

EXHIBIT 21

Counsel

Fox Rothschild LLP

2020 K St. N.W., Suite 500

Washington, D.C. 20006

www.foxrothschild.com

www.toxipedia.com

From: Quinn, Sean [REDACTED]

Sent: Tuesday, June 15, 2021 1:52 PM

To: Broz, Kristen Ward [REDACTED]

Sean

On Jun 15, 2021, at 1:46 PM, Broz, Kristen Ward [REDACTED]

Sean,

I think I just received a call from you, but I didn't see a message. Are you available to speak at 2pm?

Thanks,
Kristen

Kristen Broz

Counsel

Fox Rothschild LLP

2020 K St. N.W., Suite 500

Washington, D.C. 20006

[REDACTED]

[KBroz](#)

www.foxrothschild.com

From: Broz, Kristen Ward

Sent: Tuesday, June 15, 2021 12:04 PM

To: Quinn, Sean [REDACTED]

Cc: Haire, Dirk [REDACTED]

Subject: RE: Errata for Rep. Mooney and Mr. Story

Thanks, Sean.

I wanted to check in with you about the status of the investigation. Please let me know if you need anything else and if we can wrap this up over the next few days. I'm happy to discuss over the phone if you would like.

Also, Dirk and Mike Hough were contacted by CQ Roll Call today asking questions about the investigation. It is our understanding that the investigation remains confidential so we do not know how they obtained information about it. Dirk and Mike will not be responding to the reporter.

We'll review these transcripts and get back to you with any changes.

Regards,

Kristen Broz

Counsel

Fox Rothschild LLP

2020 K St. N.W., Suite 500

Washington, D.C. 20006

[REDACTED]

[KBroz](#)

www.foxrothschild.com

From: Quinn, Sean [REDACTED]

Sent: Wednesday, June 9, 2021 11:30 AM

To: Broz, Kristen Ward [REDACTED]
Subject: [EXT] Errata for Rep. Mooney and Mr. Story

Kristen,

I am attaching the transcripts and errata form for Rep. Mooney and Mr. Story's interview. If you have no changes please indicate that on the form (one for each transcript). Mr. Appel's transcript will follow when we receive it. You can sign these for the witnesses since we have your designation of counsel forms.

Sean

Sean M. Quinn
Investigative Counsel
Office of Congressional Ethics
U.S. House of Representatives
425 3rd St. SW, Suite 1110
Washington, DC 20024

[REDACTED]

[Sean.Quinn](#) [REDACTED]

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EXHIBIT 22

Date: 12/11/2017
Amount: \$2119.01
We have: \$1493.35
Description: Travel/Food

Name of Vender	Date Payment Appeared on Statement	Amount of Purchase	Location	Purpose of each expenditure
eDreams	August 9	\$745.62	N/A	Airplane ticket to Italy for International Catholic Legislators Network International (ICLN) Pilgrimage for Politicians and Family Summit, recognized official trip from August 24-27, 2017
B&B Galleriafrscati	August 24	\$220.94	Galleria V. Emanuele II, 21, 00044 Frascati RM, Italy	Hotel stay during trip to Italy for International Catholic Legislators Network International (ICLN) Pilgrimage for Politicians and Family Summit
Il Pomodorinoroma	August 28	\$50.70	<u>Via Campania 45E</u> 00187 Rome Italy	Food during trip to Italy
Hertz Italiana Sparoma	August 29	\$405.23	Via L. Da Vinci, 421, 00145 Roma RM, Italy	Rental car during trip to Italy

Hertz Italiana Sparoma	November 6	\$35.43	Via L. Da Vinci, 421, 00145 Roma RM, Italy	Delay rental car fee
Hertz Italiana Sparoma	November 6	\$35.43	Via L. Da Vinci, 421, 00145 Roma RM, Italy	Delay rental car fee

Date: 3/30/2018
Amount: \$340.78
We have: \$191.12
Description: Travel/Food

Name of Vender	Date Payment Appeared on Statement	Amount of Purchase	Location	Purpose of each expenditure
Chick Fil A	March 5	\$7.89	156 Joshua M. Freeman Blvd, Ranson, WV 25438	Food while traveling to vote (Fly-in Day)
Chick Fil A	March 5	\$30.21	156 Joshua M. Freeman Blvd, Ranson, WV 25438	Food while traveling to vote (Fly-in Day)
Chick Fil A	March 15	\$2.40	156 Joshua M. Freeman Blvd, Ranson, WV 25438	Food while returning from DC from votes (Fly-out day)
Chick Fil A	March 15	\$31.39	156 Joshua M. Freeman Blvd, Ranson, WV 25438	Food while returning from DC from votes (Fly-out day)

Chipotle	March 16	\$18.67	937 Foxcroft Ave, Martinsburg, WV 25401	Food while travelling to Paul Ryan and Antohny Gonzalez's receptions
Sunoco	March 19	\$22.00	2227 Golden Key Rd, Kutztown, PA 19530	Gas while returning from New York fundraising trip
Sheetz	March 19	\$51.48	8332 Martinsburg Pike, Shepherdstown, WV 25443	Gas while returning from New York fundraising trip
Dunkin Donuts	March 20	\$11.76	33 W Virginia Way, Ranson, WV 25438	Food while on district travel
California Tortilla	March 28	\$15.32	217 Oak Lee Dr, Ranson, WV 25438	Food while on district travel

Date: 4/16/2018
Amount: \$519.90
We have: \$192.83
Description: Travel/Food

Name of Vender	Date Payment Appeared on Statement	Amount of Purchase	Location	Purpose of each expenditure
Dunkin Donuts	March 29	\$11.76	33 W Virginia Way, Ranson, WV 25438	Food while on district travel
McDonald's	March 30	\$9.64	14634 Apple Harvest Dr, Martinsburg, WV 25401	Food while on district travel

McDonald's	April 2	\$21.79	732 E Washington St, Charles Town, WV 25414	Food while on district travel
Taco Bell	April 2	\$8.21	64 Flowing Springs Rd, Charles Town, WV 25414	Food while on district travel
Martins Fuel	April 2	\$34.37	190 Flowing Springs Rd, Charles Town, WV 25414	Gas while on district travel
John's Cafe and Grill	April 5	\$42.21	43 Ruland Rd, Kearneysville, WV 25430	Food while on district travel
Working Girls Cafe	April 9	\$22.90	259 Kearny St, San Francisco, CA 94108	Food during California fundraising trip

Boudin Bakery	April 10	\$30.00	1 World Way, Los Angeles, CA 90045	Food during California fundraising trip
Starbucks	April 11	\$11.95	1160 Burlingame Ave, Burlingame, CA 94010	Food during California fundraising trip

Date: 5/22/2018
 Amount: \$698.15
 We have: \$113.83
 Description: Travel/Food

Name of Vender	Date Payment Appeared on Statement	Amount of Purchase	Location	Purpose of each expenditure
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Dunkin Donuts	April 16	\$11.76	33 W Virginia Way, Ranson, WV 25438	Food while on district travel
Chick Fil A	April 19	\$8.43	156 Joshua M. Freeman Blvd, Ranson, WV 25438	Food while on district travel
Dunkin Donuts	April 23	\$11.76	33 W Virginia Way, Ranson, WV 25438	Food while on district travel
McDonald's	April 26	\$3.18	14634 Apple Harvest Dr, Martinsburg, WV 25401	Food while on district travel
Dunkin Donuts	April 30	\$6.73	33 W Virginia Way, Ranson, WV 25438	Food while on district travel

Martins Fuel	April 30	\$31.58	190 Flowing Springs Rd, Charles Town, WV 25414	Gas while on district travel
Five Guys	May 14	\$28.63	38 Joshua M. Freeman Blvd, Ranson, WV 25438	Food while on district travel
Dunkin Donuts	May 21	\$11.76	33 W Virginia Way, Ranson, WV 25438	Food while on district travel

Date: 6/11/2018
Amount: \$1243.64
We have: \$111.32
Description: Travel/Food

Name of Vender	Date Payment Appeared on Statement	Amount of Purchase	Location	Purpose of each expenditure
7 Eleven	May 24	\$64.58	110 S Mildred St, Ranson, WV 25438	Gas while on district travel
Chick Fil A	May 25	\$25.27	156 Joshua M. Freeman Blvd, Ranson, WV 25438	Food while on district travel
California Tortilla	May 30	\$21.47	217 Oak Lee Dr, Ranson, WV 25438	Food while on district travel

Date: 6/25/2018
Amount: \$745.97
We have: \$92.73
Description: Travel/Food

Name of Vender	Date Payment Appeared on Statement	Amount of Purchase	Location	Purpose of each expenditure
Shelly's Backroom	June 6	\$46.60	1331 F St NW, Washington, DC 20004	Food/Beverages for call time
Dunkin Donuts	June 15	\$6.73	33 W Virginia Way, Ranson, WV 25438	Food while on district travel
LA City Parking Meter	June 18	\$2.00	Los Angeles, CA	Parking meter fee during California fundraising trip
LA City Parking Meter	June 18	\$2.00	Los Angeles, CA	Parking meter fee during California fundraising trip

LA City Parking Meter	June 18	\$2.50	Los Angeles, CA	Parking meter fee during California fundraising trip
Shell Oil	June 19	\$32.90	Los Angeles, CA	Gas during California fundraising trip

