

EXHIBIT 1

Transcript of Interview of Former Staffer 1

Review No. 21-6998

October 21, 2021

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

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In re: FORMER STAFFER 1 : OCE Review No:
: 21-6998

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Interview of FORMER STAFFER 1
Conducted Virtually
Thursday, October 21st, 2021
10:01 a.m. EST

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Pages: 1 - 108
Reported By: Megan Kurwitz

Transcript of Interview of Former Staffer 1
Conducted on October 21, 2021

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1 Interview of FORMER STAFFER 1, conducted virtually.

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12 Pursuant to agreement before Megan

13 Kurwitz, a notary public, in and for the state of

14 Maryland.

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A P P E A R A N C E S

ON BEHALF OF OFFICE OF CONGRESSIONAL ETHICS:

SEAN M. QUINN, ESQ.

ANNIE CHO, ESQ.

OFFICE OF CONGRESSIONAL ETHICS

U.S. HOUSE OF REPRESENTATIVES

425 3rd Street, SW

Suite 110

Washington, DC 20024

(202) 225-9739

sean.quinn [REDACTED]

ALSO IN APPEARANCE:

HAROLD RODRIGUEZ, AV TECHNICIAN

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

2 MR. QUINN: So just quickly for the
3 record, today is October 21st, 2021, and we're
4 conducting the interview of FORMER STAFFER 1 by Zoom.
5 Former Staffer 1 not represented today.

6 Speaking is Sean Quinn, Investigative
7 Counsel at the Office of Congressional Ethics.
8 And I'm here with Annie Cho, also at the OCE.

9 The witness has been given a copy of 18
10 USC 1001 and has signed the acknowledgement.

11 Former Staffer 1, just quickly, thanks again for all
12 your time gathering documents and then your time
13 today. I appreciate it very much, and we'll make
14 good on my promise to get you out of here by noon.

15 So, also, as you might remember from last
16 time, I'm happy to answer any questions you have
17 throughout this discussion and interview and also
18 happy to take any breaks that you need, you know,
19 after we've gone for a little bit. Maybe need a
20 bathroom break or a water break.

21 And, then, if you don't understand any of
22 the questions that I ask you, just ask me to

1 rephrase them or repeat the question, and I'm
2 happy to do that for you. Make sense?

3 FORMER STAFFER 1: Yes. Thank you.

4 MR. QUINN: Okay. Great.

5 Well, then, with -- let's just start with
6 a couple updates from our last interview. I
7 understand you are not in Representative Mooney's
8 office anymore; is that correct?

9 FORMER STAFFER 1: That is correct.

10 MR. QUINN: Okay. And when did you leave
11 his office?

12 FORMER STAFFER 1: June -- beginning of June, I
13 do believe.

14 MR. QUINN: Okay. And do you want to just
15 briefly describe for me why you left his office.

16 FORMER STAFFER 1: Yes. I was asked if I would
17 be interested in a new job with, which I
18 was, and it was more money and different
19 opportunity and a lot less stress.

20 MR. QUINN: Okay. Good.

21 And so you're in now.

22 Can you just describe briefly what it is you do at

1 the.

2 FORMER STAFFER 1: Yeah. So basically we just

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED].

10 MR. QUINN: Okay. Great.

11 And, then, also quickly, just on your
12 departure from Representative Mooney's office, can
13 you describe -- I mean, would you say you left the
14 office on good terms with Representative Mooney?

15 FORMER STAFFER 1: Yes. He asked me if I would
16 reconsider staying, and I told him no. So, yes, I
17 think we were on good terms.

18 MR. QUINN: Then the first kind of
19 substantive issue that I want to discuss with you
20 is some allegations regarding tampering with some
21 of the evidence that was given to us or relied on
22 by Representative Mooney's office in the first

1 review. In particular, we had received reports
2 that there was a calendar that you-all relied on
3 when you were putting together purpose
4 descriptions of certain expenditures or, you know,
5 matching up receipts and that certain items on
6 that calendar had been changed in order to scrub
7 the calendar of indications of personal trips or
8 things that might be considered personal use.

9 Could you just -- generally, first, can
10 you tell me what you know about those sorts of
11 allegations.

12 FORMER STAFFER 1: Yes. The -- so I'll go back
13 first. In -- I guess -- yes. So basically he
14 used a Google calendar, and we would go through --
15 as I mentioned in the first interview -- we would
16 look at the dates of the expenditures and talk to
17 him and figure out what those expenditures were.
18 And so we would go back, and there were some
19 changes. One was -- I think it was a family
20 gathering for an event, and they changed -- I'm
21 saying "they." I should say: I think "he"
22 changed that to say something with supporters. So

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1 I think it was a family gathering, and he put
2 "supporters."

3 So [Former Staffer 2] showed me that change. I didn't
4 get change notification. So I would never have
5 known that had I not been shown.

6 MR. QUINN: Okay. And do you recall any
7 other specific instances or other specific
8 calendar changes?

9 FORMER STAFFER 1: There was one. I could not
10 remember if it's the same one or not, but there
11 was one near Thanksgiving or Christmas that was
12 changed. Specific -- but them changing -- I feel
13 like there's another one that [Former Staffer 2] showed me,
14 but I don't remember specifically what that was.

15 MR. QUINN: Okay. And so you think at
16 first the calendar entry was described as a family
17 gathering, and then it was changed to be described
18 as a gathering with constituents or supporters.

