

# **EXHIBIT 1**

## Re: Question From a Local Reporter

To Witness 2

Give me a call tomorrow to chat through it, but my understanding from Andy is that his loan was a line of credit... So not from personal funds.

Do you have his latest personal financial disclosure?

On Tue, Nov 28, 2023 at 5:18 PM Witness 2 wrote:

### Witness 1

We received the following inquiry from a local reporter whose overt bias has been somewhat problematic in the past. Can you help provide some insight? I do not plan on engaging with him; however, I need to bring myself up to speed in case he does run with something.

#### Question from Phil Williams

"Good afternoon.

This is Phil Williams with NewsChannel 5, seeking comment from Congressman Ogles on questions about his finances.

During the campaign, Congressman Ogles reported making a \$320,000 personal loan to his campaign.

However, Congressman Ogles' personal financial disclosures do not reveal substantial assets that would reflect the kind of wealth of someone who could loan such sums to his campaign.

That personal disclosure lists an investment property and three retirement accounts. The financial disclosure does NOT list any bank accounts with a value of more than \$1,000, stock holdings or any other major assets.

QUESTIONS: Can Congressman Ogles provide proof that he loaned his campaign that money? Can you provide any explanation for where the money came from?

Also, Congressman Ogles' personal financial disclosure lists a line of credit from Bankcorp South. However, property records show that line of credit was released in January 2022.

Property records show a \$700,000 line of credit from FirstBank from September 2022, apparently based on a promissory note involving Congressman Ogles' in-laws. However, that loan is NOT disclosed on the personal financial statement.

QUESTIONS: Why is an old loan disclosed, but the new loan is NOT disclosed?

I welcome any response by noon CT on Wednesday."

Witness 2 | Chief of Staff | Rep. Andy Ogles (TN-05)  
(865) [REDACTED] [REDACTED]@mail.house.gov

Witness 1

Cell: (715) [REDACTED]

# **EXHIBIT 2**

CONFIDENTIAL

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

# **Transcript of Interview of Witness 1**

Review No. 24-3057

May 15, 2024

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OFFICE OF  
CONGRESSIONAL ETHICS (OCE)  
United States House of Representatives.

REVIEW No. 24-3057  
INTERVIEW OF WITNESS 1  
Conducted virtually  
Wednesday, May 15, 2024  
1:07 p.m. EST

Job No.: 538225  
Pages: 1 - 53  
Recorded By: Jordan Collins, AAERT CER

1 Interview of WITNESS 1, conducted virtually.

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13 Pursuant to agreement, before

14 Jordan Collins, AAERT CER, Notary Public in and for

15 the Commonwealth of Virginia.

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A P P E A R A N C E S

ON BEHALF OF THE OFFICE OF CONGRESSIONAL ETHICS  
OF THE UNITED STATES HOUSE OF REPRESENTATIVES:

KRISTINA CRUMP, ESQUIRE  
HELEN EISNER, ESQUIRE  
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ON BEHALF OF WITNESS 1:

SCOTT GAST, ESQUIRE  
ALEXANDER LEE, ESQUIRE  
COMPASS LEGAL GROUP  
300 Independence Avenue, SE  
Washington, DC 20003  
202.937.2309



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C O N T E N T S

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E X H I B I T S

(None marked.)

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I N T E R V I E W

THE REPORTER: I am a notary authorized to administer oaths and this interview will be recorded by electronic means. All parties understand and agree that any certified transcript produced from the recording of this proceeding is intended for all uses permitted under applicable, procedural, and evidentiary rules and laws and shall constitute written stipulation. The parties stipulate to the use and certification of this testimony consistent with applicable law of such.

Counsel, you may proceed.

MS. CRUMP: For the record, today is May 15th, 2024, and we are conducting the interview of Witness 1. He's represented by Counsel Scott Gast and Mr. Alexander Lee, who are present here today. Speaking is Kristina Crump, investigative counsel at the Office of Congressional Ethics. I am here today with Deputy Chief Helen Eisner. Witness 1 has been given a copy of 18 U.S.C. 1001, and has signed

1 the acknowledgement.

2 INTERVIEW OF WITNESS 1 BY COUNSEL FOR OCE  
3 BY MS. CRUMP:

4 Q Witness 1, please feel free to stop  
5 me when you need to take a break, if you need to  
6 take a break, or if you have a question. Okay.

7 WITNESS 1: Will do. I should be good.

8 Q Thank you. Witness 1, are you the  
9 treasurer for Representative Andy Ogles's  
10 campaign?

11 A I am. Yes.

12 Q Okay. And how long have you been  
13 serving in that role?

14 A Coming up on two years. It's been  
15 since June or July of 2022, I think.

16 Q Okay. All right. And can you tell me  
17 a bit about the process of filing FEC Reports,  
18 what your involvement is in that, what the  
19 congressman's involvement is in that process?

20 A Let me just clarify, specifically. I  
21 have a number of clients, and Mr. Ogles --  
22 Congressman Ogles is one of them. Are you asking

1 about the specific process for him, or how I do,  
2 like, it in general?

3 Q That's a really great question. Let's  
4 start with him specifically, and then if there's  
5 additional information that's helpful, we can  
6 move to that.

7 A Perfect. Yes. Okay. So my role and  
8 duties as the treasurer are to take care of the  
9 basic bookkeeping and accounting. So I'm -- I'm  
10 an accountant by trade, I went to school for  
11 accounting, got my accounting degree, and fell  
12 into this lovely world of campaign finance. And  
13 so I get all the necessary contributions and  
14 expenses and put them into our FEC filing system  
15 as well as a Quickbooks file, where it -- I have  
16 a double entry process where we reconcile our  
17 Quickbooks accounts with the actual filing system  
18 that we log all the, like, granular details of  
19 the deposits like people's contact information,  
20 basically like a Salesforce.

21 And it direct connects to the  
22 Federal Election Commission's website where we

1 can ultimately file our quarterly reports. And  
2 then the Quickbooks file is basically used as  
3 more of a -- a checks and balances of accounts  
4 payable, accounts receivable type of thing. It's  
5 more of an accounting system, whereas the filing  
6 system is, again, more of like a Salesforce, and  
7 like a contacts -- contact manager.

8           And so then I produce the FEC  
9 Reports out of said filing system, it's called  
10 Aristotle. And I'll review those reports, and  
11 make sure that everything is in compliance with  
12 all the federal, you know, laws, rules,  
13 regulations, make sure the expenditures are, you  
14 know, accurate, that we're reporting  
15 descriptions, making sure that all the necessary  
16 contact information is available on the  
17 contribution side, and making sure, you know,  
18 individuals are staying within the contribution  
19 limits and -- and, you know, tracking their  
20 limits, and then, you know, obtaining any best  
21 efforts letters from them or, you know,  
22 re-attribution, re-designation letters.

1           And then I will send the report  
2           to the campaign, in this instance, specifically,  
3           Andy and his chief of staff, Witness 2. And if they  
4           have any final corrections, I'll make those. If  
5           they don't, then I'll file the report. It's  
6           typically on the day it's due, sometimes a day  
7           early, but typically on the day it's due.

8           Q     Okay. Okay. Thank you. Generally  
9           speaking, when it comes to reporting loans to the  
10          FEC, what is your process for that?

11          A     Yeah, so I have a loan document that I  
12          typically have my clients fill out. So it -- it  
13          -- it's a basic loan document where it just  
14          states -- I -- I actually got one today from a  
15          client. It'll just state the name of the  
16          candidate, how much they're loaning, and if  
17          there's any terms to said loan, like a due date  
18          on it, if there's any interest, and if we're  
19          going to be making any, you know, monthly or  
20          quarterly payments to the loan, and, you know,  
21          how much -- obviously, how much it's for, and  
22          then what cycle it's for. And then they'll sign

1 it and send it back to me, and then I'll receive  
2 whatever, it might be a wire and -- or a check  
3 from the candidate.

4 Q Okay. And I apologize if you already  
5 mentioned this, but when you produce that loan  
6 document, what -- where are you receiving the  
7 information from?

8 A The candidate, yeah, yeah. So I just  
9 -- I have, like, a template, and then when they  
10 want to loan money or -- a lot of candidates do,  
11 right -- like half of them that I work with,  
12 probably loan them, so I just have, like, a  
13 standard template, and I'll just send it to them  
14 like, hey, fill this out and then send over your  
15 loan document. Because everybody's different on  
16 when they want it do by. And then we'll  
17 obviously put it onto the FEC Reports.

18 Q Okay.

19 A It's basically just -- we're just  
20 basically transferring it over from the, you  
21 know, FEC Report, or the loan document to the FEC  
22 Report. So it's not required -- it's not a

1 required document, but it's just nice to have, so.

2 Q Got it. And you mentioned that you  
3 think that you joined the campaign as treasurer  
4 around June or July of 2022. Is -- is that right?

5 A I think so. I mean, it was a long  
6 time ago at this point, but yeah, I think that's  
7 right. Maybe it was even May. I would have to  
8 honestly look. I -- I don't remember the exact  
9 date.

10 THE REPORTER: I'm sorry, Counsel, I  
11 missed part of that answer

12 THE WITNESS: For me?

13 THE REPORTER: Yes, sir. Would you --

14 THE WITNESS: Oh, I -- I said --  
15 sorry. I -- I said I don't recall the exact  
16 date, but it would've been sometime in the summer  
17 of 2022, maybe May, June, or July.

18 BY MS. CRUMP:

19 Q Okay. Do you know were you -- were  
20 you involved in putting together the campaign's  
21 July 15th, 2022 quarterly report?

22 A Yes, I was. I had received -- so I



1 initially wasn't Mr. Ogles's first treasurer. I  
2 was his second treasurer. I'd gotten a call from  
3 a friend, you know, it was kind of like a  
4 relationship game. And he's the one who ended up  
5 introducing me to Andy to help out on his reports  
6 because the other treasurer had resigned. And so  
7 between him and then the -- the current  
8 congressman, they got me the information to,  
9 obviously, help out and file that report.

10 Q Okay. So you were involved in helping  
11 file that July 15th, unamended 2022 report?

12 A Yeah, absolutely. Yep. Yep.

13 Q Okay. And do you recall that report  
14 referencing a loan that Representative Ogles made  
15 to his campaign for \$320,000?

16 A Yeah. I'm aware.

17 Q Okay.

18 A Yeah. I'm aware of that one.

19 MS. CRUMP: Okay. Could we go off the  
20 record for just a second?

21 (OFF THE RECORD)

22 THE REPORTER: Back on the record.

1 BY MS. CRUMP:

2 Q Okay, great. Witness 1, we were  
3 talking about a loan that was reported in the  
4 July 15th, 2022 quarterly report for \$320,000.

5 Sitting here now, is it your  
6 understanding that Representative Ogles made a  
7 loan to his campaign for \$320,000?

8 A Sitting here now, as I understand it,  
9 it's not a loan, but rather a line of credit.

10 Q Allow me to clarify. Did  
11 Representative Ogles extend a line of credit to  
12 his campaign?

13 A As far as I'm aware, yes.

14 Q Okay. For \$320,000?

15 A Yes.

16 Q Is it your understanding that that  
17 line of credit actually came from the  
18 congressman's personal funds?

19 A I -- it is my understanding that it  
20 was a -- the line of credit was a guarantee on  
21 the, I guess, asset of his home. So I -- I would  
22 assume that the -- yes, they were personal funds,

1       yeah.

2               Q       Are you aware of any requirement to  
3       report loans backed by home mortgages or lines of  
4       credit differently than -- than other kinds of  
5       loans?

6               A       Yes.  Yeah.

7               Q       Okay.  Do you know whether reporting  
8       this line of credit to the campaign as coming  
9       from the representative's personal funds was  
10       accurate at the time?

11              A       At the time how it was reported was I  
12       understood to be the correct way.  As sitting  
13       here today, it's obviously not the correct way of  
14       how it should have been reported.

15              Q       Okay.

16              A       But that's only -- I'm only learning  
17       those facts from information that was shared with  
18       me about a week ago.

19              Q       Okay.  And who shared that information  
20       with you about a week ago?

21              A       That would've been my attorneys, so  
22       yeah.

1 Q Okay. So sitting here today, as you  
2 understand it, the way that the loan was  
3 originally reported was not the right way to have  
4 reported it, correct?

