

EXHIBIT 6

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

Transcript of Interview of Staffer Three

Review No. 23-7239

July 19, 2023

1 OFFICE OF CONGRESSIONAL ETHICS
2 OF THE U.S. HOUSE OF REPRESENTATIVES

3 OCE REVIEW NO. 23-7239
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10 Interview of STAFFER 3
11 Conducted Virtually Via Zoom
12 Wednesday, July 19, 2023
13 2:03 p.m. EST
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18 Job No.: 500305

19 Pages 1 - 106

20 Reported by: Vicki L. Forman
21
22

1 Interview of STAFFER 3, conducted
2 virtually via Zoom.

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9 Pursuant to agreement, before Vicki L.

10 Forman, Court Reporter and Notary Public in and

11 for the State of Maryland.

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1 A P P E A R A N C E S

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19

20 ALSO PRESENT: Peter Tilly, Support Analyst

21 Nicole Lytle, Paralegal

22 Maddie Reif, PD Technician

Transcript of Interview of Staffer 3
Conducted on July 19, 2023

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P R O C E E D I N G S

STAFFER 3

was examined and testified as follows:

EXAMINATION BY COUNSEL FOR THE OCE

BY MS. CRUMP:

Q Good afternoon, Staffer 3.

A Good afternoon.

Q My name is Kristina Crump. I'm counsel with the Office of Congressional Ethics and joined by me today are Peter Tilly and Indhira Benitez, both from my office. Today we are undertaking a remote video interview of Staffer 3. Today's date is July 19, 2023 and the time is 2:04 p.m.

I would like to note the witness has been provided the False Statements Act acknowledgment form and that she has signed that acknowledgment form and returned it to our office.

With that out of the way, Staffer 3, I would like to ask you some questions. First being between February 2022 and March 2022 what was your role in Representative Cherfilus-McCormick's office?

1 A February 2022 is when I came on board in
2 the office and I came on board as the Digital
3 Director.

4 Q And did you remain in that role while
5 working for the Congresswoman's office?

6 A No, I did not. I don't remember exactly
7 when. Maybe a couple of months down the line I
8 absorbed the role Press Secretary in addition to
9 Digital Director.

10 Q And then has your role shifted since then
11 or are you still Digital Director and Press
12 Secretary?

13 A No, since then I became the Communications
14 Director. I became the Communications Director
15 and now the office has a Press Secretary.

16 Q Who is the Press Secretary for the office?

17 A His name is Jonathan Levin.

18 Q And you are the Congresswoman's
19 Communications Director for her official office
20 currently?

21 A Yes.

22 Q And did you assume that role around March

1 of 2023?

2 A I believe so, yes.

3 Q Going back to the beginning when you
4 started as her Digital Director, how did you begin
5 working for the Congresswoman's office?

6 A So the Congresswoman, she asked me if I
7 could come on board to help in the congressional
8 office to be her Digital Director so through the
9 Congresswoman.

10 Q How did you know the Congresswoman prior
11 to going to work for her in her official office?

12 A I worked as a contractor for her campaign.

13 Q I know that the Congresswoman ran for
14 office multiple times so could you flag for me
15 which campaigns of the Congresswoman's you worked
16 on as a contractor?

17 A Yes, so it was the special election which
18 I believe I came on board around July or August of
19 2021.

20 Q And where are you based? In D.C.?

21 A I'm based in the West Palm Beach office.

22 Q And were you based in West Palm Beach when

1 you worked on the campaign in 2021, the beginning
2 of 2022?

3 A Well, what do you mean "based"?

4 Q So it sounds like when working for the
5 Congresswoman's official office you worked from
6 the West Palm Beach district office, is that
7 correct?

8 A Correct.

9 Q When you worked for the Congresswoman's
10 congressional campaign where were you based?

11 A Well, I was a contractor but I lived in
12 West Palm Beach.

13 Q And were you working doing work -- were
14 you doing your contracted work for the campaign
15 from home or were you doing your contracted work
16 from a campaign office?

17 A No, it's remotely so from home, yeah.

18 Q Got it, okay. In the Congresswoman's
19 official office who do you report to currently?

20 A Currently I report to Staffer One who is
21 our Chief of Staff.

22 Q And have you always reported to

1 Staffer One?

2 A As long as she's been the Chief of Staff,
3 yes.

4 Q Prior to Staffer One who did you report to
5 in the Congresswoman's official office?

6 A Prior to that I reported to Staffer Four
7 who was the former Chief of Staff.

8 Q So fair to say that when you've been
9 working for the Congresswoman's official office
10 you've been reporting to her Chief of Staff?

11 A Yes.

12 Q I guess I should start at the beginning.

13 When you came on as Digital Director what
14 were your primary responsibilities in that role?

15 A Primarily it was social media, copy, also
16 e-mails, updating the website and I believe it
17 also included organizing town halls.

18 Q And then when you absorbed the role of
19 Press Secretary did you gain any additional
20 responsibilities?

21 A Yes.

22 Q What were those?

1 A Managing press relationships, writing
2 press releases, speeches.

3 Q And now I take it do you not do that work
4 anymore and that's been absorbed by the new Press
5 Secretary?

6 A For the most part, yes.

7 Q And then now as the Communications
8 Director what do your primary responsibilities
9 entail?

10 A In the Communications Director role it's
11 primarily planning and strategy and overseeing the
12 Press Secretary, the digital pieces.

13 Q Is that planning and strategy for
14 communications or more broadly than that?

15 A No, just communications.

16 Q During your time working for the
17 Congresswoman's official office have you been
18 responsible for official communications like
19 franked mail or franked videos?

20 A Yes.

21 Q When were you responsible for franked
22 communications?

1 A Well, responsible meaning the task in the
2 approval process?

3 Q I guess I can be more specific.

4 Have you ever been responsible for
5 creating franked mailers or franked videos while
6 working for the Congresswoman?

7 A Yes.

8 Q And when were you responsible for creating
9 those franked communications for the
10 Congresswoman's office?

11 A More so as the -- once I became the Press
12 Secretary,

13 Q Do you remember roughly when that was?

14 A No, I don't.

15 Q We'll probably revisit it and maybe we'll
16 refresh your recollection then.

17 Have you ever worked -- so other than the
18 special election that we discussed, have you
19 worked for the Congresswoman's campaign since you
20 went to work for her official office?

21 A I didn't work for the campaign but I
22 volunteered.

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1 Q When did you volunteer for the campaign
2 after joining the Congresswoman's official office?

3 A I don't remember the date exactly but it
4 was the election following the special election.

5 Q Was that a full-time or part-time
6 volunteer role?

7 A Part-time for sure. I mean there -- I
8 would say part-time I guess.

9 Q And so you were doing this part-time
10 volunteering while you were working for the
11 members of the official office?

12 A Correct.

13 Q And again, you were based from your home
14 in West Palm Beach when you were doing this
15 volunteering; is that right?

16 A Correct, yes.

17 Q And were you paid for your volunteer work
18 on the campaign?

19 A No.

20 Q You have worked on various mailers and
21 content for the Congresswoman's campaign, correct?

22 A For the -- I'm sorry, say again.

1 Q For the Congresswoman's campaigns?

2 A Yes.

3 Q Have you ever been -- I should rephrase.
4 You were a contractor for her campaign
5 during the special election, correct?

6 A Correct.

7 Q And you were paid for that contracted
8 work, correct?

9 A Correct.

10 Q And then you volunteered later when she
11 ran for reelection after she assumed office,
12 correct?

13 A Yes, correct.

14 Q And how did the nature of your work change
15 from when you were a contractor to when you were a
16 volunteer?

17 A Well, the time.

18 Q You spent less time volunteering than you
19 had as a contractor?

20 A Yes.

21 Q And when you were a contractor for the
22 campaign were you a contractor through your

1 company Company Two?

2 A Yes.

3 MS. CRUMP: I would like to go ahead and
4 pull up tab one.

5 (Interview Exhibit 1 was marked for
6 identification and attached to the transcript.)

7 BY MS. CRUMP:

8 Q This is a two page document. I'll give
9 you a chance to review it before we start talking
10 about it. I'll start up here at the top and when
11 you're ready just let me know and I will scroll
12 down,

13 A Okay.

14 MS. FINK: Can you zoom in a little bit,
15 please?

16 MS. CRUMP: Sure.

17 MS. FINK: Thank you.

18 MS. CRUMP: Is that better?

19 MS. FINK: Yes. Is this the bottom of the
20 chain?

21 MS. CRUMP: No, I'm going to scroll down
22 but just let me know when you're ready for me to

1 do so.

2 MS. FINK: Can we start at the bottom up?
3 That's how this one reads I think.

4 MS. CRUMP: Sure.

5 MS. FINK: Thank you.

6 THE WITNESS: Okay, you can scroll up.

7 MS. CRUMP: Are you ready, counsel?

8 MS. FINK: Yes, thank you.

9 (Pause in the proceedings.)

10 THE WITNESS: Okay.

11 BY MS. CRUMP:

12 Q Do you see that this is an e-mail chain
13 from July 21, 2022?

14 A Yes.

15 Q And the people involved changes as the
16 e-mail is distributed but you can see that at one
17 point there was a message that was sent from the
18 Congresswoman Sheila Cherfilus-McCormick to Mark
19 Goodrich and you, do you see that?

20 A Yes.

21 Q And that's a communication dated July 21,
22 2022 at 8:41 a.m.

1 We're on the same page?

2 A Yes.

3 Q Do you recall this truth mailer being a
4 campaign mailer?

5 MS. FINK: Is it possible to see the
6 attachments to view the mailer?

7 MS. CRUMP: I do not have them up at the
8 moment but if we need to take a break later I'm
9 happy to get it and provide it.

10 BY MS. CRUMP:

11 Q Just based on the naming convention of
12 itself do you recall a campaign mailer that was
13 called the truth ad or truth mailer?

14 A Vaguely, yes, I do. I don't remember. It
15 would be great to see it.

16 Q But you remember -- whether or not that's
17 what's attached here we can address later but you
18 do recall that there was a truth campaign mailer
19 that was dealt with during the 2022 reelection
20 campaign, right?