19 FORMER STAFFER 1: It said "supporters," I'm
20 pretty sure.

21 MR. QUINN: And why do you think
22 Representative Mooney made that change?

1 FORMER STAFFER 1: Well, my opinion is he made
2 the change to make it look like he was meeting
3 with supporters to cover expenses. But, I mean, I
4 don't know that to be a fact, but it made it look
5 that way.

6 MR. QUINN: Do you remember if there were
7 specific expenditures associated with that event
8 or that time frame?

9 FORMER STAFFER 1: I don't want to be confused.
10 I'm a little confused, or not really confused, but
11 I don't remember 100 percent as to which calendar
12 entry was changed. There was one that -- if it's
13 the same one I'm thinking of, which it was a
14 Thanksgiving or Christmas, we saw a receipt, if I
15 remember correctly. I don't remember exactly
16 which store, maybe Martin's or one of the other
17 grocery stores. It was in the area -- for a big
18 amount, like 700 bucks, right before, I'm pretty
19 sure, Thanksgiving. So I'm thinking this was a
20 Thanksgiving event. I could be 100 percent wrong
21 in terms of which event it was. It may be the
22 Christmas one. It's all running -- it all runs

1 together now.

2 But, yes. So that -- we saw a receipt
3 with a lot of stuff on it. But then I went back
4 to look at the receipt again when we were
5 compiling information, and we actually ran up on
6 the receipt when we were going through -- going
7 through receipts for your first review. And even
8 though that was not mentioned on there, we did see
9 it. It was a red flag, "Whoa, this is a big
10 expenditure." So we didn't find the receipt after
11 that. I'm not sure if we misplaced it or it just
12 ended up missing. But it was pretty substantial.

13 MR. QUINN: Okay. Go ahead.

14 FORMER STAFFER 1: Again, I just don't remember
15 100 percent if that was the calendar entry that
16 was changed or not, but there was a couple
17 changes.

18 MR. QUINN: Okay. And, then, just on your
19 recollection of that specific receipt and
20 expenditure, what was the amount, again, that you
21 recalled or approximate amount?

22 FORMER STAFFER 1: I think it was around \$700,

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1 and it was near Thanksgiving. So I'm not sure if
2 the Thanksgiving event was changed or it was
3 Christmas, but there was some change with family
4 to -- if they added supporters or changed the
5 wording.

6 MR. QUINN: Okay. And do you recall what
7 sort of items were being purchased on that
8 receipt?

9 FORMER STAFFER 1: Yes. I want to say there were
10 soups. I think that stood out, and it was a very
11 long receipt. It was for \$700. There were a lot
12 of items I think that you would have at a dinner,
13 but I don't really remember 100 percent. I want
14 to say there was cranberry sauce, but the more I
15 think about it, I think it was soup. But there
16 was something that you would have to make things
17 with.

18 MR. QUINN: Okay. And then do you know or
19 do you recall if that receipt was a charge
20 directly to, like, a card or paid for by cash, or
21 was this one of these gift-card expenditures that
22 we'll talk about later?

1 FORMER STAFFER 1: I think it was -- it was a
2 campaign card.

3 MR. QUINN: Okay. Okay.

4 Other than the calendar concern, were
5 there any other types of evidence or documents
6 that were handed over to the OCE that you think
7 were changed in any way to avoid the appearance of
8 personal use or some sort of violation of House
9 rules?

10 FORMER STAFFER 1: That was changed besides the
11 calendar entry? So I would say that, as strictly
12 my opinion, that we -- when we were gathering the
13 information for each of the reimbursements -- I
14 think I described this to you in our first review
15 -- we do not know exactly what these things were.
16 It was all relied on Congressmen's -- us
17 truthfully piecing together because there's no
18 documents, or we'd find receipts. And we'd say,
19 "This is the time frame. This is" -- "What did
20 you do here?" And he'd say, "Oh, I met with
21 constituents," whatever.

22 But I would -- so I don't think everyone

1 -- we were 100 percent or he was 100 percent
2 positive what those -- what made up those
3 reimbursements. Some -- the only thing I believe
4 we could say we were positive about were the ones
5 that were stapled together and that had a little
6 adding machine. Each re- -- they have adding
7 machine on the receipts, and they were stapled
8 together, and they matched the exact
9 reimbursement. So I was pretty confident with
10 those. The others were relying on looking at his
11 calendar -- his calendar, where he was, was he
12 traveling to D.C.? Was he traveling to do a
13 district trip or whatever and putting those
14 together? So I don't know if that answers your
15 question, or if you want me to go further, please
16 let me know.

17 MR. QUINN: I guess just generally, so
18 obviously the system for matching up receipts with
19 the purpose for the expenditure was a little bit
20 imprecise. And so are you saying that your
21 general feeling was that where it was somewhat
22 unclear or gray, you think or you got the feeling

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1 that he was not being totally forthcoming about
2 some of those expenditures?

3 FORMER STAFFER 1: For -- so when -- I guess I
4 would say this, that -- that some of these were
5 on, like, the trips to his son's ball game or in
6 areas that -- or he was doing some kind of
7 campaign work. He would -- he told us he was
8 doing some kind of campaign work, making calls.
9 But the receipt maybe was larger than one person's
10 meal. I mean, those are things that come to me.
11 I'm like, "Well" I mean, we were not there.
12 And we had never seen those receipts. And if
13 you're -- and something that we should even point
14 out is that -- and I mentioned this in our last
15 review is we did not -- I had never -- I didn't
16 have anything to do with the campaign in terms of
17 finances prior. I've never seen receipts like
18 this. So basically they hand me a box; "I want
19 you to do this"; and so I did it. And so these
20 are all foreign to me and to [Former Staffer 2] and [Former Staffer 3].
21 [Former Staffer 3] was on the campaign, but she had -- she was
22 in that a little more than we were. Well,

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1 actually, a lot more than [Former Staffer 2] and myself. But
2 -- so these are all -- so all these were taken at
3 face value in terms of what he said. So -- now,
4 do I question some of the reasons? Of course. I
5 think anybody would who looked at the receipts.

