
5 world for us and where I talked about wanting to
6 wrap our heads around what this meant, I think
7 there was also like a sharp learning curve for her
8 in that our participation in here meant we
9 couldn't do this the way she would proceed
10 normally on this and understanding that part of I
11 think Aurora's excitement in participating is that
12 she viewed the congresswoman as like talent here,
13 that that didn't necessarily fit the way we viewed
14 her participation here, and that they would need
15 to have conversations around that.

16 So that's what that was.

17 Also, a lot of participation in the Met
18 Gala is at the discretion -- there is a lot that
19 is left to the discretion of the designer that is
20 almost like -- it definitely does not come up in
21 conversation with the guest. So -- and I believe
22 this was under advice from counsel as I was

1 talking with him about it. It was like let's just
2 all come together and make sure we are all on the
3 same page and where we can make sure this kind of
4 doesn't become too grandiose or beyond our scale,
5 that for her to participate it would have to be
6 able to fit and so that was the point of meeting.

7 Q Who is on this call?

8 A It is David Mitrani, Aurora James, she
9 talked about having her CFO there. I don't think
10 her counsel was there, although David can correct
11 me. I believe her CFO was there maybe. There was
12 somebody else there.

13 Q And were you on that call?

14 A I was on the call, yes.

15 Q Okay. Walk me through a little more
16 concretely the specific issues that were
17 discussed.

18 A We concentrated the conversation on
19 things that would fall under what Aurora was
20 working on, which is, one, figuring out the
21 attire, what she was thinking about that. Counsel
22 went through with Aurora what our parameters were.

1 Q What do you mean by that?

2 A Our parameters were in terms of I'll say
3 as an example what would be -- understanding that
4 she would have to rent the dress, communicating
5 with Aurora that we would need to come up with
6 something -- that she would need to have something
7 that she felt was like market equivalent and how
8 do you do that, you know, in her case where it is
9 for this event.

10 And so I think it was part exploratory in
11 Aurora's case where she was able to test off like
12 I'm thinking this, I'm thinking that, and where
13 counsel was able to tell her, you know, in
14 thinking of dress rental, these are some things
15 that we have in mind.

16 So I think the most important thing that
17 came out of the call was that this was a framing
18 conversation for the design team and for me
19 started to really kick in to this is where I went
20 from more likely that we are going to like 90
21 percent this is possible, we can have her
22 participate and it meet the compliance

1 requirements that we need.

2 Q So you are talking about the need for her
3 to rent the dress. Are you also talking about the
4 need to rent any other things provided by Aurora
5 James?

6 A I think the conversation mostly focused
7 on the attire at the time. It moved to other
8 things eventually but I think the focus of the
9 conversation had more to do -- especially since at
10 this point she was still conceptualizing what the
11 design would look like. I think we kept it mostly
12 to the dress itself with Aurora.

13 Q Okay. And what was the conversation with
14 respect to how you would come up with a price for
15 a rental?

16 A I -- so Aurora felt confident that she
17 just from her own experience in fashion and in
18 understanding like what are acceptable practices
19 for them, she felt confident that she would come
20 up with a metric that wasn't a creation of her own
21 making but one that exists that can -- that is
22 used by designers. She didn't elaborate what that

1 was, but she expressed a confidence during the
2 call.

3 Q So who was tasked with valuing the rental
4 of this dress?

5 A The designer.

6 Q Did you guys on that call talk about
7 hotels, or getting-ready rooms, excuse me?

8 A I don't remember if that came up on the
9 call.

10 Q Transportation, same question?

11 A No.

12 Q Let me go down a little bit here. Before
13 we get to this, let me just follow up on something
14 you just said. What was the conversation with
15 Aurora when you said she would ultimately be
16 tasked with valuing this. What was sort of her --
17 what was your takeaway on what she would be doing
18 in order to value the dress?

19 A I don't know specifics because this is
20 not my world, but what I did hear from her was
21 that she felt good and comfortable in coming up
22 with something that she felt was reasonable and

1 that was common for designers.

2 Q Did you guys talk about like price points
3 that would be acceptable for the congresswoman?

4 A Not on the call, no. I think it was
5 still too conceptual at that time.

6 Q Did you have a sense or did you talk
7 about on the call whether or not the congresswoman
8 would be paying for this with her personal funds,
9 via the campaign, officially?

10 A I believe by then we understood the
11 congresswoman was paying for it personally.

12 Q And so the thought process on your end is
13 that at some point in time in the future, perhaps
14 after the Gala, you will receive a bill for
15 services?

16 A Yes.

17 Q Okay. Did you plan on having any input
18 on that bill?

19 A No.

20 Q Okay. I have moved down a little bit in
21 the text messages. Let me just make sure. So at
22 the top here you can see -- I'm on Page 19 for the

1 record, we are at Wednesday --

2 A That's where the name comes from that you
3 testified about.

4 Q Vogue Entertainment Director. There you
5 go. Does that ring any bells now that you see it
6 there?

7 A Actually, no. I don't think -- I don't
8 think I spoke to him.

9 Q You may not have. I just was curious if
10 that name meant anything to you and it is fine if
11 it doesn't.

12 But here we are, we are at Wednesday,
13 September 8, so we are still a couple days out
14 from the Met Gala. Aurora sends the text to you.
15 At the bottom here you say "Just confirming you're
16 thinking of providing Riley with a tie/cummerbund?
17 There is no restriction on Riley btw." Tell me
18 what prompts that text message.

19 A Sure. This is making me think that
20 Aurora and I had a phone conversation at some
21 point where she possibly reviewed drawings with me
22 and asked about Riley and colors. Because I know

1 at some point, I don't remember the exact, I know
2 at some point I had confirmed for her that Riley
3 was getting a tux and so she had loosely suggested
4 providing him something that would be color
5 complementary. Because the color of the dress
6 went through a last-minute change. So I think --
7 I think that was me confirming what she was
8 thinking of through text.

9 Q She was thinking of providing Riley --
10 she was thinking of designing either a tie or a
11 cummerbund for him?

12 A I don't know if she was designing it but
13 I think she wanted to make sure they looked
14 coordinated in some way.

15 Q What do you mean "there is no restriction
16 on Riley btw"?

17 A Because the focus of our conversation was
18 always the congresswoman as a person who is the
19 member so at the time we were under the impression
20 that Riley didn't kind of fit into it because he
21 is not a member of congress.

22 Q In other words, that the ethics rules you

1 had been considering and contemplating were not
2 applicable to Riley because he is not a member of
3 congress?

4 A Did not necessarily apply to him. So
5 yes, while we were talking through parameters for
6 the congresswoman, that those did not necessarily
7 relate to Riley.

8 Q Did that point of view change at any
9 point in time?

10 A During discovery.

11 Q Okay. We can get to some of that later.

12 A Yeah.

13 MR. BROWN: Joshua, if you can take this
14 exhibit down, we can just go back to the screens
15 here. Okay.

16 Q So what I would like to do at this point
17 is I would like to just sort of tick off for you
18 the services that I think were provided to the
19 congresswoman in or around her participation with
20 the Gala. And then after we I think get a sense
21 for the parameters of what services or gifts that
22 she received in connection with the Gala, we can

1 talk a little bit about how those things were paid
2 for. Does that work?

3 A Sure.

4 Q Gala occurs on the 13th. That is Monday,
5 the 13th. You are with her that day; correct?

6 A Correct.

7 Q Up until the point of them departing in a
8 limousine of some kind for the Gala itself?

9 A I was with them on the limousine. It's
10 one of those standing --

11 Q Buses?

12 A Yeah.

13 Q Yeah, okay. And so you are with her up
14 until the point that she walks the carpet and
15 heads on inside?

16 A Correct.

17 Q Did she receive manicure and pedicure
18 services of some kind?

19 A She got a manicure and I believe a
20 pedicure, yes.

21 Q How was that arranged or how was that
22 coordinated?

1 A That was not coordinated through me, but
2 I was there while she was getting it done. And
3 yeah.

4 Q Who did coordinate that?

5 A I don't know if she did it or if
6 someone -- because there are these app services
7 you can use to procure the services of they're
8 getting hair blown out or a mani/pedi wherever you
9 are. So I don't know if that was done through an
10 app that the congresswoman did or somebody did it
11 for her. I did not.

12 Q Do you know how those services were paid
13 for?

14 A It was paid for by cash.

15 Q How do you know that?

16 A I know that because the woman there said
17 she needed -- she would need to be paid by cash.

18 Q So you witnessed it?

19 A Uh-huh.

20 Q And the congresswoman herself used her
21 own cash to pay for those services?

22 A Sure.

1 Q The congresswoman also had her hair done
2 and I believe that was by an Stylist 1, who is
3 affiliated with Streeters. Is that correct?