5 A Yeah. Because the funds technically  
6 never came into the bank account, so you wouldn't  
7 -- that's like a line of credit's not -- if the  
8 money wasn't actually moved into a physical bank  
9 account in the name of Andy Ogles for Congress,  
10 we should have never reported a loan for such,  
11 you know, on our reports, yeah.

12 Q So then -- and just -- I'm clarifying  
13 so to make sure I understand it right.

14 A Yeah.

15 Q Is it your understanding that the  
16 congressman took out a line of credit, and then  
17 only loaned his campaign a smaller amount of  
18 money out of that line of credit?

19 A Was it my -- I'm sorry. Was it my  
20 understanding at the time that that's what he did?

21 Q So I guess we'll start with --

22 A Is that what you asked?

1           Q     Let's start with your understanding at  
2     the time.  At the time that you were helping out  
3     with this report and getting it filed with the  
4     FEC, what was your understanding of the source of  
5     the funds as Representative Ogles communicated  
6     that to you?

7           A     Got it.  Yeah.  So at the time when I  
8     initially got the information of, okay, here's a  
9     deposit into the bank account for \$320,000.  And  
10    I say that, you know, because I was just provided  
11    a spreadsheet of the transaction details, and not  
12    an actual bank statement or bank access.  So I  
13    understood because the only information I had was  
14    that.  And so I -- I -- I took it as there's a  
15    \$320,000 loan from the candidate's personal funds  
16    because that's what I was told, coming into the  
17    actual bank account.  I knew nothing about a line  
18    of credit at that time.

19          Q     Okay.  Sitting here today, it is not  
20    your understanding that the actual campaign bank  
21    account received a loan of \$320,000 from the  
22    congressman, correct?

1 A Correct. Yeah, it did not.

2 Q Okay.

3 MS. EISNER: Hey, Kristina, is it okay  
4 if I jump in for a second and just --

5 MS. CRUMP: Yes, do. Yeah, go ahead.

6 INTERVIEW BY DEPUTY CHIEF OF OCE

7 BY MS. EISNER:

8 Q -- clarification. A few things. You  
9 mentioned a spreadsheet that was provided. Who  
10 provided you with that spreadsheet?

11 A Congressman Ogles. Yeah, Andy -- Andy  
12 did.

13 Q And was that directly from the  
14 congressman?

15 A Yes. Yep.

16 Q And what --

17 THE WITNESS: Yeah. We provided that,  
18 right, to them?

19 BY MS. EISNER:

20 Q I'm sorry.

21 MR. GAST: I don't recall that we did.

22 MS. EISNER: Okay.

1 MR. GAST: But we could talk about  
2 that.

3 MS. EISNER: Yeah. I think we -- we'd  
4 be interested in -- in seeing that if that's a  
5 document that's available. It sounds -- it  
6 certainly sounds responsive, and would be helpful  
7 to us. So yeah, I would -- we can, you know,  
8 talk about that a little bit later.

9 BY MS. EISNER:

10 Q But the -- what was the method that it  
11 was sent to you? Was it through email, or did he  
12 give it to you in person? How did you receive it?

13 A No, via -- via email, yeah.

14 Q Okay. And was that a common practice?  
15 How often would -- would you receive spreadsheets  
16 with information about the -- the finance?

17 A (Indiscernible.)

18 Q Sorry, actually, I -- I didn't hear --  
19 I didn't actually hear you. If you could say  
20 that one more time.

21 A In that particular format as a -- a --  
22 a spreadsheet that's being, I guess, transposed

1 or -- or looked at as a bank statement? Almost  
2 never.

3 Q Okay.

4 A Right. How often do I get a bank  
5 statement? I mean, I'm -- I require it. I won't  
6 file your reports if you don't give me a bank  
7 statement. I'll just -- I'll -- I'll resign, or  
8 quit, or hand over the reins to the candidate if  
9 they don't give me, like, an actual bank  
10 statement like that.

11 Q Okay. Understood. So you did have  
12 access to bank statements at that time?

13 A No, I -- I -- it was a -- it was a  
14 spreadsheet and then a PDF of bank transactions,  
15 not an actual bank statement.

16 Q And just to clarify that with the  
17 statement you just made because I think you were  
18 explaining to us that you do typically get access  
19 to bank statements. Why didn't you get access in  
20 this instance?

21 A So two things. I -- I thought that  
22 his PDFs that he was -- were -- was sending were



1 bank statements. I only later came to find out  
2 those weren't actually bank statements, and they  
3 were just like a transaction printout and not an  
4 actual bank statement. And -- and I have, as far  
5 as the banking access, I have been asking for  
6 bank access since day one, so.

7 Q And have you gotten it at any point in  
8 time?

9 A No. No, I have not gotten it. To --  
10 to this day I still don't have access.

11 Q And would you say that's unusual? It  
12 seemed like you were talking about typically  
13 getting access to bank statements is what you  
14 require to be the treasurer for a campaign. Is  
15 that unusual that you haven't received access to  
16 the bank statements?

17 A He's -- he -- he is the -- I work with  
18 two dozen congressmen, five senators, he's the  
19 only one that I don't have access to his bank  
20 account.

21 Q Okay. And the transaction --

22 A (crosstalk)

1 Q I'm sorry, I don't want to cut you  
2 off, but was there something you needed to say?

3 A It was a -- it was a -- yes, of course  
4 --

5 Q Okay.

6 A -- very unusual.

7 Q Okay. The transaction statement that  
8 you were referencing that you thought was a bank  
9 statement initially, but realized later in time  
10 -- and correct me if I'm wrong, I think you were  
11 saying you realized it was a transaction  
12 statement. What did that indicate specifically?  
13 What did that show?

14 A Oh, yeah. It -- so it showed, like,  
15 the deposits and expenses, right. So, like, if  
16 you had an Uber charge or it -- it -- it -- for  
17 all intents and purposes it looked like a bank  
18 statement. It was just transactions, though. It  
19 wasn't actually like a typical bank statement,  
20 you know, on a header and with the account  
21 information, and a running total of your balance,  
22 and the ending balance.

1 Q Okay.

2 A So yeah, it had deposits and credits.

3 Q Did it show the --

4 MR. GAST: Can I -- can I clarify one  
5 thing before we move on? Does the campaign have  
6 more than one bank account?

7 WITNESS 1: Okay, yes. Sorry. Yeah,  
8 good -- good -- good clarification. We do have  
9 more than one bank account. When Senator Ogles  
10 -- sorry -- Congressman Ogles became a congressman,  
11 I was directed to open up a second bank account.  
12 And I typically use Chain Bridge Bank in McLean,  
13 Virginia. That account, I have access to. That  
14 account, I have the bank statements for. That's  
15 the account where all the money gets deposited to  
16 today like we make all the check deposits now.

17 We -- all the, like, money that  
18 comes in online via, like, Anedot or WinRed comes  
19 to that account. And any expenses, wires,  
20 checks, debit expenses come from that account.  
21 The other account has been dormant now for, you  
22 know, a year, there hasn't been hardly any

1 transactions. So yeah, thanks, Scott. Sorry.

2 ADDITIONAL INTERVIEW BY DEPUTY CHIEF FOR OCE

3 BY MS. EISNER:

4 Q Thanks. Thank you for the  
5 clarification. That's helpful. What was the  
6 other account? You mentioned the one that you do  
7 have access to. What was the account that you  
8 did not have access to?

9 A First Horizon -- first Horizon Bank.

10 Q Okay. And was that account in the  
11 campaign's name, or was it in another  
12 individual's name?

13 A As far as I'm aware, it's in -- it's  
14 in the campaign's name, yeah.

15 Q Did you have any conversations with  
16 the congressman about that particular account,  
17 and getting access to the account?

18 A Many times.

19 Q Okay. Can you tell us about that?

20 A Yeah. Because it was, again, very  
21 untypical process, but, you know, he's a sitting  
22 member of Congress, so, you know, you don't want

1 to lose them as clients, right, so you kind of  
2 just have to deal with certain things sometimes.  
3 But I would constantly request the bank  
4 statements, or the banking activity for the  
5 reporting period leading up to, you know, the end  
6 of the quarter before our filing deadlines.

7 And typically I would get the  
8 information like two or a day before the filings  
9 were due, which, you know, is super frustrating,  
10 you know. It's like going to your accountant to  
11 be like, here, file my taxes on April 15th.  
12 They'll just be like, see you later, right? So  
13 many times I had expressed to him and to his  
14 chief of staff like, if I -- if I don't get this  
15 sooner or don't get this at all, I am going to  
16 have to resign because this is just, you know,  
17 too time-consuming for me to go through when I'm  
18 busy actually, like, making the filings now, and  
19 filing the reports, not, like, continuing to work  
20 on them.

21 Q And what was the explanation that was  
22 given to you?

1           A     Yeah, it was always, you know -- it  
2 was kind of a runaround, honestly. It was  
3 always, well, it's I'm not -- I'm not at home  
4 right now, I'm in DC. When I get back this  
5 weekend, you know, to the -- the -- the district,  
6 I -- I'll -- I'll work on it, I'll get it to you  
7 then. It's kind of, you know -- it wasn't one  
8 specific reason, it was always, yeah, I know, I'm  
9 working on it. Sorry, I'll get it to you sooner,  
10 type of thing.

11          Q     And just so I understand for the  
12 record, the -- the sort of quotes that you're  
13 relaying right now, was that in conversation with  
14 the congressman or someone else?

15          A     Yeah. Yeah. The congressman and his  
16 chief of staff, yeah.

17          Q     Okay. Did you ever get access to that  
18 First Horizon account? It sounds like you had  
19 access to the other account. But did you ever  
20 see those statements?

21          A     No, I didn't. I never got access to  
22 the First Horizon account. I got statements for

1 the first time from my counsel last week.

2 Q And --

3 MS. CRUMP: And the first --

4 Sorry. Go ahead.

5 MS. EISNER: No. Go ahead, Kristina.

6 Sorry.

7 MS. CRUMP: Thank you.

8 ADDITIONAL INTERVIEW BY COUNSEL FOR OCE

9 BY MS. CRUMP:

10 Q And the First Horizon account is the  
11 account at issue here when we're discussing this  
12 --

13 A Correct.

14 Q -- this loan that was reported in the  
15 July 15th, 2022 report? Okay.

16 ADDITIONAL INTERVIEW BY DEPUTY CHIEF FOR OCE

17 BY MS. EISNER:

18 Q And -- and you mentioned getting  
19 access --

20 A Yeah. The other account -- sorry.  
21 The other account wasn't even open at that -- at  
22 that --

1           Q     You mentioned getting access about a  
2 week ago. So have you since reviewed the bank  
3 statements for the time period when the loan was  
4 made?

5           A     Yes.

6                     (crosstalk)

7           Q     And sorry. I'm saying the loan was  
8 made, generally speaking, of course, I mean, when  
9 the \$320,000 had been reported to the FEC?

10          A     Yes. Yeah, I've gone through and I've  
11 actually updated my books and re-reconciled my  
12 account, but I have not made any changes with the  
13 Federal Election Commission.

14          Q     So now that you've seen it, what have  
15 you seen with regards to that amount of money and  
16 what occurred around the time period of the  
17 \$320,000 being reported as a loan to the campaign?

18          A     So the initial \$320,000 that we had  
19 thought was actually deposited in a campaign,  
20 turned out to be, I think, only a \$20,000  
21 transfer. I think it was a transfer from one of  
22 his personal accounts, if I'm not mistaken.



1           Q     And why was it reported to you as  
2     \$320,000 when the documents show that it was  
3     \$20,000?

4           A     Why was it shown to me that way?

5           Q     Well, why was it -- why were you told  
6     that it was \$320,000?

7           A     That's a good question. I can only  
8     guess, and I'm -- I don't know why. I can only  
9     figure a guess.

10          Q     In our process, it's fine for you to  
11     guess. So if you want to tell us what your guess  
12     is, we'd be happy to hear it.

13          A     Yeah. It just looks better when you  
14     have more money, right, and scare away the  
15     competition and buy the primary. That's my best  
16     guess, but I -- I don't know.

17          Q     Is that a conversation you ever had  
18     with anyone besides -- I know you kind of  
19     characterized it as a guess. Is that a  
20     conversation you've had?