Date: 11/30/2018
Amount: \$381.43
We have: \$203.27
Description: Travel/Food

Name of Vender	Date Payment Appeared on Statement	Amount of Purchase	Location	Purpose of each expenditure
Roy Rogers	November 1	\$28.63	144 Oak Lee Dr, Ranson, WV 25438	Food while on district travel
Chick Fil A	November 5	\$29.57	156 Joshua M. Freeman Blvd, Ranson, WV 25438	Food while on district travel
McDonald's	November 6	\$7.41	31 Maddex Square Dr, Shepherdstown, WV 25443	Food while on district travel

Sheetz	November 7	\$26.00	51 Flowing Springs Rd, Charles Town, WV 25414	Gas while on district travel
Roy Rogers	November 9	\$5.13	144 Oak Lee Dr, Ranson, WV 25438	Food while on district travel
Panera Bread	November 13	\$29.70	72 Oak Lee Dr, Ranson, WV 25438	Food while on district travel
Dunkin Donuts	November 20	\$18.14	1 World Way, Los Angeles, CA 90045	Drinks while in California for fundraiser
Panera Bread	November 26	\$5.02	72 Oak Lee Dr, Ranson, WV 25438	Food while on district travel

B Grill by Boa Steakhouse	November 26	\$53.67	1 World Way, Los Angeles, CA 90045	Food during California fundraising trip
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Date: 1/2/2019
 Amount: \$330.46
 We have: \$0
 Description: Unknown

Date: 11/27/2019
Amount: \$396.99
Alex Mooney Reimbursed

Date: 1/20/2020
 Amount: \$2863.55
 We have: \$2828.98
 Description: Food/Travel
 Alex Mooney reimbursed \$2672.30

Name of Vender	Date Payment Appeared on Statement	Amount of Purchase	Location	Purpose of each expenditure
Burger King	January 10	\$19.68	3035 Centreville Rd McLearen Square, Oak Hill, VA 20171	Food while traveling to speak at the Associated Builders and Contractors West Virginia Annual Meeting

Martins Fuel	January 12	\$15.53	190 Flowing Spring Rd, Charles Town, WV 25414	Gas while on district travel
Sheetz	January 16	\$15.56	51 Flowing Springs Rd, Charles Town, WV 25414	Gas while on district travel
Chick Fil A	January 19	\$29.49	156 Joshua M. Freeman Blvd, Ranson, WV 25438	Food while on district travel
Shell	January 20	\$10.39	779 Beverly Pike, Elkins, WV 26241	Gas while on district travel
Kings New York Pizza	January 24	\$26.18	43 C, Ruland Rd, Kearneysville, WV 25430	Food while on district travel

7 Eleven	January 26	\$13.12	201 Winchester Ave, Martinsburg, WV 25401	Gas while on district travel
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Date: 7/15/2020
 Amount: \$173.28
 We have: \$50.02
 Description: Food/Travel

Name of Vender	Date Payment Appeared on Statement	Amount of Purchase	Location	Purpose of each expenditure
Family Catering Inc	July 3	\$11.42	Rapid City, SD	Food during Fourth of July Trump event
Casey's North Utica in Illinois	July 10	\$40.60	2949 IL-178, North Utica, IL 61373	Gas while traveling back from Fourth of July Trump event

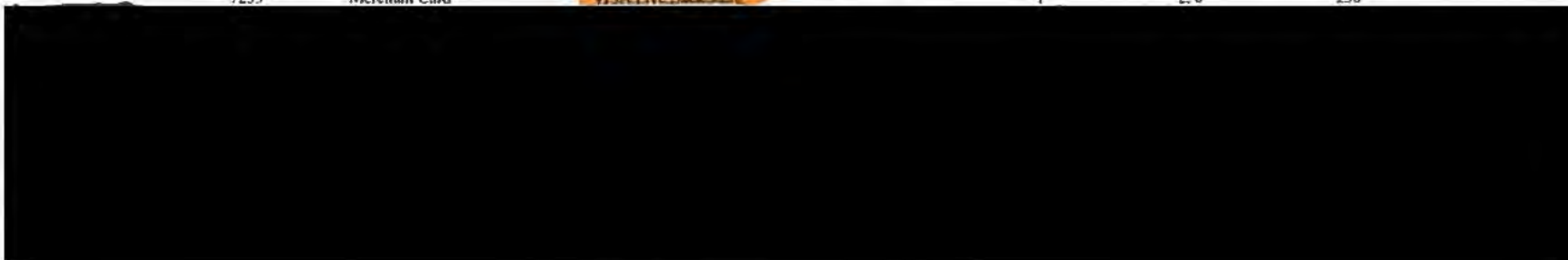
EXHIBIT 23

Date	Receipt Type	Qty Sold	Total	Payment	Full Name	Last Name	First Name
1/6/2018	Sales	4	1,000.00	Check	Alex & Grace Mooney Mooney	Alex & Grace	Alex & Grace
	100	Merchant Card	Martins \$250	1	250	250	
	100	Merchant Card	Martins \$250	1	250	250	
2/18/2018	Sales	1	500	Check	Alex & Grace Mooney Mooney	Alex & Grace	Alex & Grace
	100	Merchant Card	Martins \$250	1	250	250	
	100	Merchant Card	Martins \$250	1	250	250	
4/21/2018							
	100	Merchant Card	Martins \$250	1	250	250	
	100	Merchant Card	Martins \$250	1	250	250	
5/9/2018	Sales	2					
	100	Merchant Card	Martins \$250	1	250	250	
	100	Merchant Card	Martins \$250	1	250	250	
7/6/2018	Sales	2	500	Check	Alex & Grace Mooney Mooney	Alex & Grace	Alex & Grace
	100	Merchant Card	Martins \$250	1	250	250	
	100	Merchant Card	Martins \$250	1	250	250	
7/6/2018	Sales	2	500	Cash	Alex & Grace Mooney Mooney	Alex & Grace	Alex & Grace
	100	Merchant Card	Martins \$250	1	250	250	
	100	Merchant Card	Martins \$250	1	250	250	
8/1/2018	Sales	2	500	Cash	Alex & Grace Mooney Mooney	Alex & Grace	Alex & Grace
	100	Merchant Card	Martins \$250	1	250	250	
	100	Merchant Card	Martins \$250	1	250	250	
8/18/2018	Sales	2					
	100	Merchant Card	Martins \$250	1	250	250	
	100	Merchant Card	Martins \$250	1	250	250	
9/4/2018	Sales	3					
	100	Merchant Card	Martins \$250	1	250	250	
	100	Merchant Card	Martins \$250	1	250	250	
	100	Merchant Card	Martins \$250	1	250	250	

	100	Merchant Card		Martins \$250	1	250	250	
	100	Merchant Card		Martins \$250	1	250	250	
	100	Merchant Card		Martins \$250	1	250	250	
10/14/2018	Sales		3		750	Check	Alex & Grace Mooney Mooney	Alex & Grace
	100	Merchant Card		Martins \$250	1	250	250	
	100	Merchant Card		Martins \$250	1	250	250	
	100	Merchant Card		Martins \$250	1	250	250	
11/2/2018	Sales		3		750	Check	Alex & Grace Mooney Mooney	Alex & Grace
	100	Merchant Card		Martins \$250	1	250	250	
	100	Merchant Card		Martins \$250	1	250	250	
	100	Merchant Card		Martins \$250	1	250	250	
12/7/2018	Sales		3		750	Check	Alex & Grace Mooney Mooney	Alex & Grace
	100	Merchant Card		Martins \$250	1	250	250	
	100	Merchant Card		Martins \$250	1	250	250	
	100	Merchant Card		Martins \$250				



9/28/2018	Sales		2					
	7253	Merchant Card		VISA Five Back \$250	1	250	250	
	7253	Merchant Card		VISA Five Back \$250	1	250	250	



Date	Receipt Type	Qty Sold	Total	Payment	Full Name	Last Name	First Name
1/12/2019	Sales	4	700	Check	Alex & Grace Mooney Mooney		Alex & Grace
	100	Merchant Card	Martins \$250	I	250	250	
	100	Merchant Card	Martins \$250	I	250	250	
	69	Merchant Card	Home Depot \$100	I	100	100	
	69	Merchant Card	Home Depot \$100	I	100	100	
2/14/2019	Sales	2	500	Check	Alex & Grace Mooney Mooney		Alex & Grace
	100	Merchant Card	Martins \$250	I	250	250	
	100	Merchant Card	Martins \$250	I	250	250	
				Cash			
				I			
				Cash			
				I			
4/7/2019	Sales	4		Check	Alex & Grace Mooney Mooney		Alex & Grace
	100	Merchant Card	Martins \$250	I	250	250	
			Amazon \$25	I	25	25	
5/12/2019	Sales	3	750	Check	Alex & Grace Mooney Mooney		Alex & Grace
	100	Merchant Card	Martins \$250	I	250	250	
	100	Merchant Card	Martins \$250	I	250	250	
	100	Merchant Card	Martins \$250	I	250	250	
7/20/2019	Sales	3	750	Check	Alex & Grace Mooney Mooney		Alex & Grace
	100	Merchant Card	Martins \$250	I	250	250	
	100	Merchant Card	Martins \$250	I	250	250	
	100	Merchant Card	Martins \$250	I	250	250	
8/4/2019	Sales	4	554	Check	Alex & Grace Mooney Mooney		Alex & Grace
	100	Merchant Card	Martins \$250	I	250	250	
	100	Merchant Card	Martins \$250	I	250	250	
9/13/2019	Sales	3	750	Check	Alex & Grace Mooney Mooney		Alex & Grace
	100	Merchant Card	Martins \$250	I	250	250	
	100	Merchant Card	Martins \$250	I	250	250	
10/13/2019	Sales	4	1,000.00	Check	Alex & Grace Mooney Mooney		Alex & Grace
	100	Merchant Card	Martins \$250	I	250	250	
	100	Merchant Card	Martins \$250	I	250	250	
				I	250	250	
				I	250	250	
11/16/2019	Sales	2	500	Check	Alex & Grace Mooney Mooney		Alex & Grace
	100	Merchant Card	Martins \$250	I	250	250	
	100	Merchant Card	Martins \$250	I	250	250	
11/16/2019	Sales	2	500	Check	Alex & Grace Mooney Mooney		Alex & Grace
	100	Merchant Card	Martins \$250	I	250	250	
	100	Merchant Card	Martins \$250	I	250	250	
12/5/2019	Sales	13	550	Check	Alex & Grace Mooney Mooney		Alex & Grace
	100	Merchant Card	Martins \$250	I	250	250	
	2587	Merchant Card	Grocery Outlet \$300	12	25	300	
12/21/2019	Sales	2	500	Check	Alex & Grace Mooney Mooney		Alex & Grace
	100	Merchant Card	Martins \$250	I	250	250	
	100	Merchant Card	Martins \$250	I	250	250	