4 A Yes.

5 Q And Streeters, as I understand it, also
6 does business as Great Bowery?

7 A Yes.

8 Q The congresswoman had her makeup done by
9 Stylist 2 who looks like she is represented
10 by The Wall Group. Is that right?

11 A Correct.

12 Q The congresswoman also received a ride
13 from her home the morning of the Gala to the
14 Carlyle that was provided by Condé Nast. Is that
15 right?

16 A Correct.

17 Q And then Brother Vellies, Aurora James,
18 we may use those terms sort of interchangeably,
19 but I believe Brother Vellies through Aurora James
20 provided her with the dress; correct?

21 A Uh-huh, yes.

22 Q The shoes she wore?

1 A Yes.

2 Q The purse or the handbag?

3 A Yes.

4 Q And the jewelry?

5 A Yes.

6 Q My understanding with the jewelry is that
7 a jeweler provided jewelry to Aurora James and
8 Aurora James then provided that through Brother
9 Vellies to the congresswoman. Is that a correct
10 understanding?

11 A From the Post article I think you read
12 about that, I think that is correct.

13 Q But you don't have any firsthand
14 knowledge?

15 A No. Also, just to note, the
16 transportation from her home to the Carlyle, the
17 hair and the makeup, were put together under a
18 separate press feature called -- which focused on
19 getting ready for the Met Gala. So that was
20 not --

21 Q This is the video?

22 A Yes.

1 Q Can you tell me why that distinction was
2 important to make?

3 A Because I said earlier that a lot of this
4 was under the discretion of the designer. The
5 designer could also do hair, makeup, nails, all of
6 that because that is all part of the presentation,
7 making the distinction that that was not the case
8 here.

9 Q So the hair, the makeup and the
10 transportation to the Carlyle were associated
11 with, affiliated with, this getting ready video?

12 A (Indiscernible) yes.

13 Q Sorry. What was the thing you just said?

14 A I call it a press event.

15 Q A press event?

16 A Yes.

17 Q Back to the jewelry that was provided to
18 the congresswoman, you don't know how it worked
19 that Aurora James or Brother Vellies came in
20 possession of the jewelry, but it is your
21 understanding that Aurora James or Brother Vellies
22 provided the jewelry that the congresswoman wore

1 at the Gala to her?

2 A Right, correct.

3 Q In addition, it looks like Brother
4 Vellies/Aurora James also provided the use of a
5 hotel room for getting-ready purposes. Is that
6 right?

7 A Yes. So as we were getting down to the
8 days leading up to it, it became clear that the
9 designer and the person wearing the design had to
10 be in close proximity to each other. So Aurora
11 had secured some rooms at the Carlyle. As I
12 understood, we didn't look into the Carlyle
13 itself, but rooms were booked months in advance in
14 preparation for the Met Gala. So Aurora indicated
15 to us that she had a room where the congresswoman
16 can get ready.

17 Q Let me make sure I have this correct.
18 There are two separate days in which Aurora had
19 rooms booked that the congresswoman showed up at
20 the Carlyle. That would have been Saturday, a
21 couple days in advance of the Gala, for a fitting
22 of some kind. Is that correct?

1 A Yes. And that's where we saw what the
2 dress actually would look like.

3 Q Right. And then the congresswoman also
4 used one of Aurora's rooms that she had reserved
5 the day of the Gala itself. So Saturday and
6 Monday?

7 A Yes. So the Saturday event, it was final
8 fitting and they wanted to make sure that
9 everything would work well for that Monday. The
10 hotel room was used because it had become Aurora's
11 sort of base of operations at the time. So that
12 is why we met her there. We also had in that
13 getting ready, there was also press coverage
14 there, too, because they recorded some footage
15 that eventually made it to that video.

16 Q Brother Vellies also provided Riley with
17 a couple of things, Riley Roberts that is. And
18 that was shoes, as I understand it?

19 A Yes. She came with a pair of shoes.
20 They were not Brother Vellies shoes but they were
21 shoes.

22 Q And a bow tie?

1 A Uh-huh.

2 Q And then Brother Vellies also provided
3 transportation from the Carlyle to the Gala?

4 A Yes. Yes.

5 Q You were starting to say earlier that's
6 what I'm envisioning as one of those sort of party
7 buses, you know, big enough for you to stand up
8 in. Is that --

9 A Yeah. I don't think they would call it a
10 party bus but I think we would, we would kind of
11 look at it that way. There is a -- and I'm
12 forgetting the name. Sprinter, kind of like those
13 Sprinter vans, kind of like that.

14 Q And that's what you can see in that
15 video, is them --

16 A Yes.

17 Q -- in that transportation? Okay.

18 A And me desperately trying to stay off of
19 camera, yes.

20 Q I will have to go back and look for that.

21 It also appears that there was a courier
22 service that I think we just got some documents on

1 last night. And let me just make sure I
2 understand. The courier service was you guys, you
3 know, your team taking the Brother Vellies rental
4 materials or attire that you had and couriering it
5 back to Aurora James' team?

6 A Correct.

7 Q Am I missing anything in terms of
8 services that were provided to her, you know,
9 gifts that she may have received, related to the
10 Met Gala?

11 A As far as I know, she received no gifts.
12 And I think you have covered everything.

13 Q Okay. There was some talk of a headpiece
14 that Aurora James was designing for the
15 congresswoman. Did the congresswoman ever receive
16 a headpiece of any kind?

17 A No. I mean, there was at that Saturday,
18 the fitting, there were a couple of options, one
19 was a headpiece, one was a hat, one was a flower.
20 And so the day of the congresswoman actually wore
21 a flower. It was -- these are design options that
22 were put out, tried on her, see what fits, decided

1 against all of them.

2 Q Okay, understood. And for Riley, Riley
3 Roberts, the congresswoman's partner, did he
4 receive any other services? I saw in the text
5 messages that he had a suit from Suitsupply.

6 A Uh-huh.

7 Q And then there was some conversation
8 about him getting tailoring done by I believe a
9 friend or a colleague of Aurora James'. I think
10 the name was somebody by the name of Brown. Is
11 that right?

12 A I don't remember his name, but yes, I
13 remember her referencing a design colleague.

14 Q Did the congresswoman attend an
15 after-party?

16 A She did not.

17 Q So in terms of again services or things
18 that were provided to the congresswoman
19 surrounding the Met Gala, it seems like we have
20 ticked off everything that is -- all the relevant
21 services that she may have received in connection
22 with the Gala?

1 A Yes. I think the only thing I want to
2 note is what you shared about Riley is correct.
3 He had his suit tailored by the place where he
4 purchased it because when he purchased it, he
5 arranged the tailoring on the spot there. And he
6 came with like a haircut. So he didn't need
7 hairstyling or anything like that. So less work
8 for the gentleman.

9 Q Right, right. Let's go over a couple
10 communications that you had immediately following
11 the Gala.

12 MR. BROWN: Joshua, if you could bring up
13 Exhibit 6, please.

14 Q Just so you are aware, Exhibit 6 is still
15 the text messages.

16 A Okay.

17 Q I'm on Page 37, for the record, although
18 I'm going to scroll up so you can see the date on
19 which these text messages occurred.

20 A Thank you.

21 Q Sorry; screen is a little slow to
22 respond. So we are on Tuesday afternoon,

1 September 14. So this is the day after the Gala.
2 If it is okay with you, I'm going to keep
3 scrolling because I'm not going to talk to you
4 about these text messages here, but I am going to
5 talk to you about what's on Page 37.

6 A Yep.

7 Q You can see here at the bottom of 36 you
8 say "I have a couple of logistical/compliance
9 things left to work through." And I'm scrolling
10 to get down through the full text there. Let me
11 direct your attention -- this is the text message
12 on Page 37 where you say "I have a couple of
13 logistical/compliance things left to work
14 through." What prompts this text message to
15 Aurora?

16 A I wanted to wrap it up.

17 Q What do you mean by that?

18 A Wrap up whatever we needed to finalize.
19 I didn't know how long things would take on their
20 end. So I just wanted to leave out what we would
21 potentially need.

22 Q So this text message is an attempt for

1 you to flag for Aurora the handful of things that
2 you think still need to be taken care of with
3 respect to her and the Gala?

4 A Correct.

5 Q Let's walk through these one by one. You
6 say "Happy to put this in an e-mail if that is
7 easier. We have to set the rate for the rental of
8 the dress."