6 MR. QUINN: All right. Understood. Okay.

7 Can -- actually, sorry. Can we go off the
8 record for one minute? I'm getting a phone call
9 that I need to take quickly.

10 (Whereupon, a recess was taken.)

11 MR. QUINN: So the next thing I want to
12 talk with you about, Former Staffer 1, is some categories of
13 kind of tasks that appear to be personal errands
14 from Representative Mooney that he assigned you
15 and other staff members. And I've got a few
16 exhibits here that are compilations of some
17 documents that you sent me over the last couple of
18 days. And this first one that we're going to pull
19 up is Tab 1.

20 Harold, if you can pull that up and mark
21 that as Exhibit A.

22 AV TECHNICIAN: Stand by, please.

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1 MR. QUINN: And, Former Staffer 1, first, just
2 generally, can you tell me, did you -- was it
3 common for you to perform what appeared to be
4 personal errands for Representative Mooney?

5 FORMER STAFFER 1: Yes. He would ask me to do
6 personal errands. It wasn't every day, you know.
7 Some staff it was, but not me.

8 MR. QUINN: Okay. And we'll address some
9 of those staff. But if you want to go through
10 quickly and maybe tell me who do you think are the
11 folks that most often were assigned personal
12 errands?

13 FORMER STAFFER 1: Starting from when I was hired
14 in 2017, Hannah, she -- Hannah; [Former Staffer 3]; [Former Staffer 2];
15 the scheduler, Anita. They are -- that's the
16 brunt of who gets asked to do personal errands.
17 He's asked Madison, I think, in the past; Madison
18 Neely; [Current Staffer 2]. He's asked an intern.
19 There's -- I mean, I think someone -- if you go
20 through the list of our former staff, they've
21 probably been asked, one way or another if they've
22 been around long enough, to do something. And

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1 almost every day -- no, but schedulers, yes. They
2 were asked a lot. Or the campaign -- the people
3 who split part time and campaigned were asked a
4 lot, a lot, from my understanding of what they've
5 told me.

6 MR. QUINN: Let's look at this Tab 1 we've
7 marked as Exhibit A. Like I said, this Exhibit A
8 is a couple different e-mails and documents that
9 you sent me, communications between you and
10 Representative Mooney.

11 And, Harold, can we give Former Staffer 1 control of
12 this document.

13 (Whereupon, Exhibit A was marked for
14 identification.)

15 AV TECHNICIAN: Sure. Stand by.

16 FORMER STAFFER 1: I have control.

17 MR. QUINN: Okay. Great.

18 FORMER STAFFER 1: No, I don't. No, I don't.

19 AV TECHNICIAN: You should have it now.

20 FORMER STAFFER 1: I do.

21 MR. QUINN: Great. Okay.

22 So if you just want to look at this first

1 page. We'll take these one by one. This first
2 one is an e-mail from Representative Mooney to you
3 on August 12th, 2020.

4 Do you recall this e-mail or this request?

5 FORMER STAFFER 1: Yes. We were at the -- I
6 think, Greenbrier. And he wanted me to call to
7 see if his son could get into -- call and see if
8 they were allowing 17-year-olds into the casino to
9 watch an MMA fight.

10 MR. QUINN: Okay. And was this sort of
11 request -- and by that, I mean scheduling an event
12 or some kind of activity -- with his child on
13 task?

14 FORMER STAFFER 1: We were there for the -- one
15 of the association trips. He was a speaker, and
16 he brought his family.

17 MR. QUINN: Did Representative Mooney
18 often ask you to set up events with his children?

19 FORMER STAFFER 1: He has in the past. I would
20 not say often --

21 MR. QUINN: Okay.

22 FORMER STAFFER 1: -- but others, probably so.

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1 MR. QUINN: And so here you just had to
2 call the casino and figure out if they would admit
3 his --

4 FORMER STAFFER 1: Yeah. Well --

5 MR. QUINN: -- 17-year-old.

6 FORMER STAFFER 1: -- he's asking, "Do they allow
7 17-year-olds in?" That he wanted his son to go
8 in. He wanted me to find out the age.

9 MR. QUINN: Okay. And then if you could
10 scroll to page 2, and you can look at this quickly
11 and let me know when you've had a chance to review
12 the e-mail.

13 FORMER STAFFER 1: Okay. Is that one long
14 e-mail? No.

15 MR. QUINN: It's just one.

16 FORMER STAFFER 1: Okay. So --

17 MR. QUINN: Just page 2 right now.

18 FORMER STAFFER 1: So that was his wife. She
19 wanted me to find contacts for her daughter for
20 a -- she wanted -- I think she wanted to interview
21 someone mining in southern West Virginia. So she
22 wanted me to call the Beckley Mine Museum and find

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1 -- and get some information or get the right
2 person for her to talk to. But basically find a
3 contact for them. They were working on a project.