21 A Yes, I believe so.

22 Q Do you see that Sheila Cherfilus-McCormick

1 in her e-mail to you and Mark Goodrich says "Mark,
2 please send this out in the mail immediately.
3 Thank you so much" and then there's some emojis
4 under that? Do you see that?

5 A Yes.

6 Q Why was the Congresswoman e-mailing Mark
7 Goodrich and telling him to put this in the mail
8 immediately, do you know?

9 A No.

10 Q Was Mark Goodrich the campaign manager of
11 the campaign?

12 A Of 2022?

13 Q We can start there, sure.

14 Was Mark Goodrich the manager of the 2022
15 reelection campaign?

16 A I believe he was the lead, yes.

17 Q Do you know if Mark Goodrich was the
18 campaign manager of the 2022 special election
19 campaign?

20 A I believe, yes, he was a lead.

21 Q Was there anybody on the campaign who had
22 more oversight of campaign operations than he did?

1 A I wouldn't know that.

2 Q You worked with him and collaborated with
3 him frequently in both campaigns, correct?

4 A What do you mean "collaborated" or "worked
5 with"?

6 Q You produced a number of e-mails and text
7 messages with Mark Goodrich in this case, correct?

8 A Correct.

9 Q And those e-mails and text messages often
10 discuss edits, changes, suggestions to
11 communications for the campaign, correct?

12 A Correct.

13 Q And so you were working with him on
14 campaign communications during both campaigns,
15 correct?

16 A Correct.

17 Q And is it your understanding that the
18 congresswoman was aware of Mr. Goodrich's role in
19 campaign communications?

20 A Yes.

21 Q Is it your understanding that during the
22 campaigns Mr. Goodrich oversaw mailers,

1 advertisements and other campaign communications?

2 A In which campaign?

3 Q We can start with the first campaign, the
4 special election.

5 A I wouldn't be sure. I don't know if he --
6 well, in the way that you worded it.

7 Q Was there anybody else from the campaign
8 who gave you directions on edits to changes, to
9 suggestions for campaign communications?

10 A Yes, for sure.

11 Q Who were those people?

12 A It was Staffer One. During the special
13 election she was the communications lead so that's
14 who I worked with.

15 Q And then during the 2022 campaign for
16 reelection who else provided you direction on
17 campaign communications when you were a volunteer?

18 A That was more Mark.

19 Q And to be clear you did receive
20 directions, edits, comments on campaign
21 communications when you were working as a
22 contractor for the campaign for the special

1 election, correct?

2 A Yes.

3 Q From Mark Goodrich?

4 A Correct.

5 Q During July of 2022 that would have been
6 during the campaign for reelection, correct?

7 A Yes.

8 Q And we can take this document down but
9 there were various documents showing e-mails being
10 sent on weekdays at 4:00 p.m., 1:18 a.m.,
11 11:36 a.m.

12 What dictated when you would work on the
13 campaign during that time frame versus when you
14 were volunteering?

15 A So for the most part it would be in the
16 evenings or early in the mornings before I would
17 start my day and --

18 Q Go ahead.

19 A I was going to say did you have another
20 question.

21 Q Not if you haven't finished your thought,
22 Staffer 3.

1 A Yeah, in the evenings, more so in the
2 mornings and then if there was like an e-mail I
3 would just shoot out an e-mail.

4 Q To the best of your recollection about how
5 much were you paid for your contract work during
6 the special election campaign?

7 A I don't recall off the top of my head. In
8 total?

9 Q In total.

10 A I'm not sure.

11 Q I'll represent to you that when we
12 searched your name on the campaign website it
13 seemed as though you may have been paid about
14 \$10,500 and obviously I know that you don't
15 remember exactly how much you were paid but does
16 that seem ballpark accurate to how much you would
17 have earned while contracting for the campaign?

18 A I don't remember the number of months
19 exactly but seems like that's a little low.

20 Q Did anybody other than the campaign pay
21 you for the contracted work that you did that
22 we've been discussing?

1 A Not to my knowledge.

2 Q And you already stated that you weren't
3 paid for the work that you did as a volunteer in
4 the reelection campaign, correct?

5 A No, I was not.

6 Q Was your compensation from the member's
7 official office changed or altered during the
8 time that you volunteered for her reelection
9 campaign?

10 A What do you mean "changed or altered"?

11 Q Did you receive, for example, a pay
12 decrease while you were working on the campaign as
13 a volunteer?

14 A A decrease?

15 Q Correct.

16 A No.

17 Q So when you worked on the campaign about
18 how often would you say you were -- I'm sorry, I
19 should be more specific.

20 When you worked on the campaign as a
21 contractor in the special election about how often
22 were you in touch with Mark Goodrich?

1 A I wouldn't -- I wouldn't recall exactly.

2 Q Would it be fair to say that you worked
3 with him on a regular basis as a contractor for
4 the campaign?

5 A That would be fair.

6 Q Do you know how Mr. Goodrich was paid for
7 his work on the campaign?

8 A No.

9 Q Do you know if he ever received
10 compensation from the campaign?

11 A No, I wouldn't know that.

12 Q Do you know if he ever received
13 compensation from the Congresswoman?

14 A No, I wouldn't know that.

15 Q I take it that you don't have any
16 knowledge of how or if Mark Goodrich was paid for
17 his work on the campaign, fair?

18 A Fair.

19 Q Have you ever heard of Leadership in
20 Action?

21 A No.

22 Q Have you ever heard of SCM Consulting

1 Group, LLC?

2 A No.

3 Q Who else from the Congresswoman's official
4 office worked or volunteered on the campaign for
5 reelection in 2022?

6 A Worked or volunteered?

7 Q Yes, ma'am.

8 A I don't know. To the best of my knowledge
9 I know that Staffer Two and Nadege.

10 Q Nadege LeBlanc?

11 A Yes.

12 Q Was there anybody else from the
13 Congresswoman's official office or offices who
14 worked or volunteered on her reelection campaign
15 in 2022?

16 A I wouldn't be --

17 MS. FINK: This is limited of course,
18 right, to does she know of anybody who has worked?

19 MS. CRUMP: Of course, yeah.

20 A Okay.

21 MS. CRUMP: Thank you.

22

1 BY MS. CRUMP:

2 Q Was there an expectation from the
3 Congresswoman's office that you would volunteer on
4 the campaign for free?

5 A Not that I'm aware of. When you say
6 "expectation" --

7 Q Were you asked to volunteer for the
8 campaign or were you told to volunteer for the
9 campaign?

10 A No, I volunteered on my own.

11 Q And there wasn't any persuading that
12 needed to be done for you to do this in your free
13 time without compensation?

14 A No.

15 Q Do you recall when you first started
16 working with Mark Goodrich on the campaign?

17 A That would have been the special election.

18 Q Do you know of a person named Maria
19 Garcia?

20 A No.

21 Q Do you know of a Samantha Feldman?

22 A No.

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1 Q Hector Roos?

2 A No.

3 Q John Masseria?

4 A No.

5 Q Maritza Masseria?

6 A Her name is familiar.

7 MS. CRUMP: Can we pull up tab five,
8 please?

9 (Interview Exhibit 2 was marked for
10 identification and attached to the transcript.)

11 BY MS. CRUMP:

12 Q This is a one page document Bates labeled
13 ■ 104.

14 Do you see that on your screen?

15 A Yes.

16 Q And do you see that it is an e-mail that
17 you produced to us in this matter?

18 A Yes.

19 Q And do you see that it's an e-mail from
20 Maritza Masseria to you at your Company Two
21 e-mail address, correct?

22 A Correct.

1 Q And it's sent to you in June of 2022,
2 correct, during the campaign for reelection?

3 A That was the same time, correct.

4 Q Seeing Ms. Masseria's e-mail address does
5 that refresh your recollection of who she was or
6 what role she had in the campaign?

7 A I don't know her role but her name, yeah.

8 Q You don't know what role she had with the
9 Congresswoman's campaigns?

10 A Not specifically, no.

11 MS. CRUMP: We can go ahead and take this
12 document down.

13 BY MS. CRUMP:

14 Q Did Mr. Mark Goodrich have a specialty
15 with respect to communications that other folks on
16 the campaigns team did not have?

17 A What do you mean?

18 MS. CRUMP: Why don't we pull up tab six,
19 please.

20 (Interview Exhibit 3 was marked for
21 identification and attached to the transcript.)

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1 BY MS. CRUMP:

2 Q Staffer 3, on the screen I have some text
3 messages that you produced in this matter between
4 you and Mark Goodrich. I'm going to scroll down
5 to the specific one I would like to talk about.
6 I'm trying to get a date.

7 Do you see the conversation -- I
8 apologize, this is not a text between strictly you
9 and Mark Goodrich. This appears to be a text
10 thread between you, Mark Goodrich and
11 Congresswoman Cherfilus-McCormick, correct?

12 A Correct.

13 Q And this was a conversation that looks
14 like it started on May 11, 2022 at 4:34 p.m., do
15 you see that?

16 A Yes.

17 Q And Representative Cherfilus-McCormick
18 starts off by saying "Hello, I have been thinking
19 about our messaging. How do we get people to
20 empathize with democrats?"

21 Do you see that initial message?

22 A Yes.

1 Q And you can continue to read this if you
2 would like. I can leave this up on the screen
3 until you review.

4 A Thank you. That helps.

5 MS. FINK: Is the starting Bates number
6 370? I just can't see.

7 MS. CRUMP: Yes, it is.

8 MS. FINK: Thank you.

9 MS. CRUMP: No problem.

10 A Okay, you can scroll up.

11 MS. CRUMP: I'm going to scroll down to
12 the next series of texts.

13 BY MS. CRUMP:

14 Q Do you see here that the representative
15 says "My opponent worked with Republicans after he
16 lost the congressional primary in promoting voter
17 fraud rhetoric and even ushered in hate groups
18 such as the Proud Boys into our district."

19 A Yes.

20 Q And then it appears that Mark responds and
21 says Staffer 3, you can disregard the last text
22 LOL," do you see that?

