

EXHIBIT 5

CONFIDENTIAL

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

Transcript of Interview of Staffer Two

Review No. 23-7239

July 19, 2023

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

-----X
IN RE: INTERVIEW OF STAFFER TWO :
CASE NO: 23-7239 :
-----X

Videoconference Deposition of
STAFFER TWO
Conducted Virtually
Wednesday, July 19, 2023
9:34 a.m. EST

Job No.: 500562
Pages: 1-94
Reported by: Suja Nair

1 Videoconference deposition of STAFFER
2 TWO, conducted virtually.

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 Pursuant to Notice, before Suja Nair,
a Court Reporter and Notary Public in and for
the State of Maryland.

1 A P P E A R A N C E S
2 O N B E H A L F O F T H E O F F I C E O F C O N G R E S S I O N A L
3 E T H I C S O F T H E U . S . H O U S E O F
4 R E P R E S E N T A T I V E S :

5 K R I S T I N A C R U M P , E S Q U I R E
6 O M A R A S H M A W Y , E S Q U I R E
7 O f f i c e o f C o n g r e s s i o n a l E t h i c s
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15 O N B E H A L F O F S T A F F E R T W O

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17 S A R A H R . F I N K , E S Q U I R E
18 K A I S E R D I L L O N , P L L C
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ALSO PRESENT:

Mr. Richard Figueroa, AV Technician

Ms. Nicole Lytle

Mr. Peter Tilly

C O N T E N T S

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22	(Exhibits not marked during deposition.)	

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

2 BY MS. CRUMP:

3 Q. Good morning, Staffer Two.

4 A. Good morning.

5 Q. Here, today, we have Kristina Crump,
6 Omar Ashmawy, and Peter Tilly from the Office
7 of Congressional Ethics. We're also joined by
8 counsel, Sarah Fink, from KaiserDillon.
9 Today's date is July 19, 2023, and the time is
10 9:35 a.m.

11 We're here today undertaking a remote
12 video interview of Staffer Two. Staffer Two
13 has been provided and has signed an
14 acknowledgment of the False Statements Act.

15 Staffer Two, let's go ahead and get
16 started. Would you please tell me what your
17 current job title is?

18 A. Director of outreach and legislative
19 lead for the district.

20 Q. Got it.

21 And are you based in Congresswoman
22 Sheila Cherfilus-McCormick's Fort Lauderdale

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1 office?

2 A. Yes. Tamarac.

3 Q. Tamarac. Thank you.

4 And prior to your role with the
5 Congresswoman's official office, you worked on
6 her campaign; is that right?

7 A. Yes, ma'am.

8 Q. Okay. And when did you become the
9 director of outreach and legislative lead?

10 A. At the end of the 117th Congress.

11 Q. Okay. And so would that have been --
12 apologize for my math. Would that have been
13 January of 2022?

14 A. December of 2022.

15 Q. Okay. Thank you.

16 Okay. When did you begin working on
17 the Congresswoman's campaign?

18 A. The beginning of June 2021.

19 Q. Okay. And when -- and did you stop
20 working for the campaign in December of 2022?

21 A. January of 2022.

22 Q. Okay. And what was your title when

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1 you were working on the campaign?

2 A. It started off as staff assistant,
3 but it became office manager.

4 Q. Okay. And, then, prior to working on
5 the campaign, what was your professional
6 background?

7 A. I was in college. I had --

8 Q. Okay.

9 A. -- had just graduated.

10 Q. Great.

11 Let's talk a little bit about your
12 time on the campaign. How did you get involved
13 in working on the Congresswoman's campaign?

14 A. I had previous work for other
15 campaigns. So there was, like, a job posting.
16 It would have been -- I don't remember for
17 certain, but, like, a At Blue GAIN Power, one
18 of those, like, Democratic job posting sites.

19 Q. Got it.

20 Did you interview for the role?

21 A. Yes, ma'am.

22 Q. Okay. Who did you interview with?

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1 A. Mark Goodrich.

2 Q. Okay. Is Mark Goodrich the
3 individual who hired you to work on the
4 campaign?

5 A. Yes, ma'am.

6 Q. Okay. So you said that you started
7 as a staff assistant, and then you were
8 promoted to an office manager while working for
9 the campaign; is that right?

10 A. Yes, ma'am.

11 Q. Can you tell me a little bit about
12 what you did in your role as both a staff
13 assistant and an office manager for the
14 campaign?

15 A. Day-to-day operations, like, you
16 know, printing things; filling out forms;
17 planning events, like, campaign events for the
18 Congresswoman. It moved to overseeing the
19 canvassers and the phone bankers; creating
20 their turfs -- turfs is kind of, like, where
21 they will walk or who they will call, like,
22 what areas -- looking at quality -- quality

1 control of what they did. So, like, if they
2 called 100 people, we make sure, like, they
3 actually called those people or what those
4 people are saying, if they're, you know, going
5 to vote for her or not. I attended events with
6 her sometimes, and I also, for the phone
7 bankers and the canvassers, did their payroll.

8 Q. Okay. Just to make sure I got that
9 right. You said you did payroll for the phone
10 bankers and the -- the canvassers?

11 A. Yes.

12 Q. Okay. Okay. And did you report to
13 Mark Goodrich when you were working for the
14 campaign?

15 A. Yes, ma'am.

16 Q. Okay. Who else reported to Mark
17 Goodrich on the campaign?

18 A. To my knowledge -- like, do you want
19 me to list, like, names or --

20 Q. Well, I guess a -- a better way of
21 going about it, did just about everyone who
22 worked on the campaign report to Mark Goodrich?

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1 A. To my knowledge, almost everyone.

2 Yes.

3 Q. Okay. To your knowledge, would it be
4 fair to say that he acted as the campaign
5 manager for the campaign?

6 A. No.

7 Q. Okay. Who was the campaign manager
8 for the campaign?

9 A. Willis Howard.

10 Q. Okay. Was Willis Howard involved in
11 the day-to-day management of the campaign?

12 A. To my knowledge, no.

13 Q. Okay. Was Mark Goodrich involved in
14 the day-to-day management of the campaign, to
15 your knowledge?

16 A. Yes.

17 Q. Okay. When you were working on the
18 campaign, how much did you get paid in your
19 role as staff assistant and office manager?

20 A. It was hourly. It started off at 17
21 an hour. Then, I think, moved to, like, around
22 22, 23. I can't --

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1 Q. Okay.

2 A. -- really remember.

3 Q. Okay. And was it the campaign that
4 paid you your hourly wage?

5 A. Yes, ma'am.

6 Q. Okay. And were you paid by direct
7 deposit or check or cash or how were you paid?

8 A. Check.

9 Q. Check.

10 Okay. Were you ever paid for your
11 work on the campaign by a person or entity that
12 was not the campaign?

13 A. No, ma'am.

14 Q. Okay. And so what dictated when and
15 how much you were paid? Did you submit hours
16 to someone?

17 A. Yes, ma'am. We had, like, a Google
18 doc form where you fill out the hours you
19 worked for the day.

20 Q. Okay. Who did payroll for the
21 campaign? It sounds like you did payroll for
22 the phone bankers and canvassers, but who did

1 the other parts of payroll?

2 A. I am not for sure, ma'am.

3 Q. Okay.

4 MS. CRUMP: Can we pull up Tab 1,
5 please?

6 THE AV TECHNICIAN: Please stand by.

7 MS. CRUMP: Sure.

8 THE AV TECHNICIAN: Okay. Are you
9 able to see it, Counsel?

10 MS. CRUMP: Yeah. I'm able to see
11 it.

12 THE WITNESS: Yes.

13 THE AV TECHNICIAN: Do you want
14 remote access?

15 MS. CRUMP: Yes, I would like remote
16 access. Thank you, Richard.

17 THE AV TECHNICIAN: I'll pass it now.

18 MS. FINK: Do you mind just -- I just
19 can't see the Bates number. Do you mind just
20 reading out the --

21 THE AV TECHNICIAN: Sure. Sure.

22 MS. CRUMP: And I'll zoom in for you.

1 MS. FINK: Okay.

2 MS. CRUMP: And I'm about to scroll
3 down to a different -- this is the whole
4 exchange, but I'm going to scroll down to a
5 different one. But the starting Bates of this
6 document is 299. And I'm scrolling to 331.
7 It's taking me a little bit. One second.

8 Q. Okay. Staffer Two, did you provide
9 your text messages with Mark Goodrich in this
10 matter?

11 A. What do you mean?

12 Q. Sure.

13 Did you -- in response to our request
14 for information, did you produce a series of
15 text messages between you and Mark Goodrich?

16 A. I produced all text message between
17 me and Mark Goodrich.

18 Q. Great. Thank you.

19 And on -- on the screen, does this
20 appear to be a -- a series of texts between you
21 and Mark Goodrich?

22 A. Yes, ma'am.

1 Q. Okay. Do you see here where it
2 says -- Mark Goodrich says, I don't have a
3 check for you. I will check with Martiza
4 (phonetic) and find out why and, of course, get
5 you on this week. Yes, I will send you. And
6 it goes on.

7 You explain -- explain that you
8 submitted a day late, and he says, Oh, okay,
9 because she is very good with that stuff. I
10 will have a check with all your hours on
11 Monday.