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Date	Receipt Type	Qty Sold	Total	Payment	Full Name	Last Name	First Name
2/2/2020	Sales	2	500	Check	Alex & Grace Mooney	Mooney	Alex & Grace
	100 Merchant Card	Martins \$250		1		250	250
	100 Merchant Card	Martins \$250		1		250	250
5/1/2020	Sales	8	2,000.00	Check	Alex & Grace Mooney	Mooney	Alex & Grace
	100 Merchant Card	Martins \$250		1		250	250
	100 Merchant Card	Martins \$250		1		250	250
	100 Merchant Card	Martins \$250		1		250	250
	100 Merchant Card	Martins \$250		1		250	250
	100 Merchant Card	Martins \$250		1		250	250
	100 Merchant Card	Martins \$250		1		250	250
	100 Merchant Card	Martins \$250		1		250	250

EXHIBIT 24

Transcript of Interview of Witness 1

Review No. 21-6617

May 26, 2021

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OCE Matter (21-6617)

6

7

Interview of Witness 1

8

Conducted Virtually

9

Wednesday, May 26, 2021

10

2:04 p.m. EDT

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20 Job No. 376566

21 Pages: 1-66

22 Transcribed by: Megan Wunsch, AAERT CET

1 Interview of Witness 1, conducted virtually.

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7 Pursuant to agreement, before Martin Onuegbu,

8 Notary Public in and for the State of Maryland.

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A P P E A R A N C E S

ON BEHALF OF THE OFFICE OF CONGRESSIONAL ETHICS:

MR. SEAN M. QUINN

MR. JEFFREY BROWN

MS. ANNIE CHO

OFFICE OF CONGRESSIONAL ETHICS (OCE) OF

THE U.S. HOUSE OF REPRESENTATIVES

425 3rd Street, S.W., Suite 1110

Washington, DC 20024

(202) 225-9739

ON BEHALF OF WITNESS 1:

KRISTEN W. BROZ

FOX ROTHSCHILD LLP

1030 15th Street, N.W., Suite 380 East

Washington DC 20005

Also Present:

Joe Lorete, Remote Technician

Ryley Mayer, Student Digital Reporter

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C O N T E N T S

INTERVIEW OF WITNESS 1	PAGE
By Mr. Quinn	5

E X H I B I T S

(Attached to transcript)

WITNESS 1 EXHIBITS	PAGE
Exhibit A Smoke Hole Caverns justification	14
Exhibit B Inn at Charles Town FEC Filing	42
Exhibit C Country Inn at Berkeley Springs FEC Filing	43
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1 P R O C E E D I N G S

2 MR. QUINN: Great. So we're on the
3 record. And then, just for the record, today is
4 May 26, 2021, and we're conducting the interview
5 of Witness 1 by Zoom. Witness 1's accompanied by
6 counsel, Kristen Broz, and speaking is Sean Quinn.
7 I'm investigative counsel at the Office of
8 Congressional Ethics, and I'm here with Jeff Brown
9 and Annie Cho also with the OCE.

10 EXAMINATION BY COUNSEL FOR
11 OFFICE OF CONGRESSIONAL ETHICS
12 BY MR. QUINN:

13 Q Witness 1, I got a copy of the false
14 statements acknowledgement that you signed. And
15 so I just wanted to make sure that you got a
16 chance to look at that, at the text that came
17 along with that, the text of the act, and then
18 maybe you and Kristen had a conversation when you
19 -- when you signed that acknowledgement.

20 A Yeah, I read it. It's fine.

21 Q Okay.

22 A Thank you.

1 Q Great. And then, again, thank you very
2 much for appearing today. We appreciate your
3 time. And, like I said, we'll be sensitive with
4 your time and try to get you out of here quickly.

5 Also, at any point in the interview if you
6 have any questions for me, feel free to stop me
7 and ask that question. Or if I ask something of
8 you that's unclear or you need repeated or
9 rephrased, happy to do that for you and clarify
10 any questions, or take a break if you need to take
11 a break for any reason.

12 Does that sound good?

13 A Yep.

14 Q Okay.

15 A Thanks.

16 Q Great. So then if we could just start
17 with a little bit of information about -- about
18 you, if you can tell me where you're from and
19 where you went to school.

20 A Witness 1, and I'm from West Virginia. Do
21 you need to know the city?

22 Q Yeah, sure. City would be great.

1 A Charleston, West Virginia. And which
2 school? High school, college?

3 Q Let's start with college.

4 A Okay. West Virginia State University for
5 my undergraduate and American Public University
6 System for my master's.

7 Q Okay. And then if you could tell me how
8 you came to work for Congressman Mooney.

9 A I knew his previous district director, and
10 he was wanting to retire, and he asked me if I'd
11 be interested in taking the job. So --

12 Q All right.

13 A -- I had not met Congressman Mooney prior
14 to that.

15 Q Okay. And when was that?

16 A 2017, fall. I started in -- I think
17 November 1st, 2017.

18 Q And you were hired on as district
19 director?

20 A Yes, sir.

21 Q And is that -- is that your current title?

22 A The current title is deputy chief of staff

1 and district director.

2 Q Okay. And could you just generally
3 describe that role to me? What do you do for the
4 Congressman as deputy chief of staff and district
5 director?

6 A Sure. So I'm in DC a few months a year,
7 and I oversee the DC operation in our chief of
8 staff's absence, and any -- and then also oversee
9 the district operation's staff and constituent
10 services.

11 Q Okay. And when you're in -- when you're
12 in West Virginia, where is your office located?

13 A Charleston, but also I'm in Martinsburg
14 office as well. I travel back and forth.

15 Q Okay. So that -- that's your official
16 role or your role with the official office. I
17 want to talk a little bit about the work -- any
18 work you might do for the campaign. Do you have a
19 title with the campaign?

20 A No.

21 Q Okay. Do you do any campaign work?

22 A I volunteer for the campaign sometimes.

1 Q And what sort of work do you do for the
2 campaign when you volunteer?

3 A If there is a local GOP meeting, I may go
4 speak on behalf of the Congressman. If there's a
5 parade, we'll find volunteers, walk in the parade.
6 If we are planning a district trip and he has a
7 campaign event in the evening, I may attend that
8 with him. That's the extent of it.

9 Q Okay.

10 A Sometimes I will staff -- sorry, I have
11 one more -- sometimes I will staff the call time
12 if he's on the phone. If he's talking to donors,
13 like that, I'll sit in with him. That's about --
14 that's about it.

15 Q Okay. Understood. In your official role
16 or when you're volunteering with the campaign, I
17 want to understand a little bit about how
18 Congressman Mooney's calendar is run and managed.
19 Who manages his calendar?

20 A The scheduler.

21 Q And who is that?

22 A Ashley Phillips.

1 Q And then how is that managed -- or what
2 form is that calendar in? Is it an Outlook
3 calendar?

4 A It's a Google calendar.

5 Q You -- you mentioned that sometimes you'll
6 plan, I think you said, an official tour and then
7 sometimes there's a campaign event that night. Is
8 that also part of your responsibilities --
9 planning these official tours or events?

10 A It's -- official tour?

11 Q Yeah, let's --

12 A Yes.

13 Q -- talk about official, yes.

14 A Yes, yes.

15 Q Okay. Who else in the office helps you
16 planning those sorts of official tours?

17 A The district representatives.

18 Q Can you tell me who those are?

19 A Yes. Rhett Dusenberry, Susie Azevedo, Dan
20 Neff. If it's an event, Madison Neeley will
21 sometimes help. It's usually all hands on deck
22 when we're doing events.

1 Q Okay. And when you say "event," I just
2 want to understand what you're distinguishing
3 event from. What's -- if it's not an event, what
4 is it?

5 A I said event because I'm saying district
6 trips. So it may be -- it may be a grant
7 workshop, I call an event. So I'm clarifying it
8 as everything basically.

9 Q Okay. You said a grant workshop. What is
10 that?

11 A Um-hmm. That's where we bring
12 constituents, community organizers, anyone who's
13 looking for a federal grant, we'll -- we'll
14 organize a grant workshop, have federal agencies
15 come in, and they would present how to apply for
16 these grants.