9 A Yes.

10 Q What do you mean by that?

11 A So that was me asking her what the rental
12 rate will be for the dress.

13 Q You say "we have to set the rate for the
14 rental of the dress." Were you going to have any
15 input or participation in --

16 A No, that is not my wheelhouse.

17 Q So back to our prior conversation, Aurora
18 James and her team are going to set the rate?

19 A Correct.

20 Q And there was no discussion at any point
21 prior to this what would be or would not be an
22 acceptable or unacceptable rate?

1 A No. I think I was getting -- I was
2 asking them when they were ready, because
3 understanding there are a lot of very last-minute
4 changes to this, when they were ready, if they can
5 give me a roundabout range so I can at least tell
6 the congresswoman I don't have hard numbers but
7 I'm thinking it will be around X. So we had
8 loosely had those conversations but I knew they
9 were not formalized. And I wanted to give them
10 kind of like their time to work that through. We
11 were making changes I think even the day of,
12 Aurora was making design changes, so...

13 Q What is your understanding at the time of
14 this text message of how the dress and the attire
15 would be paid for?

16 A By this time I know the congresswoman was
17 paying for it.

18 Q Personally?

19 A Yes.

20 Q And when you say "we have to set the rate
21 for the rental of the dress," you don't just mean
22 the dress, you actually are sort of --

1 A I mean the whole --

2 Q -- suggesting the dress --

3 Go ahead. Sorry I cut you off.

4 A Sorry to interrupt.

5 I mean all things Aurora was working on.

6 Q Dress, handbag, shoes. And am I missing
7 anything, jewelry?

8 A Uh-huh.

9 Q Next bullet point, "I need to know how
10 much the Gap paid for the room." Explain that to
11 me.

12 A Yes. So in us trying to figure out the
13 hotel situation, I had expressed to Aurora's team
14 that we would have to pay for -- we understood the
15 congresswoman would have to pay for her use of the
16 room. They had some concerns with that. I don't
17 think -- you know, and I mentioned the Gap here
18 and I mentioned it because it was shared
19 offhand -- it wasn't like Aurora had shared this
20 with me, but someone on her team had indicated
21 that another vendor was paying for the hotel rooms
22 and that that vendor was potentially the Gap.

1 Q We are talking about the clothing
2 company?

3 A Yes. Because she, Aurora, has like other
4 contracts. And I obviously am not familiar with
5 how designers make sure they are cash positive
6 with all things related to the Met Gala or if this
7 was tied to something else, tied to Aurora's
8 business, but they did flag for me that they would
9 have to work through how they would be able to do
10 that, being that the room was likely being paid
11 for by another party. My impression was that that
12 was potentially the Gap. So I was trying to
13 get -- and this is me looking for like what is --
14 trying to get roundabout figures on things. Let
15 me know more or less what this cost would look
16 like is what I'm trying to get from them.

17 Q And what's your understanding of how the
18 room will be paid? Will that be paid by the
19 campaign, will that be paid personally?

20 A We knew that would be paid for
21 personally.

22 Q So at this time the day after the Gala

1 you don't have a full and complete understanding
2 of who paid for the rooms that the congresswoman
3 got ready in, but you're trying to figure out how
4 we don't receive a gift of some kind that's
5 improper under the ethics rules and so you are
6 trying to figure out who do we pay, what are we
7 paying?

8 A Correct.

9 Q Have you figured out since this text
10 message between now and then who paid for the
11 rooms and who was appropriate to reimburse?

12 A My assumption is that Brother Vellies
13 ended up paying it because that's who we paid our
14 share or that is who the congresswoman paid her
15 share to.

16 Q And that is consistent with the letters
17 that we received about Brother Vellies effectively
18 billing for services that had not been paid for
19 previously?

20 A Correct. That weren't worked out by
21 then, or at least not to my knowledge, hence my
22 inquiry.

1 Q It wasn't worked out at the time of this
2 text message?

3 A Correct.

4 Q Understood.

5 "What method should Alexandria use to pay
6 for the shoes/dress rental?" That is just you
7 trying to figure out how are we ultimately going
8 to pay for these things?

9 A Yes. What method we would use, yes.

10 Q Was there any follow-up here, or was
11 there any response by Aurora?

12 A I think -- there wasn't a direct response
13 by Aurora. I was in conversation with her team.

14 Q How does this all ultimately get sorted
15 and paid for?

16 A Ultimately the congresswoman paid for it.
17 And we eventually received an invoice that became
18 two invoices. I think what was worked out at the
19 time was the first invoice that we got and then in
20 finalizing all of this was the second invoice.

21 Q We can get to those in a second. Let me
22 jump down a couple of text messages here and we

1 will come back to that.

2 You see here we are on Wednesday,
3 September 15, so this is a day after -- September
4 14 is the day after the Gala so now we are
5 September 15, two days out. You are texting
6 Aurora, "Hi friend. I hope you are hanging in
7 there. I know there's a lot going on. I have a
8 proposal for you" -- you see that continues on the
9 next page -- "I have a proposal for you, or we
10 have a proposal for you."

11 What's going on in these text messages?

12 A So I think what is happening there is
13 that Aurora is getting a lot of negative press at
14 this time and that was my "hope you're hanging in
15 there. I know there's a lot going on."

16 I think the subsequent days like the
17 picture got worse before it got better, but what I
18 wanted to propose to her, if memory serves
19 correctly, was to explore the potential of them
20 like releasing some sort of either statement
21 together or doing something together to help kind
22 of mitigate the negative press that she was

1 beginning to get.

2 I think the participation in the Met Gala
3 I think for them was like something that we were
4 really excited about and we felt was positive in
5 many ways. But there's -- you know, I say there's
6 always a pendulum sort of effect. And I thought
7 that while Aurora understood this and saw this as
8 a good moment for her as a designer, there were
9 also negative things tied to it. So this was my
10 way of trying to think through how we could
11 potentially help her with that.

12 Q When you say -- go ahead. Sorry.

13 A My proposal for her was not tied to the
14 compliance aspects to the Gala, it was more like
15 PR.

16 Q When you say "I have a proposal" and you
17 sort of changed course and said "we have a
18 proposal," who is the "we"?

19 A I had asked the congresswoman if she
20 would be open to doing something with Aurora.

21 Q What did the congresswoman say?

22 A She said yes, she felt -- she felt like

1 if there was some way she could help, she would
2 like to.

3 Q Did the proposal or what you had
4 suggested in terms of some sort of press or joint
5 press release, did that ever come to fruition?

6 A No.

7 Q Let me back up just a moment because, as
8 you point out, there is a lot of press regarding
9 her attendance at the Gala, whether and to what
10 extent it complies with ethics rules, and I know
11 there's a lot of inquiries being made of the
12 congresswoman's team and also of the Met and of
13 Condé Nast.

14 And I know there is a phone call, there
15 is a conference call that occurs on the evening of
16 the 14th around 6:00 p.m. with -- I know Dave is
17 on that call, the Met, people from Condé Nast, and
18 folks from your team. Are you on that call as
19 well?

20 A You said the evening of the 16th?

21 Q The evening of the 14th, so the day
22 after.

1 A Yes, I believe I'm on that call.

2 Q And, again, that's a phone call in which
3 Dave is talking with folks at the Met and Condé
4 Nast how are we --

5 MR. BROWN: Joshua, are you still there?

6 (No response.)

7 MR. BROWN: This is actually a good time.
8 Why don't we take a five-minute break.

9 (A recess was taken).

10 MR. BROWN: This is Jeff Brown with the
11 Office of Congressional Ethics. We are back on
12 the record with Campaign Staffer.

13 BY MR. BROWN:

14 Q I think right before we cut for a break I
15 was asking you about the day after the Met Gala.
16 There were all sorts of press inquiries and there
17 was a conference call at the end of the day.
18 Really what I wanted to drive at with that
19 question is, was there ever any sort of like
20 official statement put out by the office or by the
21 campaign in response to some of those media
22 inquiries, or was the Instagram post and the

1 Twitter post of the Instagram post, is that sort
2 of everything that was out there at the time you
3 sent that "I have a proposal for you" text?

4 A Yeah. The only thing that has gone out
5 there was the congresswoman's Instagram post.

6 Q I thought that was the case. I just
7 wanted to verify. So thank you.

8 A Yes, that's correct.

9 MR. BROWN: Joshua, if you can pull up
10 Exhibit 8.

11 (Exhibit 8 was marked.)