12 Do you see that exchange?

13 A. Yes.

14 Q. Okay.

15 A. Yeah.

16 Q. Who is Martiza that he's referring
17 to?

18 A. Maritza was a campaign staffer who --
19 when I left on maternity leave, she assumed my
20 roles and responsibilities in the office.

21 Q. Okay. And so she became --

22 A. So --

1 Q. Sorry. Go ahead.

2 A. Oh. Sorry.

3 So I can assume that this was after
4 she took over payroll.

5 Q. Got it.

6 Okay. So while you were working on
7 the campaign, before you went on maternity
8 leave, she was not in charge of payroll at that
9 time; is that right?

10 A. To my knowledge.

11 Q. Okay. And -- but, to your knowledge,
12 after you left the campaign to go on maternity
13 leave, she took over payroll for the campaign?

14 A. Yes.

15 Q. What was -- was Maritza's last name
16 Masseria?

17 A. Yes, ma'am.

18 Q. Okay. What was her -- her role,
19 generally, in the campaign?

20 A. From what I saw, it was payroll,
21 day-to-day office operations. Because I was
22 transitioning out into maternity leave, and my

1 maternity leave was from August to October.
2 And she also handled the -- I don't know what
3 it's called, but the, like, financial filing.
4 They normally just say, like, filings, but with
5 the FEC.

6 Q. Okay. And to make sure I have that
7 right, to your knowledge, Maritza Masseria was
8 involved in preparing filings that were
9 submitted to the FEC on behalf of the
10 Congresswoman's campaign?

11 A. Yes, to my knowledge.

12 Q. Thank you.

13 Was Mark Goodrich her boss?

14 A. To my knowledge, yes.

15 Q. Okay. Do you know how she got
16 involved in the campaign?

17 A. No, I do not know.

18 Q. Okay. Do you know if she was
19 associated with Mark Goodrich outside of the
20 campaign?

21 A. No, I do not know.

22 Q. Okay.

1 MS. CRUMP: We can remove this
2 document from the screen. Thank you, Richard.

3 Q. Okay. Staffer Two, do you know of
4 anyone who did work for the campaign, but who,
5 to your knowledge, was paid by a person or
6 entity that was not the campaign?

7 A. No, not to my knowledge.

8 Q. Okay.

9 MS. CRUMP: Can we pull up Tab 2,
10 please?

11 THE AV TECHNICIAN: Please stand by.

12 Q. Okay. Staffer Two, do you see an
13 email on your screen that was provided by you
14 and that you received from

15 [REDACTED]@aol.com on June 10, 2022?

16 A. Yes. That's Ms. Rose.

17 Q. Ms. Rose?

18 Did Ms. Rose do work for the
19 campaign?

20 A. Yes. She was a canvasser.

21 Q. Okay.

22 MS. CRUMP: Richard, can you give me

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1 screen control, please?

2 THE AV TECHNICIAN: Yes. Just click
3 on your screen. I already --

4 MS. CRUMP: Oh.

5 THE AV TECHNICIAN: There you go.

6 MS. CRUMP: Thank you.

7 THE AV TECHNICIAN: You're welcome.

8 MS. CRUMP: Sorry about that.

9 THE AV TECHNICIAN: No worries.

10 Q. Okay. All right. Staffer Two, do
11 you see in this email from Ms. Rose where she
12 says -- let's see -- Mark is the person who
13 introduced me to Congresswoman Sheila dad and
14 uncle?

15 A. (No verbal response.)

16 Q. And -- and then it says, They are in
17 charge of that campaign?

18 A. Hm-mmm.

19 Q. Here, why don't I give you just a
20 minute to review that message so you're not
21 reading it while I'm asking you questions,
22 okay?

1 A. Thank you.

2 Q. No problem.

3 A. I have completed reading.

4 Q. Okay. Great.

5 What was the -- to your knowledge,
6 the Haitian outreach campaign that Ms. Rose
7 refers to in this email?

8 A. I think that the Congresswoman
9 parents, they -- they wanted to do Haitian
10 outreach, so where those people would
11 specifically knock on Haitian doors, people who
12 speak Creole, you know, text campaigns like it
13 was -- within the campaign, it was just
14 outreach to them. And Jude, he was her uncle.
15 He spearheaded that --

16 Q. Is that Jude --

17 A. -- mission.

18 Q. I'm sorry. I didn't mean to
19 interrupt you.

20 A. Oh. No. No.

21 Q. And could you tell me Jude -- Uncle
22 Jude's last name?

1 A. I honestly don't know. I always
2 called him Uncle Jude.

3 Q. Would it -- would you recognize --
4 recognize the last name -- and I apologize if I
5 mispronounce this.

6 Would you recognize the last name
7 Payoute, P-A-Y-O-U-T-E?

8 A. No. Most of the Congresswoman's
9 family that I ever met, last name was Cherfilus
10 or Smith.

11 Q. Got it.

12 Okay. So Ms. Rose's email says that
13 she worked on the Haitian outreach campaign and
14 that she -- am I correct in understanding that
15 she seems to have given some of her hours to
16 Mark over the phone and that Mark told her, per
17 this email, that he would -- he would send her
18 paycheck via Uncle Jude?

19 A. Per this email, yes.

20 Q. Per this email, right.

21 Okay. Did Mark Goodrich have
22 oversight of the Haitian outreach campaign?

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- 1 A. To my knowledge, no. I don't know.
- 2 Q. Okay.
- 3 A. Because at this time, I'm not working
4 for the campaign.
- 5 Q. Okay.
- 6 A. That's why I forwarded it.
- 7 Q. Okay. Was it -- are you aware of
8 whether Uncle Jude was being paid for
9 canvassers' work rather than just his own
10 canvassing work?
- 11 A. I do not know.
- 12 Q. Okay. Do you know whether the
13 campaign ever paid someone money with the
14 intention that that person would then
15 distribute the money among other people?
- 16 A. I don't know.
- 17 Q. Okay. Do you know if Ms. Rose was
18 paid wages by the campaign?
- 19 A. When she worked under me, she was
20 paid \$17 an hour, around that. That was the
21 average we paid our canvassers.
- 22 Q. Got it.

1 A. For the date of this email, I
2 wouldn't have recollection.

3 Q. Okay. Do you see where on Sunday,
4 June 12th at 9:45 p.m., Mark Goodrich says in
5 an email to you, CC'ing Edwin Cherfilus, Yes,
6 she worked with Jude. I will pass this to
7 Maritza because -- and get her paid this week?

8 Do you see that email?

9 A. Yes, ma'am.

10 Q. Okay.

11 MS. FINK: Ms. Crump, do you mind
12 just scrolling to the bottom of the email so we
13 can just --

14 MS. CRUMP: Sure. Yeah. That's the
15 end.

16 MS. FINK: Oh. That's the end?
17 Thank you.

18 MS. CRUMP: No problem.

19 Q. Was it your understanding that Mark
20 Goodrich could direct certain individuals to be
21 paid by the campaign?

22 A. Yes. I will -- I will say yes, from

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1 what I saw.

2 Q. Okay. And from your knowledge and
3 experience, did Mark Goodrich have access to
4 the campaign checkbook?

5 A. No. Edwin Cherfilus was the check
6 signer.

7 Q. Okay. And Edwin Cherfilus, he's the
8 individual that's CC'd here in this email from
9 Mark Goodrich on June 12th; is that right?

10 A. Yes, ma'am.

11 Q. Okay. And who -- how is Edwin
12 Cherfilus related to the Congresswoman?

13 A. Her brother.

14 Q. Okay. What was his role in the
15 campaign?

16 A. To my knowledge, he had access to the
17 bank account and finance stuff.

18 Q. Do you know what kind of financial
19 access he had beyond bank account access?

20 A. To my knowledge, just the bank
21 account and the checks.

22 Q. Okay. Is it accurate that Edwin

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1 Cherfilus paid the campaign offices' phone
2 bills on at least one occasion?

3 A. I do not know that.

4 Q. Okay.

5 MS. CRUMP: Could we -- Richard,
6 could we look at Tab 1?

7 Q. Okay. Now I'm scrolling. Okay.
8 Staffer Two, do you see that we've returned to
9 your text messages with Mark Goodrich on the
10 screen?

11 A. Yes, ma'am.

12 Q. Okay. Do you see a message from you
13 to Mark Goodrich dated July 23, 2021 at
14 5:28 p.m.?

15 A. Hm-mmm.

16 Q. Okay. And do you see where you
17 wrote, Edwin paid the phone bills?

18 A. Hm-mmm.

19 Q. Okay.

20 MS. FINK: Can you please scroll down
21 to the Bates number again, please?

22 MS. CRUMP: Sure.

1 MS. FINK: Thank you.

2 MS. CRUMP: It is [REDACTED] 324.

3 MS. FINK: 324. Thank you.

4 MS. CRUMP: No problem.

5 Q. Staffer Two, which phone bills were
6 you referring to in this message?

7 A. As that was over or almost three --
8 or two years ago, I don't recall, but probably
9 the phones for the phone bankers.

10 Q. Okay. Were the phones being used for
11 phone banking, like, mobile phones?

12 A. Yes.

13 Q. Okay. And so those -- those mobile
14 phones had to be paid however often in order to
15 maintain them to use them for the campaign; is
16 that right?