21          A     No. No, it wouldn't -- only my  
22     counsel.

1 Q Okay. What was the financial state of  
2 the campaign prior to that reported \$320,000?

3 A Like what was the -- I guess you're  
4 saying what was the financial state of it? So  
5 like, was it healthy?

6 Q Exactly.

7 A Well, I mean, it -- it -- it seemed --  
8 yeah, at the time, it seemed like it was fine and  
9 healthy like we never were in a cash crunch.  
10 But, you know, in hindsight, taking that out, we  
11 would've been a lot, you know, tighter on things  
12 and, you know, when I did go back and review and  
13 -- the first thing I looked for when I reconciled  
14 the books was, did we ever go negative or spend  
15 general money right away? And we didn't. So I  
16 -- I guess from that standpoint, they managed it  
17 somewhat well. So they must have known that it's  
18 not there, so don't spend more than that, if that  
19 makes sense.

20 Q When you're saying they, who are you  
21 referring to? You're saying, they must have  
22 known, or, they managed it. Who is that?

1           A     Yeah, whoever -- whoever was running  
2 his campaign? Yeah, like, the congressman and  
3 then whoever is running his campaign.

4           Q     Was there anyone else besides the  
5 congressman who you had regular contact with  
6 about the financial management?

7           A     Yeah, there was, his GC, his general  
8 consultant, I spoke to. He's the one who  
9 introduced me, so I spoke to him a number of  
10 times about things.

11           MS. EISNER: Kristina, I can turn it  
12 back over to you. I'm -- I'm sorry I went down a  
13 particular path, but I'm happy to have you keep  
14 on asking your questions.

15           MS. CRUMP: Sure -- sure. I'll ask  
16 some questions, but again, feel free to chime in.

17           ADDITIONAL INTERVIEW BY COUNSEL FOR OCE

18           BY MS. CRUMP:

19           Q     So, Witness 1, we talked about how  
20 the amount reported for that loan, in actuality  
21 it was only about \$20,000 that was transferred  
22 into the campaign's bank account.

1                   What was the campaign's actual  
2 cash on hand that should have been reported in  
3 the July 15th, 2022 quarterly report?

4           A       Say that again?  What should it have  
5 been?

6           Q       Yes.  What was the actual amount of  
7 cash on hand at that time?

8           A       Without the loan or with it?  I --  
9 actually either way, I -- I don't know off the  
10 top of my head, honestly.  I would have to -- I'd  
11 have to go look.

12          Q       Okay.  But the cash on hand would have  
13 included the amount of the reported loan?

14          A       Yes.

15          Q       Right?

16          A       Yes.

17          Q       So since the amount of the reported  
18 loan was much smaller, it stands to reason that  
19 the amount of cash on hand also would've been  
20 smaller, correct?

21          A       Yes.  For sure.  Yep.

22          Q       Okay.  Let's see.  Did the Congressman

1 make any other loans to his campaign that were  
2 not reported?

3 A Say -- so sorry. Say that again, my  
4 Alexa decided to talk.

5 Q No problem. So it's my understanding  
6 that the campaign reported receiving a \$320,000  
7 loan, which as we're discussing now was perhaps  
8 only for \$20,000.

9 My question is, beyond that  
10 singular loan, were there any other loans made by  
11 the congressman to his campaign that you're aware  
12 of?

13 A No. I think that was the only one, if  
14 I'm not mistaken. Yeah, that would've been the  
15 only one.

16 Q Okay. Have you talked to anyone about  
17 why the amount of the loan was reported the way  
18 it was?

19 A Since finding out?

20 Q Yes. Other than your attorneys?

21 A No, just my attorneys.

22 Q Okay. Okay.

1 MS. EISNER: Kristina, if I -- if I  
2 could ask a question about the \$20,000.

3 MS. CRUMP: Sure.

4 INTERVIEW BY DEPUTY CHIEF FOR OCE  
5 BY MS. EISNER:

6 Q Because we understand that it seems as  
7 if the amount that was transferred now that --  
8 and please correct me if I'm wrong, that you've  
9 looked at the bank accounts, the -- the amount  
10 that came into the campaign account was \$20,000.  
11 Where did that come from?

12 A I -- I -- that was a transfer from, I  
13 think -- I think Andy banks at First Horizon as  
14 well. And, like, I can -- again, I can only see  
15 the bank statements, and I haven't asked him  
16 about this, but on the bank statements, it just  
17 says like, transfer from account XXX, whatever.  
18 So I'm -- I assume that's a personal account that  
19 he has at that bank, but I -- I -- I have not had  
20 the conversation with him to clarify that.

21 Q How do you know that he banks at First  
22 Horizon?

1 A No, I'm just guessing. I don't know.

2 Q Okay.

3 A I'm -- I'm guessing that. Yeah.

4 Because he set it up. I mean, it makes sense,  
5 you know, most people, like, they want a bank  
6 where they -- they want their campaign account  
7 where they currently bank, so it's -- yeah. Okay.

8 Q But it is your sense that he had a  
9 personal account there, so the transfer indicated  
10 it came from another First Horizon account?

11 A Yeah. Yep. Yep, so that it --

12 Q And did it --

13 A -- makes sense.

14 Q Did it say his name in the, you know  
15 -- the transfer record?

16 A No, just, you know, transfer from  
17 account XXX, or whatever.

18 Q Okay. But have you had any  
19 conversations about that \$20,000 coming from a  
20 source other than the congressman?

21 A No, I have not. No.

22 Q Okay. Was the \$20,000 itself in any

1 way connected to the line of credit or any type  
2 of debt accrued by the congressman?

3 A I do not know. No, I don't know.

4 Q Have you had any conversations with  
5 the congressman about this particular transfer  
6 that occurred back in 2022? Since -- since the  
7 first reporting around the time of, you know, the  
8 initial transfer that was reported to the FEC.

9 A Did I ever --

10 Q But in the last, let's say in -- let's  
11 say in the last three months, have you had any  
12 conversations with him about the transfer?

13 A Yes.

14 Q Okay. And what were those  
15 conversations?

16 A There were -- like I -- some people  
17 had, you know, texted me or emailed me some like  
18 -- like articles about his personal financial  
19 disclosure. And so then obviously I was, you  
20 know, interested. And he had forwarded me some  
21 articles, too. And so then, obviously, we  
22 talked, and I -- that's when I first was like --



1 I heard the word line of credit, and so that's  
2 when I was like, well, I need to -- can you  
3 please get the actual, like, loan document or  
4 banking documents for this and -- and shoot it  
5 over to me? So -- and I -- I never got anything,  
6 but as soon as I saw a couple of articles is when  
7 we started to talk about it.

8 Q And -- and the when you say the word  
9 line of credit, was that something you heard from  
10 the congressman or from someone else?

11 A From the congressman, yeah.

12 Q Okay. And -- and if you could just  
13 expand on that a little bit more as far as what  
14 he said.

15 A It was a phone conversation, so I'm  
16 just recalling, I mean, it was a couple of months  
17 ago. Just I think he was clarifying if he -- and  
18 -- and this wasn't even with the FEC, it was with  
19 his personal financial disclosure, and if he  
20 needed to like include that on his personal  
21 financial disclosure form. And then that's when  
22 he related it to, well, that's where the campaign

1 loan came from is the line of credit. And  
2 initially I thought, okay, fine, like you could  
3 -- if you have a line of credit, you could still  
4 take money out of it. That didn't necessarily  
5 mean that he didn't put \$320,000 into the bank  
6 account. He could have totally taken 320 from  
7 the line of credit and put it in the bank  
8 account. So, like, at that point I didn't think  
9 anything was, you know, out of the ordinary.

10 Q Okay. And then after that  
11 conversation, did you have any further  
12 conversations with him about it?

13 A No, other than just, hey, have you  
14 gotten, you know, I still want to see, like, the  
15 banking, you know, because he kept saying that he  
16 had some sort of, like, loan documentation  
17 details, or his wife had, or something like that.  
18 And other than just like I followed up a number  
19 of times with him and his chief of staff about  
20 obtaining that, and I -- I mean, I never got it.

21 Q Okay. So what is -- if you can  
22 explain to us, what is your understanding of the

1 explanation that he had given you at the time you  
2 say approximately a few months ago about the line  
3 of credit? What's your understanding of that now?

4 A Well, that those funds never were  
5 moved from the line of credit into the campaign  
6 account.

7 Q Okay. And do you believe there was a  
8 line of credit?

9 A I don't know. No, I don't know. You  
10 can only -- again, I can only guess. I mean, I  
11 assume yes, there -- I assume there was, but I  
12 don't know.

13 MS. EISNER: Kristina, I'll go --  
14 `turn it back over to you.

15 MS. CRUMP: Sure. Helen, if it's all  
16 right with you, I think I'm going to shift to the  
17 financial disclosures. Okay.

18 ADDITIONAL INTERVIEW BY COUNSEL FOR OCE

19 BY MS. CRUMP:

20 Q Witness 1, could you just sort of  
21 explain for me what the process is for preparing  
22 Congressman Ogles's financial disclosures, where

1 you come in, what his role is? Just a general  
2 sense of who's involved, and what they do.

3 A Yeah, this is a kind of an annoying  
4 thing that I constantly have to deal with because  
5 I actually have, like, a letter that I prepare  
6 once -- well, once I file like an FEC Form 1 or 2  
7 for a candidate. And it's, you know, basically,  
8 congratulations, you know, you're now a  
9 candidate, be on the lookout for, you know, that  
10 salmon pink, whatever, colored form from the  
11 House Ethics, this is going to be for your  
12 personal financial disclosure. You know, if it's  
13 an election year, you know, it's going to be due  
14 today and, you know, if it's a non-election year,  
15 you've got 30 days from filing.

16 And I make it very clear, I don't  
17 file your personal financial disclosures. I -- I  
18 -- it's not my responsibility to do it because I  
19 don't know your personal finances, or income, or  
20 assets, or debts. Like it's happy to look it  
21 over for you, or I've introduced Scott to a  
22 number of my clients and he's done it, he's filed

1 them for me, or filed it for -- or helped them  
2 prepare it and file it. But I try to make it  
3 very clear that I don't specifically file  
4 personal financial disclosures.

5 But again, happy to help out  
6 because I've seen them a million times, so I know  
7 what they're looking for, and I've read the  
8 document, it's not rocket science, but I -- yeah.  
9 So in -- with Andy's, I did not prepare his first  
10 one. His chief of staff, I don't remember when  
11 exactly it was, had asked me to make, like, one  
12 quick change and amendment to it. Other than  
13 that -- that's the only involvement I had with  
14 his (indiscernible).

15 Q What was the amendment that he asked  
16 you to make to the financial disclosure?

17 A I don't -- I -- I reviewed the  
18 document because we did produce it, but I don't  
19 even remember now. I can't -- I can't remember  
20 it off the top of my head.

21 Q Okay. Is it your -- is it your  
22 understanding that Congressman Ogles's current

1 financial disclosure lists all of his liabilities  
2 accurately?

3 A No. It's hard for me to say, you  
4 know, I don't -- I don't know his personal  
5 finances to know that intricate detail. I mean,  
6 I would just -- I would hope so.

7 Q Okay. Do you know if the line of  
8 credit --

9 A Exactly what -- sorry.

10 Q I'm sorry I cut you off. Please  
11 finish.

12 A That's exactly why I don't do them.

13 Q Got it.

14 A Yeah, that's exactly why I don't do  
15 them because they could just lie to me, you know.

16 Q Got it. Do you know if the line of  
17 credit that may have funded the \$20,000 loan to  
18 the campaign is among the liabilities reported on  
19 his financial disclosure?

20 A I -- I don't recall. I don't think it  
21 is. No.

22 Q Okay. Let's see. Have you discussed

1 the source of the \$20,000 loan with Witness 2?

2 A The \$20,000 loan? Not that I recall,  
3 no.

4 Q Okay. And just to -- to be clear, the  
5 -- the loan was originally reported as being  
6 \$320,000, but now having reviewed the records,  
7 it's your belief that the actual amount  
8 transferred into the campaign bank account was  
9 \$20,000, and there were no other loans made by  
10 the congressman to the campaign.

11 A Got it. So have -- have I talked to  
12 him about that total loan? Absolutely, yes.  
13 Yeah. Not that it was actually 20,000, but yes.