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1 A Yes.

2 Q And then it appears that you respond and
3 you say "I think we have to shed light on what
4 he's done LOL. I'll leave that to the pros
5 (Mark)."

6 Do you see that message?

7 A Yes.

8 Q Can you explain to me what you're
9 referring to here, what Mark was a pro at?

10 A I don't remember exactly the conversation
11 but in the context of the text it looks like
12 messaging.

13 Q And so you think that you may have been
14 meaning that Mark was a pro at messaging?

15 A Correct.

16 Q And as opposed to other folks on the team
17 like yourself?

18 A Correct.

19 Q I guess I'm just trying to get at what
20 Mark was a pro at versus the other folks were
21 worked in the congresswoman's department for the
22 campaign.

1 A Well, he was experienced or according to
2 him he was experienced.

3 Q But he was not the only experienced member
4 of the campaign staff, correct?

5 A I'm not sure. I wouldn't know.

6 Q Well, you have experience in media
7 messaging, correct?

8 A Yes, I do but this is a new field for me
9 so not in the context of this.

10 Q And you said "I think we have to shed
11 light on what he's done lol. I'll leave that to
12 the pros" and so the idea was that shedding light
13 on this issue was going to be a messaging issue
14 and that's something that Mark Goodrich was good
15 at? Am I understanding that right?

16 A Correct.

17 MS. CRUMP: We can go ahead and take this
18 down.

19 BY MS. CRUMP:

20 Q I would like to move on and ask you some
21 questions about some videos and to make sure that
22 we're on the same page, I want to note that I'm

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1 referring to three franked television ads for the
2 Congresswoman's office sometimes referred to them
3 I believe as PSAs that the House Communications
4 Standards Commission approved for franking in
5 early June of 2022.

6 Do you know the videos that I'm referring
7 to?

8 A Yes.

9 Q From this point on I'm going to try to
10 remember to refer to them as the franked videos,
11 okay?

12 A Okay.

13 Q Who came up with the idea to make franked
14 videos?

15 A I don't remember.

16 Q Was it someone from the Congresswoman's
17 official staff or was it someone from the
18 Congresswoman's campaign?

19 A I don't remember.

20 Q In early June of 2022 you would have been
21 the Congresswoman's Press Secretary and Digital
22 Director, correct?

1 A Yes.

2 Q Who drafted the script for the franked
3 videos?

4 A I don't remember that.

5 MS. CRUMP: Can we pull up tab seven,
6 please?

7 (Interview Exhibit 4 was marked for
8 identification and attached to the transcript.)

9 BY MS. CRUMP:

10 Q This is a two page document that you
11 produced. There's not much on the second page
12 but on the second page there appears to be your
13 e-mail handle sign off [REDACTED] and then
14 an attachment called TV PSA Scripts Revised and
15 then this is the first page that I'll let you
16 review.

17 (Pause in the proceedings.)

18 A Okay.

19 Q Do you see on this first page there's an
20 e-mail from you to Mark Goodrich dated Wednesday,
21 March 9th at 11:52 p.m. with the subject line PSA
22 Revised?

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1 A Yes.

2 Q And you noted that you added a disclaimer
3 to the end of each script and you also noted other
4 requested changes that were added, correct?

5 A Correct.

6 Q Why would you have been sending this to
7 Mark Goodrich?

8 A It had to have been for a project.

9 Q A project such as the drafting of the
10 script for the franked videos?

11 A No, probably something with like
12 production, however, I don't know if it was the
13 franked videos that you're describing or we're
14 talking about now or another PSA idea or concept.

15 Q Did the Congresswoman's office create any
16 PSAs that were not franked?

17 A I don't know if we would say created or
18 got to the created state but there were like
19 concepts of other ones.

20 Q And did those concepts get to the script
21 writing phase?

22 A I don't remember.

1 Q So you send this TV PSA Scripts Revised
2 document to Mark Goodrich on Wednesday, March 9,
3 2022.

4 Would that line up with when the scripts
5 were being drafted for the franked videos?

6 A Possibly.

7 Q You say that you added requested changes
8 to the script.

9 Who requested those changes?

10 A I don't remember.

11 Q Why would you send the addition of
12 requested changes to Mark Goodrich if he did not
13 request them?

14 A I would have sent them if he was working
15 on production for the project.

16 Q What do you mean by "production"?

17 A If it were like editing or the video, any
18 of that type of production.

19 Q So to clarify, Mark Goodrich would have
20 been involved in the production of the franked
21 videos, correct?

22 A Correct, but I don't remember if that was

1 this instance.

2 Q But generally from your own experience and
3 knowledge Mark Goodrich was involved in the
4 production of the franked videos?

5 A Correct, yes.

6 Q Sorry, I just wanted to make sure we got
7 that clear.

8 A Yes.

9 MS. CRUMP: Let's pull up tab eight.

10 (Interview Exhibit 5 was marked for
11 identification and attached to the transcript.)

12 BY MS. CRUMP:

13 Q This is a series of texts with Mark
14 Goodrich and Sheila Cherfilus-McCormick and the
15 specific one I want to talk about is at the very
16 end. Well, not the very end but on the fourth
17 page, Bates ■ 365.

18 Do you see a message from Mark Goodrich on
19 Tuesday, March 14th at 11:11 a.m.?

20 A Yes.

21 Q Why don't you take a second to review
22 those messages. I apologize, I want to make sure

1 I'm flagging the right message as well. If you
2 look above the text message that I identified
3 there's one that you sent to Mark Goodrich on
4 Tuesday, March 14th at 9:17 a.m.

5 A Yes.

6 Q So on Tuesday, March 14th at 9:17 a.m. you
7 text Mark Goodrich and say "Good morning Mark, let
8 me know if you're free to connect today after 12
9 for a quick planning call on upcoming PSA
10 production" and then there's an emoji.

11 Do you see that?

12 A Yes, I do.

13 Q Is the PSA production that you reference
14 in this text message the franked videos?

15 A I believe it was in reference to the
16 videos.

17 Q And you connected with Mark Goodrich to
18 coordinate planning on PSA or franked video
19 production; is that right?

20 A I'm sorry, say it again.

21 Q Sure. You were trying to connect with
22 Mark Goodrich to coordinate planning on the

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1 franked videos; is that right?

2 A On the production.

3 Q The production of the franked videos,
4 correct?

5 A Correct.

6 MS. FINK: Ms. Crump, do you know what
7 year this text is from, if it's 2022 or 2023?

8 MS. CRUMP: 2022.

9 MS. FINK: Thank you.

10 MS. CRUMP: No problem.

11 MS. FINK: Well, or would it have been --

12 MS. CRUMP: I think it's 2022 but also
13 they're not my messages so I can't say.

14 BY MS. CRUMP:

15 Q But I guess fair to clarify have you
16 worked on any PSAs with Mark Goodrich in 2023?

17 A No.

18 Q So based on the context of this message
19 you would assume that this was from 2022?

20 MS. FINK: I don't think it's fair for her
21 to assume. I don't think we know. I mean based
22 on the document it looks like -- if the one above

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1 it was July 2022 and then this is March 14th,
2 based on the document it looks like March 2023. I
3 just don't want Staffer 3 to, I guess, assume one
4 way or another if we can't tell based on the
5 document.

6 BY MS. CRUMP:

7 Q Sure, but from my context you did not
8 have -- you did not coordinate any PSAs with Mark
9 Goodrich in 2023?

10 A Not that I recall, no.

11 Q Was Mark Goodrich -- you noted that he
12 was involved in the production of the franked
13 videos.

14 Does production include filming?

15 A Yes.

16 Q Does it include recording audio?

17 A It could, yes.

18 Q Does it include editing of video and
19 audio?

20 A Yes.

21 MS. CRUMP: We can remove this document
22 from the screen.

1 BY MS. CRUMP:

2 Q Did Mark Goodrich tell you to send the
3 franked videos to the Franking Commission for
4 approval?

5 A I don't remember.

6 Q To clarify, when I say the Franking
7 Commission I'm referring to the House
8 Communications Standards Commission.

9 You said you don't recall whether he told
10 you to send the franked videos to the Commission
11 for approval?

12 A I mean he could have but I don't recall.

13 MS. CRUMP: Can we pull up tab 11, please?

14 (Interview Exhibit 6 was marked for
15 identification and attached to the transcript.)

16 BY MS. CRUMP:

17 Q This is a two page document. I can start
18 at the bottom and then scroll up when you're
19 ready, okay?

20 A Okay.

21 (Pause in the proceedings.)

22 Okay, you can scroll. Okay.

1 MS. FINK: Do you mind just reading out
2 what the Bates number is or scrolling to it?

3 MS. CRUMP: Sorry about that. My Zoom cut
4 out.

5 MS. FINK: Can we get back to the Bates
6 number on that? Thank you.

7 BY MS. CRUMP:

8 Q Staffer 3, you looked at the second page
9 and we scrolled up to the first page.

10 Have you had an opportunity to review this
11 document?

12 A Yes, I have.

13 Q Do you see it's an e-mail chain where you
14 reply to Mark Goodrich on June 6, 2022 and you
15 write "All approved!" and then there's an emoji?
16 Do you see that?

17 A Yes.

18 Q What was approved that you were telling
19 Mark Goodrich about?

20 A The franked PSAs.

21 Q He provided you with the video and you
22 submitted it to the Franking Commission; is that

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1 correct?

2 A Correct, he did the production and
3 provided me with the file.

4 Q And then you kept him in the loop on the
5 franking approval process, correct?

6 A Define in the loop.

7 Q You notified him once the franked videos
8 were approved by the Committee, correct?

9 A Yes.

10 MS. CRUMP: Can we pull up tab ten,
11 please?

12 (Interview Exhibit 7 was marked for
13 identification and attached to the transcript.)

14 BY MS. CRUMP:

15 Q We'll scroll again. I'm starting on the
16 page Bates labeled [REDACTED] 381 and it continues on to
17 [REDACTED] 382.