4 MR. QUINN: Okay. Like a school -- this
5 was a school project?

6 FORMER STAFFER 1: They home-school their kids,
7 yes.

8 MR. QUINN: Okay. And so, again, same
9 question: Was it common or did you hear of other
10 instances of other staffers getting contacted by
11 Mrs. Mooney to arrange activities for the children
12 or help with school projects?

13 FORMER STAFFER 1: I think I have been asked two
14 to three times to get contacts. She asked me one
15 time to get a list of libraries or have [Current Staffer 2] do it
16 for her. And I asked [Current Staffer 2] to do it. I passed on
17 the message, and I think he ended up doing two or
18 three hours' worth of research for her. It was
19 very common for Rainer to take their kids to
20 school. Like to -- they do college classes at
21 Blue Ridge. I think I've dropped them off on the
22 way to an event with the boss. It wasn't really

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1 out of the way. It was there. Maybe one time it
2 was. I don't remember 100 percent. I think [Current Staffer 2]
3 has done the same thing. I know Rainer has.
4 [Former Staffer 3], many times, has been asked. And they
5 consider her campaign, which that's not a campaign
6 task, of course, but would take their kids on
7 errands to extracurricular activities -- [Former Staffer 3], a
8 lot; and Hannah a lot as well.

9 MR. QUINN: If we can scroll to page 3,
10 there's another type of request, it looks like,
11 here. This one's an e-mail from January 15th,
12 2020, from Representative Mooney to you, Former Staffer 1.
13 And if you'd take a minute to review this. Just
14 let me know once you've had a chance to read it.

15 FORMER STAFFER 1: Yeah. I was asked to -- if I
16 remember correctly, they were -- had gotten the
17 Prius, and they were trying to get their title
18 transferred over, I believe. So they wanted me to
19 call the DMV people. They -- for somehow, he went
20 to the DMV where he lives, and he -- he didn't
21 like what was told to him in terms of they
22 couldn't do something. So he asked me to look

1 into it for him. So I had to go back and forth
2 with the DMV folks to get stuff taken care of so,
3 I guess, he wouldn't have to make a trip, if I
4 remember, go to -- he had to go back there, I
5 think, by the phone. So I did some research and
6 talked to them on his behalf.

7 MR. QUINN: And the Prius was a personal
8 vehicle?

9 FORMER STAFFER 1: Yes. I think it was the
10 Prius. So I'm not 100 percent sure of that.
11 That's the newest vehicle I think they've gotten.
12 So I think it was a Prius, or maybe -- they also
13 have a car for their son. So it may have been
14 that one. I don't remember which one.

15 MR. QUINN: Whichever car it was, you
16 think it was a personal vehicle that you were
17 trying to have the --

18 FORMER STAFFER 1: Yes.

19 MR. QUINN: -- something done with the
20 title?

21 FORMER STAFFER 1: Yeah.

22 MR. QUINN: And just a ballpark figure, do

1 you recall maybe how much time you spent on this
2 task?

3 FORMER STAFFER 1: Not -- no. I don't. I just
4 remember that I had to go -- I had to go -- to
5 call the governor's office. Then they -- had to
6 call the DMV commissioner and then go through them
7 and the local office. And I went back and forth
8 with them.

9 MR. QUINN: Okay. And is this something
10 that you think you would have done during sort of
11 traditional work hours or hours you would have,
12 instead, been doing official work?

13 FORMER STAFFER 1: Yeah. I think I'd done this
14 during the day when I talked to the governor's
15 staff because it was working hours. Now, I mean,
16 I may have -- could have done it in the evening,
17 but they would not have been open.

18 MR. QUINN: All right. And, then, let's
19 look at -- I believe this was a two-page e-mail.
20 So if you'd scroll to page 5 now.

21 FORMER STAFFER 1: Okay.

22 MR. QUINN: And this is another e-mail

1 from Representative Mooney. This one is August
2 13th, 2019. If you want to take a second to look
3 at that.

4 FORMER STAFFER 1: Yes. So they asked me -- are
5 you ready?

6 MR. QUINN: I was just going to say: Once
7 you've had a chance to look at it, if you could
8 just tell me what sort of request is being made
9 here.

10 FORMER STAFFER 1: Okay. So they asked me to
11 kind of contact, I believe -- well, you see it.
12 Can you find the right contact person at the
13 Department of Health for Grace? Okay. Yeah, they
14 wanted -- she wanted to get her, I think, medical
15 license in West Virginia. So I had to -- I
16 researched that, but I also -- I think I may have
17 called someone, too. Yeah, because I have a
18 number in here. So I called someone, I think. I
19 don't remember who, unless I have it in the
20 e-mail. Let me see. Is this one e-mail or two?
21 Okay. Yeah.

22 MR. QUINN: That one is just one page.

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1 FORMER STAFFER 1: Okay. Yeah. So I think I had
2 to call someone to get the correct information to
3 make sure it was accurate.

4 MR. QUINN: And then apologies for the
5 repetitive questions. But any recollection or
6 ballpark figure of how much time this task took
7 you?

8 FORMER STAFFER 1: I don't. I would say an
9 hour or more. I'd probably waited on somebody to
10 call me back. So, I mean, a couple hours. So I
11 always wanted to make sure the information was
12 accurate, and I wanted to confirm with someone on
13 the phone to make sure it's the right information
14 before I sent it.

15 MR. QUINN: Did -- when you were asked to
16 do these sorts of tasks, this one being helping
17 Representative Mooney's wife transfer over her
18 medical license to West Virginia, did you ever
19 have any concerns about whether or not this was a
20 personal task or something appropriate to ask a
21 Congressional staffer to do?