14 Q Okay.

15 A So I guess my point is I haven't  
16 talked --

17 Q You cut out just a little bit at the  
18 end there. I'm sorry, would you mind repeating  
19 it?

20 A I was saying, I -- I haven't, I guess  
21 to clarify, I haven't spoken to him in the last  
22 week since finding out additional details --

1 Q Okay.

2 A -- about the loan.

3 Q Fair enough. Have you had any  
4 conversations with the congressman about this  
5 review, this inquiry by the Office of  
6 Congressional Ethics?

7 A With -- no, mm-mm.

8 Q Have you had any --

9 A I'd say maybe -- yeah. Sorry, go  
10 ahead.

11 Q Sorry, I didn't mean to cut you off.

12 A It's okay. I was going to say you're  
13 probably going to ask it next, but maybe with  
14 Witness 2, but no, I don't -- I don't. Other than  
15 my attorneys, I don't think anybody else knows.

16 Q Okay. So you -- you might have had a  
17 conversation with Witness 2 about this review?

18 A Possibly. I -- I feel like he was giving  
19 me a heads-up that he was having one, and one might  
20 be coming to me, but I -- I certainly didn't, like,  
21 reach out to him, but --

22 MS. CRUMP: Okay. Let's see.



1                   Helen, do you have anything else  
2                   that you want to cover?

3                   MS. EISNER: I just have a few final  
4                   questions. So Kristina, if you have any other  
5                   topics that you want to cover before getting to  
6                   those --

7                   MS. CRUMP: No, that's -- that's the  
8                   bulk of what I wanted to cover. So go, take it  
9                   away.

10                  MS. EISNER: Okay.

11                  ADDITIONAL INTERVIEW BY DEPUTY CHIEF FOR OCE  
12                  BY MS. EISNER:

13                  Q        At any point in time, did anyone ask  
14                  you to answer our questions here today anything  
15                  other than truthfully?

16                  A        No, I -- nobody asked me to.

17                  Q        Okay.

18                  A        Yeah.

19                  Q        And I think you have a, you know, a  
20                  fairly good sense of the information that we are  
21                  looking into today. Is there anything else you  
22                  think we should know about either the filings or

1 campaign operations?

2 A No. I mean, other than -- yeah, I  
3 mean, it's already public information, you know,  
4 the original filings were filed late, but  
5 obviously the FEC knows that, they already fined  
6 us for it. That's the end. That's really --  
7 other than that, it's filing. Other than that  
8 question about the loan, everything else is in --  
9 in pretty good order, so.

10 Q And you continue to be the treasurer  
11 for the campaign?

12 A As of today, yes. Yeah.

13 Q Okay. And you say as of today, just  
14 so I understand, is that are you anticipating a  
15 change?

16 A No.

17 Q Okay. No.

18 MS. EISNER: I don't have any further  
19 questions, Kristina. Do you?

20 ADDITIONAL INTERVIEW BY COUNSEL FOR OCE

21 BY MS. CRUMP:

22 Q Just a -- a quick one. And correct me

1 if I'm misunderstanding this, but is it -- is it  
2 correct that the FEC currently has a request for  
3 additional information outstanding to the  
4 campaign?

5 A We do have one, yes.

6 Q Okay. Is --

7 A And we're -- we will be filing  
8 amendments now that we know of the change, and  
9 there's a couple other things that we're needing  
10 to take care of, but are waiting until we had  
11 this conversation, per my counsel advice, so.

12 Q Okay.

13 A But the most -- the most recent RFIA,  
14 if I recall, was adding a -- a JFC to the  
15 statement of organization, which would've already  
16 been addressed.

17 Q Okay. So what changes or amendments  
18 are -- is the campaign looking at making, you  
19 know, now that we've had this conversation?

20 A Yeah, I mean, unfortunately we'd have  
21 to make an amendment to every report that's been  
22 filed because the very initial transaction is the

1 first transaction of the entire committee. So it  
2 would change the numbers for every single report  
3 proceeding that. So it would have to be every  
4 single report.

5 Q Okay. And so changing both the amount  
6 of the reported loan, as well as the amount of  
7 cash on hand, as well as -- what else am I  
8 missing?

9 A There's a couple -- there's a couple  
10 of, like -- again, I haven't, like, fully gone  
11 through it with a fine tooth comb yet. I -- I  
12 did -- again, I did reconcile like the Quickbooks  
13 account, but I haven't gone through and  
14 reconciled the FEC one, but I did already pick  
15 out, and so has my counsel a few expenditures  
16 that also were just not provided on, like, Andy's  
17 original spreadsheets that will need to get added  
18 as well. And nothing -- nothing like outrageous,  
19 but nonetheless, they still have to get at it  
20 because we don't file reports that are off even  
21 one penny, so.

22 Q Right. Have you ever had anything

1 like this happen for your other clients?

2 A Not like this, no.

3 Q No. And that's all.

4 ADDITIONAL INTERVIEW BY DEPUTY CHIEF FOR OCE  
5 BY MS. EISNER:

6 Q The transactions that you're  
7 mentioning, what is this -- what are the sizes of  
8 those transactions?

9 A They're -- they're all -- they're all  
10 pretty small between 20 and \$150. Actually,  
11 they're all like under the itemized threshold  
12 limits, so -- so far so --

13 Q Okay. So they're disbursements that  
14 are --

15 A Yeah.

16 Q Are we talking about disbursements or  
17 receipts?

18 A Disbursements?

19 Q Yeah. Okay. And who made those  
20 disbursements?

21 A I would -- I don't know for certain,  
22 but I would imagine that it was Andy because they

1 were debit card transactions, and he's the only  
2 one that has the debit card.

3 Q Have you seen what the transactions  
4 were for?

5 A Yeah. Yeah, I can -- I can tell what  
6 they're for, you know, like Uber or Exxon Mobil  
7 or what have you. I can -- I -- Starbucks and --  
8 yeah, you can -- I can tell who they're for.

9 Q Okay.

10 A Or what they're for.

11 Q And anything that raises concerns that  
12 they were not for bonafide campaign purposes?

13 A No, no, no, nothing that -- no.  
14 Nothing that was glaring, no.

15 Q Nothing that was glaring. Anything  
16 that --

17 A I mean, I'm -- I'm a -- I'm a -- I'm  
18 -- I'm pretty cynical to begin with. I'm always  
19 like, do you really got to, like, you know,  
20 expend this on that to win your campaign? But  
21 no. No. I mean --

22 Q Okay. Understood. And final question

1 you had just on the bank accounts issue. I know  
2 there were two bank accounts. The bank account  
3 that we had mentioned, the First Horizon one, is  
4 that still in use in any form for the campaign?

5 A As far as I'm aware, it's still open,  
6 yes, but it is not in use.

7 Q So does that mean that it does not  
8 have any funds in it, but it's an active account?

9 A As of the last statement that I was  
10 provided, it did have a balance, so it's  
11 definitely still open and it has a balance. But  
12 it looks like there's like -- I'd have to look.  
13 Again, off the top of my head, I don't recall,  
14 but, like, in the last reporting period, I don't  
15 think -- think there were any like transactions  
16 since, like, maybe April.

17 Q Okay.

18 A Maybe March. I can -- I can't  
19 remember, but -- and even then it was like three  
20 transactions.

21 Q And you said as of now, and help me  
22 understand this to make sure I'm getting this

1 right, all the new receipts are going into the  
2 other account, not the First Horizon account?

3 A Yeah, I -- there hasn't been -- as far  
4 as I'm aware, there hasn't been a deposit in that  
5 account in some time.

6 Q Okay. Okay. That's all the questions  
7 I have.

8

9 BY MS. CRUMP:

10 Q That's all I have, Witness 1, thank  
11 you very much for taking the time to talk with us  
12 today. We appreciate your cooperation.

13 A You're welcome --

14 MS. CRUMP: And while we're -- I think  
15 we'll go off the record, and then just one more  
16 thing to add before you leave.

17 THE REPORTER: And Ms. Crump, would  
18 you like to order at this time?

19 MS. CRUMP: We would like to order a  
20 copy of the transcript, yes.

21 THE REPORTER: Thank you.

22 (Off the record at 1:52 p.m.)



1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

2 I, Jordan Collins, AAERT CER, the officer  
3 before whom the foregoing proceedings were taken,  
4 do hereby certify that any witness(es) in the  
5 foregoing proceedings were fully sworn; that the  
6 proceedings were recorded by me and thereafter  
7 reduced to typewriting by a qualified  
8 transcriptionist; that said digital audio  
9 recording of said proceedings are a true and  
10 accurate record to the best of my knowledge,  
11 skills, and ability; and that I am neither  
12 counsel for, related to, nor employed by any  
13 of the parties to this case and have no  
14 interest, financial or otherwise, in its outcome.

15

16 *Jordan Collins*

17

18 \_\_\_\_\_  
19 Jordan Collins, AAERT CER, Notary Public in and for  
20 the Commonwealth of Virginia.

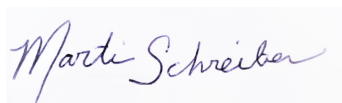
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CERTIFICATION OF TRANSCRIPT

I, Marti Schreiber, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding; that said proceedings were reduced to typewriting under my supervision; that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; and that I am neither counsel for, related to, nor employed by any of the parties to the case and have no interest, financial or otherwise, in its outcome.



---

Marti Schreiber,  
Planet Depos, LLC  
May 25, 2024

# **EXHIBIT 3**



FOR IMMEDIATE RELEASE

July 28<sup>th</sup>, 2022

Contact: **Witness 2**

### **Andy Ogles Responds to Questions About Campaign Finances**

**MAURY COUNTY, TN** – In response to various requests for information about the ogles campaign late filing and reported fundraising; Andy Ogles issued the following statement:

“At the time I was initially asked about our ongoing fundraising efforts several months ago, I stated that we had raised approximately \$453,000. That information was accurate to the best of my knowledge at the time, based upon pledges both directly to my campaign and to independent expenditure groups that were preparing to get engaged in the race. I am not allowed to coordinate messaging, but I can and did direct donors to a few independent expenditure groups they were planning to assist in my getting elected. Senate candidate JD Vance in Ohio used the same strategy successfully in his primary race. Others are doing the same thing. I believe the figure I quoted at the time is actually far less than what has been raised and spent to assist my campaign, both with my campaign “hard” dollars and soft money that independent groups are spending.

It was not my intent to overstate my fundraising success, and I believe the total amounts raised by my campaign and other groups to whom we directed donors actually reflect the accuracy of my initial statement about fundraising.

As to the late filing of the FEC reports for last quarter, there were paperwork and communications issues with the filing that delayed it. We corrected those and filed an accurate report and have filed all of the required reports since that time in a timely and accurate fashion.

My opponents are attempting to use these issues as a distraction from their own records and the false and misleading attacks that they and their out of state cronies are relying upon to confuse voters. At the end of the day, I don’t believe attack ads from fake conservative groups in Massachusetts will fool enough Tennesseans to win an election for Democrats pretending to be Republicans.

Nevertheless, I wanted to set the record straight so that we can focus on issues that actually affect families in the 5th district, like Biden’s disastrous social, economic and open border policies.”

###

*For more information about Andy Ogles, go to [www.andyogles.com](http://www.andyogles.com).*

29 Public Square Columbia, TN 38401

[www.andyogles.com](http://www.andyogles.com)

# **EXHIBIT 4**

CONFIDENTIAL

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

## **Transcript of Interview of Witness 2**

Review No. 24-3057

May 15, 2024

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OFFICE OF  
CONGRESSIONAL ETHICS (OCE)  
United State House of Representatives

REVIEW No. 24-3057  
INTERVIEW OF WITNESS 2  
Conducted virtually  
Wednesday, May 15, 2024  
2:06 p.m. EST

Job No.: 538225

Pages: 1 - 53

Recorded By: Jordan Collins, AAERT CER

1 Interview of WITNESS 2, conducted virtually.

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13 Pursuant to agreement, before

14 Jordan Collins, AAERT CER, Notary Public in and for

15 the Commonwealth of Virginia.

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A P P E A R A N C E S

ON BEHALF OF THE OFFICE OF CONGRESSIONAL ETHICS  
OF THE UNITED STATES HOUSE OF REPRESENTATIVES:

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C O N T E N T S

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E X H I B I T S

(None marked.)

1 I N T E R V I E W

2 THE REPORTER: I am a notary  
3 authorized to administer oaths and this interview  
4 will be recorded by electronic means. All  
5 parties understand and agree that any certified  
6 transcript produced from the recording of this  
7 proceeding is intended for all uses permitted  
8 under applicable, procedural, and evidentiary  
9 rules and laws and shall constitute written  
10 stipulation. The parties stipulate to the use  
11 and certification of this testimony consistent  
12 with applicable law of such.