18 A Okay.

19 Q This appears to be a text conversation
20 between you, Mark Goodrich and Sheila
21 Cherfilus-McCormick; is that right?

22 A Yes.

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1 Q And scrolling for some indication of when
2 this conversation occurred, it looks like this
3 conversation occurred around May 31, 2022.

4 Does that appear correct to you?

5 A Well, the date is there.

6 Q So scrolling to the part of the
7 conversation I wanted to ask about, do you see how
8 on page 381 Mark Goodrich says "I need this
9 approved now so it can go to franking and then I
10 can move on to the next"?

11 A Yes.

12 Q Is it fair to say that Congresswoman
13 Cherfilus-McCormick was aware that Mark Goodrich
14 was working on the production of the franked
15 videos?

16 A Yes.

17 Q Fair to say that she was aware that he was
18 keeping tabs on the franking approval process as
19 well?

20 MS. FINK: I'm not sure -- I just don't
21 want Staffer 3 to go too far down the line of
22 saying what somebody else is aware of. I

1 understand based on this text there's indications
2 but beyond that she can't say what others are
3 aware of.

4 BY MS. CRUMP:

5 Q Well, in this conversation on page 382
6 Mark Goodrich says in this text communication with
7 you and the Congresswoman -- there's a message
8 that says "I need you to finalize the TV spot with
9 the changes you asked for this weekend. It must
10 go to franking ASAP," do you see that?

11 A Yes, I do.

12 Q And the Congresswoman was an active
13 participant in this text thread based on this
14 document that you produced, correct?

15 A Correct.

16 MS. CRUMP: We can take this down.

17 BY MS. CRUMP:

18 Q In addition to working on the production
19 and some franking things that we talked about, did
20 Mark Goodrich reach out to various television
21 stations about airing the franked videos?

22 A I'm not sure.

1 Q Do you know if he obtained W-9s from
2 various television stations to get them set up to
3 be paid with MRA funds?

4 A Repeat the question.

5 Q Sure. Do you know if Mark Goodrich
6 obtained W-9s from various TV stations to get them
7 set up to be paid with MRA funds?

8 A Yes.

9 Q So fair to say that Mark Goodrich was
10 involved in getting the billing set up for the
11 franked videos with respect to the TV stations,
12 correct?

13 A I wouldn't word it that way.

14 MS. CRUMP: Can we pull up tab 12, please?

15 (Interview Exhibit 8 was marked for
16 identification and attached to the transcript.)

17 BY MS. CRUMP:

18 Q This is a longer text thread but the part
19 that I would like to ask you about is primarily
20 this first page but if you would like to review
21 the whole document just let me know and I'm happy
22 to scroll for you, okay?

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1 A Yes.

2 Q Do you see that on --

3 A I'm sorry, I meant can I see the full
4 page?

5 Q Sure. I'll scroll down to the very bottom
6 and you tell me when to stop, okay?

7 A Okay. You can keep going.

8 (Pause in the proceedings.)

9 Q We're back at the top page and do you see
10 a message from you to Mark Goodrich on June 7,
11 2022?

12 A Yes.

13 Q And do you see where you told him "Please
14 update name and address fields to reflect the
15 office" and you identify stations to be updated
16 and stations for which it's already been
17 submitted?

18 A Yes.

19 Q And do you see where you write "Next
20 steps: Please have all vendors submit W-9 to be
21 set up in system ASAP"?

22 A Yes.

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1 Q What was the W-9 needed for for the TV
2 stations?

3 A Well, it's not for the TV stations.

4 Q What is it for?

5 A It's for Kelly.

6 Q So the W-9s that you're referring to are
7 W-9s provided by TV stations, correct?

8 A Meaning the TV -- yes.

9 Q And then the W-9s were to be provided to
10 Kelly; is that right?

11 A Correct.

12 Q And who is Kelly?

13 A Kelly is our finance person in the
14 congressional office.

15 Q And why did Kelly need W-9s completed by
16 these TV stations?

17 A I don't know. That's just the process.

18 Q It says that vendors needed to submit W-9s
19 to be set up in the system, do you see that?

20 A Yes.

21 Q Are you referring to the billing system?

22 A Correct, yes.

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1 Q So the W-9s were needed in order to get
2 the TV stations paid; is that right?

3 A Kelly's process is to have a W-9 for the
4 invoice or vendor.

5 Q And she handles the payments to the
6 vendors, correct?

7 A I believe so.

8 Q So Mark Goodrich was obtaining vendor W-9s
9 to be provided to Kelly in your official office,
10 correct?

11 A Correct.

12 Q Was Mr. Goodrich primarily the point of
13 contact with the TV stations about the franked
14 videos?

15 A Yes.

16 Q Did you ever correspond with any of the TV
17 stations about the franked videos before they
18 aired?

19 A I'm not sure.

20 Q Do you recall having any conversations
21 with any TV stations that aired the franked
22 videos?

1 A I believe -- I'm not sure.

2 Q And as we talked about before, the
3 Congresswoman to your knowledge was aware of
4 Mr. Goodrich's work on the franked videos,
5 correct?

6 A To my knowledge she was aware about the
7 production of the videos.

8 Q I want to shift gears just a little bit.

9 MS. FINK: Would now be a good time for a
10 break?

11 MS. CRUMP: Of course. Let's go off the
12 record.

13 (A brief recess was taken.)

14 MS. CRUMP: Back on the record.

15 BY MS. CRUMP:

16 Q Staffer 3, I would like to call your
17 attention to a document I would like to pull up.
18 It's tab 14.

19 (Interview Exhibit 9 was marked for
20 identification and attached to the transcript.)

21 BY MS. CRUMP:

22 Q This is a five page document so I'll go

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1 ahead -- would you like me to start at the bottom
2 and scroll up?

3 A Yes, please.

4 Q It looks like the e-mail that starts at
5 the bottom is a little cut off so I'll start at
6 the top of that bottom e-mail and then can scroll
7 when you need me to, okay?

8 A Okay. Okay, can you scroll up?

9 (Pause in the proceedings.)

10 Q Would you like me to continue to scroll
11 up?

12 A Yes. Okay.

13 Q I would like to start at the bottom on
14 Bates 23-7239-000089. There's a start of an e-
15 mail from Jacob Rubashkin to Staffer Four and
16 you with the subject line Media Inquiry - Time
17 Sensitive Inside Elections, do you see that?

18 A Yes.

19 Q And Mr. Rubashkin is an inside elections
20 reporter, correct?

21 A I would assume, yes.

22 Q That's what he represented himself to be

1 in this e-mail thread, correct?

2 A Yeah.

3 Q And in his e-mail to you he asks a few
4 questions about the franked videos; is that right?

5 A Yes, he did.

6 Q Without getting too much into leads yet,
7 one of the questions has to do with the type of
8 form that was submitted to the TV stations for the
9 franked videos, right?

10 A Correct.

11 Q Another one of the questions he asks has
12 to do with Mark Goodrich and generally who he is,
13 is that also correct?

14 A Yes, correct.

15 Q What did you do after you received this
16 June 22, 2022 e-mail from the inside elections
17 reporter?

18 A I don't remember exactly. More than
19 likely I would have called our Chief of Staff.

20 Q And at that time that would have been
21 Staffer Four?

22 A Yes.

1 Q And do you know or do you recall what you
2 and Staffer Four would have discussed about
3 this reporter's inquiry?

4 A I don't remember the conversation exactly.

5 Q In preparation for your interview did you
6 review this document?

7 A No.

8 Q So then after you received this inquiry
9 the reporter follows up the next morning, do you
10 see that?

11 A Yes.

12 Q And then later that morning on June 23rd
13 you reply to the reporter and CC Staffer Four, do
14 you see that?

15 A Yes, I do.

16 Q And you provide a statement to the
17 reporter, do you see that?

18 A Yes, correct.

19 Q In the statement that you make do you
20 address the question that the reporter asked
21 about the forms that were submitted to the TV
22 stations?

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1 A No.

2 Q Do you respond to the reporter's questions
3 about Mark Goodrich or his role?

4 A No.

5 Q Scrolling up then on June 23rd at
6 11:05 a.m. the reporter follows up on your
7 statement, do you see that?

8 A Yes.

9 Q And he asks another question about Mark
10 Goodrich, do you see that?

11 A Yes.

12 Q And he asks another question about the
13 forms that were submitted, do you see that as
14 well?

15 A Yes, I do.

16 Q Do you know who provided these forms that
17 he's asking about to the TV stations in the first
18 instance?

19 A No, not exactly, no.

20 Q Well, did you provide NAB Candidate
21 Advertisement Agreement Forms to the TV stations
22 for the franked videos?

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1 A Not to my knowledge.

2 Q Did Mark Goodrich have any input on the
3 statement that you provided to the reporter on
4 June 23, 2022?

5 A I don't remember.

6 Q Do you remember anything else that you did
7 after receiving this reporter's inquiry?

8 A Yes, just normally we would -- I would
9 draft a statement and then give that to either our
10 Chief of Staff or the member for approval.

11 Q Did you contact Mark Goodrich about this
12 reporter's inquiry?

13 A Not to my knowledge.

14 Q Do you know if anybody contacted Mark
15 Goodrich about this reporter's inquiry?

16 A I don't remember.

17 MS. CRUMP: Let's pull up tab 16.

18 (Interview Exhibit 10 was marked for
19 identification and attached to the transcript.)

20 BY MS. CRUMP:

21 Q Staffer 3, this is a one page e-mail Bates
22 labeled PG-WFOR 50.

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1 Do you see this June 22, 2022 e-mail from
2 WFOR CBS Representative to Mark Goodrich?

3 A Yes, I do.

4 Q And do you see the subject is Issue NAB
5 (Sheila Cherfilus-McCormick)?

6 A Yes.

7 Q And do you see that this e-mail was sent
8 on June 22, 2022 in the evening?

9 A Yes.

10 Q And do you see where it says "Mark - thank
11 you for your help sorting this out. I have
12 attached the Issue NAB, WFOR CBS Representative,
13 Account Executive?" Do you see that?