17 Q Okay. Got it. Understood. And then,
18 also, before we get into sort of some of the
19 substantive stuff, I -- I know you and I have
20 talked before because you were helping on the
21 front end with organizing some of the documents
22 that Representative Mooney produced to us, so I

1 wanted to ask you a little bit about your
2 involvement in that process. How -- maybe we can
3 just start generally. Can you tell me what your
4 involvement in that production of documents was?

5 A Sure. Congressman asked me to put
6 together the information that OCE requested. So I
7 put together the information from receipts, things
8 like that, and put together a document, provided
9 it to the Congressman, what I found, and --

10 Q Okay. And are those documents that you
11 collected, stored centrally somewhere --

12 A Stored --

13 Q -- or somebody collected those documents?

14 A Yes. The campaign documents, the
15 Congressman and Sophia -- I don't know her last
16 name. She's part-time campaign staff -- she was
17 -- and part-time official. She -- she got those
18 from the Congressman at his house, at his campaign
19 office.

20 Q Okay. Is that Sophia Murray?

21 A Yes.

22 Q Yeah, okay. So Sophia helped you collect

1 some of the documents --

2 A Yes.

3 Q -- on the campaign side? How about on the
4 official side? If you collected any official
5 documents, how did that --

6 A The official --

7 Q -- process go?

8 A Sure. The official scheduler had hotel
9 receipts. I -- Madison Neeley, who planned -- who
10 planned district trips and retreats, she had
11 documents. And then also our financial
12 administrator Dean Lester, he had documents, so
13 just requested documents for all of them that we
14 needed to put the document together, and then I
15 also had documents as well. And we -- we -- we
16 also contacted certain venues for information as
17 well.

18 Q Okay. Great. I know when you -- when
19 documents were produced, they were -- I'm going to
20 show you an example in a second, so just let me
21 know if you don't know what I'm talking about --

22 A Okay.

1 Q -- but there were a lot of Word documents
2 that were titled Justification, that had
3 essentially tables.

4 MR. QUINN: And, actually, Joe, if you can
5 go ahead and pull up Tab 1, so we can look at an
6 example of that.

7 REMOTE TECHNICIAN: Sure thing. Stand by.

8 MR. QUINN: Sure.

9 REMOTE TECHNICIAN: And did you want me to
10 mark this?

11 MR. QUINN: Yeah. You can mark that as
12 Exhibit A.

13 REMOTE TECHNICIAN: (Inaudible.)

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

16 Q So, Witness 1, here's just an example of -
17 - of one of these documents. We've applied Bates
18 stamps to these documents --

19 A Um-hmm.

20 Q -- a number -- a designation system at the
21 bottom, and this document has a Bates stamp
22 THAM_2701. So just looking at the document, are

1 you -- did you create these types of Word
2 documents?

3 A I did.

4 Q Okay. And did anybody help you with
5 these?

6 A Yes.

7 Q Okay. So --

8 A Sophia Murray and Ashley Phillips.

9 Q Okay. Great. And then, just so I
10 understand how -- how we ended up getting these
11 documents, I want to look particularly at the
12 purpose of each expenditure. That category
13 appears in all of the Word documents like this
14 that you've produced. Did you come up with these
15 purposes, these purpose descriptions?

16 A Yes. We would look at -- yes.

17 Q Okay. I think maybe you were about to
18 tell me how you came up with those purpose
19 descriptions --

20 A Yeah. So --

21 Q -- if you can tell me that.

22 A -- what I was going to say was, both

1 Ashley and I and Sophia typed that. So if you're
2 asking about the specific -- did I do this
3 specific one, I don't remember that. But so it
4 was a -- we all contributed to doing these --
5 writing the expenditures.

6 Q Okay. Understood.

7 A I just don't remember which ones I did and
8 --

9 Q Sure. Yeah. There were -- there were a
10 lot of them. I understand.

11 A There were.

12 Q Well, also, I'll say we appreciate that
13 work. That was helpful.

14 And then I just want to ask about a couple
15 other people in -- in Representative Mooney's
16 official staff and the campaign staff.

17 A Okay.

18 Q Do you know who --

19 MR. BROWN: Hey, Sean, can I jump in just
20 real quick, before you move on --

21 MR. QUINN: Sure.

22 MR. BROWN: -- that --

1 MR. QUINN: Yeah.

2 MR. BROWN: -- Witness 1, with respect to
3 the purpose of each expenditure, you mentioned
4 yourself and a couple other people who came up
5 with those expenditures. Did you guys do that in
6 conjunction with the Congressman?

7 WITNESS 1: Yes.

8 MR. BROWN: Okay. And so what's his
9 involvement in, you know, preparing one of these
10 documents?

11 WITNESS 1: We would -- he was aware of
12 the expenditures in terms of we -- he had the
13 documents that you've -- you sent to us, and we
14 went through each one with him, and we would go
15 through his calendar and he would say this is what
16 this is for, this is what this is for, so
17 ultimately these are his answers.

18 MR. BROWN: Okay. And he's signing off on
19 these materials obviously before they're produced
20 to us?

21 WITNESS 1: Signing off -- are you asking
22 he signed off on this specific before it was sent

1 to you?

2 MR. BROWN: He's -- he's seeing these and
3 signed off on these materials obviously being sent
4 to the OCE?

5 WITNESS 1: Yes.

6 MS. BROZ: Okay. I'm just -- sorry, I'm
7 just going to step in here. I'm not --

8 MR. BROWN: Sure.

9 MS. BROZ: -- totally sure what you mean
10 by signed off, Jeff, but --

11 MR. BROWN: Let me rephrase that then.
12 The Congressman reviewed all these materials with
13 you before they were produced to the OCE? Is that
14 --

15 MS. BROZ: Yeah. Witness 1, you can
16 respond to that.

17 WITNESS 1: Yes.

18 MS. BROZ: Okay.

19 MR. BROWN: Thank you.

20 Sorry, Sean. Go ahead.

21 MR. QUINN: No, no. That's great.

22 Thanks, Jeff.

1 Joe, you can take down this exhibit for
2 now. We might call that back up later. Thank
3 you.

4 BY MR. QUINN:

5 Q I was saying I wanted to ask you about a
6 couple other people that are employed by either
7 the official office or the campaign office. Do
8 you know who the current treasurer is for the
9 campaign?

10 A I do not.

11 Q Do you know -- do you know Witness 2 or
12 Witness 2. I don't know if I'm pronouncing that
13 correctly.

14 A I know his name. I don't think I've ever
15 had a conversation with him.

16 Q Do you know what he does for the campaign?

17 A I think he's the compliance officer.

18 Q Okay. And then do you know the name Betty
19 DeHaven? Do you know who she is?

20 A I do, yes.

21 Q Okay. And -- and what's her role?

22 A I don't think she has a role now. I'm not

1 sure if she's a campaign manager -- I mean a
2 campaign treasurer. She used to be the campaign
3 treasurer. I do --

4 Q Okay.

5 A -- know that.

6 Q Previously? Yeah, sorry. Previously, she
7 was the campaign treasurer?

8 A Yes.

9 Q Okay. And then you mentioned earlier
10 Dean, I think Dean Lester. Is that his last name?

11 A Yes. Um-hmm.

12 Q Okay. And what's his role?

13 A He is the financial administrator. He's a
14 shared employee for the official office.

15 Q And can you just describe what he does for
16 the office?

17 A He handles all the financial pieces of the
18 office, so reimbursements in terms of expense
19 reports for staff, he handles our office budget,
20 the MRA. Also, he's the office administrator too,
21 so he handles equipment and coordinating the
22 equipment for all the offices.

1 Q Okay. Does Dean advise you on -- I guess
2 in the most general terms -- on -- let me start
3 over. Dean works on the MRA budget and spending;
4 is that correct?

5 A Yes.

6 Q Okay. And does he advise you on what
7 types of expenditures are appropriately charged to
8 the MRA?

9 A Yes.

10 Q Okay. And --

11 A If -- if asked, I should say. Yes, if
12 asked.

13 Q If asked, okay. When -- in what sort of
14 circumstances, if you could give me an example,
15 when's a time that you might ask Dean when the --
16 if an expenditure is appropriately charged to the
17 MRA?

18 A If it's a training class, if one of our
19 staff wants to have some training, I would ask,
20 "Is this" -- "is this appropriate?" and he'd say
21 "yes" or "no."

22 Q Okay. And so you use him as a resource to

1 decide -- let's say he says "no," what would you
2 do?

3 A I wouldn't -- if it's an official event --
4 event -- I say event to tours and all -- but it
5 depends what the ask is, to be honest. For -- I
6 mean, if it wasn't something he covered
7 officially, we wouldn't -- I wouldn't do it. If
8 you don't want the -- depends what it is.

9 Q Okay. Let's --

10 A It's pretty -- it's pretty --

11 Q -- I'll give an example.

12 A Yeah.

13 Q So I'm sure it's -- yeah, I'm sure it's
14 fact dependent. Let's say -- in a second, we'll
15 talk about some of the all-staff meetings --

16 A Okay.

17 Q -- so if we can take those as sort of a
18 general example. I know there's some campaign
19 spending on the all-staff meetings and also some
20 MRA spending related to those. How -- how did you
21 go about deciding which -- which funds to use for
22 those sorts of events?

1 A Sure. If it's social in nature and if
2 there wasn't training or development, we would
3 spend -- use campaign dollars for those. If it's
4 training, lodging, things like that, it would be
5 for the MRA, if it's part of a staff training
6 weekend or whatever it was.