13 Counsel, you may proceed.

14 MS. CRUMP: For the record, today is  
15 May 15th, 2024, and we are conducting the  
16 interview of Witness 2. He is represented by  
17 Counsel Scott Gast and Alexander Lee who are  
18 present today.

19 Speaking is Kristina Crump, investigative  
20 counsel at the Office of Congressional Ethics.  
21 I am here with Deputy Chief Helen Eisner. Mr. --  
22 Witness 2 has been given a copy of 18 USC 1001

1 and signed the acknowledgement.

2           Witness 2, please feel free to  
3 stop me if you need a break or have a question.

4           WITNESS 2: Sure.

5           INTERVIEW BY COUNSEL FOR OCE

6 BY MS. CRUMP:

7           Q     Witness 2, are you Congressman Ogles'  
8 current chief of staff?

9           A     Yes, I am.

10          Q     Great. And did you also work for his  
11 campaign?

12          A     Yes, I did.

13          Q     Okay. And what was your role on the  
14 campaign?

15          A     Title was campaign manager.

16          Q     Okay. And that was accurately  
17 reflective of your what, your role as well?

18          A     I suppose so. Maybe not as much as  
19 maybe a traditional or typical campaign manager  
20 would have done. It was my first role ever as  
21 managing a campaign, especially to that level.  
22 So my -- my day-to-day was probably more limited

1 than -- than most.

2 Q Okay. When did you start working for  
3 Congressman Ogles' campaign?

4 A The best of my recollection, the  
5 official start date was May 9th of 2022.

6 Q Okay. And what was the financial  
7 state of the campaign when you started and in  
8 those initial few months?

9 A I have no idea. I never knew the  
10 financial state of the campaign since the  
11 entirety of the time that I was working for it.  
12 My role was more driven at volunteer management,  
13 volunteer coordination, day-to-day operations on  
14 where we pitch him on the ground, logistics of  
15 getting him there, comms, that type of stuff. I  
16 come from a grassroots background, so I had very  
17 little to no knowledge at all on the -- the  
18 financial. Certainly when I first started, had  
19 no knowledge at all.

20 Q Okay. So you weren't kept apprised of  
21 the cash on hand for the campaign?

22 A No, nobody was.

1 Q Okay. And when you say nobody was,  
2 how was that the case?

3 A Anytime there was a question about  
4 what needs to be paid for, can we go this  
5 direction, GCs had a question on what could we  
6 spend here, there, as soon as it got to a  
7 question of what could we spend and where could  
8 we spend it, how could we spend it, it was  
9 always, that's an Andy question, that's an Andy  
10 question, direct that to Andy.

11 Q Okay. And that was the party line  
12 across the campaign in response to financial  
13 questions was, that's an Andy question?

14 A It was, yes.

15 Q And why was that?

16 A I don't know. Never really thought  
17 about the why, frankly. I'm not -- I couldn't --  
18 couldn't tell you, honestly.

19 Q Okay. Do you recall when you started  
20 getting paid by the campaign?

21 A I couldn't remember the first day that  
22 I received a paycheck come through. I don't

1 remember that first day, no.

2 Q Okay. Did you ever have any issues  
3 with getting paid or receiving your paycheck?

4 A No.

5 Q Okay. Did you ever work on a  
6 volunteer basis before working on a paid basis  
7 for the campaign?

8 A Say that Line -- work for a non-paid  
9 basis that --

10 Q Did you ever work on a volunteer basis  
11 before getting paid by the campaign for your work?

12 A Oh, no. I -- I had previous  
13 employment all the way up until the end of the  
14 conclusion of the Tennessee General Assembly that  
15 year.

16 MS. CRUMP: Okay. Ms. Sample, if you  
17 could, would you mind opening Exhibit 13 for me?

18 THE TECH: Yes. Standby, please.

19 Exhibit is on the screen.

20 BY MS. CRUMP:

21 Q Okay. Witness 2, I'll report to you  
22 that what we're trying to show on the screen,

1 hopefully you're able to see it, is, you know,  
2 when you search the FEC database for  
3 disbursements to Witness 2, Witness 2 last name,  
4 Witness 2 first name, Andy Ogles for Congress,  
5 these are the disbursements that appear.

6 Does this seem to be reflective  
7 of the payments that you received while working  
8 as campaign manager? And please feel free to  
9 come closer, you know, so that you're able to see  
10 it.

11 A (Inaudible.)

12 MS. CRUMP: And Ms. Sample, if you  
13 could zoom in a little bit, maybe that would help  
14 the witness.

15 A I think I got it now. It's okay. Yeah,  
16 that looks relatively correct.

17 Okay. All right. Thank you.

18 MS. CRUMP: Ms. Sample, we can go  
19 ahead and remove that exhibit.

20 BY MS. CRUMP:

21 Q Witness 2, are you familiar with a  
22 loan that was reported by the campaign in its



1 July 15th, 2022, quarterly FEC report reported in  
2 the amount of \$320,000?

3 A Only -- only to the extent of say  
4 media reports under something. So I suppose  
5 somewhat familiar in that extent and anything  
6 that's done to try and respond to grassroots  
7 people about it or something. But -- but  
8 familiar in that sense.

9 Q Okay. During the campaign as campaign  
10 manager, did you have any role in reporting to  
11 the media or, you know, letting folks know about  
12 the financial state of the campaign or how much  
13 money the campaign had in cash on hand?

14 A Somewhat, but it was -- it was -- most  
15 of the time it was me carrying either direct  
16 quotes that Andy had provided to the campaign.  
17 We had some of the people that were somewhat more  
18 media savvy than myself that might have helped  
19 out on occasion. So there were occasions where,  
20 say, for just a general run of the mill story, I  
21 would help craft in something, say immigration  
22 policy. But specifically as it relates to

1 anything finance-related, my point on  
2 communications with that was really just take and  
3 deliver a direct quote that a Andy had simply  
4 copied and pasted it itself into a Word document  
5 or something.

6 Q Would it be accurate to say that all  
7 knowledge that you had of the financial state of  
8 the campaign at that time would have come from  
9 the congressman himself?

10 A Yeah, I would say that's accurate.

11 Q Okay. So when the campaign reported  
12 receiving a \$320,000 loan, did you understand  
13 what the source of that loan was at that time?

14 A I did not. I didn't know anything  
15 about it. And frankly, again, as I said, my --  
16 my day-to-day was -- there wasn't much of a  
17 reason at all for me to be concerned with any of  
18 that going on. It just -- you know, you're  
19 already working 14 hour days doing what you're  
20 trying to do. I just had no reason to pay  
21 attention to that or bring it up.

22 Q Is it your understanding that

1 Representative Ogles would have been able to  
2 afford to loan his campaign \$320,000 at the time  
3 that that loan was reported?

4 WITNESS 2: I have no idea about  
5 that either, honestly. I -- I know him from, you  
6 know, hosting a couple talk radio programs with  
7 him and -- and whatever his previous history was  
8 with the state of doing, you know, some stuff  
9 with Americans for Prosperity. But I know  
10 nothing about his ability for that.

11 BY MS. CRUMP:

12 Q Okay. Sitting here today, do you know  
13 whether the loan the reported loan of \$320,000  
14 was accurately reported to the FEC?

15 A All I can go off of is just what --  
16 no, I don't. I -- I don't know anything about  
17 that. I -- like I said before, I'm just reading  
18 what -- what media is picking up and that's it.

19 Q Okay. Do you know whether a loan in  
20 the amount of \$320,000 was ever made to the  
21 campaign?

22 A I suppose it's in the sense of, again,

1 because the media accounts picking up on the date  
2 that that might have been done or presumably  
3 they're pulling off some type of public records,  
4 I suppose, but that's the extent of my knowledge  
5 on that. So I --

6 Q And just to make sure that I'm clear,  
7 what media accounts are you referencing?

8 A Primarily some in -- I guess I the one  
9 that's come top of my head is maybe some local  
10 reporting out of the district. We would -- well,  
11 in my capacity as campaign, sorry, chief of staff  
12 now even, we would receive -- have received  
13 inquiries in the past of we've pulled these  
14 records, it's indicated this amounts, do you have  
15 any response to it? That type of thing.

16 Q Okay. So the only knowledge you have  
17 about whether \$320,000 would -- was actually  
18 loaned to the campaign by the congressman is  
19 based on inquiries that you've received from the  
20 media. You don't have any further knowledge of  
21 that subject?

22 A No further knowledge of that. The

1 only other knowledge I've had is in developing  
2 responses to either grassroots leaders that I've  
3 responded back to or -- or even maybe getting in  
4 line response back to some of those media  
5 inquiries, which I don't think we maybe responded  
6 to, a brief conversation with the congressman  
7 where he indicated it being something with a line  
8 of credit, very -- very limited understanding,  
9 very limited knowledge on that. And that's the  
10 -- the extent of what I know about that is -- is  
11 just enough to get that baseline information for  
12 him to respond back with.

13 Q Okay. You mentioned having a  
14 conversation with the congressman where he  
15 intimated that the loan to the campaign came from  
16 a line of credit. When was that conversation, to  
17 the best of your recollection?

18 A I can't be exact, but it would have  
19 had to have been around the time that that first  
20 story broke, whenever the CLC -- I don't -- I  
21 don't know the acronym. Whenever CLC put forward  
22 that -- that -- sorry, the language escaped me,

1 whatever they put forward to ask for -- for an  
2 inquiry to -- to take place, there was a local  
3 story that came out of that. And again, I can't  
4 be exact as to when -- maybe end of this year, of  
5 last year, beginning of this year, somewhere  
6 around that time frame.

7 Q Okay. And how did this topic come up  
8 between you and the congressman in conversation?

9 A It probably would have come up from --  
10 I'm trying to think here. It either would have  
11 come up from the email inquiry that was sent  
12 saying there's a report on this and we have a  
13 response, me just going to the congressman and  
14 saying, hey, we've seen some reports on this, how  
15 do you want to respond? It -- it -- literally  
16 that's -- I'm just trying to think right now if  
17 there would have been any other occasion where  
18 that come up. But -- but no, anyways, that's how  
19 I -- it's my understanding how it would have come  
20 up or my recollection that it would have come up  
21 is they sent an email asking about the response  
22 to it, I go to the congressman, you know, how do

1 you want to respond to this?

2 Q Okay. And what did he tell you about  
3 the reported \$320,000 loan?

4 A Just like I said, and -- and -- before  
5 is very sort of vague language of the line of  
6 credit taken out, the pledge to that amount, and  
7 then he would immediately go into, you know, I  
8 wasn't a -- a rich person, had to make sure we're  
9 risking what we have to run for Congress,  
10 represent the people in Tennessee's Fifth  
11 District and things like that. But -- but as far  
12 as anything that's pertinent specifically to the  
13 -- the dollar amount itself, it was always a very  
14 sort of short response on that.

15 Q Do you have any information about the  
16 line of credit that he referenced where it may  
17 have been taken out? What amount? When?

18 A No. Sorry, repeat that question again?

19 Q I'm asking if you have any information  
20 about that line of credit that he told you may  
21 have funded the loan to the campaign, you know,  
22 if you know, when he took out that line of

1 credit, where, who the creditor was?

2 A Oh, no, no, no. Sorry. No, I -- I  
3 know nothing about that at all.

4 Q Okay. Would it be fair to say that it  
5 would be a line of credit that would have had to  
6 have been opened before the campaign was over?

7 A I honestly don't know about that  
8 either. I am -- frankly not even sure -- I'm not  
9 even sure what he meant by line of credit. So I  
10 -- I'm not sure where it would have even come  
11 from or what it was comprised of or anything.

12 Q Okay. Do you believe that the  
13 congressman opened a line of credit to make a  
14 loan to his campaign?

15 A Do I believe?

16 Q Mm-hmm.

17 A Sure, yeah. I mean, again, I have no  
18 reason to -- to not believe that.

19 Q Okay.

20 MR. EISNER: Can I jump in  
21 Kristina? here,

22 MS. CRUMP: Please do.



1 INTERVIEW BY DEPUTY CHIEF FOR OCE

2 BY MS. EISNER:

3 Q A -- a few questions. So are you  
4 still in the same position as campaign manager?

5 A Not in a technical sense, no. I'm  
6 chief of staff now. Obviously, like most chiefs  
7 on the Hill, everything does eventually funnel  
8 through us. But -- but effectively my only title  
9 right now is chief of staff.