14 A Yes, I do.

15 Q This e-mail is from the same day that the
16 inside elections reporter reached out to your
17 office, correct?

18 A I'm sorry, I don't remember the date on
19 the last e-mail.

20 MS. CRUMP: Can we flip back to the last
21 tab?

22 THE TECH: Absolutely.

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1 BY MS. CRUMP:

2 Q Scrolling down we're looking back at the
3 initial e-mail that you received from
4 Mr. Rubashkin with Inside Elections. It's dated
5 June 22, 2022 at 10:38 in the morning, do you see
6 that?

7 A Yes, same date..

8 MS. CRUMP: Thank you. Can we go back to
9 tab 16A, please?

10 BY MS. CRUMP:

11 Q Do you know what form WEOR CBS Representative
12 is providing Mr. Goodrich in this e-mail?

13 A No.

14 Q Do you know if Mr. Goodrich forwarded or
15 otherwise provided this form to you?

16 A I'm not sure.

17 Q You still do not recall whether you spoke
18 to Mark Goodrich about the inquiry from the
19 reporter from Inside Elections?

20 A No, I don't.

21 MS. CRUMP: Let's pull up tab 17.

22

1 BY MS. CRUMP:

2 Q This is a one page e-mail thread Bates
3 PG-WOFR 309.

4 Staffer 3, do you see this e-mail thread
5 with the bottom e-mail from you to WFOR CBS
6 Representative dated June 23, 2022 at 12:34 p.m.?

7 A Yes, I do.

8 Q Do you see the subject is Corrected Form?

9 A Yes.

10 Q And this is the day after you received the
11 initial e-mail from the Inside Elections reporter,
12 correct?

13 A Correct, yes.

14 Q And also after Mark Goodrich had received
15 that form from WFOR CBS Representative that we
16 looked at in the last document, correct?

17 A Yes, correct.

18 MS. FINK: I just want to make clear that
19 we haven't seen what that form is. Of course we
20 saw the name of the attachment but that was it.

21 BY MS. CRUMP:

22 Q Staffer 3, what did you communicate to

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1 Mr. Dorsey here, and you can take a minute to
2 review the document if you need?

3 A It says "I am forwarding the corrected NAB
4 form at your request. It was our position that we
5 did not need to provide an NAB as the spots were
6 public service announcements."

7 Q It goes on and says "We appreciate that
8 your legal department agreed with us that we were
9 providing the incorrect form at the start and we
10 are providing this new form at your request even
11 though we disagree that an NAB form is necessary
12 for PSAs," do you see that?

13 A Yes.

14 Q Did you have a discussion with CBS or
15 Paramount's legal department?

16 A No.

17 Q Who did?

18 A I'm not sure exactly who did.

19 Q Who drafted this e-mail to WFOR CBS
20 Representative from you?

21 A This e-mail came from me.

22 Q You wrote this e-mail?

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1 A No, I didn't write the statement.

2 Q Who wrote this statement?

3 A I'm not sure who wrote it but I remember
4 it being given to me by Mark I believe.

5 MS. CRUMP: Let's take a look at tab 18.

6 (Interview Exhibit 11 was marked for
7 identification and attached to the transcript.)

8 BY MS. CRUMP:

9 Q This is a two page document. I can
10 scroll. You can see the bottom and I can scroll
11 up to the next page. Take a minute to review.

12 A I'm sorry, I'm not sure what's at the top.

13 Q Are you referring to this top part here
14 (indicating)?

15 A Yes.

16 Q Do you see that there is a forwarded
17 message that is the bottom e-mail in this thread
18 and that is an e-mail from Mark Goodrich to you,
19 Congresswoman Cherfilus-McCormick and Nadege
20 LeBlanc on June 23, 2022?

21 Do you see that bottom e-mail?

22 A Yes, I do.

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1 Q And then it appears that that e-mail was
2 forwarded to WFOR CBS Representative by Mark
3 Goodrich with the subject CBS Station?

4 A Okay.

5 Q Do you see that as well?

6 A Yes.

7 Q So Mark Goodrich says to you and others
8 "Hi Staffer 3, Maritza sent you an NAB form
9 yesterday. Please take that form and send it to
10 WFOR CBS Representative with the following
11 note" and then he provides some text.

12 Is this the same statement that you
13 provided to WFOR CBS Representative in the
14 document that we were just looking at?

15 A I believe so.

16 Q Who is Martiza or Maritza?

17 A I believe it was supposed to be Maritza.

18 Q And who is Maritza?

19 A I just know her in connection to Mark.

20 Q What is her relationship with Mark?

21 A I know that she works with him. I'm not
22 sure beyond that.

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1 Q Is her last name Masseria?

2 A I believe something like that.

3 Q So Mark Goodrich provides the note to give
4 WFOR CBS Representative and he even writes your
5 signature with the Congresswoman's office at the
6 bottom, do you see that?

7 A I do but -- yeah, I do.

8 Q Why did he draft this statement for you?

9 A I'm not sure.

10 Q You see this was an e-mail he sent to you,
11 the Congresswoman and Nadege LeBlanc, correct?

12 A Correct.

13 Q Who is Nadege LeBlanc?

14 A She is the congressional office's district
15 Chief of Staff.

16 Q And he also provided this statement to the
17 Congresswoman per this e-mail, correct?

18 A Correct, yes.

19 Q This e-mail would suggest that the
20 Congresswoman was aware that Mark Goodrich was
21 involved in updating forms for the TV stations?

22

1 MS. FINK: Again, I don't think Staffer 3
2 really can't say more than what the e-mail says.
3 She can't say whether the Congresswoman read it or
4 not or what she was aware of.

5 BY MS. CRUMP:

6 Q Is that the Congresswoman's e-mail address
7 that this e-mail from Mark Goodrich on June 23,
8 2022 was sent to?

9 A Yes.

10 Q Is that the Congresswoman's personal
11 e-mail address?

12 A That's one of her e-mail addresses.

13 Q And this is also -- this is your e-mail
14 address with CompanyTwo.com, correct?

15 A Yes, correct.

16 Q So he did not send this message to
17 anyone's official house e-mail addresses, correct?

18 A Not to my knowledge.

19 Q But this was a communication about -- this
20 e-mail had to do with official communications from
21 the Congresswoman's office, correct?

22 A Correct.

1 Q Was it unusual for Mark Goodrich to be
2 e-mailing you or the Congresswoman about business
3 from her official office?

4 A Not unusual for me. I can't speak on the
5 Congresswoman.

6 MS. CRUMP: I'd like to pull up tab 19.

7 (Interview Exhibit 12 was marked for
8 identification and attached to the transcript.)

9 BY MS. CRUMP:

10 Q Staffer 3, this is an 18 page document.
11 I'm just scrolling through.

12 Would you like to read the entire message
13 starting from the beginning?

14 A Yes, please.

15 Q Okay, no problem. Just let me know when
16 you're ready for me to scroll.

17 A Okay.

18 (Pause in the proceedings.)

19 Q For full disclosure I think we've covered
20 most of what I was going to ask about but I'll let
21 you —

22 A Okay.

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1 Q If we get to a point where I'm asking you
2 questions and you would like to continue reading
3 the document please let me know, okay?

4 A That's fine.

5 Q What we've been looking at is a text
6 thread that began on June 22, 2022 at 10:55 p.m.,
7 do you see that?

8 A Yes, I do.

9 Q And who is part of this text thread?

10 A It looks like Nadege, myself and the
11 member.

12 Q And am I correct that this appears to be a
13 thread drafting the official statement to the
14 Inside Elections reporter?

15 A I believe, yes.

16 Q In response to the question -- I'll hold
17 here. In the response to the question about why
18 the House office submitted a Candidate
19 Advertisement Agreement Form, you drafted language
20 saying that Mark Goodrich had never represented
21 himself to work for the Congressional office; is
22 that right?

1 A I believe this was my first draft.

2 Q And that does seem correct because the
3 Congresswoman does say "let's just say Mark never
4 represented himself to work for the office. Leave
5 it at that."

6 Do you see that message?

7 A Yes, I do.

8 MS. FINK: I'm not sure that there is a
9 basis to say that that statement you read about
10 Mr. Goodrich is a response to the question you
11 read above it.

12 BY MS. CRUMP:

13 Q Then let's look -- again, we're on page
14 [REDACTED] 107.

15 Do you see the question "Why did House
16 office submit Candidate Advertisement Agreement
17 Forms to WFOR and WPLG on behalf of SCM
18 identifying her as a federal candidate and
19 representing her office as authorized committee
20 for fed candidate" and do you see in parentheses
21 where it says "Unsure how to answer this"?

22 A Is that to me?

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1 Q Yes.

2 A Yes, I do.

3 Q Is this perhaps paraphrasing the question
4 that the Inside Elections reporter had posed to
5 you and Staffer Four?

6 A Yes.

7 Q And the text that follows beginning with
8 "Mark Goodrich has never represented himself to
9 work for the Congressional office," is that
10 proposed language responding to that question?

11 A Yes, it is but I'm not sure if I drafted
12 it.

13 Q Sure, but that was language that was
14 responding to that question? You're just not sure
15 if that was language you yourself had drafted?

16 A Correct, yeah.

17 Q And then the member says --

18 MS. FINK: Can we take a break and go off
19 the record for a minute?

20 MS. CRUMP: Sure.

21 (A brief recess was taken.)

22 THE WITNESS: I'm sorry, I just wanted to

1 go back to the text we were looking at because I
2 wanted to make sure that I understood you
3 correctly.

4 MS. CRUMP: Okay.

5 THE WITNESS: And to clarify, in general
6 when I -- when I drafted this original statement
7 it was in general responding to the reporter and I
8 just wanted to make sure it didn't -- I didn't
9 come across as if it was for a specific question
10 versus the entire list of questions that he sent.

11 MS. CRUMP: That's fine.

12 BY MS. CRUMP:

13 Q Do you see on page [REDACTED] 111 the
14 Congresswoman says "You must put in your response:
15 As to your question about the campaign, we do not
16 work with the campaign and do not know anything
17 about their plans"?