22 FORMER STAFFER 1: I mean, by this time, when I

1 first started with the congressman, I really
2 didn't understand what really difference -- I knew
3 the difference of campaign official, but I didn't
4 -- I guess I just kind of got intertwined in their
5 way of doing things. Like, "Oh, there are these
6 guys." Especially the half-and-half staff. I
7 would -- I was just like, "Oh, they can do
8 whatever, and" -- I didn't know the campaign rules
9 that you -- at that point. But this time, in
10 2019, to answer your question, I'm going -- I
11 mean, I knew it was something that it's going to
12 take -- it's going to take the place of me doing
13 something I should be doing. But I'm in the
14 mindset if he wants it done, who am I to question
15 it? He's my boss. So I always knew that I
16 probably shouldn't be doing it, but I just did it.
17 I mean, if I would have said -- if I had said no,
18 he probably wouldn't have been very happy, and I
19 don't know what would happen then. But I think
20 that was the mindset of every staffer. And that's
21 probably -- I mean, you know, it doesn't feel
22 right doing things like this, but, I mean, he's

1 not asking you to take money to someone. So, I
2 mean, you kind of, I guess, pick and choose your
3 battles. This may take up some time, but it's --
4 was it worth maybe getting fired over or him be
5 mad at you over that? Probably not. I mean, I
6 guess I was under the impression if it's not him
7 asking me to do -- I guess this was so common for
8 people and the kind of practice, we just got to --
9 we just done it. If that makes sense. I don't
10 know.

11 MR. QUINN: Right. And so, I guess, was
12 it your sense that it was just part of the culture
13 of the office that there was no division between
14 personal tasks and official tasks for
15 Representative Mooney?

16 FORMER STAFFER 1: Yeah. Yeah. Exactly. When I
17 started, I was going to say, in 2017, we had two
18 part-time staffers who were on the campaign, I
19 believe. Well, I think **Former Staffer 5**, she was
20 part-time and she was -- and then Hannah -- she
21 left. And then Hannah took over as a campaign
22 part-time person. I did -- and then she was

1 always usually doing stuff for the campaign. So I
2 mean, it was very -- it was well-known that if
3 you're the campaign worker, you -- you were almost
4 there. You were at their beck and call for
5 anything, even though you got official salary as
6 well. So even to the point when Hannah left, I
7 did -- I told our chief of staff, "I don't want to
8 have another part-time staffer." Because they're
9 here, but they're not here. Right. So I cannot
10 count on them to open the office because the
11 Congressman wanted them somewhere else. So during
12 the day, he'd want them to do something else. So
13 I even asked, "I don't want to have another
14 part-time staffer that would do part time --
15 campaign part time." That I would -- that I would
16 oversee the district, if that makes sense.

17 MR. QUINN: Yeah, that does.

18 FORMER STAFFER 1: I mean, I know -- I'm just,
19 like, "I don't want another -- I don't want to
20 deal with that."

21 MR. QUINN: Right. That does make sense.

22 So for the folks that were both employed

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1 in the official office and the campaign, they were
2 frequently taken away from their official duties
3 to do what was maybe described as campaign work
4 but frequently also was personal work for the --

5 FORMER STAFFER 1: Yes.

6 MR. QUINN: -- Congressman?

7 FORMER STAFFER 1: I think the understanding is:
8 If you work on the campaign, you also work for the
9 Mooney family, if that makes sense.

10 MR. QUINN: That does make sense.

11 FORMER STAFFER 1: I'm not sure if that answers
12 your question, but --

13 MR. QUINN: No, that does.

14 FORMER STAFFER 1: Okay.

15 MR. QUINN: Let's look at page 6, another
16 example of a different sort of task that was
17 assigned to you. It looks like Representative
18 Mooney e-mailed you on April 21st, 2021. And if
19 you'd take a second to look at the e-mail, just
20 let me know when you've had a chance to look at
21 it, and describe that task for me.

22 FORMER STAFFER 1: Yes. Okay. Yeah. I remember

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1 vividly the -- so the Congressman's mother wrote a
2 book about Cuba and Americanism and things like
3 that. So he often will give his books to other
4 members of Congress, things like that. It's a
5 really good book, beside the point. But the --
6 those who came in -- his mother is 80-something
7 years old -- and he -- yeah. He said, "I need
8 someone to pick those books up." I'm like, "Well,
9 they're going to" -- I call, and it was a huge
10 shipment of books. And I'm like, "Well, can we
11 just rent a truck?" He did not want to rent a
12 truck. "Get someone to rent a truck and do it for
13 you." And he's like, "No. Just have them go pick
14 it up." And I asked the intern, "Well, would you
15 pick this up for the Congressman," and he did it.
16 He's like, "Yes, I can." He got there; it was way
17 too big. So I think he had almost -- then I think
18 maybe [Current Staffer 2] went over there and -- because I called
19 him. I'm like, "This is too big for him to get.
20 It's just" -- I didn't feel good about it anyway.
21 He's an intern. And -- but he did vol- -- he's
22 like, "Yes, I'll do it." But I know he wasn't

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1 happy about getting all those books. So I told
2 the Congressman. I'm like, "We can't get these
3 things. We need to rent a truck or something."
4 And he's like, "Oh, no. We don't want to rent a
5 truck." So [Current Staffer 2] went over there and helped him,
6 and they brought those back. I think they brought
7 them maybe to her house or to the office. I don't
8 remember. But it was a big ordeal in terms of
9 getting these books for his mother, which he gives
10 out -- I mean, he's giving it to constituents,
11 things like that. They don't sell them, but they
12 give those out.