7 Q Okay. And so I understand Dean gives you
8 that sort of advice for the MRA. Is there an
9 equivalent to Dean on the campaign side, somebody
10 that you go to and ask for advice about what you
11 can spend campaign funds on?

12 A I'm unsure. I don't spend campaign funds.
13 I'm not part of that conversation.

14 Q Okay. Is there -- in the way that Dean
15 gives you advice on what you can spend MRA money
16 on, is there anybody else in the office that you
17 go to or view as a resource for any of those sorts
18 of related ethics questions or questions about
19 spending MRA funds?

20 A No, no. Dean. That's who I would go to.
21 He usually -- if he doesn't know, he'll get the
22 answer for us.

1 Q Okay. And I asked if there was a Dean
2 equivalent to the campaign, and you might've taken
3 that question as somebody who gives you advice on
4 campaign spending. I'll ask more broadly. Do you
5 know who -- is there a person on the campaign side
6 that deals with the campaign budget or determines
7 the campaign budget?

8 A I'm unsure.

9 Q Okay. Let's talk about some of those all-
10 staff meetings. Who plans those events?

11 A All-staff meetings, I plan those. And
12 then Madison Neeley, who works for me, she -- she
13 -- she does all the heavy lifting --

14 Q Okay.

15 A -- if you will. She does the work; I take
16 the credit.

17 Q Okay. Yeah. If you could -- if -- if you
18 could just describe when you say "heavy lifting,"
19 just to be specific, give me some examples of what
20 sort of things she does.

21 A She puts the agenda together. She books
22 the rooms, she -- all the logistics in terms of

1 food. She sends out the notifications to the
2 staff, dress code -- basically plans the whole
3 event.

4 Q I think we mentioned, and you can confirm
5 if I'm correct or not, but for the all-staff
6 meetings, some of the spending is MRA funds and
7 then some are campaign funds; is that correct?

8 A Yes.

9 Q Okay. How -- you go through Dean to spend
10 the MRA funds. How would you or Madison arrange
11 spending campaign funds if you needed to do that?

12 A We would -- we would be given the campaign
13 credit card, and we would book whatever we would
14 need. For example, if it's liquor or if it's
15 something else like that, we would book that.

16 Q Okay. And who would give you that
17 campaign credit card?

18 A Now, it would be the chief of staff, Mike
19 Hough, or -- yeah, now. So, before, it was Sophia
20 Murray, whomever the campaign worker was.

21 Q Okay. Do you know who has -- who holds
22 campaign credit cards?

1 A I know the Congressman has a credit card
2 -- campaign credit card, but I'm not sure if
3 anyone else has -- has one.

4 Q Okay. And we're using the term credit
5 card. Do you know if it's a credit or a debit
6 card?

7 A No.

8 MR. QUINN: Okay. If we could pull up
9 that Exhibit A, just again quickly, Joe.

10 Q We talked a little bit about all-staff
11 meetings. This -- on this Exhibit A -- and the
12 purpose of the expenditure on this says, Lodging
13 while on an official district tour. Could you
14 tell me what an official district tour is? That
15 might --

16 A Yes.

17 Q -- sound like a silly question, but --

18 A No, that's fine.

19 Q -- if you could just describe that.

20 A Yes. So broadly an official district tour
21 or this specific expenditure?

22 Q Let's start broadly, and then we --

1 A Okay.

2 Q -- can talk about some specific ones.

3 A A district tour is basically the
4 Congressman going to one of our 17 counties and
5 visiting with constituents, business owners,
6 government officials.

7 Q Okay. And who does the planning for those
8 district tours?

9 A I do with conjunction to my staff.

10 Q Okay. And are these district tours pretty
11 common? How frequently would you say he goes on a
12 district tour?

13 A Frequent -- I don't know how to judge that
14 to be honest.

15 Q Okay. How does the Congressman normally
16 travel when he's on these district tours?

17 A You mean, like, a car --

18 Q Car, plane --

19 A -- is what you're asking?

20 Q Yes.

21 A Yeah, a vehicle.

22 Q Okay. All right.

1 MR. QUINN: Jeff, did you have a question?

2 I think you're muted right now, Jeff.

3 WITNESS 1: He has -- can I just finish
4 answering real quickly?

5 MR. QUINN: Sure.

6 WITNESS 1: So, I mean, he has -- our
7 district is six hours apart. So I think in the
8 three and a half years I've been with him, he --
9 he may have flown to -- to Charleston from DC
10 area, and he's taken the train a couple times, but
11 most time district tours means he's in the car and
12 he's stopping in places.

13 MR. QUINN: Okay. Jeff, you can go ahead
14 if you had something.

15 MR. BROWN: I just wanted to go back to
16 the frequency question. Is it -- you know, I know
17 you can't pinpoint it exactly, but is it -- is it
18 once a year? Is it once a month? Is it somewhere
19 in between there?

20 WITNESS 1: I know it's not once a year.
21 It's -- you have district work periods. Does he
22 travel -- I don't -- I can't say he travels every

1 district work period, but even when he's home,
2 he'll stop and do tours. So I don't -- I still
3 can't answer the question because I'm unsure what
4 the -- what frequency is. I don't have a metrics
5 to really say he does this every certain amount of
6 time. I don't know.

7 MR. QUINN: How about -- sorry. Go ahead,
8 Jeff.

9 MR. BROWN: No, no. You go ahead.

10 MR. QUINN: I was just going to continue
11 on that.

12 BY MR. QUINN:

13 Q Do -- would a district tour -- an official
14 district tour always have an agenda --

15 A Not always.

16 Q -- like a laid-out agenda?

17 A No.

18 Q Okay. Do most of them have an agenda?

19 A I try to let them have -- I try to have an
20 agenda, but he likes to do impromptu stops, which
21 drives me crazy, so -- so, no. I -- we should
22 have. We do -- we do not though.

1 Q Okay. So it -- it depends. And could you
2 give me just an idea --

3 A Yeah.

4 Q -- compare frequency --

5 A So --

6 Q -- of a planned out district tour versus
7 an impromptu district tour?

8 A Yes.

9 Q What's more common? What's the ratio?

10 A And I'm -- even if we don't say district
11 tour, district stops, him visiting the district --
12 it could be -- if he's coming to Charleston, that
13 could be anywhere from two to three days or even a
14 week because the district is so far apart. So we
15 will plan two or three stops a day or more in
16 different counties while we're going down, back to
17 his house, up and down. So if we're doing that
18 and I have enough time to plan, we'll have an
19 agenda at each stop. We'll have what we call a
20 line by line or LBL, which kind of lays out where
21 we're going.

22 So but sometimes during the impromptu,

1 he's at his -- say he's coming back from DC, he
2 wants to go to a business, he'll stop in. Or he's
3 driving somewhere, it's like, I'm going to stop
4 and visit this business or visit these government
5 officials. Even when we do have a district line
6 by line or an agenda, he'll just say I'm going --
7 I'm going to go down this downtown and knock on --
8 I'm going to knock on these businesses' doors and
9 say hello and introduce myself. I'm going to stop
10 by the courthouse, go say hi to people.

11 Does that answer your question?

12 Q Yes, that does. Yes, that's helpful. Do
13 you know what car he normally drives when he's on
14 these district tours?

15 A Normally, he has a Prius now he drives.
16 So before that he had an -- an old Saturn, I
17 think. And then sometimes staff would drive him,
18 but not all the time.

19 Q When -- when the Congressman's on these
20 district tours, does he frequently stay overnight
21 in those counties that he's touring?

22 A If he's away from his house, yes.

1 Q Okay.

2 A When I say "away," I mean a couple hours
3 probably. That's not -- that's not always the --
4 there's not a fine line. Like, if you drive -- if
5 you're gone this many hours or you're this far
6 away from home, you want to stay, it's kind of
7 whatever he wants to do.

8 Q Just to again try to get a little idea of
9 the frequency of these district tours, so how
10 about -- how about this year, can you recall some
11 of the district tours he's taken?

12 A You want a number or just --

13 Q Let's start --

14 A -- top of my head?

15 Q Let's -- how about -- let's do it this
16 way. We can start with the most recent district
17 tour you can think of, and then we can kind of try
18 to move back from there.

19 A The -- he was in, I think, Pendleton
20 County, Hardy County, he visited with some -- a
21 couple small businesses, I believe, and that was,
22 I think, last month or maybe the beginning of this

1 month. I don't remember the dates.

2 Q Just a ballpark is fine.

3 A I don't -- I just don't remember. I think
4 -- I think maybe beginning of May. I'm unsure
5 though.

6 Q Okay. Was that -- was that on an
7 overnight district tour?

8 A I don't remember.

9 Q And then any others this year that -- that
10 you can recall?

11 A Yeah. He's -- he's -- he's done some
12 events around his house. One was a -- he opened
13 -- I think maybe a ribbon cutting for a new
14 kitchen for a Boys & Girls Club. Something he had
15 -- I just don't recall all of those. He's done a
16 few things around his house. I just don't
17 remember exactly what those are.

18 Q Let's focus on -- maybe it'll help you
19 remember -- can you recall the last overnight
20 district tour that he went on?

21 A No, I don't. I don't remember, the top of
22 my head.

1 Q Okay. Can you think of -- it doesn't have
2 to be the last one -- a recent overnight district
3 tour?

4 A I don't remember -- no, I don't remember.

5 Q Okay. We can go through a couple
6 documents, and then -- and then maybe --

7 A Okay.

8 Q -- it'll help you remember. And,
9 actually, we can look at this Exhibit A. Why
10 don't we talk about this one. So this -- this
11 specific official district tour, can you tell me
12 about -- about this tour?