12 Q We will get to the exhibit in a second,
13 but let me just ask you, who is Janna Pea?

14 A I view her as an extension of Aurora's
15 team. I believe she is part of her I guess it is
16 PR team, but Janna was there the same day as the
17 Met Gala and my sort of impression of her is that
18 she is someone who helps make things happen for
19 Aurora, helps facilitate things for her, and she
20 was our like team contact, our main team contact.

21 Q Okay. And it looks like she had some
22 involvement with billing?

1 A She was my main conduit. So outside of
2 talking to Aurora, I spoke with Janna.

3 Q And so here before you I have an e-mail.
4 For the record, this is Exhibit 8 and it is
5 THAOC_1667. It is an e-mail to you from Janna
6 Pea. It is sent Sunday, September 19, 2021. And
7 it says "Invoice for MET attire. See below and
8 let me know if you have any questions."

9 I have attached the pdf that is
10 referenced here below. Can you tell me what this
11 invoice is?

12 A That was the first one that I had
13 received from them.

14 Q So this is the first invoice from
15 Cultural Brokerage Agency doing business as
16 Brother Vellies. This is an invoice that you
17 received on September 19, 2021. I would note that
18 the total here is \$2,283.93.

19 Did you guys have a conversation in the
20 wake of receiving this invoice, you and Janna?

21 A Yes. I called Janna.

22 Q What did you call her and talk about?

1 A I told her that I wanted to confirm that
2 that was the correct invoice. One of the things
3 that was incorrect about it is that by that time
4 we had understood it was going to be a shoe
5 rental, not a shoe purchase, and the reason for
6 that is that Janna had indicated they were using
7 the shoe for some shoots. So it wouldn't make
8 sense for us to buy it. So I flagged that for
9 her.

10 And then I also asked her just -- I
11 didn't know like what they had settled on in terms
12 of those items until I saw the invoice. But in
13 talking to her, I said and I just want to confirm
14 that the gown rental price is correct as well.
15 Since we had hit a loose range, I know it wasn't
16 confirmed, but I would like -- if it's okay, I
17 just want to make sure that this is correct. And
18 so she said she would get back to me.

19 Q What was the loose range that you guys
20 had hit on?

21 A We had said it would land somewhere
22 around about a thousand dollars, which I think

1 that's kind of there, too, but I just wanted to
2 confirm with them that that was correct.

3 Q When did you land on that amount and how?

4 A It wasn't a firm number. None of these
5 numbers were firm until after; right? So prior --
6 and you have seen this -- I start asking questions
7 of give me a rough idea just so that I can prep
8 the congresswoman. And so they said the attire
9 would land at maybe around a thousand, a little
10 more or less, and so I had given her sort of like
11 just to prepare, because I know you have to work
12 your personal financial situation, this is kind of
13 what they told me we are at, it is not set in
14 stone and we won't know, but just to do my due
15 diligence. And since I saw that the shoe was a
16 purchase and that kind of was a flag to me, can we
17 look at all of this over again just to make sure
18 it is correct before I pass it on.

19 Q I appreciate nothing was set in stone,
20 but when were you having these conversations where
21 you were getting the impression like it will
22 roughly be close to a thousand dollars?

1 A I would say Saturday, that Saturday of
2 the fitting. Because by then we have like
3 materials, for example. Like a lot of stuff has
4 become more concrete by then, you know, again,
5 like you confirmed, knowing that it wasn't a
6 hundred percent set.

7 Q So you get this invoice from Janna on the
8 19th and it's fair to say that that is not what
9 you were expecting, that 2,283.93 figure?

10 A I'm not going to say it wasn't what I was
11 expecting. I just noticed an error is what I
12 would say. That's what prompted me to, like,
13 question it.

14 Q Okay. So you call her. And just walk me
15 through that. What do you say to her?

16 A I said Hey, Janna, just got the invoice.
17 I think that there is -- there's incorrect
18 information on there. Can you take a look at
19 this? And I outlined for her the same as here
20 what was a flag to me.

21 Q And that would have been the shoe
22 purchase?

1 A Uh-huh.

2 Q And that would have been the fact that we
3 were anticipating something closer to a thousand
4 dollars as opposed to --

5 A No, I didn't say what we were
6 anticipating. I asked her to just confirm that
7 that was correct.

8 Q Okay. Let's go to that subsequent
9 invoice that you get.

10 MR. BROWN: So Joshua, can you please
11 pull up Exhibit 9.

12 (Exhibit 9 was marked.)

13 Q I'm going to scroll down a little bit so
14 you can see this e-mail from the beginning.

15 A Thank you.

16 Q So you can see Monday, September 20, so
17 we are talking about the next day here, another
18 invoice is sent. The first e-mail says "Hi Janna"
19 from a Brandon Proctor. He's forwarding the
20 invoice, and then she, Janna, forwards it to you
21 on again the 20th, which is a day later. I will
22 give you a chance to read that and you can tell me

1 when you're done.

2 A I'm done, thank you.

3 Q Just for the record, again, this is
4 Exhibit 9, THAOC_1573. I'm going to scroll down.
5 Attached to this is the second invoice. So just
6 to confirm, this is the invoice you received a day
7 later and it is the one you received after that
8 conversation with Janna you just referenced?

9 A Yes.

10 Q Okay. I will note that it still says
11 "Met Gala Shoe Purchase, Ribbon Pump"?

12 A Uh-huh.

13 Q Did the congresswoman purchase the shoes
14 or did she return the shoes?

15 A No, she returned the shoes.

16 Q So this invoice is in error when it says
17 "purchase." It is actually a rental of the shoes?

18 A Correct.

19 Q Did you have a conversation with Janna
20 about this invoice when you received it?

21 A No. I let it go.

22 Q Do you have any idea why the dress went

1 from, you know, what it cost down to \$300?

2 A No.

3 Q Who is tasked or who is responsible for
4 paying this invoice when it comes in?

5 A The congresswoman.

6 Q Do you send this invoice to the
7 congresswoman?

8 A I did not send it to her. I just told
9 her that we got it.

10 Q Let me make sure I was asking that last
11 question appropriately. The congresswoman is
12 going to pay for it personally, as we have
13 previously discussed. But who is actually going
14 to do the entering of the credit card information
15 and actually filling out what needs to be filled
16 out to make sure it gets paid?

17 A That would be me.

18 Q And you have access to her personal
19 credit card information such that you can do that?

20 A I do now. I didn't at that time.

21 Q Are you aware whether anybody besides
22 yourself had conversations with Aurora James,

1 anybody at Brother Vellies, Janna Pea about the
2 invoice and the changes between the invoice on the
3 19th and the 20th?

4 A Outside of what we just discussed, no, no
5 additional conversation.

6 Q None that you're aware of?

7 A Correct. None from me and none that I'm
8 aware of from our team.

9 Q Understood. This invoice is not paid in
10 September. Why isn't it paid for in September of
11 2021?

12 A I didn't consider it the final invoice
13 because I knew we still had to work through the
14 hotel and so I did not treat it as a final
15 invoice.

16 Q Did you reach out at any point in time to
17 anybody at Brother Vellies or Aurora James or
18 Janna Pea to follow up on the invoice?

19 A I spoke with Janna.

20 Q When was that?

21 A This was -- I don't remember if it was
22 before I got the second invoice or if it was that

1 day, it happened to be that day, that I had
2 flagged to her that I was waiting on additional
3 items and she indicated to me it would be some
4 time before they could figure it out.

5 Q Okay. So let me make sure I have this
6 straight. You get the first invoice on the 19th,
7 you and Janna have a conversation in which you
8 flag some concerns about the correctness of that
9 bill.

10 A Yes.

11 Q She sends you another bill on September
12 20, which is for \$990.76. That is the one we have
13 in front of us right now. At some point either in
14 that conversation on the 19th or at some point on
15 the 20th --

16 A It was -- yes, it was --

17 Q It was after the 20th after you received
18 this -- let me get this straight then.

19 So after you received this second bill,
20 you and Janna have another conversation in which
21 you say got it on the dress rental, the jewelry
22 rental and the shoe rental, but we're still

1 missing some outstanding stuff including --

2 A The hotel was the primary one for me at
3 this time.

4 Q Was there anything else?

5 A I think I only focused on the hotel. I
6 think it had also come into my radar that we would
7 have to work out the transportation from the
8 Carlyle to the Met Gala and I wasn't -- I
9 wasn't -- I don't -- I knew at that point that
10 that was a question, but I hadn't -- I hadn't
11 gotten clarity on like what that would look like
12 so I hadn't known yet what to ask them for yet.