17 A. Yes.

18 Q. Okay. And so that would have been
19 phone banking for the Congresswoman's campaign;
20 is that right?

21 A. Yes, ma'am.

22 Q. Okay. Do you recall having any

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1 further conversation with that -- with Mark
2 Goodrich about Edwin Cherfilus's paying the
3 phone banking phone bills?

4 A. To my memory, no.

5 Q. Okay. Were there other campaign
6 expenses that Edwin Cherfilus paid for, to your
7 knowledge?

8 A. No. I just know he had access to the
9 bank account and signed the checks.

10 Q. Okay. Do you know who else had
11 access to the bank account for the campaign?

12 A. The only two I know is the
13 Congresswoman and Edwin.

14 Q. Okay. And did anyone else have check
15 signing authority for the campaign?

16 A. Not to my knowledge.

17 Q. Okay. Okay. Did you -- did you ever
18 have to present a budget for the campaign to
19 Edwin?

20 A. Yes.

21 Q. Okay. What kind of budget did you
22 have to present him with?

1 A. For early voting, they had people
2 who, like, stand outside and hand flyers if
3 people are, like, walking, and he wanted a
4 budget to know how much that would cost.

5 Q. Okay. But it wasn't your impression
6 that Edwin Cherfilus was going to be personally
7 paying for those items; is that right?

8 A. No. He just had, like, the check
9 signing authority.

10 Q. Okay. So then I'd like to --

11 MS. CRUMP: We can remove this from
12 the screen. Thank you, Richard.

13 Q. Okay. So we talked a little bit
14 about Ms. Rose, and we reviewed that email with
15 Mark Goodrich. Beyond that conversation,
16 again, are you aware of anyone who did work for
17 the campaign, but who was paid by another
18 person or entity that was not the campaign?

19 A. Not to my knowledge.

20 Q. Okay. I'd like to ask you a few
21 questions about Mark Goodrich and his role in
22 the campaign.

1 Do you know how Mark was paid for his
2 work on the campaign?

3 A. No, I do not.

4 Q. Okay. Do you know how Maritza
5 Masseria was paid for her work on the campaign?

6 A. No, I do not.

7 Q. Okay. Did -- let's talk a little bit
8 about what Mark did on the campaign.

9 You said that he oversaw your work on
10 the campaign, correct?

11 A. Yes, ma'am.

12 Q. Okay. And that he oversaw the work
13 of most people who worked on the campaign?

14 A. In that office, yes, ma'am.

15 Q. Okay. And, in that office, you --
16 you're referring to the campaign office,
17 correct?

18 A. Yes. The Congresswoman had two
19 offices.

20 Q. Okay. Which office did you -- you
21 said you worked out of the Tamarac office; is
22 that right?

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1 A. Tamarac district office. Her
2 campaign office was in Sunrise.

3 Q. Okay. Sun -- so there was a Sunrise,
4 Florida campaign office. And, then, where was
5 the second campaign office?

6 A. In West Palm Beach.

7 Q. Okay. Do you know if Mark Goodrich
8 oversaw operations of the West Palm Beach
9 campaign office?

10 A. No, I do not.

11 Q. Okay. But you know that he oversaw
12 operations at the Sunrise, Florida campaign
13 office?

14 A. Yes, ma'am.

15 Q. Okay. And did Mark work out of the
16 campaign office during the campaign?

17 A. Yes, ma'am.

18 Q. Okay. Does Mark Goodrich still work
19 out of the campaign office or offices?

20 A. I don't -- I don't know.

21 Q. Okay. Does he ever do any work in
22 the Congresswoman's district offices?

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1 A. He has helped us with some things.

2 Q. And I'll circle back to that. When
3 -- when is the last time that you saw Mark
4 Goodrich in the Congresswoman's campaign
5 office?

6 A. That might be a long time ago. I
7 haven't been to the campaign office in a while.

8 Q. Okay.

9 A. Over seven months.

10 Q. Okay. And when is the last time that
11 you've spoken with Mark Goodrich?

12 A. In May. I don't remember the exact
13 date.

14 Q. Okay. But it would have been in May
15 of 2023?

16 A. Yes, ma'am.

17 Q. Did you talk to him about this
18 review?

19 A. It was a text. I had reached out to
20 him for a Democratic club in Tampa area.

21 Q. Okay. So you did not discuss this
22 review with Mark Goodrich?

1 A. I have discussed it with him.

2 Q. Okay. When did you --

3 A. But that was -- that was our last
4 conversation.

5 Q. I see. I understand.

6 When did you discuss this review with
7 Mark Goodrich?

8 A. I don't recall exactly, but it was
9 around the time you guys let, you know, the
10 Congresswoman know and him know you're asking
11 for information and that they're under
12 investigation.

13 Q. Okay. Did Mr. Goodrich reach out to
14 you or did you reach out to him to discuss it?

15 A. I think -- I don't know who reached
16 out to who. I wouldn't remember who reached
17 out to who.

18 Q. Okay. Was the conversation in
19 person, text, phone, FaceTime --

20 A. In person.

21 Q. In person?

22 A. In person.

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33

1 Q. Do you --

2 A. Hm-mmm.

3 Q. Do you recall where the conversation
4 took place?

5 A. We were at a restaurant.

6 Q. What did Mr. Goodrich tell you about
7 this review?

8 A. He was kind of saying he was upset.
9 He was saying OCE is not real. He doesn't know
10 what they're investigating. He doesn't
11 understand; that he didn't feel the need to
12 tell you guys anything. And I was telling him,
13 based on what I looked up, They are real; they
14 are, like, the -- the preliminary before it
15 goes to Congressional Ethics.

16 But he was very just upset about it.
17 He didn't understand, and he -- like, he's
18 not -- they're not real. He never heard of
19 them before. So it was kind of like that, and,
20 then, me telling him, you know, It is real.

21 Q. Okay. It sounds like Mr. Goodrich
22 acknowledged receiving communications from our

1 office. Was that your impression?

2 A. To my knowledge, yes.

3 Q. Okay. Did you discuss the underlying
4 allegations of this review with Mr. Goodrich?

5 A. Regarding it was about the PSA
6 commercials.

7 Q. Okay. And what did he tell you about
8 the PSA commercials in that conversation?

9 A. That he doesn't understand why you
10 guys are investigating. He didn't say anything
11 of substance because he was just very upset.

12 Q. Okay. How long was this conversation
13 with Mr. Goodrich at the restaurant?

14 A. It was pretty brief, because I didn't
15 know too much about what happened with the
16 commercials. I was out of the office dealing
17 with [REDACTED]

18 Q. Okay. We might come back to that
19 conversation, but I'm going to keep going
20 through some other topics now.

21 A. Okay.

22 Q. Perfect.

1 Okay. When Mark Goodrich worked on
2 the campaign, was he involved in crafting
3 campaign TV advertisements?

4 A. Yes, ma'am.

5 Q. Okay. He was also involved in
6 generating campaign mailers and other campaign
7 communications?

8 A. To my knowledge, yes, ma'am.

9 Q. Okay. Mark Goodrich was also
10 involved in directing campaign strategy?

11 A. To my knowledge, some strategy.

12 Q. Okay. And it sounds like Mark
13 Goodrich was also involved in overseeing block
14 walking, phone banking, field operations; is
15 that right?

16 A. Alongside me, yes, ma'am.

17 Q. Right, alongside you.

18 Was there anything in the campaign
19 that Mark Goodrich didn't have some degree of
20 involvement with?

21 A. I don't know.

22 Q. Okay. You're not aware of anything

1 that he didn't have any involvement with on the
2 campaign?

3 A. I am not aware of anything.

4 Q. Okay. Have you -- you mentioned
5 earlier that Willis Howard was, in title, the
6 campaign manager of the campaign; is that
7 right?

8 A. Yes, ma'am.

9 Q. Do you know how he became involved in
10 the campaign?

11 A. No, ma'am. I do not know.

12 Q. Can you shed any light on why the
13 campaign manager, in title, would be a
14 different person from the person who actually
15 managed the campaign?

16 A. I would not know that.

17 Q. Okay. Do you know who Maria Garcia
18 was?

19 A. That name sounds familiar, but I
20 couldn't pinpoint for you. I'm sorry.

21 Q. That's okay.

22 Would the name Maria Garcia del Rio

1 be -- be helpful at all to clarify that?

2 A. Oh. I'm still the same. Like, I --
3 I know I heard the name before. I just don't
4 know, like --

5 Q. That's fine.

6 A. -- like, what --

7 Q. Okay. All right. Have you ever
8 heard of Leadership in Action PAC?

9 A. Yes, ma'am.

10 Q. Okay. How have you heard of that
11 entity?

12 A. It was a debate, I think it was, with
13 the Congresswoman and, like, her opponents, and
14 the opponent, like, brought up Leadership in
15 Action.

16 Q. Okay. Do you know whether Mark
17 Goodrich is associated with Leadership in
18 Action PAC?

19 A. To my knowledge, yes.

20 Q. Okay. Are you aware of the fact that
21 -- scratch that. Scratch that.

22 How is Leadership in Action PAC

1 affiliated with Mark Goodrich, to your
2 knowledge?