10 Q Do you have any type of role for the  
11 campaign?

12 A Not a technical role, no, no. No,  
13 Again, I still will, say, oversee some of the  
14 ground operations and similar to what I had  
15 before, but -- but it's not a campaign manager I  
16 suppose. Now, I -- I will say since we came up  
17 here, several of the unofficial operations have  
18 switched to me since we -- we were brought into  
19 office. So since we went to a new bank account  
20 with a new treasurer, I have done quite a bit to  
21 stand up small dollar operations. I've done  
22 quite a bit to get a new PAC DC operation on

1 board with us, a -- a different district  
2 fundraiser. So since January 3rd of '23, a lot  
3 of that operation did switch over to me. So I --  
4 I guess I should correct myself in it. That is  
5 in the unofficial side, and that is something  
6 that I -- I handle quite a bit of.

7 Q Let me kind of break that apart too,  
8 just so I understand. When you say technical,  
9 are -- are you referring to just not a paid  
10 position or you don't have a title? Is that how  
11 -- how are you describing technical?

12 A Both, yes. Yeah, both is what I mean  
13 there. It's not -- not a paid position and not a  
14 technical title as well.

15 Q But I think you were just describing  
16 that you're still involved as far as helping set  
17 up a bank account, and it sounds like you were  
18 communicating with a new treasurer; is that  
19 correct?

20 A That is correct. Right.

21 Q Okay. And what role did you play in  
22 setting up the new bank account?

1           A     I played no role in setting up the new  
2 bank account. That was something that -- that  
3 Andy transitioned over with Witness 1.  
4 Well, I guess to be fair, I was at least made  
5 aware that that was happening when we got up here  
6 again. So switching from the First Horizon to  
7 this new Chain Bridge account that Witness 1.  
8 helps us run now, I was obviously made aware that  
9 that transition was taking place. And transition  
10 probably isn't even the right word. It was  
11 really just a new account that we just started  
12 moving all the operations into going forward.  
13 Again, getting stuff out of the hands of whoever  
14 had it previously into primarily Witness 1's hands  
15 and the fundraising operation primarily switching  
16 to -- to the things I was controlling from, say,  
17 January of '23, going forward.

18           Q     Okay. And so what role did you play  
19 in that? Was this just you had that information  
20 --

21           A     In setting up the new bank account?

22           Q     -- or did you have any role in sort of

1 what you just described with that process?

2 A Sorry, you mean the -- the process of  
3 setting up the new bank account?

4 Q Setting up or helping to inform  
5 individuals like the treasurer that a new bank  
6 account should be set up?

7 A Oh, that was a fairly simple process,  
8 actually. That was a suggestion Witness 1  
9 had for the sake of expediting the majority of  
10 the things that he needs to control for us for  
11 proper reporting and everything else. It's going  
12 to be easier if he has an account that he can see  
13 and he has access to and he can have easier  
14 access to numbers as well. So when we got into  
15 office, he made a suggestion to me and Andy,  
16 both, hey, this is a similar account that I use  
17 for a lot of my other clients. It'd be easy if  
18 you set that up for you guys as well, kind of as  
19 simple as that. And we just -- Andy gave the go  
20 ahead on it, go ahead and do that, and then from  
21 that point, it's been something that Witness 1 and I  
22 both have had access to and been operating in

1 that at least -- I can't remember the exact date  
2 we set that up, but it's been operating at least  
3 since we came up here in a couple months into '23  
4 I believe is when it was actually set up.

5 Q Okay. So you -- so you do have access  
6 to that bank account?

7 A The Chain Bridge one, correct. The --  
8 the newer one, that's correct.

9 Q What is the bank account that you did  
10 not have access to?

11 A Oh, that's the -- the First Horizon  
12 account that was used all throughout the 2022  
13 campaign.

14 Q Okay. Now -- go ahead.

15 WITNESS 2: Sorry. Can I ask  
16 you-all a question?

17 MR. GAST: Yes, for sure. Can we go  
18 off the record for a second?

19 MS. EISNER: Sure.

20 (OFF THE RECORD)

21 THE REPORTER: Back on the record.

22 MR. GAST: Helen, did you want to --

1 to ask the question again or --

2 BY MS. EISNER:

3 Q Yeah, I -- I -- I -- I can ask the  
4 question again. I mean, we were -- we were  
5 talking about the new bank account or -- and the  
6 -- what was the reason that the new bank account  
7 was set up?

8 A Oh, sure. So to -- to clarify, I just  
9 wanted to -- the reason as to why the new bank  
10 account was set up, I don't want to speculate  
11 about that too much. I -- I think other parties  
12 could probably answer that better than I could,  
13 frankly. All I know is that it was just going to  
14 be easier for our treasurer to have access to the  
15 records, the information that he needed to get  
16 stuff to us in a timely manner. And that I -- I  
17 think speaks for itself.

18 But I did want to make a -- a  
19 note that First Horizon Bank account, the one  
20 that was used primarily during the 2022 campaign.  
21 In October of '22, specifically on October 13th  
22 of '22, I was given access to a card that's tied

1 to the account specifically for day-to-day  
2 expenditures, but I -- I didn't want to make sure  
3 that access to accounts -- didn't have access to  
4 see records or transactions or anything like  
5 that. Again, I had no reason to need any of that  
6 during that '22 campaign given my -- my role.

7 So anyways, First Horizon account  
8 was used during the campaign, and then coming up  
9 here, it switched to the -- or at least  
10 everything we were doing from '23 onwards, at  
11 some point in '23 was -- was switched to that --  
12 that Chain Bridge account.

13 Q So you were the campaign manager and  
14 you didn't have any reason to have access in 2022  
15 to the campaign account besides that card?

16 A That's correct, yeah. And -- and even  
17 then, you know, it'd become admittedly cumbersome  
18 for us in the campaign side to operate this way,  
19 but it kind of is what it is or was what it was  
20 at that time. But -- but all the way up even  
21 until October of '22, every -- every even daily  
22 expenditure went through Andy. And then in

1     October, for little things, I did have a card  
2     within a presumably set limit on it somewhere  
3     that we could do sort of day-to-day purchases on.

4             Q     Okay. Every single expenditure from  
5     the campaign went through the congressman?

6             A     Yes. Yeah, prior to October, I had no  
7     other way. Nobody on the campaign had any other  
8     way to do it.

9             Q     Why did it change in October?

10            A     Because of what I mentioned before. I  
11    think it just reached a point that it had become  
12    so cumbersome, we still had, you know, a month  
13    left to run stuff that was -- we -- we need to  
14    actually ramp up an actual campaign and stuff,  
15    you know, just had to be done. And so I -- it  
16    was done in October, I think, just to get a thing  
17    off of his plate, that was just to make it easier  
18    for the rest of the campaign in the final --  
19    final month of it going into November.

20            Q     How often would you talk,  
21    understanding you didn't have access at that  
22    point in time to that bank account, how often



1 would you speak with the congressman about the  
2 campaign's cash on hand and overall financial  
3 health?

4 A Very little. The -- the cash on hand  
5 wasn't necessarily a situation that I had to be  
6 too concerned about. That was more a question  
7 for people above my pay grade, if you will, the  
8 GCs, the people that were actually going to make  
9 larger purchases and bigger spends. My -- my  
10 role was more, you know, we had -- the entire  
11 campaign was run on -- on a ton of volunteers  
12 that Andy, through reputation and being the  
13 grassroots guy, had been able to -- to accumulate  
14 over decades worth of working in Tennessee. So  
15 it was really just utilizing the power of those  
16 people to get them out to places, make sure we  
17 had a presence on hand, make sure we were, you  
18 know, tracking good media opportunities for him.

19 So again, for my role, short of  
20 some yard signs and stuff here and there, flyers,  
21 business cards, there wasn't much that I needed  
22 to be concerned about with cash on hand.

1 Everything we were doing or I was responsible for  
2 didn't -- didn't cost any money.

3 Q You said people above your pay grade,  
4 GCs. Can you just -- is that an acronym? Can  
5 you clarify that? Or I might have just misheard  
6 that.

7 A Oh, sorry. The -- the consultants we  
8 were using, those are the ones that --

9 Q The -- the consultants.

10 A Right, right. Any of the consultants  
11 we were using. I -- I was never in the capacity  
12 to, say, make a decision on if we're going to  
13 make a major radio purchase or a television buy.  
14 Admittedly it was --

15 Q Were you involved -- were you involved  
16 in campaign strategy?

17 A Loosely, but again, strategy only to  
18 the extent of, do we put them in Maury County as  
19 opposed to Davidson County on certain days? Do  
20 we put him with this GOP group or that grassroots  
21 group on a certain day? As far as national  
22 strategy is concerned, I -- I had a -- a voice in

1 that, but -- but certainly not a -- a  
2 recognizable or noticeable one.

3 Q What about during the sort of primary  
4 period, were you involved in the strategy then in  
5 --

6 A Same exact thing there, yeah.

7 Q Okay. So, you know, in your role as  
8 campaign manager, in that period of time in the  
9 spring of 2022, what was -- what was the state of  
10 the campaign? What was the overall sense of how  
11 the congressman was doing prior to the primary?

12 A Prior to the primary date, you mean?  
13 So prior to -- to August, is that the idea?

14 Q Prior to August. Well, actually,  
15 let's talk about the spring --

16 A Yeah.

17 Q -- if you recall, because it seems  
18 like you started around that time period. So in  
19 the spring when you came on, what was the sense  
20 of how the campaign was doing internally?

21 A Great. You know, we had some -- some  
22 good groundswell, good buzz. It seemed like the

1 -- the numbers were going to be in his favor,  
2 especially with the demographic of the district  
3 itself. You had two people running from, say,  
4 the left or middle, two moderates that were going  
5 to split a moderate vote, which gave Andy a  
6 pretty nice pathway to victory by picking up some  
7 more of the, you know, people on the -- the  
8 right-leaning side of things. He had established  
9 himself in the state for decades prior to that  
10 being a grassroots driven guy. The -- the  
11 narrative of who Andy was and why he -- he wants  
12 to serve was -- was forming himself and -- and it  
13 seemed to be resonating with media. It was  
14 resonating with outside groups. It was  
15 resonating with the grasstop leaders that I knew  
16 personally as well. So all indications were that  
17 -- that it was a -- it was going very, very well,  
18 and people were excited to see Andy to become a  
19 congressman and -- and we thought we had a great  
20 pathway to victory as well.

21 Q And what was your understanding of the  
22 financial health of the campaign?

1           A     Again, I -- nothing other than -- my  
2     -- my understanding of financial health  
3     throughout the entirety of the campaign was  
4     dictated entirely upon media reports or -- or  
5     otherwise. I -- I -- I never knew what was being  
6     spent, how much we were being -- how much we were  
7     spending. That was -- all of that was -- was  
8     either completely outside of my purview or  
9     conversations that I wasn't included on.

10          Q     Okay. Do you recall when you first  
11     learned that the congressman reported in his FEC  
12     reports providing a \$320,000 personal loan to the  
13     campaign? Do you recall learning of that at the  
14     time?

15          A     No, I don't recall learning about that  
16     at the time.

17          Q     Okay. When did you first learn about  
18     that?

19          A     About the loan itself, The first time  
20     I learned about that was -- again, even during  
21     the campaign, it wasn't -- it wasn't something  
22     that really came up. The first time I -- I -- I

1 -- I remember that was when we received inquiries  
2 about it when I was up here. And again, it -- it  
3 could have been something that came across my  
4 plate before. It's just not anything that drew  
5 my attention in the way that it did when we --  
6 when we were up here and first got that inquiry  
7 about the CLC push or something.

8 Q Okay. Do you recall, this would have  
9 been approximately May of 2022, that there was  
10 some reporting about campaign filings not  
11 occurring and sort of public statements about how  
12 much cash on hand or how much the campaign had  
13 raised and the accuracy of those statements. Do  
14 you recall that?