13 Q So as of the 20th then you feel like the
14 ball is in Janna's court, Brother Vellies' court,
15 and you are waiting to hear from them, you are
16 waiting to get an updated invoice from them?

17 A Correct.

18 Q Do you ever follow up with anybody over
19 there about an updated invoice?

20 A After that conversation with Janna, no.

21 Q Does anybody from Brother Vellies or does
22 Janna follow up with you about these sorts of

1 things?

2 A Not about it directly. We will
3 periodically -- Janna will periodically be in
4 touch about other things and sometimes they would
5 circle around like Aurora, but nothing -- nothing
6 from her indicating that like another invoice was
7 imminent.

8 Q So after the 20th you don't reach out to
9 them, they don't provide you with another invoice,
10 and we get to the point in time where the OCE
11 sends notice to the congresswoman about an open
12 review.

13 MR. BROWN: And then if we can bring up
14 Exhibit 10, Joshua.

15 A Before you do that, just to clarify,
16 after the second invoice I did indicate to Janna
17 that I knew that wasn't the final invoice. And
18 she shared with me that she would need some time
19 to work that through.

20 Q Okay. And, in other words, you were just
21 sort of waiting at that point. It is like I have
22 put the ball in your court, you guys need to send

1 me another invoice so we can get this squared
2 away?

3 A Yes.

4 Q And then it sort of just falls through
5 the cracks until the OCE comes a knocking?

6 A Yeah, I think so. I think it didn't --
7 it didn't become a focus until then.

8 Q Okay. Let's pull up Exhibit 10. Thank
9 you, Joshua.

10 (Exhibit 10 was marked.)

11 Q And I will just flag for you that the
12 March 3 here, is this -- well, go ahead. I will
13 let you read this e-mail and then I will ask you
14 some questions about it, but I will just show you
15 here at the bottom this is the Monday, September
16 20, 2021, e-mail in which Janna has forwarded the
17 invoice, and then this e-mail right here on the
18 next page is where it's forwarded to you, and then
19 I will let you read these next couple of e-mails
20 and you let me know when you are done.

21 MR. BROWN: For the record, this is
22 Exhibit 10, THAOC_ 1556.

1 Q I can zoom in for you.

2 A/V TECHNICIAN: While she is reading
3 that, it looks like we lost Mr. Sandler. I just
4 wanted to let everyone know.

5 MR. MITRANI: Yeah. He had to jump to
6 another call.

7 A Oh, yes, uh-huh, thank you.

8 Q So again this is Exhibit 10. Let me just
9 confirm -- I assume I know the answer to this, but
10 let me just confirm the OCE notifies the
11 congresswoman of a review, I believe documents are
12 delivered on March 1 and 2, and then I see here on
13 the 3rd you reach out to Janna, "Hi, Janna, long
14 time no speak to!" and you say at the bottom there
15 "Would it be possible for me to get confirmation
16 on the invoice from Brother Vellies?"

17 I assume that the statement and the
18 nature and the review, the document request that
19 we asked is what -- we provided to you guys is
20 what prompted you to reach back out to Janna?

21 A Yes. This is me circling back, let me
22 pick this up again.

1 Q Effectively what happened here is Janna
2 says I will get that for you, and then she says
3 "quick bump" -- I assume that means bump in the
4 road -- I can't get you that because we never got
5 payment?

6 A Uh-huh.

7 Q And then you say "Ok. We will have to
8 take care of this asap. Can I give you a call
9 tomorrow?"

10 Did you guys end up having a
11 conversation?

12 A I believe we did. I believe we did. I
13 think when I talked to Janna, I said, you know,
14 I'm sorry -- I was kind of re-upping this in my
15 head as well, and I think I reviewed with her that
16 there were some things that were pending as well.

17 Q What do you mean by that?

18 A In having the conversation with her, I
19 was reminded, you know, I reminded -- I'm trying
20 to remember if she reminded me, I reminded her,
21 that we still had not factored in the hotel.

22 MR. BROWN: Joshua, if you can bring up

1 Exhibit 11.

2 (Exhibit 11 was marked.)

3 MR. BROWN: And if you can give her
4 control, that would be great.

5 Q Just if you want to take control and read
6 through this and then I will ask you some
7 questions.

8 A Okay.

9 Right.

10 MR. BROWN: Joshua, if you can give me
11 control back.

12 Q So this looks like to me, but correct me
13 if I'm wrong, you and Janna have a conversation in
14 the wake of the OCE review and you guys have that
15 conversation you just mentioned and then this
16 looks to me like a receipt that was provided by
17 Brother Vellies to you confirming payment of that
18 September 20 invoice?

19 A Correct.

20 Q September 20, 2021 invoice? That's
21 correct?

22 A Correct. I think at this point it was

1 pay whatever you have and then understanding that
2 there were still some things they were working
3 through that we would, you know, in the process of
4 going through this, need to pay a separate
5 invoice.

6 Q Okay. So let me again make sure I just
7 understand that.

8 In the call you had with Janna you
9 discussed that there were probably some other
10 things that needed to be taken care of but either
11 your thought process or her thought process was we
12 have this invoice, let's pay this invoice and we
13 can deal with the other things later?

14 A That was counsel's process, to just pay
15 what we have, yeah.

16 Q Understood. Let's talk about this
17 receipt quickly. I'm going to zoom in here. You
18 can't see it particularly clearly, but I think you
19 have seen this document and understand that this
20 is the \$300 for the gown rental, the handbag and
21 the jewelry rental, and then the ribbon pump. And
22 the total is \$990.77. Again, that is consistent

1 with the second invoice we have seen.

2 If you look here on the left side, just
3 flagging this for you, it says "Contact
4 Information" and that has your e-mail address and
5 it looks like it is paid with an AmEx ending with

6



7 A Uh-huh.

8 Q What AmEx is that?

9 A That is the congresswoman's AmEx.

10 Q Okay. Is that a personal or a campaign
11 AmEx?

12 A It is a personal card that she uses when
13 there are times she has to make campaign
14 reimbursable expenses, but it is her personal
15 card.

16 Q Explain that to me a little further.
17 Sorry.

18 A So like if she is buying a gift for a
19 member or going out to lunch and uses the card,
20 stuff like that.

21 Q But is it a card that is used for her
22 personal card that she uses for campaign expenses

1 or is it her personal card that comes out of her
2 personal funds?

3 A It is her personal card that comes out of
4 her personal funds.

5 MR. BROWN: Joshua, can you go to Exhibit
6 23 -- actually, sorry, Joshua, 22.

7 A/V TECHNICIAN: Stand by.

8 (Exhibit 22 was marked.)

9 Q I will let you scroll through this as you
10 want, but as you are looking, I will just mention,
11 this is one of the AmEx bills you provided to us.
12 It is redacted, but I'm going to ask you a couple
13 questions about it. You can take control and
14 scroll through it.

15 CAMPAIGN STAFFER: Joshua, would you be
16 able to give me control?

17 A/V TECHNICIAN: My apologies. I gave it
18 to Mr. Brown instead. You have control now.

19 CAMPAIGN STAFFER: Thank you.

20 A Okay. I looked through it.

21 Q Yeah, so let me just ask you a couple
22 things because this doesn't look like a personal

1 card to me. It says "Business Platinum Card" at
2 the top and I also see here -- sorry, Joshua, if
3 you can give me control -- you saw it at the
4 bottom, so I will -- let me scroll through it
5 again. You are, it looks like, an authorized user
6 on this card along with some other folks. So I'm
7 just -- I guess I'm just trying to verify this is
8 a -- it doesn't seem like a personal card because
9 it says "Business Platinum Card" and there are
10 other authorized users, but is it your
11 understanding this is a personal card?

12 A It is my understanding this is a personal
13 card. I'm the only one that has authorized use of
14 it.

15 Q Okay. And because you are an authorized
16 user and because, you know, you have some, it
17 sounds like, oversight of these sort of things,
18 you know, your understanding is when the
19 congresswoman pays for things using this card,
20 that comes out of her personal funds and not
21 campaign funds?

22 A Yes. When she has personal expenses

1 here, it would come out of her personal card.
2 There isn't a -- I think the fact that it is a
3 business card under like a business-type account
4 is more in the way that she set it up. But AmEx,
5 as far as I understand, gauges this account on
6 personal credit and she uses this -- she uses it
7 for personal use.

8 Q You started to say something earlier
9 about like if she has to reimburse the campaign or
10 something like that. What were you getting at?