3 A. I don't know that.

4 Q. Okay. Has Mr. Goodrich ever
5 discussed Leadership in Action PAC with you?

6 A. Not with me, no.

7 Q. Okay. Do you know how Mark Goodrich
8 was paid for his work on the campaign?

9 A. No, I do not know.

10 Q. Okay. Was it your impression that he
11 was working for the campaign for free?

12 A. No. I don't -- I don't know.
13 Respectfully, that -- that was above my pay
14 grade, so I don't know.

15 Q. Right.

16 So you don't know one way or the
17 other whether he was paid for his work on the
18 campaign?

19 A. No, ma'am.

20 Q. Okay. Do you recognize the name
21 Hector Roos?

22 A. Yes, ma'am.

1 Q. Okay. Who is Hector Roos?

2 A. Hector was -- I don't know his
3 official title. He -- he was there in the
4 beginning, but he left. And when I went on
5 maternity leave, he, like, came back for a
6 little bit, but he worked in the office. I
7 don't know what he actually did, though.

8 Q. Okay. He worked with Mark Goodrich?

9 A. Yes. And the Congresswoman.

10 Q. And skipping around -- I apologize,
11 but I want to make sure I don't forget to ask.

12 You referenced the conversation that
13 you had with Mark Goodrich at the restaurant
14 where you briefly discussed this review by the
15 Office of Congressional Ethics.

16 Who else was present during that
17 conversation?

18 A. Nadege, but she was in the restroom
19 when that part happened. It was kind of like a
20 meet-up, you know, to catch up.

21 Q. Okay. So was anyone else present
22 when you and Mark Goodrich discussed this

1 review?

2 A. No.

3 Q. Okay. Do you know how Mark Goodrich
4 got involved with the Congresswoman's campaign?

5 A. No, I do not.

6 Q. Do you know what his background was
7 prior to this campaign?

8 A. From what he told me, he was a Hill
9 staffer, and he worked on different campaigns
10 throughout the State of Florida and -- was it
11 New York or New Jersey? One of those places
12 where he's from.

13 Q. Okay. Do you recall any of the
14 campaigns he worked on in Florida?

15 A. I remember him telling me about
16 someone in the Keys, because he said that he
17 loved living there, but I don't remember who
18 the person was.

19 Q. Okay. Do you recall whether those
20 campaigns were for Democrats or Republicans or
21 Independents or do you recall?

22 A. Oh. I think it was, like, city

1 commission, so I don't think they had a party.

2 Q. Okay. Did the Congresswoman's
3 campaign have a finance director?

4 A. Not to my knowledge.

5 Q. Do you know if the campaign ever
6 tried to hire a finance director?

7 A. That's what I actually applied for.
8 I was just applying --

9 Q. Okay.

10 A. -- seeing what sticks.

11 Q. Got it.

12 And so the person that you
13 interviewed with for the finance director
14 position was Mark Goodrich; is that right?

15 A. Yes, ma'am.

16 Q. And so he was involved in trying to
17 hire a finance director for the campaign?

18 A. Yes, ma'am.

19 Q. Okay. And, to your knowledge, the
20 campaign never did end up hiring a finance
21 director?

22 A. Not to my knowledge.

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1 Q. Okay. Okay. Shifting gears just a
2 little bit.

3 Have you worked on the
4 Congresswoman's campaign since you went to work
5 for her official office?

6 A. I did not work. I volunteered.

7 Q. You volunteered?

8 Okay. So you were not paid for the
9 work that you did for her campaign?

10 A. No, ma'am.

11 Q. Okay. When did you -- during what
12 time period did you work on the Congresswoman's
13 campaign after you started working for her
14 official office?

15 MS. FINK: Could I just ask you to
16 clarify?

17 MS. CRUMP: Sure. I can definitely
18 ask that in a more clear way.

19 Q. You just said that you volunteered
20 for the Congresswoman's campaign after you went
21 to work for her official office, correct?

22 A. (No verbal response.)

1 Q. Okay. When did you do that
2 volunteering?

3 A. I don't know the specific dates, but
4 I would assume around May, April. That is
5 normally when campaigns kick off.

6 Q. Okay. Of 2022?

7 A. Yes, ma'am.

8 Q. Okay. And was that volunteering for
9 the campaign in 2022, was that full time,
10 part-time? Do you recall?

11 A. Leisure time; when I had free time.

12 Q. Okay. And who did you report to as a
13 volunteer for the campaign?

14 A. I don't think I, like, actually had,
15 like, a reporting duty. A lot of it was
16 maintain relationships that I built on the
17 campaign. So if I knew someone from here,
18 okay, well, this -- a lot of forwarding, as you
19 can see, like, even with Ms. Rose.

20 Q. Okay. Was it your impression that
21 Mark Goodrich was continuing to manage the
22 campaign during this time period?

1 A. He was overseeing.

2 Q. Okay. He was overseeing the campaign
3 in 2022; is that right?

4 A. To my knowledge, yes.

5 Q. Okay. I'd like to ask you -- oh.
6 Who -- who asked you to work for the
7 Congresswoman's official office after the
8 campaign ended?

9 A. The Congresswoman herself.

10 Q. Okay. All right. So now I have a
11 few questions about Mark Goodrich's role after
12 the Congresswoman had won her seat.

13 A. Okay.

14 Q. So you mentioned that since you
15 assumed your role in her official office, that
16 Mark Goodrich has done some work with the
17 Congresswoman's official office; is that right?

18 A. Yes. He has helped and advise [sic]
19 me.

20 Q. Okay. Since the Congresswoman won
21 her seat in Congress, did Mr. Goodrich work on
22 developing legislative priorities for the

1 Congresswoman's committees?

2 A. Not to my knowledge. I know that he
3 knew a lot of groups. And she was a part of
4 Veterans Affairs, and she was placed there.
5 And he doesn't know anything about Veterans
6 Affairs, so she did ask him to ask -- I can't
7 remember the veteran group, but to ask them,
8 like, what should her priorities be.

9 Q. Okay.

10 MS. CRUMP: Could we pull up Tab 1,
11 please?

12 THE AV TECHNICIAN: Please stand by.
13 I'm giving you remote access now.

14 MS. CRUMP: Thank you.

15 THE AV TECHNICIAN: You're welcome.

16 Q. Okay. Staffer Two, do you see on
17 your screen, again, some of the text messages
18 between you and Mr. Goodrich?

19 A. Yes, ma'am.

20 Q. Okay. I'm scrolling to Bates ■ 382.
21 Okay. Do you see a series of messages
22 exchanged between you and Mark Goodrich on

1 February 3, 2022?

2 A. Yes, ma'am.

3 Q. Okay. Do you see a message that you
4 sent to Mr. Goodrich that says, Could you send
5 me Sheila priorities for the veterans
6 committee?

7 A. Yes, ma'am.

8 Q. And do you see where he responds and
9 says, Johanna asked me for this, as well. I
10 will write something up this afternoon and send
11 to both of you tonight?

12 A. Yes, ma'am.

13 Q. Okay. Who is Johanna?

14 A. She was the legislative director.

15 Q. Okay. So is it your impression that
16 the Congresswoman's legislative director asked
17 Mark Goodrich to write something up for
18 priorities for the veterans committee?

19 A. Yes, from the conversation he had
20 with the veterans group.

21 Q. And just to make sure I understand.
22 Johanna is official staff for the

1 Congresswoman's official office, correct?

2 A. Yes, ma'am.

3 Q. Okay.

4 A. Yes, ma'am.

5 MS. CRUMP: We can remove this from
6 the screen, Richard. Thank you.

7 Q. Okay. Since the Congresswoman's
8 election, has Mark Goodrich asked you to
9 coordinate meetings between the Congresswoman
10 and other elected officials?

11 A. Yes, ma'am.

12 Q. Okay. Since the Congresswoman's
13 election, has Mark Goodrich prepared media
14 statements for the Congresswoman's official
15 office?

16 A. In the beginning. I don't recall if
17 they were official or unofficial interviews,
18 but, yes, he has done both.

19 Q. Okay. So he has done both official
20 and unofficial media statements for the
21 Congresswoman's official office? I'm sorry.
22 Maybe --

1 A. Yes, he has.

2 Q. Okay. Has he prepared media
3 statements for the Congresswoman about official
4 travel that she's undertaken?

5 A. Official travel?

6 Q. Particularly a trip to Israel, I
7 believe.

8 A. With APAC? I -- I don't think so. I
9 don't -- I don't remember. That was, like, at
10 the very beginning.

11 Q. Okay. Well, let's pull up Tab 6 and
12 see if we can refresh your recollection.

13 THE AV TECHNICIAN: Please stand by.

14 Passing remote access.

15 MS. CRUMP: Thank you, Richard.

16 THE AV TECHNICIAN: You're welcome.

17 Q. Staffer Two, do you see an email on
18 your screen, Bates [REDACTED] 15? It appears to be an
19 email chain between you and Mark Goodrich dated
20 January 19, 2022.

21 A. Yes, ma'am.

22 Q. Okay. Do you see some texts that

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1 appears to be a statement about the
2 Congresswoman's upcoming trip to Israel?