13 A 5-12-20, the one that's on the screen?

14 Q Yeah. So it looks like it happened in May
15 of 2020, and he stayed overnight at the Smoke Hole
16 Resort.

17 A If I -- my memory serves me correctly, he
18 met with HardyNet Telecommunications. I think he
19 went to Seneca Rocks to tour that tourism area. I
20 think that's what it was -- maybe a couple more.
21 I don't remember the extent of it.

22 Q All right.

1 A And he stayed there.

2 Q Stayed at Smoke Hole Resort. Understood.

3 MR. QUINN: We can pull up -- Joe, you can
4 take this document down.

5 Q Do you remember how -- how that tour got
6 planned? How did it come about?

7 A Yes. It was impromptu; I do remember
8 that. So we -- he called me, and also -- so I had
9 my staffer Dan Neff, he -- he contacted the
10 locals, who we thought he should meet with -- one
11 with broadband issues, I do remember that -- so we
12 put those meetings together, why he was there.

13 Q Okay.

14 A And the scheduler -- the scheduler booked
15 his rooms. I didn't do that.

16 Q Okay. You said he called you. It was an
17 impromptu tour that started because he called you?

18 A Yeah. Well, that's how all these -- he's
19 like, I want -- that's how all -- mostly district
20 trips, he'll say, I want to travel these days or
21 I'm going -- I have some time in the next few
22 days, let's go, let's go visit some people.

1 Q Okay. Do you remember that -- for this
2 tour and that specific beginning of that
3 conversation of that phone call you got from him,
4 do you remember that conversation?

5 A No.

6 Q Okay. I know you said you don't remember
7 the conversation. Just in general, how -- what
8 was his interest in this are, or what -- how did
9 -- how did he describe it to you? What did he
10 want to do there?

11 A I don't remember. He tells me counties he
12 want to go -- he wants to go to, and we go from
13 there. Or he'll -- he'll -- sometimes he'll ask,
14 "Where should I go? Do you have any
15 recommendations?" and I'll give recommendations.

16 Q Okay. And for -- which counties is it
17 that he would've been visiting on this trip?

18 A Oh, would have been visiting? I don't
19 remember which counties exactly he visited, but,
20 in that area probably Pendleton, Hardy, possibly
21 -- Pendleton, Hardy -- sorry, I'm trying to
22 remember my map. It'd be one of those lower

1 eastern panhandle counties.

2 Q Okay. And you mentioned Hardy
3 Telecommunications. Is that in Hardy County, I
4 assume? Is that correct?

5 A Yes.

6 Q Okay. And how far is that from the
7 Congressman's house?

8 A Hmm, I'm unsure. You're talking miles,
9 hours. If I were a guessing man --

10 Q Yeah, driving --

11 A -- I'd say three hours.

12 Q -- driving distance.

13 A Three -- three hours, possibly.

14 Q Okay. And then Smoke Hole Caverns, do you
15 know how far driving distance that is from the
16 Congressman's house?

17 A I don't.

18 Q So you've got Hardy Telecommunications,
19 you mentioned he went to Seneca Rocks tourist
20 area. Do you recall any other stops that he made
21 on that trip?

22 A No, I don't.

1 Q So this is -- I'm interested in how -- how
2 you all decided how to spend -- or -- or to spend
3 campaign funds on this trip. It's a -- you said
4 it was an official -- an official tour; right? Is
5 this the sort of thing you would've gone to Dean
6 about to discuss, or did you go to Dean?

7 A I don't recall going to Dean for any of
8 this.

9 Q Okay. Do you know how the decision got
10 made to -- to charge this to the campaign?

11 A I don't.

12 Q Okay. Do you know who would've made that
13 decision?

14 A I don't, with that one, know.

15 Q Do you know who booked the hotel?

16 A Ashley Phillips.

17 Q Have you -- so not on this specific trip
18 but on these official district tours in general,
19 have you had any conversations with anybody about
20 whether or not you're going to spend campaign
21 funds or MRA funds on the -- on those official
22 tours?

1 A Can you -- I'm not following the question.
2 Sorry.

3 Q Have you -- I know you said for this
4 specific official tour you don't recall how you
5 came to the decision to spend campaign funds. Do
6 you remember any other conversations about any
7 other official district tours where you were
8 trying to decide to spend campaign funds or MRA
9 funds?

10 A Not counting the -- like the retreats and
11 things like that, I don't recall. No.

12 Q Okay.

13 A Those, I have specific knowledge that I
14 had conversations.

15 Q Sorry. Can you repeat that?

16 A Yeah. With the staff retreats/meetings, I
17 -- I usually have conversations about the campaign
18 in terms of what we can spend MRA dollars on that.

19 Q Okay. For this Smoke Hole Caverns stay,
20 you said Ashley Phillips would've booked the
21 hotel. So would it have been Ashley that went
22 through the process of -- of using campaign funds

1 to book the hotel?

2 A I'm not sure if she did, but, usually,
3 yes.

4 Q Okay. I know -- I know you guys have done
5 some of the all-staff meetings at a different
6 resort, one called Canaan Valley. Are you
7 familiar with that, that resort?

8 A Um-hmm. Sure.

9 Q Okay. We discussed the all-staff meetings
10 with -- with Representative Mooney, so I won't
11 rehash that here with you, but I did want to talk
12 about another trip to Canaan Valley that was not
13 an all-staff meeting that was in late 2018,
14 December of 2018. Are you familiar with -- with a
15 December 2018 trip that the Congressman took to
16 Canaan Valley?

17 A I am.

18 Q Okay. And can you tell me about that
19 trip?

20 A When -- when I say I'm familiar, I'm
21 aware.

22 Q Did you help plan that trip?

1 A I did not.

2 Q Okay. Do you know who did?

3 A I do not.

4 Q Okay. Then -- then maybe when you say
5 you're aware of the trip, how are you aware of
6 that trip?

7 A I put -- I put the documents together for
8 you guys, so I -- I may have seen it on his
9 calendar, just for clarity's sake, but I don't --
10 that's all.

11 Q Okay. And you don't know who would've
12 helped him plan that trip?

13 A No. I -- no.

14 Q Okay. I have a couple other -- just in
15 looking at -- at the Congressman and the
16 campaign's FEC expenditures, have a couple
17 specific overnight stays that I'm going to show
18 you and ask you about, and -- and I want to know
19 if these were associated with any official tours
20 that you can remember. I'm hoping this might
21 refresh your recollection a little bit.

22 MR. QUINN: Joe, if we can pull up Tab 4.

1 REMOTE TECHNICIAN: Sure thing. Stand by.
2 And this will be marked as Exhibit B.

3 (Exhibit B was marked for identification
4 and is attached to the transcript.)

5 BY MR. QUINN:

6 Q Have you ever seen -- Witness 1, have you
7 ever seen FEC expenditure reports like this?

8 A I have seen FEC expenditure reports.

9 Q Okay. I just want to look at this top one
10 actually that Joe zoomed in on, The Inn at Charles
11 Town. It looks like this was in November of 2020.
12 Do you know if this was associated with a official
13 district tour?

14 A No, I don't know.

15 Q Okay. Do you know what -- do you know
16 what this expenditure for travel, if you look at
17 the purpose description, at The Inn at Charles
18 Town was for?

19 A No.

20 MR. QUINN: Okay. Okay. Joe, you can
21 take this one down, and then we can pull up Tab 5,
22 and mark that as Exhibit C.

1 REMOTE TECHNICIAN: Sure thing. Stand by.
2 And you said to pull up which tab again?

3 MR. QUINN: Tab 5. And then if you can
4 focus on bullet C or item C.

5 (Exhibit C was marked for identification
6 and is attached to the transcript.)

7 BY MR. QUINN:

8 Q Country Inn of Berkeley Springs and -- and
9 the report says that this expenditure happened in
10 07 of 2020, July of 2020. Do you recall, is --
11 was this overnight stay associated with an
12 official tour?

13 A Not that I recall.

14 Q Okay. Do you know where this is --
15 Berkeley Springs?

16 A I do.

17 Q Okay. Do you recall any other trips by
18 the Congressman to Berkeley Springs?

19 A To Berkeley Springs, I know we have, but I
20 don't recall when.

21 Q Okay. What is -- what is Berkeley
22 Springs, or what's around that area?

1 A Berkeley Springs is in Berkeley -- that is
2 in Morgan County.

3 Q Okay. And is that, like, a tourist
4 attraction or --

5 A Yes. A lot of -- lot of DC folk come
6 down.

7 Q And what's -- what is the tourist
8 attraction or why would -- why do people go there?

9 A They have a beautiful -- the country is
10 beautiful. It's very quiet, quaint. They have a
11 couple (indiscernible), so it's a good way to get
12 away from the city. It's very close to DC.

13 Q Okay. You said you remember the
14 Congressman has visited Berkeley Springs; is that
15 right?

16 A Yes.

17 Q Okay. And you just don't recall the
18 dates?

19 A Yeah, I don't -- no, I don't.

20 Q Okay. Do you know -- do you know why he
21 visited?

22 A Why? I don't remember the exact reason.

1 No, I don't.

2 Q Do you know, was -- do you know if it was
3 work related, or was it a personal trip that
4 you're thinking of?

5 A We have -- we have had an official visit
6 there. It's -- yeah, I don't know if he had
7 personal -- if he's been there personally. I have
8 no idea.