11 A Like travel. Because she doesn't always
12 have her campaign card handy, so there are times
13 when we would have to reimburse, but there is no
14 like auto pay feature. You can pick what accounts
15 you are paying something into and we itemize
16 everything. So whatever is a campaign expense,
17 the campaign would cover, and what is her expense
18 she would cover.

19 Q Okay. Give me one quick second here.

20 MR. ASHMAWY: Can I ask a quick question?

21 MR. BROWN: Yes.

22 BY MR. ASHMAWY TO THE CAMPAIGN STAFFER:

1 Q Is there a separate campaign card?

2 A Yes.

3 Q Does that happen to also be an AmEx card?

4 A We have one now. We did not -- I think
5 we started using AmEx cards a couple months ago.

6 Q Okay. Previous to using an AmEx card for
7 the campaign, what kind of card did you use?

8 A A Brex card, which we still have. Some
9 staff still have the Brex cards.

10 BY MR. BROWN TO THE CAMPAIGN STAFFER:

11 Q The Brex card is the campaign card, is
12 that what -- previously the Brex card was the
13 campaign card?

14 A Yes. And we still have it.

15 Q And you produced some documents with the
16 Brex card and again that is the campaign card?

17 A Yes. I don't know what documents we
18 produced under the Brex card.

19 Q That's fair. I can follow up with
20 counsel if need be.

21 A Thank you.

22 MR. ASHMAWY: Thank you very much.

1 Q Okay. Regarding the Brother Vellies
2 reimbursement here which -- or payment for, excuse
3 me -- back to Exhibit 11, this 990.77, you
4 ultimately paid -- you actually physically did the
5 paying for that on the credit card; right?

6 A Correct.

7 Q What's the congresswoman's awareness of
8 the fact that this hasn't been paid between
9 September and whatever the exact date of payment
10 is here?

11 A I don't think she had an awareness of it.
12 I think she knew that it -- she knew that it
13 wasn't -- obviously she knew that it wasn't paid,
14 but like where were we in there, I wouldn't say
15 she was given regular updates or anything like
16 that.

17 Q Why do you say obviously she knew it
18 wasn't paid for?

19 A Because she would be the one paying for
20 it or at least being aware that it is hitting her
21 account.

22 Q Okay. You said you are not providing her

1 regular updates. Are you providing her updates of
2 some kind on these, the need to make payments
3 here?

4 A The update that she had until we got
5 advice from counsel was that we knew there were
6 still some things pending.

7 Q And that relates back to the conversation
8 we had about you talking with Janna Pea in or
9 around September 20 that we can and should expect
10 another invoice?

11 A Correct.

12 Q But she didn't follow up with you after
13 that?

14 A We had -- when you say "she," you mean
15 Janna?

16 Q I'm sorry. I mean the congresswoman.

17 A Oh, the congresswoman. We did have
18 another conversation about it and I had said to
19 her that I was kind of -- I knew they were working
20 through some things on their end and I didn't know
21 what that would look like. So I was just -- what
22 I said to her, I'm kind of leaving it on them.

1 Q And roughly when would that have
2 occurred?

3 A It was definitely in the fall.

4 Q So we are talking September, October,
5 November time frame?

6 A Yeah.

7 Q And then once we get to 2022, you don't
8 hear anything from Janna and this is not the focus
9 of -- focus for you. You are not updating the
10 congresswoman and none of this is really getting
11 dealt with until early May when we saw this e-mail
12 traffic we just looked at with Janna?

13 A Uh-huh, yes.

14 Q Okay.

15 MR. BROWN: If you can take these
16 exhibits down, Joshua, that would be great.

17 Q I want to change gears and talk about the
18 hairstyling services that the congresswoman
19 received. From the documents you guys produced to
20 us, we got a September 30 invoice from Stylist 1,
21 I think via Streeters, which is his
22 representation. That doesn't get paid until

1 February 24. So what's the basis for the delay
2 there?

3 A I think the delay there for me was I
4 didn't have access to her personal credit card at
5 that moment, but also I think it was just -- I
6 think our focus at the time was just clarifying to
7 them who needed to pay it and it was something
8 that kind of like, you know, it fell off my radar.

9 MR. BROWN: Joshua, can you bring up
10 Exhibit 13.

11 (Exhibit 13 was marked.)

12 MR. BROWN: Joshua, if you could give her
13 control of that.

14 Q I will let you scroll to the bottom and
15 make your way up, kind of refamiliarize yourself
16 with this string. It is a part of a very long
17 string in which you are all having communications
18 with Stylist 1 and his team, but for your
19 purposes, the string really starts with Condé Nast
20 I think flagging that you, I think they say team
21 AOC, will be taking over the billings.

22 A Uh-huh.

1 Q So go ahead. Just refamiliarize yourself
2 with this string and I can ask you some questions
3 after that.

4 A Okay, thank you.

5 Q Does this string help you remember any
6 better about the basis for the delay here?

7 A So yes and no. So on one level it did
8 fall off my radar and I think I remember getting
9 e-mails from them usually when I was somewhere
10 else where I couldn't like be at my laptop and
11 focus on it. But another issue that came up
12 there, and I think it's noted here, like -- I'm
13 actually trying to see if it's noted here -- there
14 wasn't a way to pay for the invoice using a credit
15 card.

16 So once I made contact with Danielle, it
17 took a few days from here, but we were able to
18 settle it. And there were some -- there were some
19 sort of like -- there had to be some back and
20 forth that I had with her on making sure that we
21 were able to secure payment for it.

22 So it took some time to do once I like

1 focused on it, but --

2 Q It looks to me like it is certainly not
3 the priority given all the --

4 A It is not, but also I also --

5 MR. MITRANI: I don't think that is a
6 fair characterization, Jeff.

7 Q Go ahead. Go ahead and characterize it
8 yourself.

9 A I think for me it was a matter of like
10 finding a way that we could pay for this using the
11 congresswoman's personal credit card, and that was
12 part of the delay back and forth once I was able
13 to have like actual contact with someone on there.

14 Q What's the congresswoman's awareness of
15 the delays with respect to payment to Stylist 1
16 and Streeters for this, these services?

17 A She was not aware at the time I think.
18 She became aware after I had made payment.

19 Q Is she aware they are threatening to file
20 lawsuits?

21 A No.

22 Q She is aware, though, in the same sense

1 that she was aware that the Brother Vellies
2 payments had not been paid in the sense that this
3 hadn't been drawn down on her personal account?

4 A Correct.

5 Q Is she following up with you at all about
6 this, these issues?

7 A She would bring it up periodically, yeah.

8 Q So then what's the issue or what's the
9 challenge in getting access to her personal credit
10 card?

11 A I think she -- I think she was just let
12 me know when you're ready and I said when I have a
13 chance to settle on it, we can take care of that.

14 Q But I think you said earlier up until
15 more recently you didn't actually have access to
16 her personal card or you didn't have, physically
17 have, the card that you could make payment with.
18 Is that correct?

19 A Yes. It isn't because she withheld it
20 from me or anything like that. I had told her
21 once I focus on this I'm going to need this
22 information from you and she said okay.

1 MR. BROWN: Let's pull up Exhibit 14,
2 please.

3 (Exhibit 14 was marked.)

4 MR. BROWN: If you can give her control
5 of that, that would be great.

6 CAMPAIGN STAFFER: Thank you.

7 Q Take your time and familiarize yourself
8 with that document.

9 A Okay, thank you.

10 Q If you can make it easier and scroll all
11 the way down to that Great Bowery receipt for me.

12 A Uh-huh.

13 MR. BROWN: For the record, this is
14 Exhibit 14. We are at THAOC_1082.

15 Q This is the receipt from Great Bowery
16 that you received confirming payment for the hair
17 services that were provided to the congresswoman
18 in connection with the Gala?

19 A Yes.

20 Q So I see here that they are on an AmEx
21 that ends in [REDACTED] What card is that?

22 A I believe -- hold on; I'm looking. I

1 believe it is the card -- because one of these
2 vendors I had to use -- I had to use my authorized
3 card for. If you give me a second, I can confirm
4 that.

5 MR. MITRANI: Jeff, the [REDACTED] card is a
6 subaccount of the [REDACTED] card.

7 MR. BROWN: Right. Let me just make
8 sure. I will ask her this, but, Dave, you can
9 chime in here if you want to or need to.

10 Q The [REDACTED] card I understand is an
11 authorized user. You are an authorized user on
12 this card. And again this is the AmEx business
13 card that I pulled up previously. I can pull that
14 up again if it is helpful.

15 A Yes, yes, it is. The reason why I did it
16 under my authorized user is because it required a
17 wet signature and I wasn't around the
18 congresswoman, and in the interest of expediency I
19 just did it that way.