3 MS. FINK: Can you just give us a
4 minute --

5 MS. CRUMP: Yes.

6 MS. FINK: -- to read it, please?

7 Q. Go ahead. Go ahead and take a
8 minute, and let me know when you're ready.

9 A. I read the email.

10 Q. Okay.

11 MS. CRUMP: Counsel, have you had the
12 opportunity to review?

13 MS. FINK: Yes. Thank you.

14 Q. Okay. Staffer Two, does this appear
15 to be text that Mark Goodrich prepared
16 concerning the Congresswoman's upcoming travel
17 to Israel?

18 A. Yes. This was the day after she was
19 sworn in. I was the only staffer at this time,
20 too.

21 Q. Oh. So did Mr. Goodrich prepare --
22 was this a media statement concerning the

1 upcoming trip?

2 A. To my knowledge, this is what it
3 appears to be. I -- I really don't remember.
4 I was running crazy at this moment.

5 Q. That's fine.

6 And -- but it sounds like it wasn't
7 uncommon for Mark Goodrich to prepare media
8 statements both for the Congresswoman's
9 official office and otherwise, correct?

10 A. Yes. If I needed assistance, he was
11 always a helping hand.

12 Q. Got it.

13 MS. CRUMP: Richard, we can go ahead
14 and take down this document.

15 Q. After the Congresswoman was elected,
16 did Mark Goodrich handle media requests?

17 A. Yes. He wasn't the only one. It was
18 multiple people.

19 Q. Okay. But he was one of multiple
20 people who handled media requests for the
21 Congresswoman after her election?

22 A. Yes, ma'am.

1 Q. Since the Congresswoman's election to
2 her seat, has Mark Goodrich drafted public
3 statements about legislation for the
4 Congresswoman?

5 A. I honestly don't remember.

6 Q. Okay.

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

9 THE AV TECHNICIAN: Yes. Please
10 stand by.

11 Q. Okay. Staffer Two, I'll give you and
12 your counsel a moment to review the document on
13 the screen, okay?

14 A. Yes, ma'am.

15 Okay. I have read it.

16 Q. Okay.

17 MS. FINK: Counsel, I'm sorry.
18 Another 30 seconds, please.

19 MS. CRUMP: No problem.

20 MS. FINK: I've read it. Thank you.

21 MS. CRUMP: No problem.

22 Q. Okay. Staffer two, is it your

1 understanding that Mark Goodrich has drafted
2 public statements about legislation for the
3 Congresswoman's official office?

4 A. She was not sworn in at this time.

5 Q. Okay.

6 A. Unfortunately, the Florida elections
7 did not certify the election. So she was
8 supposed to, but because they did not certify
9 it, she was unable, as you can see in the
10 email. It says, I was unable to vote yesterday
11 as I will not be sworn in until next week.

12 Q. Exactly.

13 But this is a statement that Mark
14 Goodrich prepared about legislation in the
15 House of Representatives after she had won, but
16 not been certified as the winner; is that
17 right?

18 A. I would say so.

19 Q. Okay.

20 MS. CRUMP: We can take this off the
21 screen, Richard.

22 Q. Was Mark Goodrich involved in

1 crafting the Congresswoman's House bio after
2 her election?

3 A. To my knowledge, yes. I think so.

4 Q. Okay.

5 MS. CRUMP: I would like to pull up
6 Tab 10, please.

7 THE AV TECHNICIAN: Please stand by.

8 Q. And I will give you a -- a moment to
9 review the document on -- on the screen, okay?

10 A. Sorry. Excuse my dog in the
11 background.

12 Q. No problem. And I should have said
13 this earlier, Staffer Two. But if you need to
14 take a break at any time when a -- when a
15 question isn't pending, just let me know, and
16 we can go off the record. But I'm not bothered
17 by your dog, in any event, so just let us know.

18 MS. FINK: Is this the full email
19 chain that's displayed on the screen?

20 MS. CRUMP: There is a second page,
21 but, just, that's it.

22 MS. FINK: Thank you.

1 Q. Okay. Staffer Two, have you had a
2 chance to review this page?

3 A. No. Give me --

4 Q. Okay.

5 A. -- a little more --

6 Q. No problem.

7 A. Okay. I've finished.

8 Q. Okay. Staffer Two, do you see on
9 your screen an email from Mark Goodrich to you
10 on January 20, 2022?

11 A. Yes, ma'am.

12 Q. Okay. What is the RV that's being
13 referred to in this email?

14 A. The Congresswoman RV that she
15 purchased to do mobile offices for.

16 Q. Okay. So this was in conjunction
17 with a learning and listening tour coordinated
18 by her official office; is that right?

19 A. I don't think we carried it out. I
20 think she wanted to have one, but it was --

21 Q. Okay. So it was a -- she purchased
22 the RV and intended to have a learning and

1 listening tour, but you're not sure if --

2 A. Oh. No. We still use it. It's for
3 mobile office for constituent services. Our
4 district is big, so we go to, like, different
5 parts. Our district is, like, furthest point
6 to furthest point, almost two hours.

7 Q. Okay.

8 A. So it goes out weekly.

9 Q. Okay. And it looks like Mark
10 Goodrich was involved in preparing the artwork
11 for the Congresswoman's official RV; is that
12 right?

13 A. Well, it's her RV, but yes.

14 Q. Okay. So, I guess, to backtrack and
15 make sure I understand. The Congresswoman
16 personally purchased an RV; is that correct?

17 A. Yes.

18 Q. And --

19 A. Basically -- oh. Sorry.

20 Q. No. No. I'm sorry. I shouldn't
21 have talked over you. Please go ahead.

22 A. And she personally pays for the

1 maintenance and, like, all of that regarding
2 that.

3 Q. Okay. Do you recall when the
4 Congresswoman purchased the RV?

5 A. From my memory, it was December 2021.

6 Q. Okay. And, then, has the RV since
7 then strictly been used to visit constituents
8 throughout the district?

9 A. It's been used for events, as well.

10 Q. Campaign events or official events?

11 A. Official events. And it was used for
12 a campaign event before.

13 Q. Okay. And you said that the
14 Congresswoman personally pays for the
15 maintenance of this RV; is that right?

16 A. Yes. House counsel said the only
17 thing that the MRA is responsible for is the
18 payment by her.

19 MS. FINK: And, of course, this --
20 these questions, like all of them, are to -- to
21 the extent you -- you are aware of -- of the
22 facts.

1 THE WITNESS: Yeah.

2 Q. Did you have a conversation with
3 House counsel about the propriety of her
4 maintaining the RV with her personal funds?

5 A. Yes. Ms. Jeanette Jenkins.

6 Q. And House counsel told you that it
7 was okay for the Congresswoman to pay for and
8 buy the RV in the first instance?

9 A. Oh. She had already bought the RV.

10 Q. Okay. So House counsel approved the
11 personal -- use of personal funds to maintain
12 the RV, but wasn't asked about the purchase of
13 the RV; is that right?

14 A. (Inaudible.)

15 Q. Okay. Were there --

16 A. She discussed --

17 Q. I'm sorry. I interrupted you.

18 A. She just discussed, like, different
19 rules that comes with it.

20 Q. Okay. Was this conversation by phone
21 or by email?

22 A. My House email.

1 Q. Okay. Were there any other -- it
2 sounds like this RV was used for official
3 office business.

4 Were there any other items that the
5 Congresswoman paid for with personal funds that
6 supported official office business, to your
7 knowledge?

8 A. No. I do not know.

9 Q. You don't know?

10 Okay. To your knowledge, did any
11 other staffers use personal funds for items
12 that supported official office work?

13 A. No. I don't know.

14 Q. Okay.

15 MS. FINK: Ms. Crump, we've been
16 going for about an hour. Would now be an okay
17 time for you to take a break?

18 MS. CRUMP: Absolutely. If we want
19 to take about ten minutes?

20 MS. FINK: Sure. Yeah. Can we go
21 off the record?

22 MS. CRUMP: Yeah. Let's go off the

1 record, please.

2 THE AV TECHNICIAN: All righty. Off
3 the record at 10:32.

4 (A recess was taken.)

5 BY MS. CRUMP:

6 Q. Hello again, Staffer Two.

7 A. Hello.

8 Q. I have another document that I would
9 like to look at with you.

10 MS. CRUMP: Richard, would you please
11 pull up Tab 12?

12 THE AV TECHNICIAN: Stand by.

13 Q. Okay. And, Staffer Two, this
14 document is multiple pages. So I'll start at
15 the top and -- and zoom out, also, if you'd
16 like. But let me know when you would like me
17 to scroll down.

18 A. Sure.

19 I'm ready to go to the next page.

20 MS. CRUMP: Counsel, can we scroll?

21 MS. FINK: Oh. Yes. Thank you.

22 Q. All right. Here's the next page.

1 A. I'm ready for the next page.

2 Q. Okay. Here's the last page.

3 A. I finished.

4 Q. Okay. Okay. So you see on your
5 screen we have Bates numbered documents [REDACTED] 287
6 through [REDACTED] 289?

7 A. Yes, ma'am.

8 Q. Okay. And this appears to be an
9 email chain that involves you, Mark Goodrich,
10 Nadege LeBlanc, the Congresswoman; is that
11 right?

12 A. Yes, ma'am.

13 Q. Okay. And it appears to me that the
14 thread begins when Mark Goodrich sends some
15 documents and information to you and Nadege and
16 the Congresswoman. Am I reading that right?