13 MR. QUINN: Do you recall which intern
14 this was?

15 FORMER STAFFER 1: Sam Ollis.

16 MR. QUINN: Can you spell that.

17 FORMER STAFFER 1: S-A-M O-L-L-I-S.

18 MR. QUINN: O-L-L-I-S.

19 FORMER STAFFER 1: Yeah. Sam was
20 self-explanatory. Sorry.

21 MR. QUINN: That's okay. And the whole
22 collection of books, were those all going to

1 Representative Mooney's office to be given away to
2 constituents, or were some of these books that
3 Representative Mooney's mother was also keeping
4 for herself?

5 FORMER STAFFER 1: It was probably half and half
6 in terms of -- I think it was there just because
7 they can pick them up. He wanted those both -- he
8 gave them to constituents. So district offices
9 have those. The D.C. has those. I think he gave
10 them to all the members of Congress in terms of
11 GOP members. But, yes, some went to her. They
12 were her books. And this was -- if you recall the
13 date, so that was right in the middle of the mix
14 of the first -- so I was very -- I was annoyed
15 with that task.

16 MR. QUINN: Let's go to page 7 -- next
17 page. And this is an e-mail from August of 2018
18 or an e-mail chain from August 2018. If you'd
19 take a second to read that --

20 FORMER STAFFER 1: Okay.

21 MR. QUINN: -- and just let me know when
22 you've had a chance.

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1 FORMER STAFFER 1: Okay.

2 MR. QUINN: I think this was actually a
3 two-page e-mail.

4 FORMER STAFFER 1: Yeah. I'm going to have to go
5 back and look because

6 So Randall is the Commissioner of Arts and
7 History for the State of West Virginia. Often --
8 I don't remember this -- I know this e-mail was, I
9 think, during -- we were picking up a grant
10 workshop. He was down in the Charleston area,
11 which is four or five hours from his house. He's
12 bringing the family down. They were planning
13 events around that. We were doing a grant
14 workshop. If I recall correctly, there was a lot
15 of -- we did a lot of official stuff during this
16 visit. I don't recall, now that I look at this,
17 why Grace wanted to meet with Randall. A lot --
18 because they do -- he also is all like the
19 national -- the -- I think they do the history
20 bees, things like that, that her kids were
21 involved with. So they're -- we also -- so
22 there's a lot of intertwining pers- -- I think

1 personally, but also there's a lot of professional
2 intertwining, too, because he handles all the
3 fares and festivals of the stay, things like that.
4 So to be honest with this, this -- I'm looking at
5 this now. This could be something official. I
6 don't remember. But something I had -- we had to
7 set up with Grace. So I don't remember that 100
8 percent.

9 MR. QUINN: Well, what was the work that
10 Grace did with Randall? Can you just describe
11 that relationship.

12 FORMER STAFFER 1: Well -- so there -- I'm trying
13 to think to be accurate. So with a -- with a --
14 he does like state spelling bee, stuff like that.
15 So he would talk to her with that -- about that.
16 Her kids participated in the national spelling
17 bees and history bowls, which I think he had
18 something to do with. So probably something to do
19 with that. Officially -- not, there's some --
20 there are some -- there have been some state like
21 -- I think there's like a boys' day or something
22 like that, or girls' -- some kind of thing that

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1 [Rep. Mooney's older daughter] would go to -- their daughter -- that he ran.
2 So that -- this particular instance, I'm not 100
3 percent sure. I'm going to look at it again to
4 make sure. I just know I had it set it up for
5 Grace.

6 MR. QUINN: Right. Other than this
7 particular instance, were there -- do you recall
8 other instances of setting up meetings for Grace
9 or any other -- let's stick with Grace. Any other
10 meetings that you set up for Grace that you had
11 the sense were not official meetings but you were
12 just acting as her scheduler?

13 FORMER STAFFER 1: That's a nice way to put it.

14 MR. QUINN: What was that? Sorry.

15 FORMER STAFFER 1: I said, "That was a nice way
16 of putting that."

17 So when they would do -- using 4th of July
18 week -- and this was August. So he was doing long
19 stints in the district or he won't plan something
20 like that. They would come along, and she would
21 -- like we'd have to set up -- I think there was a
22 time we set up tickets for them to go to the Clay

1 Center, which they would always come to visit.
2 They would -- I think it was a production with
3 princesses one time for the daughter. I don't
4 know if that -- I feel like that was canceled, but
5 I don't 100 percent remember at this second.

6 So, yes, there were things that we would
7 put together for Grace in terms of her and the
8 family when they were -- we would set the
9 schedule. So basically he was going to be there,
10 too. So it was kind of for both of them. But it
11 would be like -- I think like Kid Zone. They
12 often go to -- they would -- he would want kid
13 activities to do in the district. So I'd have to
14 find -- I think they did like a jumping zone.
15 They would do the Clay Center a lot. They would
16 do --

17 MR. QUINN: What is the Clay Center?

18 FORMER STAFFER 1: It's an arts -- arts and
19 science center that have exhibits. They're for
20 kids. It's a big -- a little museum, too, for our
21 -- it's in our -- it's our city here. They
22 would -- I think they've done like Waves of Fun,

1 which is in Hurricane. I think we've done that.
2 We've set it up for them. And basically once we
3 set it up, we'd coordinate times for them to go
4 with other things, if that makes sense.