20 Q Okay. And consistent with our prior
21 conversation, this AmEx card is a card that the
22 congresswoman pays for out of her personal funds?

1 A Yes. When she has personal expenses, she
2 pays for it under her personal card, yes.

3 Q It is the business card but she pays for
4 these things personally?

5 A Yes.

6 MR. BROWN: Let's take this exhibit down,
7 Joshua.

8 Q Same series of questions but with respect
9 to the makeup services that the congresswoman
10 received. So it looks like September 23, shortly
11 after the Gala, The Wall Group reaches out about
12 billing information and then this doesn't get paid
13 until March 16. So same question. What's the
14 basis for the delay in payment to The Wall Group
15 for the makeup services?

16 A I think they are all under the same sort
17 of line of thinking where other things kind of
18 took precedence and I think I put all of this in
19 my head as like these are things that are still
20 sort of pending to deal with and move to deal with
21 it at the time that you see in the documents.

22 That was also a situation where there

1 was -- there needed to be a conversation had with
2 making sure that we could do payment and that
3 payments were done with the credit card and they
4 had to brief me on a separate process in order to
5 do that.

6 MR. BROWN: Joshua, can you bring up
7 Exhibit 17, please.

8 (Exhibit 17 was marked.)

9 MR. BROWN: If you could give her
10 control.

11 Q Please take some time and familiarize
12 yourself with it.

13 MR. BROWN: Just for the record, it is
14 THAOC_1741 it starts at.

15 A And I'm starting from the bottom?

16 Q Yes. This is a series of e-mails that
17 you exchanged with accounts receivable at The Wall
18 Group. I really just want to ask you about the
19 last e-mail in the string so the first e-mail of
20 the top e-mail.

21 A Okay.

22 Q But take your time and read it as you

1 would like.

2 A Yes, I'm there. Thank you.

3 Q So we are at Friday, February 25, 2022,
4 and somebody at The Wall Group, collections
5 specialist The Wall Group, says "I'm not sure if
6 Melio reached out to you but your payment has been
7 rejected. Can you please advise or reach out to
8 Melio..."

9 In the documents we received at the OCE,
10 it looks like this is sort of the last
11 communication until payment is made on I think
12 March 16. So I'm just wondering who this Melio is
13 and how things ultimately got resolved and payment
14 was made?

15 A Sure. So Melio is a third-party credit
16 card processing vendor that The Wall Group uses.
17 And the way it is set up with them, it takes
18 several days for payments to process and then a
19 few days for The Wall Group to receive
20 notification. The payment was rejected because I
21 had used a personal card and it was not set up to
22 accept personal cards. So in my conversation with

1 Nathreen we figured that out, and then I had to do
2 it what she determined was sort of the original
3 way they did it, was through just filling out a
4 credit card authorization form and it was
5 processed that way.

6 Q And so that's what is occurring between
7 the 25th here and March 16th when these credit
8 card receipts -- all right.

9 MR. BROWN: Joshua, if you can pull up
10 Exhibit 18, please.

11 (Exhibit 18 was marked.)

12 MR. BROWN: If you can give her control,
13 please.

14 Q Just let me know when you have had a
15 chance to look through that, but I think these are
16 the receipts associated with The Wall Group credit
17 card payment?

18 A Yes. Yes.

19 Q Okay. For the record, Exhibit 18,
20 THAOC_0162, we have two sets of receipts and you
21 can see here one of them is under your name, one
22 of them is under the congresswoman's name. It

1 looks like the ones under the congresswoman's name
2 say "Credit Card Sale" and the ones under your
3 name say "Credit Card Return." I'm just trying to
4 figure out what happened here.

5 A I think it was that I had used -- yeah, I
6 think I had used the wrong card. I had confused
7 my cards. And I had them return it and then
8 reissue.

9 Q And it gets reissued on this [REDACTED]
10 American Express card it looks like. Is that
11 right?

12 A Yes.

13 Q And that [REDACTED] again, just so we have it
14 all right over here, is the AmEx Business Platinum
15 Card that the congresswoman is the holder of that
16 card?

17 A Correct.

18 Q And this is the AmEx that we have talked
19 about before. It doesn't really look like a
20 personal card but you have told us that she uses
21 that card to pay for personal expenses?

22 A Correct.

1 Q Okay. Let's go to Exhibit 19.

2 (Exhibit 19 was marked.)

3 MR. BROWN: If you could give her
4 control, Joshua.

5 Q I just want to ask you about this letter
6 here on the first page, but there are some
7 attachments to that letter. Take a look at the
8 document and let me know when you're ready.

9 Maybe I should start by asking have you
10 seen that letter before?

11 A Yes.

12 Q I'm actually not going to ask you about
13 any of the exhibits. I will just ask you about
14 the letter.

15 A Okay.

16 Q You have seen this letter so I just want
17 to get your sense for, I think, Brian Svoboda says
18 here something like we are in receipt of your
19 request for an invoice and supporting
20 documentation for any goods, services or amenities
21 which Representative Alexandra Ocasio-Cortez and
22 Mr. Riley Roberts may have received from our

1 clients in regard to the September 13, 2021, Met
2 Gala for which no payment has been made yet.

3 How does that request to Brother Vellies
4 and Aurora James come about?

5 A This is one -- so Aurora James, as you
6 see here, secured counsel and someone who has an
7 understanding of -- sorry. Let me -- I'm sorry.

8 Q That's okay.

9 A I am putting it on do not disturb. Sorry
10 about that.

11 So after Aurora secured counsel, I think
12 the counsel was able to thoroughly review what was
13 supporting documentation for this and gave us a
14 more complete picture of the expenses incurred.

15 Q Do you know when the request was made of
16 Aurora and Brother Vellies roughly?

17 A When the request was made. It was made I
18 believe soon or shortly after she secured counsel.

19 Q Which, again, do you roughly know just a
20 time frame?

21 A The exact date I'm not sure.

22 Q And I want to make sure I understand this

1 correctly so interrupt me or correct me if I'm
2 getting this wrong, but when the OCE contacts the
3 congresswoman, that is in or around March 1st or
4 2nd. And then you reach out to Janna Pea and have
5 some conversations about paying the Brother
6 Vellies invoice. That happens shortly thereafter.
7 But you also said there were some conversations
8 about outstanding items that you were aware of.
9 Does this letter relate to those outstanding
10 concerns? Like how do those two things factor in
11 together?

12 A Yeah. So we knew the hotel was an
13 outstanding item and we knew that from September.
14 And we knew there was going to have to be
15 something for the car service. So at minimum we
16 knew there were outstanding items. Once counsel
17 became involved here, I think he was able to give
18 a more thorough review and have a more thorough
19 accounting from Aurora, understanding his
20 expertise is in compliance, and this is where we
21 get the fullness of it.

22 We had not discussed Mr. Roberts',

1 Riley's, items beforehand and we were not -- we
2 were not aware that the -- we were I think focused
3 on the hotel the day of, and so in getting this,
4 we saw that like the entire use of the hotel was
5 to be factored in.

6 Q Let me ask you about this. I see there
7 are two separate rooms, 1122 and 911, and I see a
8 charge for the 12th and two charges for the 13th.
9 Again, it was my understanding that the
10 congresswoman used the hotel room on the 11th. I
11 think that was Saturday. And then the 13th as
12 well. Can you help me understand why the charges
13 are two on the 13th and one on the 12th?

14 A So the 12th is where we met with Aurora
15 for the fitting. I was not aware that that was
16 going to be factored in here. So I think that's
17 why you have two separate days. But she was in
18 the room during the fitting and there was some
19 shooting like we talked about earlier.

20 On the 13th there are two separate rooms
21 here. The congresswoman stayed at Room 1122 that
22 day. And so one of the things that occurred in

1 the days leading up to the Met, the day of the Met
2 Gala itself, is that she had a -- she had a
3 hearing for a committee that she had to be online
4 for. And so Aurora gave her use of one of like
5 the rooms for that purpose so that she could have
6 some privacy there.

7 Q It looks to me, though, like Saturday,
8 the 11th of September, was the fitting. Didn't
9 the fitting occur on a Saturday?

10 A Yes, it was a Saturday.

11 Q That's why I'm confused about the charge
12 for the 12th here.

13 A Yeah, it should be the 11th.

14 Q And the other room, you said the
15 congresswoman used 1122?

16 A Yes, she used 1122.

17 Q And what do you think the charge is for
18 911? Is that where Aurora James was getting ready
19 but the congresswoman used the space? Or I'm
20 trying to get a better sense for what the specific
21 usage was here.