18 Do you see that message?

19 A Yes.

20 Q So this was a directive from the
21 Congresswoman to put this in the statement to the
22 reporter?

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1 A Yes.

2 Q Was this statement true?

3 A Yes. Well, yes, to my knowledge.

4 Q Mark Goodrich was a part of the
5 Congresswoman's campaign, correct?

6 A Yes.

7 Q And you worked with Mark Goodrich on the
8 franked videos, correct?

9 A Correct, yes.

10 Q The Congresswoman says "Maritza should not
11 respond," do you see that?

12 A Yes.

13 Q I guess I'm trying to understand why would
14 Maritza be asked for a statement by anyone in this
15 situation?

16 A I'm not sure.

17 Q Do you know what her role was in this
18 situation?

19 A No.

20 Q Scrolling down I am going to ask a
21 question about a later point. Let me just make
22 sure that it's just this one page. If you would

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1 like to continue reading the document starting
2 here I'm happy to scroll through. I'm going to
3 ask questions about texts on this page and on page
4 123 which is down toward the end.

5 Would you like to read those pages?

6 A Yes, this is where I hadn't read yet.

7 Q I believe that you hadn't read starting
8 here so please continue.

9 A Okay.

10 Q Just let me know when you're ready.

11 A Okay, you can scroll up.

12 (Pause in the proceedings.)

13 Q I'm going to page 123.

14 A Okay.

15 Q I'll scroll down to the last page.

16 A Okay.

17 Q I'm going to go back to page 117 of this
18 text thread.

19 Do you see there's a message from Nadege -
20 Sheila for Congress? Is this Nadege LeBlanc?

21 A Yes.

22 Q Do you see where she says "SCM I do not

1 think we should mention Mark in our statement at
2 all"?

3 A Yes.

4 Q And SCM, those are the Congresswoman's
5 initials, correct?

6 A Yes.

7 Q Then later on she says "I feel like the
8 more information we give the more questions they
9 we ask. Think our answers should be as vague as
10 possible with no specifics," do you see that
11 message?

12 A Yes, I do.

13 Q Was there any reason to not want to be
14 asked questions about Mark Goodrich?

15 A I believe she was talking about the cost
16 of the ad.

17 Q She did say prior to that -- scrolling
18 up a ways it says "I do not think we should
19 mention Mark in our statement at all," do you see
20 that?

21 A I do, yeah.

22 Q Do you get the sense that she did not want

1 to be asked questions about Mark Goodrich?

2 MS. FINK: This is based on what you were
3 thinking at the time during these messages.

4 A Right. At the time I wouldn't be sure at
5 all.

6 BY MS. CRUMP:

7 Q On page [REDACTED] 123 do you see where the
8 Congresswoman says "We need to find out from
9 ethics if someone could have volunteered to help
10 us get pricing for TV spots"?

11 Do you see that message?

12 A Yes.

13 Q And then do you see where Nadege says
14 "Ethics said they would have an answer today"?

15 A Yes.

16 Q And she says "We asked yesterday"?

17 A Yes.

18 Q What did you all ask the Ethics Committee
19 relevant to this conversation?

20 A I'm not sure. I mean I wasn't --

21 Q Did you reach out to the Ethics Committee
22 about Mark Goodrich?

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1 A No, not to my knowledge.

2 Q Do you have any knowledge of what anybody
3 else from the office may have asked the Ethics
4 Committee about volunteers collecting pricing from
5 TV stations?

6 A No, not that I remember.

7 Q So you were not a part of contacting the
8 Ethics Committee with respect to the inquiry
9 that's referenced here on [REDACTED] 124?

10 A No, not to my knowledge. I don't remember
11 that.

12 Q So fair to say you don't know what answer
13 was provided to that question?

14 A Correct.

15 MS. CRUMP: Let's pull up tab 20.
16 Actually before you do that maybe I can make this
17 clear.

18 BY MS. CRUMP:

19 Q Staffer 3, did the Congresswoman ever ask
20 you and Mark Goodrich whether she should pull the
21 frank ads or franked videos from the air?

22 A Yes.

1 Q What was that question of hers in response
2 to? Why was she reaching out to you and Mark
3 Goodrich about that?

4 A Well, I know why she -- I can speak to why
5 she was reaching out to me.

6 Q Okay.

7 A I remember she was getting like -- I guess
8 like her colleagues or her peers were saying this
9 is not normal. Kind of no one has ever really
10 done it this way.

11 Q And why did she reach out to Mark Goodrich
12 about potentially pulling the franked videos from
13 the airwaves?

14 MS. FINK: She just answered that she can
15 only answer that question for herself, not for
16 Mr. Goodrich.

17 MS. CRUMP: I just wanted to confirm that
18 that was the case.

19 A Yes.

20 BY MS. CRUMP:

21 Q Did you reach out to legal for an opinion
22 on whether to pull the ads?

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1 A No, not to my knowledge I don't remember
2 doing it.

3 MS. CRUMP: Can we pull up tab 20?

4 (Interview Exhibit 13 was marked for
5 identification and attached to the transcript.)

6 BY MS. CRUMP:

7 Q This conversation begins on [REDACTED] 385 and do
8 you see on June 10, 2022 that the Congresswoman
9 has this discussion with you and Mark Goodrich
10 about whether to pull the ads that we've been
11 discussing?

12 A Yes.

13 Q Scrolling down do you see that
14 Mr. Goodrich provides some input in response to
15 that question?

16 A Yes.

17 Q Do you see on June 10, 2022 on page [REDACTED] 387
18 the Congresswoman asks "Should we ask legal for an
19 opinion" and do you see that you respond "Yes"?

20 A Yes.

21 Q Do you see that she responds "Okay please
22 ask"?

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1 A Yes.

2 Q And did you like that comment with your
3 phone?

4 A I did, yes.

5 Q So did you ask legal for an opinion?

6 A I don't remember to my knowledge. I
7 believe I've only talked to Ethics.

8 Q Did you talk to Ethics about this
9 question?

10 A The franking people not about this
11 question but about the frank video for approval.

12 Q But outside of requesting approval of the
13 frank videos you did not reach out to anyone from
14 legal for an opinion as the Congresswoman
15 suggested that you can recall, correct?

16 A Not that I can recall, correct.

17 Q And this was a request that she made on
18 June 10, 2022?

19 A Yes.

20 Q And that was last summer?

21 A Correct.

22

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1 MS. CRUMP: We can pull this down.

2 BY MS. CRUMP:

3 Q Switching gears a little bit, after the
4 Congresswoman is sworn in what was Mark Goodrich's
5 role in her official office?

6 A What do you mean after she was sworn in?

7 Q Once she assumed a seat in Congress what
8 role did Mark Goodrich have in her official
9 office?

10 A I'm not sure. I mean I wouldn't be able
11 to say exactly.

12 Q Did he continue working for the campaign
13 going into her reelection campaign cycle?

14 A Yes. I believe so, yes.

15 Q Mr. Goodrich was involved in creating
16 franked radio spots for the Congresswoman's
17 official office, correct?

18 A Yes, I believe he did like some
19 production.

20 Q And Mr. Goodrich was also involved in
21 creating franked mailers for the Congresswoman's
22 official office, correct?

1 A Yes.

2 Q And that included newsletters from her
3 official office?

4 A Newsletters as in like a print mailer?

5 Q Like a print mailer that gave a
6 legislative update.

7 A Yes.

8 Q Was Mr. Goodrich involved in the franking
9 approval process for mailers?

10 A Involved in what way?

11 Q Well, was he involved in decisions about
12 whether to make certain changes to mailers --
13 strike that.

14 Was he involved in deciding whether
15 certain changes to mailers required Franking
16 Commission approval, for example?

17 A I'm not sure your question. I mean he was
18 involved to the extent of if there was a franking
19 request or an edit. Is that what you mean?

20 Q It may be easier just to walk through some
21 of the documents so let's pull up tab 27.

22 A Okay.

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1 (Interview Exhibit 14 was marked for
2 identification and attached to the transcript.)

3 BY MS. CRUMP:

4 Q Do you see this is a one page document
5 Bates labeled Image Plus Graphics 96? Do you see
6 that on your screen?

7 A Yes.

8 Q Do you see at the bottom of the e-mail
9 thread is an e-mail from you to Mark Goodrich with
10 the subject line Revised Mailer that's dated
11 Friday, May 27, 2022 at 10:54 a.m.?

12 Do you see that?

13 A Yes, I do.

14 Q And then do you see above that that
15 Mr. Goodrich forwarded that e-mail to Image
16 Plus Graphics representative?

17 A Yes.

18 Q Do you see that he made a comment "I'm
19 working as fast as I can with this government
20 bureaucracy"?

21 A Yes, I do.

22 Q Was that a sentiment that Mr. Goodrich

1 expressed to you on occasion in the course of
2 working on franked communications?

3 MS. FINK: Can you be a bit more specific
4 with this sentiment? I'm not sure it's clear from
5 this what sentiment would be expressed to Staffer
6 3.

7 MS. CRUMP: Sure.

8 BY MS. CRUMP:

9 Q Staffer 3, did Mr. Goodrich ever voice
10 frustration with government bureaucracy when
11 working on franked communications?

12 A I'm not sure.

13 MS. CRUMP: Let me pull up tab 28.

14 (Interview Exhibit 15 was marked for
15 identification and attached to the transcript.)

16 BY MS. CRUMP:

17 Q Staffer 3, this document, Image Plus
18 Graphics 97 is a two page document. I'll go ahead
19 and scroll down so that you can see the entirety
20 of the document.

21 A Okay.

22 Q Was this a piece of franked mail that the

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1 Congresswoman's official office sent out?

2 MS. FINK: This is of course to the extent
3 that you can tell without other context.

4 A Yes, I remember this piece.

5 BY MS. CRUMP:

6 Q And so Mr. Goodrich was involved in the
7 production of this franked mail piece, correct?

8 A I don't remember him being involved in the
9 production of it.

10 Q Let me flip back to tab 27, please.

11 A I'm sorry, you mean print is also part of
12 production? Is that what you mean?

13 Q Yes.

14 A Okay. Yes.

15 MS. FINK: Is tab 28 the attachment to tab
16 27?

17 MS. CRUMP: Yes.

18 MS. FINK: Thank you.

19 MS. CRUMP: Let's take a look at tab 29.

20 (Interview Exhibit 16 was marked for
21 identification and attached to the transcript.)