5 MR. QUINN: So frequently when there were
6 trips, the family would accompany Representative
7 Mooney and you would plan both Representative
8 Mooney's official activities and then also plan
9 activities for the family that were purely
10 entertainment or for the kids?

11 FORMER STAFFER 1: Yeah. I would present him
12 with a schedule. He asked me to put things
13 together. I've put together a whole list of
14 stuff, and I would present it to him. And he'd
15 say "yes," "no," "yes," "no," whatever. "Show it
16 to Grace." And -- so, yes.

17 MR. QUINN: And then would you also
18 actually arrange the activities? So either buy
19 tickets or reserve space if that was needed?

20 FORMER STAFFER 1: I want to say I have. I think
21 I did for a Disney -- some kind of production one
22 time at the Clay Center. I think I have also

1 worked with the campaign to purchase tickets. I
2 think I told -- let the campaign worker -- this --
3 what they want, they bought them over the phone.
4 I can't give you -- the Disney thing stands out.
5 But I'm sure --

6 MR. QUINN: I think we'll look -- I think
7 we'll look at a document in a minute --

8 FORMER STAFFER 1: Yeah.

9 MR. QUINN: -- so that -- a production of
10 The Little Mermaid. Do you --

11 FORMER STAFFER 1: I think so, yes.

12 MR. QUINN: Okay.

13 FORMER STAFFER 1: Yeah.

14 MR. QUINN: We'll look at that soon.

15 FORMER STAFFER 1: But I'm sure there's been
16 instances where I had -- because when I would
17 present this to him, I'd say, "This is the cost.
18 This is the thing." So like that. So now I would
19 maybe -- I would maybe propose times around some
20 of his official stuff. So, I mean, there were
21 times he would say, "Schedule me one thing this
22 day officially."

1 MR. QUINN: And the remainder of the day
2 was for family activities or entertainment?

3 FORMER STAFFER 1: Yes.

4 MR. QUINN: Okay. Let's go to page 9.
5 You're on 7 right now.

6 FORMER STAFFER 1: Okay.

7 MR. QUINN: Yep. And this is October 10,
8 2018, e-mail from Representative Mooney. His wife
9 is CC'd on the e-mails directed to you.

10 FORMER STAFFER 1: Yes.

11 MR. QUINN: It looks like it's talking
12 about one of his daughters wants to interview
13 someone at the Gauley River rafting trip.

14 FORMER STAFFER 1: I'm looking. Yes. I don't
15 remember what I did with that, to be honest. I'm
16 sure I called. I would have to look at the sent
17 messages to see if there is anything that's --
18 that accompanies that, but I'm sure if he told me
19 to do it, I did it.

20 MR. QUINN: Does this -- this looks like
21 maybe another example of a school project that
22 the -- that you helped arrange some sort of

1 interview or --

2 FORMER STAFFER 1: Yeah.

3 MR. QUINN: -- or research for the
4 daughter?

5 FORMER STAFFER 1: Uh-huh.

6 MR. QUINN: All right.

7 FORMER STAFFER 1: Yeah. I don't remember much
8 with it, to be honest, but --

9 MR. QUINN: Okay.

10 FORMER STAFFER 1: But I'm sure I did.

11 MR. QUINN: And, then, we're almost
12 getting through this list. Sorry it's a little
13 bit of a laundry list. Let's go to page 10.

14 FORMER STAFFER 1: Sure.

15 MR. QUINN: And then this is an e-mail
16 from -- an e-mail exchange between you and
17 Representative Mooney on January 31st, 2020.
18 Again, if you want to take a second to look at
19 that.

20 FORMER STAFFER 1: Okay. I was going to Korea,
21 which didn't happen. So Madison was out. She had
22 just adopted a baby. Okay. So I -- yeah. So she

1 was going to be in town -- and I think -- with
2 him, maybe, or just with the kids, I think. No,
3 he was going to be there.

4 MR. QUINN: He is -- Representative
5 Mooney's wife?

6 FORMER STAFFER 1: Yes, Grace. So a lot of times
7 I'll refer to her as Dr. Mooney. She's a medical
8 doctor. She's a brain surgeon, and I think she
9 has a doctorate in pharmacology. So -- yeah. So
10 he wanted me to -- he said he's going to talk to
11 Mike about assigning a D.C. staffer to be around
12 in case they need something to go on the trip with
13 him. But -- because I was going to be gone,
14 Madison, who would usually bring her kids -- she
15 would sometimes bring her kids along to meet them
16 places so they could play together. They had --
17 she'd done it in the past. But I think also --
18 and before she had kids, I think she told me she
19 had watched the youngest kid for him. I don't
20 know it to be fact. I'm pretty sure she told me
21 that. So, yes, I was just getting permission from
22 them to -- yeah. They're going to the poetry

1 contest. So they were going to be in town for
2 that.

3 MR. QUINN: So is this e-mail -- let me
4 tell you my understanding of what's going on here
5 and you can tell me if that's correct or not. But
6 you were going to be traveling for a total -- or
7 STAFFDEL and -- but you were concerned that
8 because the wife and the daughter were going to be
9 in Charleston that you would need to staff them or
10 that somebody would need to staff the wife and the
11 child?