17 A. Yes, ma'am.

18 Q. Okay. Can you explain to me what
19 this plan or program is that Mark Goodrich
20 provided to you all?

21 A. It was a political vote-by-mail
22 program based on -- we vote by mail in Florida.

1 Basically, starting over. So it is a plan to
2 sign people up for vote-by-mail.

3 Q. And why was Mark Goodrich, I guess,
4 pitching this to the Congresswoman?

5 A. Since it's political, and it benefits
6 Democrats.

7 Q. I guess my question is: Was this
8 a -- a campaign plan that Mark Goodrich --

9 A. Yes.

10 Q. -- was proposing?

11 Okay. So this was -- this
12 vote-by-mail program that Mark Goodrich was
13 proposing to the Congresswoman was for the
14 campaign, for her reelection; is that right?

15 A. Yes, ma'am.

16 Q. Okay. And do you know what the
17 Congresswoman was going to do with this plan?
18 I see references to a -- a deck and typos.

19 Was she going to use this for
20 something or -- I'm just trying to get a sense
21 of what the work product was that you and Mark
22 Goodrich were working on.

1 A. I don't know. I can't say how she
2 intended to use it.

3 Q. Okay. Did you, at that time, have an
4 understanding of what the document would be
5 used for?

6 A. No. I knew what the project was, but
7 I did not know how it would be distributed.

8 Q. Okay.

9 MS. CRUMP: Richard, we can go ahead
10 and take this off the screen.

11 Q. Okay. So we've talked about how Mark
12 Goodrich did some work for the Congresswoman's
13 official office after she was sworn in,
14 correct?

15 A. Yes, ma'am.

16 Q. Okay. And, to your knowledge, the
17 Congresswoman was aware of the fact that Mark
18 Goodrich was doing work for her official
19 office, correct?

20 A. He was assisting, advising.

21 Q. Okay. We went over how Mark Goodrich
22 drafted statements to the media, correct?

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1 A. Yes, ma'am.

2 Q. Okay. And we went over how he
3 requested that you set up meetings between the
4 Congresswoman and other elected officials?

5 A. Yes, ma'am.

6 Q. Okay. And we went over how he had
7 input on the Congresswoman's House bio after
8 her election?

9 A. I said from my memory, I -- I think
10 he had involvement, but I don't fully remember.

11 MS. CRUMP: Can we pull up Tab 9,
12 please?

13 THE AV TECHNICIAN: Please stand by.

14 Q. Okay. On the screen we have a single
15 page document Bates marked [REDACTED] 103. Staffer
16 Two, do you see this document, which appears to
17 be a forwarded email from Mark Goodrich on
18 January 18, 2022, sent to Willis Howard, the
19 Congresswoman, you, and Nadege LeBlanc?

20 A. Yes, ma'am.

21 Q. Okay. And do you see that it's
22 forwarding a message from MIG World, with an

1 email address of [REDACTED]?

2 A. Yes, ma'am.

3 Q. Do you recognize the
4 [REDACTED] email address, by any chance?

5

6 A. No, ma'am, I do not.

7 Q. Okay. Does this email refresh your
8 recollection as to whether Mark Goodrich was
9 involved in generating the Congresswoman's
10 House bio?

11 A. Based on what he forward. He forward
12 the House bio. But, again, I don't know the
13 inner workings of it.

14 Q. Okay.

15 MS. CRUMP: We can take this down.

16 Q. All right. So was there anything
17 that we haven't talked about today -- are there
18 any examples of Mark Goodrich doing work for
19 the Congresswoman's official office that we
20 haven't talked about already?

21 A. To my memory, I don't -- I don't
22 know.

1 Q. You don't --

2 A. Can you ask a specific question?

3 Q. That's what I'm trying to get at.

4 I -- I've raised some specific examples of work
5 that he was doing connected to the official
6 office for the Congresswoman, and I'm asking
7 was there anything outside of that, that we've
8 talked about that he also did for the official
9 office.

10 A. To my memory, I don't know.

11 Q. Okay. And you stated before you
12 don't know whether Mark Goodrich is paid or
13 not; is that right?

14 A. Yes. I do not know.

15 Q. Okay. Did you, personally, ever
16 speak to the ethics commission about Mark
17 Goodrich?

18 A. No, ma'am.

19 Q. Okay. Were you ever involved in
20 conversations about talking to the ethics
21 commission about Mark Goodrich?

22 A. Could you clarify what you're asking?

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1 Q. Sure.

2 A. I'm sorry.

3 Q. No problem.

4 So you said you never personally
5 talked to the ethics commission about Mark
6 Goodrich. Are you aware of anyone else in the
7 Congresswoman's office talking to the ethics
8 committee about Mark Goodrich or do you not
9 know?

10 A. No. I'm not aware.

11 Q. Okay. Okay. In your opinion, why
12 doesn't Mark Goodrich work for the
13 Congresswoman's official office? Do you have
14 any insight into that?

15 A. No.

16 Q. When Mark Goodrich was doing this
17 work that we've been talking about, after the
18 election, for the Congresswoman's official
19 office, where was he working from? Do you
20 know?

21 A. I recall from the Sunrise campaign
22 office.

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1 Q. Okay.

2 MS. CRUMP: Can we pull up Tab 13,
3 please?

4 THE AV TECHNICIAN: Stand by.

5 Q. Okay. This is a three-page document.
6 I'll let you review this page, and then I can
7 scroll down when you're done. Just let me
8 know.

9 A. Yes, ma'am. I'm ready for you to
10 scroll.

11 Yes, ma'am.

12 Q. Okay. And then there's one last
13 page.

14 A. Oh. Okay. Sorry.

15 Q. No worries.

16 A. I finished reading, ma'am.

17 Q. Okay. Do you see this email chain
18 Bates labeled [REDACTED] 52 through [REDACTED] 54, which
19 appears to be --

20 A. Yes, ma'am.

21 Q. It appears to be an email thread that
22 involves Maritza Masseria, someone from

1 Accurate Business Systems, and yourself; is
2 that right?

3 A. Yes, ma'am.

4 Q. Okay. What are these invoices for
5 that Maritza refers to in these emails,
6 generally?

7 A. I -- I do not know about the campaign
8 invoices, but for the congressional invoices,
9 there are, as listed, our congressional shirts.
10 The Congresswoman has coloring books for when
11 she visits schools; five by seven cards that
12 has information about the services we offer
13 and, like, a QR code to, like, do a privacy
14 form; our congressional tent. Those two, step
15 and repeats, as you can see, they are not ours,
16 and I edited that. More coloring books and
17 table skirt -- like, a table cloth.

18 Q. Okay. And it looks as though -- and
19 correct me if I'm wrong -- Maritza is emailing
20 this vendor identifying charges for the
21 campaign and then charges for the congressional
22 office; is that right?

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1 A. Yes. The vendor had a mixup with
2 what was campaign and congressional. So she
3 was, what appears to be, trying to rectify it.

4 Q. Okay. Do you see on page [REDACTED] 53
5 where --

6 A. Yes.

7 Q. -- it's written, Also, please remove
8 Mark Goodrich and address on all invoices?

9 A. Yes, for the congressional ones.

10 Q. Okay. And why was Mark Goodrich's
11 name needing to be removed from the
12 congressional ones?

13 A. Because it has to be my name because
14 we were using my purchase card.

15 Q. Okay. Was this something that had to
16 be done on occasion, remove Mark Goodrich's
17 name from documents, to ensure that the proper
18 contact from the official office was listed?

19 A. From my memory, I do not know. But
20 from this, it was to make sure that the stuff
21 that was congressional was separate and that I
22 took care of it, because it was under my card.

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Conducted on July 19, 2023

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1 Q. Okay. Do you know why Mark
2 Goodrich's name ended up on -- on those
3 invoices to begin with?

4 A. He uses this vendor. So he has that
5 relationship, and he connected us with her.

6 Q. Okay. And he has that relationship
7 with the vendor for campaign work; is that
8 right?

9 A. To my knowledge, yes.

10 Q. Okay. So is it fair to say that Mark
11 had continued to work on the campaign after the
12 Congresswoman was elected to her office?

13 A. It's fair, within context. She won
14 and then started right back up, a election.
15 She was finishing a term.

16 Q. Right. Yeah. And so I can reframe
17 that.

18 Upon being elected and having an
19 election again in a few months, Mark Goodrich
20 continued to work on her campaign, correct?

21 A. Yes. To my knowledge, yes.

22 Q. Okay. Okay.

1 MS. CRUMP: We can take this document
2 down.

3 Q. Okay. Staffer Two, after the
4 Congresswoman won her seat, Mr. Goodrich was
5 also involved in some MRA-funded ads for the
6 Congresswoman's official office; is that right?

7 A. Yes. To my knowledge, yes.

8 Q. Okay. Were those ads only videos, to
9 your knowledge?

10 A. Yes. To my knowledge, it was videos.

11 Q. You're unaware of any other
12 MRA-funded communications Mr. Goodrich was
13 involved in?

14 A. No. I don't know.

15 Q. Okay. And so I'm going to ask you
16 some questions about the videos. And just to
17 make sure that we're both --

18 A. Okay.

19 Q. -- talking about the same thing, I'm
20 going to refer to them as -- or I'm referring
21 to three franked television ads, or as the
22 Congresswoman's office may have called them, I

1 believe, GSAs that the House Communication
2 Standards Commission approved for franking in
3 early June of 2022.