22

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1 BY MS. CRUMP:

2 Q Staffer 3, this is a one page document at
3 Image Plus Graphics 143. As you can see by
4 reviewing the document it is a continuation of
5 the e-mail thread that we were looking at in tab
6 27.

7 Mark Goodrich -- do you see at the top
8 where he writes to Image Plus Graphics
9 representative "I know I'm rushing the approval.
10 We can fix sizing and mail panel without going
11 back for approval,..."?

12 Do you see that?

13 A I do.

14 Q Based on your review of this document and
15 your knowledge regarding this mail piece for the
16 Congresswomen's official office, do you know what
17 approval he's referencing here?

18 MS. FINK: She really can't answer what he
19 might mean in a document she hasn't seen.

20 BY MS. CRUMP:

21 Q Did Mr. Goodrich ever discuss with you
22 what kind of changes could and could not be made

1 to franked mailers without going back for approval
2 from the Franking Commission?

3 A No, not that I remember.

4 Q Did Mr. Goodrich give you instructions
5 about changes to be made to franked mailers?

6 A I believe, yes.

7 MS. CRUMP: Can we pull up tab 130? I
8 meant 30, sorry. Please pull up tab 30.

9 (Interview Exhibit 17 was marked for
10 identification and attached to the transcript.)

11 BY MS. CRUMP:

12 Q Staffer 3, do you see on your screen a two
13 page document Bates number Image Plus Graphics 95,
14 page one and two?

15 A Yes.

16 Q Do you see that on June 7, 2022 at
17 1:30 p.m. you sent Mark Goodrich a link to a
18 revised mailer, page one and two?

19 A Yes.

20 Q Do you see how shortly after that
21 Mr. Goodrich replied in all caps "The mail panel
22 is in the wrong spot! I have asked it to be moved

1 three times!"

2 A Yes.

3 Q Does this e-mail and your general
4 knowledge of working on communications with Mark
5 Goodrich suggest that Mr. Goodrich was involved in
6 giving you instructions to change MRA funded
7 mailers?

8 A Well, this specific ask was the panel
9 being in the wrong spot.

10 Q And it was the mail panel on what?

11 A On the legislative update mailer.

12 Q And that was a franked mailer that went
13 out from the Congresswoman's official office,
14 correct?

15 A Yes, it was.

16 MS. CRUMP: We can pull this down.

17 BY MS. CRUMP:

18 Q Mr. Goodrich was also involved in getting
19 vendors paid with MRA funds for franked mailers,
20 correct?

21 A Well, he would submit the invoice for the
22 printer I believe.

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1 MS. CRUMP: Can we pull up tab 31, please?

2 (Interview Exhibit 18 was marked for
3 identification and attached to the transcript.)

4 BY MS. CRUMP:

5 Q Staffer 3, do you see on your screen a two
6 page document, the second page of which doesn't
7 really have any content? The Bates numbers are
8 ■■■ 292 and ■■■ 293.

9 A Yes.

10 Q This is an e-mail thread that you produced
11 to our office in this matter, correct?

12 A Correct.

13 Q Do you see at the bottom you write an
14 e-mail to Mark Goodrich on April 4, 2022 and you
15 write "Hi Mark, I'll need the U.S. 3602 also to
16 submit. Just found out. Thanks"?

17 Do you see that?

18 A Yes.

19 Q What is the U.S. 3602 just generally
20 speaking?

21 A It's like related to postage.

22 Q For franked mailers?

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1 A Well, I don't know if it's all mailers or
2 just franked mailers.

3 Q Was this communication regarding postage
4 with regard to franked mailers?

5 A Yes.

6 Q Do you see at 5:49 p.m. on the same day
7 Mr. Goodrich responds "That is not happening"?

8 A Yes..

9 Q He says "We will of course submit after
10 the mail has been sent."

11 A Uh-huh.

12 Q Do you see where he says "Tell the woman
13 who works for us to pay the company please"?

14 A I do.

15 Q Who is the woman who works for us that
16 he's responding to? Who is he referring to here?

17 A I believe because of the context of the
18 e-mail he was referring to Kelly.

19 MS. CRUMP: We can pull this document
20 down.

21 BY MS. CRUMP:

22 Q Was Mark Goodrich ever given access to an

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1 MRA credit card?

2 A I have -- I wouldn't know that.

3 Q So is it fair to say that Mark Goodrich
4 was doing work on both official and campaign
5 communications after the Congresswoman was sworn
6 in to Congress?

7 A Could you define "doing work"?

8 Q Staffer 3, we've reviewed a number of
9 documents showing that Mr. Goodrich was working on
10 MRA funded mailers, videos. You know that he was
11 working on MRA funded radio ads, correct?

12 MS. FINK: I think a distinction here is
13 also -- Staffer 3 is not trying to be difficult.
14 The term here has implications about knowledge
15 that somebody is being paid which Staffer 3 may
16 not know so she may be getting at that and not
17 trying to --

18 A Right, sorry. I meant like -- I know he
19 was helping if that's what you mean.

20 BY MS. CRUMP:

21 Q Well, setting aside the question of
22 whether or not he was paid -- I can do work on my

1 friend's lawn and not get paid for the work that I
2 do and so when I say was he doing work, I'm not
3 referring to whether or not he was paid but did he
4 do work on official communications and campaign
5 communications?

6 A Okay, yes.

7 Q Thank you.

8 A Sure.

9 MS. FINK: Whenever is a good time for
10 another break. We're at another hour.

11 MS. CRUMP: Yeah, I'm getting close to the
12 end so let me just finish up this section and then
13 we can take a break. How about that?

14 MS. FINK: Sounds good.

15 BY MS. CRUMP:

16 Q Staffer 3, to the best of your knowledge
17 was the Congresswoman aware that Mark Goodrich was
18 involved in the production of franked materials?

19 A Yes.

20 Q When was the Congresswoman's 2022 primary
21 for reelection, do you recall?

22 A No.

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1 Q What dictated the timing in mailing out of
2 the mailers and the videos? Was there a reason
3 why they went out at the time that they did?

4 A Well, in terms of the videos for the
5 franked videos it had to be -- the congressional
6 office -- like there's a blackout period so you
7 can't like send anything out during a blackout.

8 Q And the blackout is the time period
9 leading up to an election; is that right?

10 A Yes, correct.

11 Q With respect to how the franked
12 communications were prepared, how did they differ
13 from other campaign communications? Was the
14 process different?

15 A In how like the mailers were prepared?

16 Q Yeah, how the franked radio ads, videos,
17 mailers were prepared.

18 Was the process by which those things were
19 prepared different from the process by which the
20 campaign communications were prepared?

21 A Sort of, yes.

22 Q In what way?

1 A Well, the approval processes are different
2 in that regard.

3 Q So franked communications require approval
4 from the Franking Commission?

5 A Yes.

6 Q What other differences were there between
7 how the franked communications were created and
8 how campaign communications were created?

9 A I'm not sure. You mean like the creative
10 process? Is that what you mean?

11 Q Sure. For example, the franked
12 communications, were they made by the same people
13 who worked on campaign communications?

14 A Sometimes.

15 Q Were they printed or aired by the same
16 vendors that worked on campaign communications?

17 A That part I wouldn't know. I would know
18 for the congressional office.

19 Q What was the purpose in your mind of the
20 June 2022 franked videos?

21 A Well, in my mind number one they were
22 late. I mean they should have -- like the goal

1 was to complete them much earlier but our district
2 had gone without like a member really being able
3 to be active and so many people in our district
4 didn't know what was going on, who was in charge,
5 what changes were being made, who to call, where
6 to call and so that was the goal or my goal at
7 least.

8 Q And that was your goal but you don't
9 recall whether it was someone from the campaign or
10 the official office who had the idea to create and
11 air these franked videos, correct?

12 A No, I don't recall where exactly the
13 concept to create the videos came from, no.

14 MS. CRUMP: Okay, we can take a break here
15 and then there won't be too much after that so
16 let's go off the record.

17 (A brief recess was taken.)

18 MS. CRUMP: Let's go back on the record.
19 I'd like to pull up tab 36.

20 (Interview Exhibit 19 was marked for
21 identification and attached to the transcript.)

22

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1 BY MS. CRUMP:

2 Q Staffer 3, this is a two page document.

3 Do you see it's Bates labeled [REDACTED] 127 and
4 [REDACTED] 128? Do you see that on your screen?

5 A Yes.

6 Q Does this appear to be an e-mail that you
7 produced to us in this matter?

8 A It appears so.

9 Q And do you see that it's an e-mail from --
10 well, let's start at the bottom. It's an e-mail
11 that you sent it appears to Mark Goodrich on
12 July 13, 2022 and then Mark Goodrich responds the
13 same day saying "Thank you so much" with a heart
14 emoji, do you see that?

15 A Yes.

16 Q I'm going to give you a second just to
17 take a look at the caption that's underneath the
18 image in this e-mail that you sent.

19 A Okay.

20 Q Do you see that the subject line of the
21 e-mail message is Amplify Truth Campaign?

22 A Yes.

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1 Q Does the term "Amplify Truth Campaign"
2 ring any bells for you? Do you recall what that
3 was about?

4 A I believe it was this graphic.

5 Q And did you create this graphic?

6 A Yes.

7 Q And then is the caption that's provided
8 underneath it something that would have been
9 posted like on social media, for example? What
10 was this for?

11 A Probably social media.

12 Q Did you draft this language in the
13 caption?

14 A I don't remember drafting the beginning
15 part but the end, "My opponent." That part.

16 Q Do you know who would have drafted the
17 beginning part of this caption?

18 A It would have been the member or
19 Mr. Goodrich.

20 Q Do you know anything about -- well, strike
21 that.

22 Do you see where it says All vaccination

1 money was billed through my office and paid
2 directly to our over 2,000 person workforce"?