9 Q When you say you had an official visit
10 there, do you mean like a -- like a district tour
11 --

12 A A district tour, yeah. Like --

13 Q Okay. And but so you remember there was a
14 district tour, but you can't say right now whether
15 or not that was in July of 2020?

16 A No, no.

17 Q Okay. Was it in the last --

18 A (Inaudible.)

19 Q -- was it in the last year?

20 A I don't recall.

21 Q Okay. Do you remember -- I guess this is
22 kind of marked in all of our memories obviously --

1 was it before the pandemic?

2 A I -- I think so.

3 Q Okay.

4 A But I'm --

5 Q So --

6 A -- not certain --

7 MS. BROZ: Sean, if I -- if I may, just to
8 -- because I think it might help clarify, I think,
9 some of what you're trying to get at and what
10 Witness 1's been testifying to, Witness 1, are you
11 responsible for scheduling every tour that the
12 Congressman ever makes of a district or just
13 official district tours?

14 WITNESS 1: Official district tours. And
15 sometimes he does that on his own too. I mean,
16 majority of time, I mean, I would -- if I had to
17 put a number on it, 90 percent of the times I do
18 all of -- I would do his official tours, but not
19 -- this FEC report, I wouldn't schedule his -- his
20 campaign travel.

21 Q Okay. Right. But I guess -- I guess what
22 I'll clarify is, for example, the Smoke Hole

1 Caverns tour was an official tour that his lodging
2 was paid for by the campaign; right? We just
3 looked at that one. Just asking you, Witness 1,
4 so there are --

5 A I'm sorry.

6 Q -- there are official tours -- yeah.
7 There are official tours that you're involved
8 planning -- involved in the planning, and the
9 campaign at times pays for those -- for the
10 lodging for those tours; that's right? And the --

11 A Yeah --

12 Q -- Smoke Hole Caverns tour is an example
13 of that?

14 A Yes. The Smoke Hole Cavern -- I didn't
15 book those, so I don't know why that was booked
16 for the campaign. I have no -- I don't know why.

17 So the scheduler would -- books the --
18 when I say -- I organize the -- the meetings,
19 things like that, but the -- the -- the lodging is
20 usually handled by -- the booking is handled by
21 the scheduler of the --

22 Q Okay.

1 A Does that make sense?

2 Q Yeah. So you will plan the agenda or the
3 tour, and then the scheduler will book the
4 lodging, if there --

5 A Yes.

6 Q -- needs to be lodging for the tour?

7 A Yes, sir.

8 Q Okay. And that's true for the official
9 tours that we're talking about?

10 A Yes, sir.

11 Q Okay. Understood. And, also, you do
12 recall an official tour to Berkeley Springs, but
13 you don't recall when that happened; is that
14 correct?

15 A Yes.

16 MR. QUINN: Okay. And then if we can take
17 down Exhibit C, and call up Tab 6, and you can
18 mark that as Exhibit D.

19 REMOTE TECHNICIAN: Sure thing. Stand by.

20 (Exhibit D was marked for identification
21 and is attached to the transcript.)

22 Q While he's pulling that up, does -- does

1 the Congressman ever take official tours of his
2 own district? Have you ever planned any official
3 tours for his own -- or, sorry, his own county?

4 A Yes.

5 Q Okay. Is there ever an occasion, or do
6 you recall an instance, where he would've stayed
7 overnight somewhere for one of those tours?

8 A Not that I recall.

9 Q Okay. Then looking at these Hampton Inn
10 -- for around the same time in 2020, July -- this
11 one's July 22nd, 2020 -- do you know -- do you
12 know of any official events or campaign events
13 that happened in Charles Town that would be
14 related to this Hampton Inn charge?

15 A No.

16 MR. QUINN: Okay. Okay. You can take --
17 you can take that exhibit down, Joe.

18 Q All right. So -- so now that we've been
19 talking about these for a little bit, I just want
20 to ask one more time, can you think of any other
21 official tours that you helped plan where the
22 Congressman stayed overnight anywhere?

1 A Stayed overnight? Sure. When he -- when
2 he stays in Charleston, he's stayed in Buckhannon,
3 he's stayed in Elkins. He has stayed in Weston.
4 He has stayed in Moorefield. He has stayed in --
5 multiple times, all those places.

6 Q Okay. I want to ask you about some --
7 some other -- some of the other expenses that we
8 asked about in the request for information that
9 you helped organize the response to. I wanted to
10 ask about the charges at St. James' Church and St.
11 Zita's. Do you recall those, or are you familiar
12 with those?

13 A Yes. I recall the -- for the -- I recall
14 the information you requested.

15 Q Okay. Do you -- are you familiar -- aside
16 from organizing documents for the production, are
17 you familiar with those expenditures or what --
18 what sort of campaign money is spent at St. Zita's
19 or St. James'?

20 A Without -- no. Yeah, I'm not -- not
21 familiar with those.

22 Q Okay.

1 A I just organized it.

2 Q Okay. So Congressman Mooney told us that
3 these are for gift cards that he purchases from --
4 from St. Zita's and St. James. You've never had
5 anything to do with any of those gift cards?

6 A That's what he's told me. I have -- for
7 one, the parades, they have given us a gift card
8 to purchase balloons, things like that, but that's
9 the extent of the gift card knowledge I have.

10 Q Okay. And when you say they gave them to
11 you, do you know who gave you that -- those gift
12 cards?

13 A Ted Dacey.

14 Q Okay. And who's Ted?

15 A He was the former communications director.
16 He also worked on the Congressman's campaign.

17 Q Okay. Any other instances that you can
18 recall where you used one of these gift cards?

19 A Yes. I used a gift card for -- let me
20 think. I've used it a couple times -- with gift
21 cards. I think we bought campaign volunteers
22 dinner after the parade one year. Trying to

1 think.

2 Q Do you recall where you -- where you
3 bought them dinner?

4 A I don't remember the name of the place. I
5 think it was pizza though.

6 Q Okay.

7 MR. BROWN: The gift cards that you've --
8 you've received and you've used, where are the
9 gift cards to? Like you said you bought -- you
10 bought balloons. Where?

11 WITNESS 1: You mean the -- can you ask me
12 one more time? Sorry.

13 MR. BROWN: Sure. So the gift cards, are
14 -- are they to a specific --

15 WITNESS 1: Oh. No, they were -- if I
16 recall, I know the one for the parades were just
17 Visas.

18 MR. BROWN: So, in other words, you could
19 buy balloons at wherever you buy balloons with the
20 Visa card, and you could buy pizza wherever you
21 buy pizza, and these gift cards aren't to specific
22 shops or stores?

1 WITNESS 1: If I -- yes. The one that I
2 had for the parade, if I remember, was just Visa.
3 It was just a plain Visa, not specific for any --
4 any one store.

5 MR. BROWN: Okay.

6 WITNESS 1: Yeah. The last time that I --
7 that I used a gift card was I bought supplies for
8 the Congressman's campaign office, and that was a
9 Target gift -- it wasn't Target -- I think they
10 were maybe purchased at Target, but I could use it
11 anywhere. I went to Staples, and I bought
12 campaign office material.

13 So I think that's three instances that I
14 think I've used the gift card that I recall.

15 BY MR. QUINN:

16 Q Okay. And do you know, in -- in all those
17 instances, did you get the gift card from Ted, or
18 is there somebody else?

19 A Ted, and then Mike Hough was the one for
20 the -- the Staples -- I used at Staples.

21 Q Okay. Other than Ted and Mike, do you
22 know anybody else that handles or holds these gift

1 cards?

2 A Sophia had those as well.

3 Q Okay. Do you know -- I asked you about
4 the car that the Congressman drove, and -- and I
5 know you mentioned a Prius and a Saturn. Is there
6 a car that's designated as a campaign car?

7 A The Tahoe.

8 Q Okay.

9 A Chevy Tahoe.

10 Q Do you -- have you had any experiences
11 using that Tahoe or seeing it being used?

12 A I've seen it one time, I believe.

13 Q Okay. And when was that?

14 A I don't remember, but the -- I just
15 remember they were holding campaign signs. That's
16 all I remember.

17 Q Okay. I think you also probably saw and
18 helped organize some documents related to meal
19 charges for the -- for the campaign. Do you
20 remember -- do you remember those?

21 A Yes.

22 Q Have you ever charged meals to the

1 campaign?

2 A The campaign has bought me -- bought my
3 meals before, yes.

4 Q Okay. And how -- how does that normally
5 happen? Who buys those meals?

6 A Hmm, just depends, in terms of if the
7 Congressman's with us and he's -- and we're doing
8 campaign work, he will use his campaign card.
9 I've seen him get -- pay for it cash, and then
10 he'll get reimbursed, be reimbursed for whatever
11 he got. So I can't tell you how many meals I've
12 gotten, but I have had meals on the campaign.

13 Q How about with -- with Michael or with
14 Mike Hough? Have you also had meals on the
15 campaign with him?

16 A I have.

17 Q Okay. And you said he also has a -- he
18 has a campaign card that he uses?

19 A I didn't say that.

20 Q Okay. Do you know if he does?

21 A I don't.

22 Q Okay. And did Mike buy the meals when you

1 had campaign meals with him?

2 A He has used -- I don't -- I don't
3 remember. I think he did, but I think he used --
4 he used a gift card. So the -- I think he used a
5 gift card. I didn't see him pay, but I think he
6 said he was using a gift card, so I don't know.

7 Q Okay. On that instance that you're
8 recalling, where was that?

9 A In Charles Town at Glory Days, that's one
10 instance. There have been more, I know. I just
11 don't remember exactly where.