15 A I do, yes. And that's actually what I  
16 -- what I mean is, even when that came up during  
17 the campaign, I remember the response we sent out  
18 was whatever quote Andy gave us. But we were  
19 more dealing with the -- with the aspect of the  
20 late filing of it, not what was comprised in the  
21 filing itself. No one had really spoken about  
22 that at that time, at least not that we were

1 aware of. And if it was reported on, it's  
2 certainly not anything that we were dealing with  
3 in the campaign side to respond to grasstop  
4 leaders or to respond to media bat or anything.  
5 That was all more about filing after the -- the  
6 deadline than it was about what was in the filing.

7 Q Okay. When did you first have  
8 conversations with the congressman about the late  
9 filings?

10 A The late filings?

11 Q Yes.

12 A I can't remember the first time. It  
13 would have been the first time that we sent a  
14 response back to one of the inevitable of stories  
15 that came out. So I -- whenever that filing was  
16 due, maybe the end of July, is that -- was that  
17 the end of that quarter, I believe. There --  
18 there was one -- there was actually some press  
19 release that was sent out from the campaign  
20 around that time frame. I believe that's --  
21 there's probably a date on the top of that.

22 MS. CRUMP: Helen, if you're

1 interested, that's Exhibit 10.

2 BY MS. EISNER:

3 Q Yeah, we can we can pull up Exhibit  
4 10, just so you can see it and that might help  
5 you.

6 THE TECH: I'm fine --

7 WITNESS 2: Yeah.

8 BY MS. EISNER:

9 Q And this is a press release I believe  
10 from July 28th, 2022.

11 A Yeah, that sounds about right. So  
12 whatever the end of that quarter was, that's --  
13 that's the -- the first time that we had had  
14 those conversations. And even then it was taking  
15 a copy and paste from the response that Andy had  
16 given and just putting my name on it, because, I  
17 mean, they need to contact somebody on the  
18 campaign and we had such a -- a limited campaign  
19 staff. I was the guy tasked with doing this. So  
20 that's -- that's the first time we would have  
21 heard the response or had any conversation there.

22 Q Okay. And at that point in time, when



1 your name was put on this press release, what  
2 conversations did you have with the congressman  
3 about the reason for, you know, these reporting  
4 issues?

5 A Again, very little. Didn't delve into  
6 any intricacies of why or how or what. It was  
7 just there's the response, send that out, keep  
8 trudging, going forward with the campaign. Our  
9 message is good. The -- that -- that was it  
10 really, just here's the response that we want to  
11 give, work with this response.

12 Q Okay. So you didn't ask any further  
13 questions about whether or not the numbers were  
14 correct?

15 A I did not, no.

16 Q Did you believe that the numbers were  
17 correct?

18 A And at that time -- I sorry, say that  
19 again?

20 Q Did you believe that the numbers were  
21 correct?

22 A I did. Well, again, at that point, it

1 was just about the -- the filing late. That's  
2 what -- what we kept getting pinged on or -- or  
3 -- or passed with responding to some grasstop  
4 people. I -- I had no reason to even ask a  
5 follow-up question about the total number itself.  
6 Nothing had been -- there's no indication I was  
7 given about anything prior to this, that I would  
8 have needed to ask follow-up questions  
9 specifically about that number. We were, at that  
10 time, just worried about getting that report in.  
11 And by we, I mean, the campaign staff was worried  
12 about the report getting in later than it should  
13 have and us being tasked with, well, how do we go  
14 respond to this when we're showing up to the next  
15 event?

16 Q And who was the treasurer at the time?

17 A At that time, I honestly don't  
18 remember. At that time, it would have either  
19 been an individual named Troy Brewer or, at some  
20 point, Andy switched treasurers to  
21 Witness 1 and I cannot be certain about when that  
22 date happened.

1 Q Why did the campaign switch treasurers?

2 A Again, I'm not totally certain on that  
3 either. I -- I -- other than maybe even there  
4 might be some information listed in there, but I  
5 can't be certain about why -- why the treasures  
6 were switched.

7 Q Once Witness 1 was brought on,  
8 how often did you have conversations with him?  
9 How often were you in communication with him?

10 A During the campaign, virtually none.  
11 Very little, if -- if at all. Now, since then,  
12 since I've been chief, I -- I speak with Witness 1  
13 fairly often. But -- but during that '22  
14 campaign cycle, almost never.

15 Q Okay. Did Witness 1 ever express  
16 any frustrations to you about how the campaign  
17 was run?

18 A No, not about how the campaign was run.

19 Q Okay. Did he express any frustrations  
20 to you?

21 A On occasion, he would express  
22 frustrations about being able to get records from

1 that First Horizon bank account. And there would  
2 be occasions where I would, say, call or text  
3 Andy and say, hey, Witness 1 needs records from that  
4 First Horizon bank account. Can you help him  
5 out? But -- but outside of that, that's been the  
6 only frustration he's ever expressed to me.

7 Q Okay.

8 MS. CRUMP: Ms. Sample, can we take  
9 down this exhibit, please? Thank you.

10 BY MS. EISNER:

11 Q When he expressed frustration, let's  
12 start with Witness 1. Why was he  
13 frustrated? What was it about not getting access  
14 to those records that frustrated him?

15 A Well, I have assumed it's because he  
16 needs those records to compile some kind of  
17 report.

18 Q Okay. And when you communicated, it  
19 sounds like you did communicate with the  
20 congressman about this. What did the congressman  
21 tell you?

22 A Oh, just that, hey, I'll work on it

1 and get it to him.

2 Q And did he get the -- those records to  
3 him?

4 A I -- I -- I assume so, but -- but  
5 again, I'm not -- I'm not sure. I mean, unless  
6 Andy would come in and say, hey, I got those  
7 records to him or something. But that is  
8 typically all it was is, hey, Witness 1 needs these  
9 records. He's seen if I can get you to send  
10 those to him quicker sooner rather than later.  
11 I'd deliver that information to Andy and he'd  
12 say, hey, thanks, I'll work on it.

13 Q When was the last time you spoke to  
14 Witness 1?

15 A Today.

16 Q Okay. And what did you speak about?

17 A Today I spoke about we needed to make  
18 a purchase for a train ticket for Andy. The  
19 website we were using has a code that was going  
20 to be texted to an individual that's marked as  
21 the, I don't know, designee or the person that  
22 that needs to be sent to. So I needed him to

1 text me the code so we could actually purchase  
2 that.

3 Q Okay. Have you spoken with him about  
4 the reported \$320,000 loan that was made -- that  
5 was reported to the FEC as having been made to  
6 the campaign in 2022?

7 A The -- the -- the only conversations  
8 I've had with Witness 1 about that are, again,  
9 circulating around the time that it started to  
10 become to -- to my awareness of asking Witness 1, Do  
11 you know anything about this? Is there anything  
12 that you do to help Andy? Just trying to put  
13 people in Andy's orbit to try and properly  
14 situate him so he can get the response out there  
15 needed. And I can't be exact about the time as  
16 to when I had those conversations. But that's  
17 the conversations I would have with Witness 1 is, Hey,  
18 they're asking questions about some kind of loan  
19 on some type of disclosure or something. Do you  
20 know anything about this? And can we do anything  
21 to -- to try and help him to -- to figure this  
22 out?

1           Q     Okay. Besides the conversations about  
2     the press response to inquiries about the loan,  
3     have you had any conversations with him about the  
4     accuracy of the reporting of the \$320,000 loan?

5           A     Oh, no, not at all.

6           Q     Okay. And in the last week, have you  
7     had any conversations about that loan or access  
8     to records or the congressman's payments to the  
9     campaign?

10          A     No, certainly not. Outside of the  
11     people in this room, the only people I've talked  
12     to anything about this, it's just been these two.

13          Q     Okay. Have you talked to Witness 1.  
14     about the Office of Congressional Ethics  
15     investigation?

16          A     No.

17                MS. EISNER: Kristina, I -- I'm happy  
18     to turn it back to you. I do have some more  
19     questions about the loan, but if -- I don't want  
20     to cut you off, so --

21                MS. CRUMP: No, you're not cutting me  
22     off. So you should feel free to go forward. I

1 can jump in whenever you'd like to take a break.

2 ADDITIONAL INTERVIEW BY DEPUTY CHIEF FOR COE

3 BY MS. EISNER:

4 Q Okay. So just kind of continuing down  
5 this same train about the loan. You know, we've  
6 heard from various sources now that this loan,  
7 while reported to the FEC as having been made as  
8 a personal loan, never in fact occurred and that  
9 that amount was never transferred to the  
10 campaign. Do you have any understanding or sort  
11 of familiarity with that?

12 A No, not at all.

13 Q Does that surprise you?

14 A I don't know.

15 Q Okay. When you say you don't know, it  
16 sounds like, you know, there's been a lot of  
17 scrutiny of this loan. When I tell you that  
18 we've heard from, you know, sources that this  
19 loan did not occur, does that resonate with any  
20 other information that you've heard?

21 A No. And that -- that's why I say, I  
22 don't know. It's because I -- I -- I know so



1 little about what's going on with any of this. I  
2 -- I wouldn't know if that -- I don't know why  
3 that -- I don't have any sense of -- of context  
4 for whether that should or should not be a  
5 surprising thing. I don't know why it would or  
6 would not be surprising. I just -- I have no way  
7 to -- to properly respond to -- to that question,  
8 frankly. Does that make sense?

9 Q Given that you were involved in the  
10 campaign in the spring of 2020, in that -- 2022,  
11 apologies, in that time period, can you think of  
12 any reason why the congressman would report a  
13 \$320,000 personal loan to the campaign that the  
14 campaign did not receive?

15 A No, I -- I couldn't speculate on that  
16 either.

17 Q Okay. Is there any reason that the  
18 campaign would want to have recorded higher cash  
19 on hand in mid-April of 2022?

20 A Again, I -- I -- I wouldn't know  
21 either on that one. I couldn't speculate on that  
22 one.

1 MS. EISNER: Okay. Kristina, I'm  
2 happy to turn it back over to you.

3 ADDITIONAL INTERVIEW BY COUNSEL FOR COE  
4 BY MS. CRUMP:

5 Q Witness 2, have you had any  
6 conversations with the congressman about this  
7 inquiry?

8 A This one? No.

9 Q Have there been any -- aside from  
10 media inquiries, have there been any other  
11 inquiries into this matter?

12 A Aside from media, no. No, not to my  
13 knowledge, no.

14 Q Okay. So you have not talked to the  
15 congressman about the OCE's investigation?

16 A Other than to say, hey, we got our  
17 media inquiry here and set up with Counsel here,  
18 that's -- that's been the extent of my  
19 conversations with him about this.

20 Q Okay. Do you know whether or not the  
21 congressman is cooperating with this review?

22 MR. GAST: Other than what you may

1 have learned through your attorneys.

2 WITNESS 2: Oh.

3 MR. GAST: Have you had a conversation  
4 with the congressman?

5 WITNESS 2: Oh, no. Then no.

6 Certainly not. No.

7 BY MS. CRUMP:

8 Q All right. I'll -- I'll rephrase the  
9 question to make it clear for the record.

10 Other than conversations that you  
11 may have had with your attorneys, do you have any  
12 information to inform you whether or not the  
13 congressman is cooperating with the OCE's review?

14 A No.

15 Q Okay. Have you had any conversations  
16 with the Ethics Committee regarding the  
17 congressman's liabilities that are reported in  
18 his financial disclosures?

19 A With the Ethics Committee? There was  
20 a -- during his original preparation of, and  
21 correct me if I use the incorrect terminology or  
22 if I'm not discussing what you're talking about,

1 but during the original preparation of the  
2 financial disclosure from last year, I did have  
3 someone from, it could have been House Ethics, I  
4 can't be certain where she was from, review his  
5 initial preparation of that, give a few pointers,  
6 this needs to be included, that doesn't need to  
7 be, correct it here. And then I -- I  
8 transitioned or -- or passed that information  
9 back to him. And I believe to Witness 1 as  
10 well, trying to include as many people as  
11 possible that knew more than I did on the subject  
12 to -- to make sure it was properly situated, you  
13 know. But is that what -- is that what you mean?

14 Q Yes. Did you -- who prepared the  
15 congressman's financial disclosures, both his  
16 Candidate Report and his New Filer Report?

17 A He did, of course, as I mentioned  
18 before, with some inputs from some other people  
19 more experienced than himself, but he's the one  
20 that prepared it.

21 Q Okay. Did you have any discussions  
22 with him about loans, mortgages, lines of credit

1 being reported in those documents?