4 You know, just for purposes of us
5 being on the same page, are you aware of the
6 videos that I'm referring to?

7 A. Yes, I'm aware of them.

8 Q. Okay. From this point, I'm just
9 going to refer to them as the franked videos.

10 A. Okay.

11 Q. Okay. When did you become aware of
12 the franked videos?

13 A. Could you clarify?

14 Q. Sure.

15 Were you involved in generating the
16 franked videos?

17 A. No. I was off [REDACTED].

18 Q. [REDACTED] can I ask
19 when you were off [REDACTED] ?

20 A. [REDACTED]
21 Well, it was, like, in the middle of the night,
22 so either May 16th or the 17th, and he was

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1

Q. Okay. I'm sorry to hear that.

2

3

Were -- did you return to work after
4 those two weeks or did you take additional time
5 off after that?

4

5

6

A. I was partially there; partially not.

7

8

9

Q. Okay. So, nevertheless, you were not
10 involved in creating the franked videos?

10

11

A. No, ma'am, I was not.

12

Q. Okay. You were not involved in
13 planning for their airing or distribution,
14 either?

14

15

A. No, ma'am, I was not.

16

Q. Okay. Do you know who was involved
17 in putting together and airing these franked
18 videos?

18

19

A. I do not know.

20

Q. Okay. Were you a part of any
21 conversations about using the MRA to pay for
22 the videos -- the franked videos?

22

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1 A. When I came back -- well, when I was
2 out, Nadege had asked for the purchase card to
3 pay for them. And when I came back, Kelly, the
4 finance person, she asked for the phrasing
5 approval, the -- the ad itself, and the
6 invoice. And I, like, forwarded it to
7 Nadege -- well, CC'd Nadege to handle it,
8 because I wasn't aware.

9 Q. Okay. But you weren't a part of
10 planning to use the MRA for these franked
11 videos?

12 A. I probably was CC'd, but as far as me
13 actually being aware and paying attention, no,
14 I was not.

15 Q. Okay. You don't have any knowledge
16 or recollection of any conversations about
17 using the MRA to pay for the franked videos?

18 A. Not to my memory, no.

19 Q. Okay. You said that you began
20 working for the campaign in June of 2021; is
21 that right?

22 A. Yes, ma'am.

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1 Q. Okay. Are you aware of loans that
2 the Congresswoman made to her campaign that
3 summer that you started on the campaign?

4 A. No, ma'am.

5 Q. Okay. Were you a part of any
6 discussions about the Congresswoman's loans to
7 her campaign while you worked on the campaign?

8 A. No, ma'am, I wasn't.

9 Q. Okay. Have you been a part of any
10 discussions about those loans since then, since
11 you worked on the campaign?

12 A. No, ma'am.

13 Q. Okay. Are you aware of other loans
14 during other time periods that the
15 Congresswoman has made to her campaign?

16 A. No, ma'am, I am not.

17 Q. Okay. Have you ever heard of SCM
18 Consulting Group, LLC?

19 A. No, ma'am, I have not.

20 Q. Okay. Who on the campaign would have
21 coordinated the campaign's acceptance of the
22 loans from the Congresswoman?

1 A. I do not know.

2 Q. Okay. Who -- who was involved in
3 keeping track of contributions and donations to
4 the campaign?

5 A. I do not know.

6 Q. Okay. You said the Congresswoman and
7 her brother were the ones who had check writing
8 authority for the campaign, correct?

9 A. Yes, to my knowledge.

10 Q. Okay. And, to your knowledge, they
11 both had financial access and involvement with
12 the campaign?

13 A. Yes, ma'am.

14 Q. And you said that Maritza Masseria
15 did the campaign's FEC reporting?

16 A. To my knowledge, yes.

17 Q. Was there anyone else on the campaign
18 who did the campaign's FEC filings or
19 reporting?

20 A. Not that I know of.

21 Q. Okay. Let's see. So you said that
22 while you were director of field operations,

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1 you oversaw block walking and phone banking,
2 canvassing, things like that; is that right?

3 A. Yes, ma'am.

4 Q. Okay. Where did the campaign get its
5 block walkers or canvassers from?

6 A. We did job postings, emailed schools,
7 the Democratic Party.

8 Q. Okay.

9 A. Reached out to see if they know
10 anyone.

11 Q. Have you ever heard of a company
12 called Essential Community Health?

13 A. No, I have not.

14 Q. Okay. Do you know of anyone who
15 worked on the campaign who also worked for any
16 companies that the Congresswoman was involved
17 with?

18 A. No. I know her brother, but --

19 Q. Okay. Okay. Have you heard of Truth
20 and Justice, Inc., or Truth and Justice PAC?

21 A. No.

22 Q. Okay.

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1 MS. CRUMP: Can we pull up Tab 1,
2 please?

3 THE AV TECHNICIAN: Please stand by.
4 Oh. I accidentally gave access to the wrong
5 person. One second.

6 There we are.

7 Q. I'm going to scroll to [REDACTED] 338.
8 Staffer Two, do you see on your screen the
9 production of text messages between you and
10 Mark Goodrich?

11 A. Yes, ma'am.

12 Q. Okay. Okay. This -- what I would
13 like to talk about is on [REDACTED] 338 and continues
14 on to [REDACTED] 339.

15 A. Okay.

16 Q. Specifically, I'd like to start here.
17 So if you'd like me to -- to zoom in, and then
18 I can scroll down when you're ready.

19 A. I'm ready.

20 Yes, I read it.

21 Q. Okay. Do you see here that Mark
22 Goodrich sent you what appears to be a link

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1 that says, Truth and Justice? Perhaps on this
2 last page, there's some sort of affiliation
3 between this link and Truth and Justice.

4 A. Yes, ma'am.

5 Q. Okay. You can see the -- the website
6 for the link he sent is, notbarbarasharief.com?

7 A. Yes, ma'am.

8 Q. Okay. Who was Barbara Sharief?

9 A. The Congresswoman's opponent at the
10 time.

11 Q. Okay. And this was back in October
12 of 2021?

13 A. Yes, ma'am.

14 Q. Okay. So Mark Goodrich sends that to
15 you, and you say, Is it illegal to remove the,
16 Sheila for Congress, LOL.

17 Can you tell me what you were
18 referring to?

19 A. I think this was an attack ad. So I
20 think it says, like, at the bottom, Paid for
21 and authorized -- or, you know, whatever the
22 exact wording is. I don't recall. And I was

1 just asking if it could be removed.

2 Q. Right.

3 And he said that you couldn't,
4 basically, right?

5 A. Yeah.

6 Q. Okay. Does this refresh your
7 recollection of whether you'd ever heard of an
8 entity called Truth and Justice?

9 A. Yes. This is the one time. Like,
10 now that you see the link.

11 Q. Okay. Do you know where Mark
12 Goodrich got this link from or what his
13 involvement was with Truth and Justice?

14 A. No. I don't know his involvement.

15 Q. Okay. You -- you asked him if it
16 would be illegal -- illegal to remove the,
17 Sheila for Congress, and he said, Yeah, very
18 much so.

19 Is it your recollection that Mark
20 Goodrich had control over the content of what
21 was in this website?

22 A. No. I just see that it said, Paid

1 for or authorized, whatever that blur that they
2 have to put for political ads, and that was --
3 but I don't know who created it or the
4 background behind it.

5 Q. Okay. Well, if it said that it was
6 paid for by Sheila for Congress, wouldn't it
7 stand to reason that it was created by the
8 campaign that Goodrich was running?

9 A. It said it was paid for by Sheila for
10 Congress, but I can't say if he directly
11 created it or started it or did the work with
12 it.

13 Q. Okay. Okay. And you're unaware of
14 what Mark Goodrich's connection might be to
15 Truth and Justice, sitting here today?

16 A. Yes. For my memory, I'm not aware.
17 I only remember this because I remembered the
18 attack ad on Barbara Sharief.

19 Q. Okay. Okay.

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

22 Q. Okay. We are getting very close.

1 So we discussed a conversation that
2 you had with Mark Goodrich at a restaurant
3 about this review. Other than that
4 conversation and any conversations with your
5 attorneys and messages that were produced to
6 us, have you discussed this review with anyone?

7 A. Yes.

8 Q. Okay. Who have you discussed this
9 review with?

10 A. Oh. Staffer Three and Nadege
11 LeBlanc, and the Congresswoman.

12 Q. Have there been multiple
13 conversations or just one involving all three
14 of those?

15 A. With Staffer Three, it was we were
16 at her son's graduation party, and she had
17 just briefly asked -- she was out of office.

18 [REDACTED] She had asked how
19 --like, basically, you know, how's the office;
20 how are things going. And then she asked did
21 she submit everything she needed, and I said I
22 don't know. I don't have any involvement.

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1 Because at the time, I didn't have -- you guys
2 didn't, like, name me or anything. I really
3 didn't know too much what was going on.

4 Q. Okay. And so was the conversation
5 that you had with Staffer Three at her son's
6 graduation party sort of limited to document
7 collection and whether all of Staffer Three's
8 documents had been collected or was anything
9 else about the review discussed?