22 A Yeah, I'm -- I don't -- I'm not clear on

1 that.

2 Q Okay.

3 MR. BROWN: Joshua, can you go to 19-A
4 for me.

5 (Exhibit 19-A was marked.)

6 MR. BROWN: If you can give her control,
7 please.

8 Q Just take a look at that and let me know
9 when you're ready.

10 A I'm done, thank you.

11 Q I just want to make sure I understand.
12 This looks to me like the payment or receipt for
13 payments in response to the letter that Brian
14 Svoboda, counsel for Brother Vellies, and Aurora
15 James, sent to you. Is that a correct
16 understanding?

17 A Correct.

18 Q And if you can scroll down just a little
19 bit for me to the next page, this is made on an
20 AmEx ending in 1008. What kind of card is that?

21 A That is the congresswoman's personal
22 card.

1 Q And that is different than the Business
2 Platinum Card that we have been talking about --

3 A Yes.

4 Q -- previously?

5 Okay. And this is a personal AmEx?

6 A Yes. This is the card number she gave me
7 specifically for these purchases.

8 Q Okay.

9 MR. BROWN: Can you pull up Exhibit 23,
10 Joshua.

11 (Exhibit 23 was marked.)

12 MR. BROWN: If you can give her control.

13 Q I just want to confirm this is the AmEx
14 card we were just talking about. You produced a
15 copy of it to us and I believe these are the most
16 recent charges there that relate to the Met Gala?

17 A Correct.

18 Q And this ends in [REDACTED]. This is the
19 congresswoman's personal credit card that she uses
20 personal funds to pay for?

21 A Yes.

22 Q Bear with me for a second. I'm getting

1 close to wrapping up here.

2 MR. BROWN: Joshua, if you can go to
3 Exhibit 20 -- I'm sorry. Can you pull up Exhibit
4 21.

5 (Exhibit 21 was marked.)

6 MR. BROWN: If you could give her
7 control, please.

8 Q Just take your time and kind of refresh
9 your recollection with respect to this e-mail
10 string and then I want to ask you just a couple
11 brief questions about it.

12 A Sure.

13 I am ready. Thank you.

14 Q I just want to make sure I understand.
15 These are e-mails regarding reimbursement -- not
16 reimbursement -- invoicing for the congresswoman's
17 use of a ride from her home to the Carlyle on the
18 day of the Met Gala?

19 A Correct.

20 Q What prompts these communications with
21 Condé Nast?

22 A So at the time where it was booked,

1 because this was all part of the getting ready
2 feature, we were not clear that this would be
3 something that the congresswoman would have to
4 personally expense until after, after the event,
5 and so what spurred this on is a conversation with
6 counsel where they confirmed that she would have
7 to personally expense it, and that's where you see
8 the subsequent requests.

9 Q And so you have the understanding that
10 this should be paid for -- or you as a team have
11 an understanding that this should be paid for
12 right after the Met Gala? Is that what you said?

13 A No. We weren't clear on it until shortly
14 before engaging them.

15 Q Shortly before engaging counsel?

16 A No, shortly before engaging the Vogue
17 folks. So I will clarify why. So when we set out
18 that they were going to do this feature for a
19 precedent, the Vogue folks indicated what they
20 needed, because obviously the congresswoman
21 doesn't need a van, she could drive herself. And
22 so since they set staff that they wanted there and

1 what size of the vehicle, et cetera, that they
2 would need, it wasn't clear to us that that would
3 be also part of what she would have to personally
4 cover until much later.

5 Q And so I guess that's what I'm trying to
6 get at. When do you as a team understand that or
7 decide that she should reimburse for this expense?

8 A Post discovery.

9 Q So during the associated review process?

10 A Yes.

11 MR. BROWN: Can I get control of the
12 document, Joshua. Thank you.

13 Q This e-mail is Wednesday, March 16. You
14 are talking a little bit about effectively how to
15 divvy up the expense. How do you get to the 180?

16 A It was math by amount of persons in the
17 vehicle I believe divided by the total cost.

18 Q So 586 divided by 4?

19 A Uh-huh.

20 Q And that comes out to something a little
21 lower for me so I was trying to figure out if I
22 missed something there --

1 A Yeah, I mean -- yeah.

2 Q -- but, in any event, the thought process
3 is we are just trying to divide this up evenly?

4 A Correct.

5 Q Okay. In this e-mail I think at the
6 bottom you say -- never mind. Scratch that. I
7 think I have one more question about this before I
8 start wrapping things up.

9 MR. BROWN: You can take that down.

10 Q So I understand we have this personal
11 card, this personal AmEx card, that the
12 congresswoman recently used to pay for the 5,000
13 and change to Brother Vellies. And then there's
14 this separate card, this AmEx Business Platinum,
15 that is also a personal card. What's the
16 difference between the two cards? When were you
17 instructed to use a certain card versus another
18 card? Walk me through the distinction between
19 those two cards.

20 A The cards that we used for the purchases
21 that you most recently reviewed, I just -- in this
22 sense I went with the card that she gave me to use

1 specifically for this. It's not a card that I had
2 access to prior or anything like that.

3 The other card, I understood it -- the
4 way we understand it to be is that it is a card
5 that is her personal card that she will at times
6 use campaign expenses for. So we itemize those
7 out and we pay out what belongs to the campaign
8 and we leave the rest. So for us functionally,
9 that is a personal card. And to me it is just a
10 matter of her giving me a different card to use.

11 Q So you don't really have an appreciation
12 for why she would use one or the other but for
13 your purposes you understand both of those to be
14 personal cards --

15 A Right.

16 Q -- that she pays for personally? Okay.

17 A Correct. I have spoken -- in us looking
18 to like prepare for this, I think we moved to try
19 and like quickly address like anything outstanding
20 leading up to this process, understanding that
21 this is something that is important and we do take
22 seriously and that I think in some ways expediency

1 took over going over line item detail just to kind
2 of -- for us to be able to say we do want this
3 handled, we do want this settled, and that was our
4 priority.

5 Q Okay. I just have a couple I think
6 hopefully quick questions and then I will wrap
7 things up before I give you an opportunity to
8 touch on anything else you feel like we should
9 touch on.

10 I know you guys collected communications
11 from yourself, from the congresswoman, from Riley.
12 We didn't get a lot of communications, e-mail
13 communications, from the congresswoman regarding
14 the Gala. So I guess I have two questions about
15 that. You know, were her records or her e-mails
16 searched and did you play a part in that? And is
17 it does she not do a lot of communicating via
18 e-mail about something like the Gala? How does
19 she communicate about these sort of things with
20 staff?

21 A So I can say as part of our documentation
22 discovery, counsel did request personal and

1 campaign e-mails with the specific search terms,
2 and that included her e-mail. From what you see
3 here -- and this is the picture presented -- this
4 was all handled mostly under -- my
5 correspondence -- Lauren Hitt, who is our comms
6 director, handled the press pieces of this and the
7 congresswoman did not engage through e-mail
8 anything related here. I think for us this was
9 something that like the bulk of it actually didn't
10 have directly to do with her in terms of
11 preparation and compliance. When I say didn't
12 have to do with her, meaning we were trying to
13 figure out what it was, and then the pieces that
14 were hers were determined to be hers and we didn't
15 do those through e-mail, those were conversations
16 with her.

17 Q Yeah, that is consistent with the
18 documents that I saw, but I did want to verify
19 that you're primarily having in-person or virtual
20 communications with her about these things. Okay.

21 We have touched on a lot of stuff today.
22 Is there anything that we didn't touch on that you

1 feel we should touch on in light of some of the
2 questions I have asked? Is there anything you
3 feel I didn't give you an opportunity to share?

4 A No. I think the only thing for me that I
5 think is important to clarify, and I think this
6 has to do with the delay in some of the invoice
7 payments, is that this was always something that
8 was understood, you know, at the time even and I
9 believe to some there is correspondence indicating
10 that it was clear that these were expenses that
11 the congresswoman had to personally incur and that
12 we were always under that understanding that that
13 would be honored, and I think that's important to
14 say.

15 MR. BROWN: Well, unless, Dave, you have
16 anything or, Omar, you have anything, I think we
17 can go off. I think I will just thank you --
18 Omar, did you have anything?

19 MR. ASHMAWY: No, I don't. Thank you
20 very much for your time. I appreciate it.

21 MR. BROWN: I will also just echo that.
22 Thank you for your time and I will say we can go

1 off the record.

2 (Off the record at 12:53 p.m.)

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