12 Q What is Glory Days? Can you tell me? Is
13 that like a fast food restaurant or --

14 A It's a bar and grill, I think. So they
15 have a huge menu; I do know that. It's like a bar
16 -- it's bar food. So --

17 Q Okay. Can we go back quickly -- I think
18 we're actually getting pretty close to being done,
19 but I did mean to ask you -- if we can go back to
20 that -- that Smoke Hole Caverns trip that we
21 talked about for a little bit in May of 2020.

22 A Yeah.

1 Q Do you know who went on that trip with the
2 Congressman?

3 A Yes. I may not know everyone, but I do
4 recall a few people. Him; Dan Neff, a district
5 representative -- I'm not sure if Dan stayed, but
6 I know he was there; Rainer Kissel, he was also a
7 district representative at the time; Congressman's
8 mother was there; I -- I think -- I think Mike
9 Hough came as well, and Mike also -- yeah, I'm
10 pretty sure he came because he took meetings too
11 on the side.

12 MR. QUINN: Okay. Joe, if you can call up
13 Exhibit A. We already marked that. I just want
14 to make sure we're talking about the right one.

15 Q So this is the --

16 A It's May 2020.

17 Q Yeah. Okay. So that's -- that's true?

18 A Yes. I don't have the calendar in front
19 of me, but I'm -- I'm -- I'm pretty sure that's
20 the one we're talking about.

21 Q Okay. You had produced some emails that
22 were related to planning this trip, I think. If

1 we --

2 A Okay.

3 Q -- could just look at some of those real
4 quick, and then you can tell me what you remember.

5 MR. QUINN: If you can pull up Tab 2, Joe.

6 REMOTE TECHNICIAN: Sure thing. Stand by.

7 MR. QUINN: And you can mark that as
8 Exhibit E.

9 And then, Joe, when you pull it up, you
10 can give Witness 1 control of -- of the document,
11 and then you can let him look at it. I think it's
12 a two- or three-page document.

13 (Exhibit E was marked for identification
14 and is attached to the transcript.)

15 MR. QUINN: If you want to take just a
16 second to look at that real quick, Witness 1.

17 WITNESS 1: Okay.

18 REMOTE TECHNICIAN: Okay. And I've given
19 him control as well.

20 MR. QUINN: Okay. You should be able to
21 scroll through it. Let me know if you can't.

22 WITNESS 1: Okay. I can zoom in?

1 MR. QUINN: Yes, I think you can.
2 WITNESS 1: I don't know how to go down,
3 so --
4 MR. QUINN: Joe, can you give --
5 WITNESS 1: -- I just --
6 MR. QUINN: -- can you give Witness 1 --
7 WITNESS 1: -- I think I figured --
8 MR. QUINN: -- a little guidance?
9 WITNESS 1: -- this out.
10 MR. QUINN: Oh, okay.
11 WITNESS 1: Okay. Yeah, no, I did not
12 figure it out. Sorry.
13 MR. QUINN: That's okay. Joe --
14 MS. BROZ: Can you --
15 MR. QUINN: -- can you help Witness 1?
16 MS. BROZ: Can you guys just move it down
17 a page when he's done reading so I can also follow
18 along?
19 MR. QUINN: Yeah. I'm going to let
20 Witness 1 just read --
21 WITNESS 1: Yeah.
22 MR. QUINN: -- and familiarize himself

1 with the document, and then we can scroll --

2 WITNESS 1: Yeah, we can go --

3 MR. QUINN: -- to where we need to.

4 WITNESS 1: -- I'd go down -- I'm -- I'm
5 good. Okay.

6 (Pause to review document.)

7 WITNESS 1: Okay. Second page please.
8 Okay.

9 MR. QUINN: And then if you can scroll up,
10 Joe.

11 BY MR. QUINN:

12 Q Witness 1, I think you wrote on May 12th
13 at 11:35 to, it looks like, Derek Barr that his
14 very active five-year-old is also with him?

15 A Yes.

16 Q Does that help you -- did he have his
17 daughters with him too -- or one of his daughters?

18 A I think -- yeah, I think that the youngest
19 was with him now. I'd forgotten about that, but,
20 yeah. I don't remember -- I remember sending this
21 email and him telling me his daughter was going to
22 be with him, but I'm assuming she went -- I was

1 not on the trip, so I think she went, but I don't
2 know. I forgot about that.

3 MR. QUINN: Okay. If we can scroll down
4 to the first email, Joe, in the chain.

5 Q So I think you had told me this was an
6 impromptu trip, and it looks like here in your
7 email to Derek, you said, "Congressman Mooney is
8 unexpectedly going to be in Moorefield tomorrow."
9 Do you know -- does looking at this email help you
10 remember when -- when you got notice of anything
11 about the conversation you had with Congressman
12 Mooney for the -- when he started planning this
13 trip?

14 A No. I -- I guess I'll scroll out. If I
15 remember correctly, it says impromptu. He said he
16 -- it being at six -- I'm saying at 6:13, he
17 probably called me right before then and I
18 started. I don't know. Maybe earlier that day.
19 I have no idea. I don't remember.

20 Q Okay. And so you -- so he would've told
21 you or asked you about Hardy Telecommunications
22 and seeing if you could set up a meeting with

1 them?

2 A I don't remember what he asked. He's a
3 big fan of that company, so he tries to stop in
4 when he's in town, so that could very well be the
5 case.

6 Q Okay. We added the daughter to the list.
7 You gave me Dan Neff, Rainer Kissel, the
8 Congressman's mother, Mike Hough, and then his
9 daughter. Do you remember anybody else on the
10 trip now that we've talked about it a little more?

11 A I'm thinking -- I -- I was not there, so I
12 -- Mike may have had his son, but I don't know. I
13 think he did. I think his son was with him.

14 Q Okay.

15 A I'm just unsure.

16 MR. QUINN: Okay. Great. If we can go
17 off the record for a few minutes and take, like, a
18 five-minute break, I think we can probably wrap
19 things up pretty quickly -- unless, Jeff, did you
20 have a question about this? Jeff, you're on mute.

21 WITNESS 1: He's muted.

22 MR. BROWN: Sorry. Just one question

1 before we go off the record.

2 Witness 1, is it normal for the
3 Congressman to bring family on these district
4 tours?

5 WITNESS 1: Yes, he will occasionally
6 bring his family.

7 MR. BROWN: Okay. And -- and who is that?
8 Is that usually his wife? Is it usually his
9 mother? Is it usually his kids?

10 WITNESS 1: One of the kids. Not one -- I
11 said one. His kids. His wife will come. Usually
12 she'll do the 4th of July events.

13 MR. BROWN: Okay. Thank you.

14 WITNESS 1: You're welcome.

15 MR. QUINN: Okay. Then we can go off the
16 record for a second, and why don't we come back in
17 about five minutes.

18 (Pause in proceedings.)

19 MR. QUINN: Okay. Great. Well, I think,
20 with that, that's all the questions that we have
21 unless Jeff or any -- you've thought of anything
22 in the last minute or two.

1 MR. BROWN: Nope. Thank you for your
2 time, Witness 1. Really appreciate it.

3 WITNESS 1: Thank you. I appreciate it.

4 MR. QUINN: Yeah.

5 MS. BROZ: Nothing here as well. Thank
6 you.

7 MR. QUINN: Yeah. Thanks very much,
8 Witness 1. I also just want to say again I
9 appreciate all your work for gathering those
10 documents. I know that was probably a big
11 project, and -- and it's much appreciated.

12 WITNESS 1: It wasn't fun, but, yes.

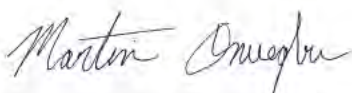
13 MR. QUINN: Yeah. Okay. Well, with that,
14 we can go off the record, Martin.

15 (Off the record at 3:19 p.m.)
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17
18
19
20
21
22

1 CERTIFICATE OF COURT REPORTER - E-NOTARY PUBLIC

2 I, Martin Onuegbu, the officer before whom
3 the foregoing deposition was taken, do hereby
4 certify that said proceedings were electronically
5 recorded by me; and that I am neither counsel for,
6 related to, nor employed by any of the parties to
7 this case and have no interest, financial or
8 otherwise, in its outcome.

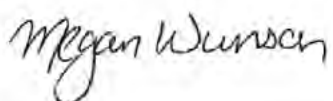
9 IN WITNESS WHEREOF, I have hereunto set
10 my hand and affixed my notarial seal this 28th day
11 of May, 2021.

12
13 
14

15 Martin Onuegbu, E-Notary Public
16 in and for the State of Maryland
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CERTIFICATE OF TRANSCRIBER

I, Megan Wunsch, do hereby certify that the foregoing transcript is a true and correct record of the recorded proceedings; that said proceedings were transcribed to the best of my ability from the audio recording and supporting information; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.



Megan Wunsch, AAERT CET

May 28, 2021

EXHIBIT 25

Federal Election Commission (FEC) (Question 1)

Names	Contact information
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Michael Hough	[REDACTED] michael.hough [REDACTED]
Hannah Mansell	Mansell.d.hannah [REDACTED]
Seth Burger	seth.burger [REDACTED]
John Jacobson	jfacobson66 [REDACTED]
Brendan Mohoney	[REDACTED] brendanmahoney4 [REDACTED]
Sophia Murray	[REDACTED] sophialourdes21 [REDACTED]
Renee LaFaver	reneel1143 [REDACTED]
James Appel	[REDACTED] james [REDACTED]