10 A. Oh. Nothing about the review.

11 Q. Okay. Was that the only time that
12 you discussed this review with Staffer Three?

13 A. To my memory, yes.

14 Q. Okay. You said that you also
15 discussed this review with Nadege LeBlanc; is
16 that right?

17 A. Yes, ma'am.

18 Q. And did you discuss this review with
19 Nadege LeBlanc one time or multiple times?

20 A. On a few occasions.

21 Q. Okay. When was the first occasion
22 that you discussed it with Ms. LeBlanc?

1 A. Was when she -- the Congresswoman was
2 made note of it. And for all the TV ads, the
3 Congresswoman asked if anyone had emails, to,
4 like, save it, like, as PDFs and start sending
5 it over to her attorney. But I didn't have
6 any.

7 Q. So the first conversation that you
8 had with Nadege LeBlanc about this review, it
9 sounds like, was for communicating to you that
10 the Congresswoman wanted you to search your
11 emails for documents that we had requested. Is
12 that, more or less, right?

13 A. Yes, to submit.

14 Q. Did -- in that conversation, that
15 first conversation with Nadege LeBlanc, did you
16 discuss anything else about this review?

17 A. No.

18 Q. Okay. When was the second time that
19 you discussed this with Nadege LeBlanc?

20 A. I can't recall, really, like, the
21 times. We would sometimes -- I know I sent --
22 I did, like, research on -- oh. Because this

1 was, like, the first time I'm preparing
2 anything about OCE. So I sent, like, research.
3 And there was also a representative from Hawaii
4 who had a similar -- theirs was about digital
5 ads or something with communication and MRA.
6 So I looked that up, and I sent it to Nadege.

7 Q. Okay. Other than that conversation
8 about your research about the OCE and the first
9 conversation about document collection with
10 Nadege, have you had other conversations with
11 Nadege LeBlanc about this review?

12 A. Just when they -- they wanted to talk
13 to us, that we would get an attorney, like,
14 setting up the call with KaiserDillon --

15 MS. FINK: I just -- I just caution
16 you not to say anything about any calls that we
17 were all on, just in case.

18 A. Okay. Yes. Yes. No. Just -- well,
19 just, like, the formation of, now you've been
20 requested, and the Congresswoman got you an
21 attorney.

22 Q. Okay.

1 A. And, like, a few texts, as you can
2 see in the text messages.

3 Q. Okay. The Congresswoman referred you
4 to your attorneys; is that correct?

5 MS. FINK: I'm going to object to
6 sort of any -- I don't want her to get into any
7 line of questioning about kind of how she came
8 to her attorneys or found her attorneys or any
9 arrangements like that. That's -- that's
10 privileged.

11 Q. Okay. I'll ask, is the Congresswoman
12 paying for your legal representation in this
13 matter?

14 MS. FINK: And I'll object to that,
15 also.

16 MS. CRUMP: On what grounds, Counsel?

17 MS. FINK: As privileged for how her
18 attorneys are being paid for and to that being
19 part of the -- under the privilege of her
20 relationship with us.

21 MS. CRUMP: Okay. I may come back to
22 that, but that's fine.

1 Q. So we've covered the conversations
2 that you had with Nadege Leblanc about
3 collecting emails, and we've covered the
4 conversations you had with Nadege Leblanc about
5 research of the OCE.

6 Is there anything else that you've
7 discussed with Nadege Leblanc about this
8 review?

9 A. Just, like, the text messages, as you
10 could see in there.

11 Q. Okay. And that's it?

12 A. Yes, ma'am.

13 Q. Okay. You also said that you
14 discussed this review with Congresswoman
15 Cherfilus-McCormick; is that correct?

16 A. Yeah.

17 Q. Okay.

18 A. Gathering documents.

19 Q. For gathering documents?

20 Have you discussed anything else
21 about this review with the Congresswoman?

22 A. No, ma'am.

1 Q. Okay. Okay. You said that you last
2 spoke with Mark Goodrich in May; is that
3 correct?

4 A. Yes, ma'am.

5 Q. And was that when you met him at the
6 restaurant?

7 A. No. It was in text message.

8 Q. Okay. And what did you speak to him
9 about via text message?

10 A. I had text him -- reached out to a,
11 like, DNC club, Hillsborough Democratic Club,
12 and he -- can I pull up the text message or can
13 you pull up the text message so I can read it?

14 Q. Sure.

15 MS. CRUMP: Let's pull up Tab 1.

16 THE AV TECHNICIAN: Stand by.

17 Q. Okay. And so I assume it would be at
18 the very bottom; is that right?

19 A. I don't know how it's tabulated or
20 labeled, but yes.

21 Q. Okay. So on your screen, we're
22 looking at [REDACTED] 401, and there's a text message

1 exchange between you and Mark Goodrich on
2 Tuesday, May 16th at 10:50 p.m.

3 Is this the message that you've been
4 referring to?

5 A. No, ma'am.

6 Q. Okay. Should I scroll up?

7 A. It's after this, ma'am.

8 MS. FINK: It looks like there should
9 be one more message. I will go back and review
10 and make sure, Ms. Crump, that this is the full
11 PDF. Because I do believe there is one more
12 after that.

13 MS. CRUMP: Okay.

14 MS. FINK: If we want to take a break

15 --

16 MS. CRUMP: It's okay. We can
17 actually take this down.

18 Q. My question is really more about, is
19 Mark Goodrich still doing work for the
20 Congresswoman's campaign right now?

21 A. Not to my knowledge.

22 Q. Okay. Do you know if Mark Goodrich

1 is still doing work for the Congresswoman's
2 official office?

3 A. Not to my knowledge.

4 Q. Okay. Do you know when he stopped
5 doing work for the campaign?

6 A. Not to my knowledge, no.

7 Q. Okay. Do you know when he stopped
8 doing work for the Congresswoman's official
9 office?

10 A. Not to my knowledge. I do not know.

11 Q. Okay. Do you know whether he has or
12 has not stopped working for the campaign or
13 official office?

14 A. To my knowledge, I do not know.

15 Q. You don't know?

16 Okay. So if he -- if he has stopped
17 doing work for the campaign or official office,
18 you also would not know why that would be?

19 A. No, I do not know why.

20 And I want to clarify that it's not
21 that he's doing work for the official office.
22 He has advised and helped and assisted.

1 Q. How do you distinguish doing work for
2 the official office and advising the official
3 office?

4 A. I distinguish it as if I need
5 assistance in something, he will help me out --

6 Q. Okay.

7 A. -- or he, like -- yeah.

8 Q. And he also helps out Johanna
9 LeBlanc, who is also official staff to the
10 Congresswoman?

11 A. Johanna LeBlanc is no longer official
12 staff, and I don't know their conversations.

13 Q. Okay. But earlier we reviewed that
14 he told you Johanna LeBlanc had requested that
15 he prepare legislative priorities for the
16 veterans community.

17 Do you recall that?

18 A. Yes, I recall that, but that is the
19 only thing I have for him and Johanna LeBlanc.

20 Q. Okay. And it's also your
21 recollection that he prepared statements for
22 the media and coordinated media requests?

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1 A. Yes.

2 Q. Okay. So when you say that he
3 advised the Congresswoman's official office,
4 it's not as though you called him and said, I
5 need some advice, and he said, Here's what I
6 would do if I were you. You asked him to --

7 A. Correct.

8 Q. -- help you do things, right?

9 A. That's right. Assisted and advice.
10 Yep.

11 Q. Right.

12 And so you -- you would tell him that
13 you needed help, and he would generate work
14 product for you?

15 A. He would generate whatever we need
16 help with.

17 Q. Okay. And that included written work
18 product?

19 A. That included talking points.

20 Q. Which are written?

21 A. Yep. That were written.

22 Q. Okay. I think I'm just about done.

1 If we could just go off the record for a couple
2 of minutes, I can review my notes and make
3 sure.

4 MS. CRUMP: So let's go ahead and go
5 off the record.

6 THE AV TECHNICIAN: All right. Off
7 the record at 11:23.

8 (A recess was taken.)

9 MS. CRUMP: Staffer Two, I really
10 want to thank you for your time today. We
11 appreciate you appearing and taking the time to
12 talk to us. You know, we ask that you keep
13 this information confidential that we've
14 discussed today. But, again, I want to thank
15 you for -- for talking to us.

16 THE WITNESS: Okay.

17 MS. CRUMP: All right. Let's go
18 ahead and go back off the record.

19 (Off the record at 11:27 p.m.)
20
21
22

1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

2 I, SUJA NAIR, the officer before whom
3 the foregoing deposition was taken, do hereby
4 certify that the foregoing transcript is a true
5 and correct record of the testimony given; that
6 said testimony was taken by me electronically
7 and thereafter reduced to typewriting under my
8 direction; that reading and signing was not
9 requested; and that I am neither counsel for,
10 related to, nor employed by any of the parties
11 to this case and have no interest, financial or
12 otherwise, in its outcome.

13 IN WITNESS WHEREOF, I have hereunto
14 set my hand and affixed my notarial seal this
15 19th day of JULY, 2023.

16 My commission expires: April 21, 2027

17

18

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Suja Nair

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