3 A Yes, I see it.

4 Q Do you know what this language is
5 referring to?

6 A It was referring to I think a news article
7 I believe.

8 Q Was it a news article that discussed
9 vaccination projects that one of the member's
10 company had worked on?

11 A Yeah, it was something in reference to
12 that.

13 Q Do you know what office the vaccination
14 money was billed through that's referenced here?

15 A No.

16 Q Do you have any knowledge about the
17 member's companies?

18 A No.

19 Q Do you have any knowledge about work that
20 the member's companies may have done for COVID
21 vaccinations?

22 A General knowledge.

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1 Q Can you describe that general knowledge
2 for me?

3 A I just know that they did some type of
4 vaccination in South Florida I think.

5 Q You don't know anything about the
6 financial aspect of the program?

7 A No.

8 MS. CRUMP: Let's pull up tab 37.

9 (Interview Exhibit 20 was marked for
10 identification and attached to the transcript.)

11 BY MS. CRUMP:

12 Q Staffer 3, this is a five page document
13 Bates labeled [REDACTED] 170 through 174, do you see that?

14 A Yes, I do.

15 Q Looking at the beginning of [REDACTED] 170 and the
16 continuation on page 171, is this the newspaper
17 article that you referenced when we were looking
18 at the previous document?

19 A Yes, I believe so.

20 MS. FINK: To the extent you can tell
21 without having read it or I guess seeing what it
22 looks like outside of an e-mail.

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1 A Right, I vaguely remember the title.

2 BY MS. CRUMP:

3 Q And the title for reference is "Did Sheila
4 Cherfilus-McCormick Buy Her Seat With Taxpayer
5 Money Earmarked for Vaccines?"

6 Is that the article you're referencing?

7 A Correct.

8 Q And this article through a series of
9 forwards eventually made its way to you on
10 June 16th of 2022 and was sent to you by Nadege
11 LeBlanc, do you see that?

12 A Yes.

13 Q Why did Nadege forward this to you to the
14 extent that you know?

15 A I don't remember. Probably for my
16 awareness.

17 Q Do you recall any conversations that you
18 had with anyone about the allegations that we've
19 discussed so far?

20 A No.

21 Q Do you know who processed the candidate's
22 loans to her campaign?

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1 A No.

2 Q You don't know who on the campaign would
3 have been responsible for that?

4 A No.

5 Q Do you know what the source of any of the
6 member's loans to the campaign was?

7 A No.

8 Q You don't know one way or the other
9 whether the member's loans to her congressional
10 campaign came from her personal funds or not?

11 A No.

12 Q Safe to say that you also do not know
13 whether the money from the vaccination efforts
14 funded the member's loans to the campaign,
15 correct?

16 A No, I wouldn't know that.

17 MS. CRUMP: We can take this document
18 down.

19 BY MS. CRUMP:

20 Q Staffer 3, who is Barbara Sharief?

21 A She is like an official. I don't know her
22 exact title, sorry.

1 Q That's okay. Did she run against the
2 Congresswoman leading up to the special election?

3 A Do you mean in this special election?

4 Q Was she one of the Congresswoman's
5 competitors in the special election?

6 A Yes.

7 Q Do you know whether since then Mark
8 Goodrich has worked on Barbara Sharief's political
9 campaigns?

10 A I'm not sure.

11 Q You don't have any knowledge one way or
12 the other?

13 A No, I'm not sure.

14 Q Would you be surprised to learn that Mark
15 Goodrich did work for Barbara Sharief's campaigns?

16 A Surprised?

17 Q Would it seem at odds with the kind of
18 work he had been doing prior to that?

19 A He does campaigns.

20 Q But it wouldn't strike you as unusual that
21 Mark Goodrich would work for the Congresswoman's
22 former primary opponent?

Transcript of Interview of Staffer 3
Conducted on July 19, 2023

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1 A No, not really.

2 MS. CRUMP: Okay. Let's pull up tab 38.

3 (Interview Exhibit 21 was marked for
4 identification and attached to the transcript.)

5 BY MS. CRUMP:

6 Q While that's pulling up have you ever
7 heard of a company called Urban Initiatives?

8 A No.

9 Q Staffer 3, on the screen is a one page
10 document Bates labeled [REDACTED] 44.

11 Do you see on the screen that it is a text
12 message thread of messages exchanged between you
13 and Nadege LeBlanc?

14 A Yes.

15 Q Do you see where Nadege in part says "SCM
16 asked me to ask you a if the people ever reached
17 out to you"? Separate message "Ethics"?

18 A Yes.

19 Q Is this something that the Congresswoman
20 had discussed with you prior to this May 16th text
21 message?

22 A Sort of, yes.

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1 Q When did you discuss this review with the
2 Congresswoman?

3 A I don't remember the exact date but it was
4 before [REDACTED].

5 Q And what did you discuss with the
6 Congresswoman?

7 A She just said that the office needed more
8 information about the PSAs but she knew I was
9 [REDACTED] or trying to
10 get to the place where I could have [REDACTED] and
11 that I could handle it or figure out all the stuff
12 or whatever once I got back.

13 Q And did she mean to handle the document
14 collection or handle something else?

15 A Yeah, she said like they needed a lot of
16 stuff.

17 Q Did you discuss this review with the
18 Congresswoman beyond the need for document
19 collection?

20 A No.

21 Q Was it just the one conversation that you
22 had with the Congresswoman about this review?

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1 A I believe so, yeah.

2 Q Other than your attorneys and the
3 Congresswoman did you ever talk to anyone else
4 about this review?

5 A Well, Nadege asked me for this text and
6 then she asked me for -- I don't remember the date
7 but she said hey, we need -- can you send me like
8 anything that had to do with PSAs. I believe that
9 was her wording. I can't remember exactly and she
10 said just shoot them to me via e-mail.

11 Q With respect to Ms. Nadege did you only
12 discuss the document collection for this matter or
13 did you discuss anything else about this matter
14 with her?

15 A I just remember the documents, like her
16 needing the files.

17 Q Other than the Congresswoman, Nadege
18 LeBlanc and any conversations you may have had
19 with your attorneys did you discuss this review
20 with anyone else?

21 A Not that I remember.

22 Q And you became aware of this review in

1 late spring or early summer of this year, correct?

2 A It would have been -- I guess you would
3 consider that late spring.

4 Q When did you last speak to Mark Goodrich?

5 A I don't -- I don't know. I don't know
6 exactly when. It's been a while.

7 Q Do you know if he continues to do work for
8 the Congresswoman's campaign?

9 A Not that I know of.

10 Q You don't know one way or the other?

11 A Correct.

12 Q Does he continue to do work paid or unpaid
13 for the Congresswoman's official office?

14 A No, not through -- I don't have any -- not
15 any projects that like we would -- that are under
16 my oversight I guess is the word you would say.

17 Q You're saying you can't speak for other
18 projects that other folks in the office might
19 have?

20 A Correct, like I wouldn't know.

21 Q Has the Congresswoman talked to anybody
22 you know about this investigation other than

Transcript of Interview of Staffer 3
Conducted on July 19, 2023

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1 Nadege and yourself?

2 A Not that I know.

3 MS. CRUMP: Let's go off the record.

4 (A brief recess was taken.)

5 EXAMINATION BY COUNSEL FOR STAFFER 3

6 BY MS. FINK:

7 Q Staffer 3, I wanted to ask you just a few
8 clarifying questions. If we can pull back up tab
9 19 which are Staffer 3's text messages with
10 Ms. LeBlanc and the Congresswoman and if we can
11 look at please [REDACTED] 107 to [REDACTED] 108 which we had
12 previously reviewed. If you can scroll down a
13 little bit, please,

14 Staffer 3, do you see in this draft -- is
15 this the draft statement in response to the
16 questions from the reporter from Inside Elections
17 that you had previously discussed?

18 A Yes.

19 Q And this statement about Mr. Goodrich in
20 the draft, that statement that starts with
21 "Mr. Mark Goodrich has never represented himself
22 to work for the Congressional office," was that

1 meant to be a draft answer to the question in
2 the bullet point immediately preceding that
3 sentence?

4 A No, it was in general to the reporter's
5 inquiry overall.

6 Q In this initial draft that you sent in the
7 text did you include any draft response to that
8 bulleted question?

9 A No, I was asking what the response should
10 be. I don't know if that was clear.

11 Q Is that why you wrote unsure how to answer
12 this?

13 A Yes.

14 Q And then if we can please move to in the
15 same tab [REDACTED] 111. I'm going to direct your
16 attention to the first message on this page from
17 where it says "Sheila for Congress" and it states
18 "You must put in your response: As to your
19 question about the campaign we do not work with
20 the campaign and do not know anything about their
21 plans."

22 Who did you understand the Congresswoman

1 to be referring to in this text when she wrote "we
2 do not work with the campaign"?

3 A The Congressional office, like the
4 official office.

5 Q Did you understand her to be saying that
6 she herself was not working with Mr. Goodrich?

7 A No.

8 MS. FINK: Thank you. Those are all my
9 questions.

10 MS. CRUMP: All right. Let's go off the
11 record.

12 (Off the record at 5:02 p.m.)

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1 CERTIFICATE OF SHORTHAND REPORTER-
2 NOTARY PUBLIC

3
4 I, Vicki L. Forman, Court Reporter, the
5 officer before whom the foregoing proceedings were
6 taken, do hereby certify that the foregoing
7 transcript is a true and correct record of the
8 proceedings; that said proceedings were taken by
9 me stenographically and thereafter reduced to
10 typewriting under my supervision; and that I am
11 neither counsel for, related to, nor employed by
12 any of the parties to this case and have no
13 interest, financial or otherwise, in its outcome.

14 IN WITNESS WHEREOF, I have hereunto set my
15 hand and affixed my notarial seal this 31st day of
16 July 2023.

17 My Commission Expires:
18 June 24, 2024

19 _____
20 _____

21 NOTARY PUBLIC IN AND FOR
22 THE STATE OF MARYLAND