2 A No. Other than what was given on  
3 those sort of pointers that I received back from  
4 that individual in House Ethics or wherever she  
5 was from, that was the extent of -- of anything I  
6 had. Again, I -- I would have no basis of  
7 knowledge to have in that kind of conversation to  
8 tell him. So I tried to get other percent that  
9 could tell him something worthwhile.

10 MS. CRUMP: Okay. Ms. Sample, could  
11 we pull Exhibit 6 please?

12 THE TECH: Stand by, please.  
13 Counsel?

14 MS. CRUMP: Yes.

15 THE TECH: I only have Exhibits 1  
16 through 13 without 6.

17 MS. CRUMP: Got it. Give me one  
18 moment. Okay. Could we try Exhibit 2?

19 THE TECH: Yes. Stand by, please.

20 MS. CRUMP: Okay, great. Could you  
21 zoom in just a bit, Ms. Sample?

22 BY MS. CRUMP:

1           Q     Witness 2, on your screen, I hope  
2     you're able to see, it looks like a Gmail  
3     printout, a forwarded message to Witness 1,  
4     I believe from Andy Ogles. Are you able to  
5     see that?

6           A     Yeah, I can see that.

7           Q     Okay. Is this a document that you've  
8     seen before?

9           A     That's from Andy to Witness 1. Oh, thank  
10    you. From Andy to -- no, never seen this before.

11          Q     Okay. So because some of -- some of  
12    this document is edited out, I wasn't sure if you  
13    were on an earlier part of the email chain or  
14    something like that. But this is from October  
15    15th, 2023, and in the email, it says, "Also the  
16    loan is a line of credit secured by our home."  
17    Do you see that?

18          A     I do.

19          Q     Okay. Do you remember having  
20    conversations with the congressman around this  
21    point in time about the loan to the campaign that  
22    we've been discussing or the line of credit that

1 we discussed earlier?

2 A It could have been around that time  
3 frame. Like I said before, I -- I can't -- I  
4 don't remember when that CLC thing came through.  
5 It was late last year, early this year, as I said  
6 previously. So it could have been around that  
7 time frame. I -- I just frankly can't remember.

8 Q Okay. And you don't have any  
9 knowledge or information to agree or disagree  
10 with this statement that the loan to the campaign  
11 was from a line of credit secured by his home,  
12 right?

13 A That is correct, yes.

14 MS. CRUMP: Okay. Ms. Sample, if we  
15 could pull down that exhibit?

16 BY MS. CRUMP:

17 Q Witness 2, has anyone told you to  
18 answer our questions with anything other than the  
19 truth today?

20 A Say that one more time? Has anyone --

21 Q Oh, I'm sorry. I wasn't able to see  
22 you. There you are.

1           Has anyone told you to answer our  
2 questions anything other than truthfully today?

3           A     No, absolutely not.

4           MS. CRUMP:   Okay.   Helen, do you have  
5 any additional questions?

6           MS. EISNER:   Nothing else for the  
7 record.

8           BY MS. CRUMP:

9           Q     Okay.   Witness 2, before I guess we go  
10 off the record, I think, you know, the issues  
11 that we're looking into are pretty clear from the  
12 request from information that we sent you as well  
13 as the questions that we've asked you here today.  
14 Is there anything else that you think we should  
15 know or would be helpful for us to know as we  
16 look into this reported loan?

17          A     No.

18          Q     Okay.   You don't have any additional  
19 information to provide us?

20          A     No, ma'am.

21          MS. CRUMP:   Okay.   All right.   Well,  
22 we can go ahead and go off the record.   Thank you



1 so much again for your time here today.

2 (Off the record at 2:54 p.m.)

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1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

2 I, Jordan Collins, AAERT CER, the officer  
3 before whom the foregoing proceedings were taken,  
4 do hereby certify that any witness(es) in the  
5 foregoing proceedings were fully sworn; that the  
6 proceedings were recorded by me and thereafter  
7 reduced to typewriting by a qualified  
8 transcriptionist; that said digital audio  
9 recording of said proceedings are a true and  
10 accurate record to the best of my knowledge,  
11 skills, and ability; and that I am neither  
12 counsel for, related to, nor employed by any  
13 of the parties to this case and have no  
14 interest, financial or otherwise, in its outcome.

15

16 *Jordan Collins*

17

18 \_\_\_\_\_  
19 Jordan Collins, AAERT CER, Notary Public in and for  
20 the Commonwealth of Virginia.

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CERTIFICATION OF TRANSCRIPT

I, Marti Schreiber, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding; that said proceedings were reduced to typewriting under my supervision; that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; and that I am neither counsel for, related to, nor employed by any of the parties to the case and have no interest, financial or otherwise, in its outcome.



---

Marti Schreiber,  
Planet Depos, LLC  
May 25, 2024

# **EXHIBIT 5**

Andy Ogles for Congress Transaction Report 4/15/2022 - 7/15/2022

Bank: First Horizon [REDACTED]

Date	Account Business	Description	Category	Check	Credit	Debit
------	---------------------	-------------	----------	-------	--------	-------

# Not Responsive

Not Responsive

Not Responsive

Not Responsive



Not Responsive

Not Responsive

Not Responsive

Not Responsive

# Not Responsive

4/15/2022 Checking

TRANSFER FROM [REDACTED]

Administrative : Book Transfer

320000.00

Loan From Candidate

# **EXHIBIT 6**

Not Responsive

[Redacted]



Witness 1

**Fwd: Message from KM\_227**

2 messages

Andrew Ogles [Redacted]

Sun, Oct 15, 2023 at 10:11 AM

To: [Redacted] Witness 1

[Redacted] Not Responsive

Also the loan is a line of credit secured by our home.  
Thanks again!

In Freedom,  
Andy Ogles  
Congressman TN-5  
615 [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

# **EXHIBIT 7**



5:55



250<sup>FT</sup>



12

Witness 1

Not Responsive

Quick update and question.

- 1) Andy says the loan is a line of credit against his home. It is NOT secured by private funds. I asked him to call you to verify that as well if you need him to.
- 2) Andy plans to shut down the old bank account when he goes home tomorrow. I assume you will still need the account statements from the previous quarter (July-September) before he does that?

Not Responsive



iMessage



# **EXHIBIT 8**

5:47



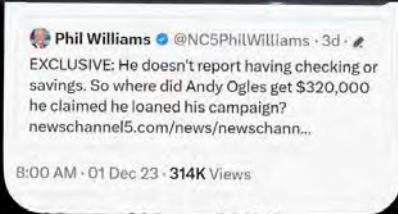
20<sup>FT</sup>

5G 91

13



Frances



Looks like he is zeroing on Andy. He should be zeroing on Justin who is a "no show, do nothing" politician.

Sun, Dec 3 at 12:34 PM

Phil is essentially a narcissist with borderline sociopathic tendencies. He leaches from anything that will get his own name in the headlines.

The \$320,000 loan was obtained through a line of credit secured against Andy's home. It's as straightforward as that. Phil will try and make a story out of anything.

It takes a lot of money to run for Congress. That's why our government is run by elites. Andy is not in that class; he's a regular person who took a big risk to change the direction of our country.

For sure!!

He'll move on to something else soon enough.



Text Message



5:50



0.3MI

5G

90

13



Katherine



**Here are the 105 RINOs who Voted to Remove Fellow Republican George Santos from Congress - BUT NOT ANY...**

[thegatewaypundit.com](http://thegatewaypundit.com)

Fri, Dec 1 at 10:41PM

The liar Phil is at it again. If Phil really cared to research enough, the \$320,000 loan was obtained through a line of credit secured against Andy's home. It's as straightforward as that.

It takes a lot of money to run for Congress. That's why our government is run by elites. Andy is not in that class; he's a regular person who took a big risk to change the direction of our country.

Not Responsive



Text Message



5:53



600<sup>FT</sup>

89

13

DH



Davis

you're around

Thu, Jan 18 at 2:44 PM

Would be great to get together if you're in DC next. I'll be there 1/23-1/26



I'm sorry for missing your text yesterday. Thank you for offering to help cover that story. However, we are keeping it low-key for now. Off the record, it's just a simple line of credit that Andy secured against his personal home. He isn't a millionaire who can self-fund and had to risk everything to represent Tennessee's Fifth. Phil failed to do the necessary research. We have decided not to dignify the hit piece with a response.

Not Responsive



iMessage



5:54



600<sup>FT</sup>

89

12



Kelly



**REVEALED: Tennessee Rep. Andy Ogles faces ethics complaint, comparison to George Santos**

newschannel5.com

I'm assuming you saw this

Wed, Jan 10 at 9:35 PM



Yeah...we're tracking that nonsense. It's a Soros funded organization attacking Andy. The money was a line of credit Andy took out on his personal home. There is no story there at all. Leftist media will always hit a spin, especially when you're someone like Andy kicking dirt in their eyes. Thanks for the head up, though.



He's welcome on my show anytime and can count on my support.

I'm proud to say, I AM someone like Andy. :)

I sincerely appreciate that.



@oczki\_willa @oczki\_w · 7h

REVEALED: Tennessee Rep. Andy Ogles



iMessage



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Laura >



**REVEALED: Tennessee Rep. Andy Ogles faces ethics complaint, comparison to George Santos**

[newschannel5.com](https://newschannel5.com)

I'm sure you saw this already

Yeah...we've been tracking it. It's the same thing Phil reported on in November (Andy's line of credit on his personal home). No story there at all. This is a George Soros funded group that has filed a complaint. We're keeping an eye on it and talking to the treasurer about whether anything needs to be updated to cover it quietly.

Let me know if you hear anything from folks in the district.



I will

Not Responsive



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Michael Patrick >

Tue, Jan 9 at 1:45 PM



**REVEALED: Tennessee Rep. Andy Ogles faces ethics complaint, comparison to George Santos**

[newschannel5.com](https://www.newschannel5.com)

Yeah...we've been tracking that story. Same story he ran about a month ago on Andy taking a line of credit out on his personal home. Not sure what story is there, but Phil is going to spin it up. I appreciate you sending it my way.

Not Responsive



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# **EXHIBIT 9**

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Text Message

The majority of the information being referenced originates from Phil Williams' biased reporting. Unfortunately, Phil tends to publish whatever suits his narrative, regardless of the responses he receives. This is the reason our communications team, alongside media experts and high-profile elected officials, advise us to ignore Phil's baseless claims.

However, here is a possible response you could give from your perspective. Don't say anything came from our camp:

Leftist media is always looking for an angle to denigrate Republican elected officials on financial issues.

They attempted to fault Speaker Johnson for not disclosing anything (he didn't even disclose a bank account), despite his consistent adherence to reporting requirements and a clean record with the FEC.

<https://www.thedailybeast.com/does-new-speaker-of-the-house-mike-johnson-have-a-bank-account>

They targeted Congressman Mark Green for an alleged improper stock



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[new-speaker-of-the-house-mike-johnson-have-a-bank-account](#)

They targeted Congressman Mark Green for an alleged improper stock purchase, despite his consistent adherence to reporting requirements and a clean record with the FEC.

<https://www.businessinsider.com/congress-stocks-mark-green-tennessee-disclosure-2022-8?amp>

Congresswoman Diana Harshbarger was attacked over a similar claim.

<https://www.wjhl.com/news/local/harshbarger-rep-says-financial-advisor-caused-congresswoman-to-violate-stock-disclosure-rules/amp/>

In the case of Congressman Ogles, the complaint was filed by CLC, a group funded by George Soros known for its attacks on Republicans.

Andy has publicly explained on talk radio that discrepancies in reporting arose during a transition between treasurers and bank accounts, which were subsequently corrected and fully accounted for with the FEC. Andy, not being wealthy, likely had to personally loan funds to his campaign, possibly securing it against his own home, to support his bid to represent



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[violate-stock-disclosure-rules/amp/](#)

In the case of Congressman Ogles, the complaint was filed by CLC, a group funded by George Soros known for its attacks on Republicans.

Andy has publicly explained on talk radio that discrepancies in reporting arose during a transition between treasurers and bank accounts, which were subsequently corrected and fully accounted for with the FEC. Andy, not being wealthy, likely had to personally loan funds to his campaign, possibly securing it against his own home, to support his bid to represent Tennessee's Fifth District. He has fully cooperated with the FEC on any corrections, just like every other member of Congress who has encountered similar issues. Thus, little credibility should be given to unfounded allegations from an organization backed by Soros.

Not Responsive



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