12 FORMER STAFFER 1: Yeah. So I think that he was
13 -- I think he was contemplating coming with them.
14 And I think when I asked Mike, and he asked me to
15 -- he said I could go. Mike is the chief of
16 staff, and he said to check with Alex to make sure
17 they wouldn't need me here while I was in
18 Charleston. And so I don't think he did district
19 trips because I think he said I'm following him --
20 the family. So I think he was coming, too,
21 possibly. But I think he wanted someone around,
22 as you can see in his response, in case they would

1 need something.

2 Does that make sense?

3 MR. QUINN: Right. So -- yeah. I think
4 it does.

5 FORMER STAFFER 1: Okay.

6 MR. QUINN: But, in sum, this was a
7 personal trip to Charleston for a poetry
8 competition that Representative Mooney may or may
9 not have been on, but there was still concern with
10 the family would need to be staffed even though
11 there was no official activity occurring at the
12 time?

13 FORMER STAFFER 1: Yes.

14 MR. QUINN: Okay. And was that common
15 that you would staff family when Representative
16 Mooney wasn't there?

17 FORMER STAFFER 1: Well, there's -- there's not
18 oftentimes she would come -- I think maybe a
19 couple times she would go by herself and the kids.
20 I mean, it wasn't always that she would go by
21 herself to the District in terms of coming to
22 Charleston. If she did, she didn't always need --

1 I think just as many times she didn't need us.
2 But I think the consensus was if she was here --
3 because I think Alex just wanted her to try to go
4 visit a hospital, or something like that, on her
5 behalf. But I didn't think she ever did that. I
6 think -- the only thing I can recall is she went
7 to Marshall University one time -- excuse me --
8 and he did, too, to speak about something or they
9 came to Charleston.

10 So there have been a couple times they've
11 -- I'm getting off on a tangent here. So I'm --
12 to answer your question: We were -- if they were
13 in town, I think the consensus was that he would
14 want us around in case he would need something
15 done. Did they ask us every time? I don't think
16 so. There was a time in Marsh- -- they went to
17 Marshall by themselves. They didn't ask us. You
18 know, there was a time that they were in
19 Charleston at some kind of boys' -- I think it was
20 some kind of camp at -- I think it was a Randall
21 Reeves thing. The Congressman spoke to kids, and
22 they were with him. But I think his kids were

1 there.

2 I need to take one quick break.

3 MR. QUINN: Sure.

4 (Whereupon, a recess was taken.)

5 MR. QUINN: And just to go back to my last
6 question, my sense from this e-mail -- and
7 actually -- sorry.

8 Harold, can you pull up that exhibit
9 again.

10 AV TECHNICIAN: Stand by.

11 MR. QUINN: So we're on page 10 of the
12 exhibit. And my sense from this e-mail is that
13 there was a concern or a possibility that even
14 though Representative Mooney wasn't in Charleston,
15 you knew his wife and daughter would be there and
16 they might need to be there to staff them.

17 So my question is: Was it common to staff
18 his wife or children when he wasn't present?

19 FORMER STAFFER 1: Personally --

20 MR. QUINN: Yes.

21 FORMER STAFFER 1: -- myself? I don't -- I don't
22 recall a time that I had to go out and staff them

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1 myself. Now, I have arranged, like, for our --
2 or, actually, Madison to meet them places, things
3 like that -- I do believe [Former Staffer 2] that we was doing
4 a District trip in the Eastern Panhandle, and I
5 think he asked [Former Staffer 2] to come along. He told me
6 his intent was in case somebody -- to sit with
7 [Rep. Mooney's younger daughter] while he was meeting with people. But
8 myself personally, I've never been out there.
9 When I -- I guess to answer your question bluntly
10 is I wouldn't do it myself. I would -- that'd
11 basically mean I'd find some -- as you can see, I
12 have Jean, Susie -- someone can sit with her if
13 they needed -- she needed something.

14 MR. QUINN: Okay. And then let's go to
15 page 11.

16 Former Staffer 1, I don't know if you still have
17 control of that or not.

18 FORMER STAFFER 1: I do.

19 MR. QUINN: Okay.

20 FORMER STAFFER 1: Okay.

21 MR. QUINN: And if you want to take a
22 second to review this e-mail exchange.

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1 FORMER STAFFER 1: How many -- is that just one
2 page or two?

3 MR. QUINN: It's just that one page.

4 FORMER STAFFER 1: Okay.

5 MR. QUINN: And this looks like it
6 happened on February 10th, 2020, that e-mail
7 exchange between you and Representative Mooney,
8 and it concerns the West Virginia Secretary of
9 State website and some sort of business
10 registration.

11 Could you describe what is going on here.

12 FORMER STAFFER 1: Yes. If I remember correctly,
13 the Congressman wanted me to figure out something
14 about -- I think his wife was setting up the
15 consulting business, I believe. And she had to
16 talk to the -- let's see -- they got stuck on a
17 other certain part of trying to do that, and they
18 asked -- I guess he asked me to figure out how
19 they can get past that or what happened.
20 Because -- the city he was choosing, if I remember
21 correctly, was not adding -- was not what he
22 needed done to where he was operating the

1 business, I believe. He wanted to be maybe
2 statewide or nationwide, and he couldn't get past
3 just doing the city.

4 MR. QUINN: Okay. Is that something --

5 FORMER STAFFER 1: If that makes sense.

6 MR. QUINN: Yep, that makes sense. So, in
7 summary, this was Representative Mooney asking you
8 to help him and his wife set up some sort of state
9 business license for his wife's personal business?

10 FORMER STAFFER 1: Yes.

11 MR. QUINN: Okay. Do you recall ever
12 doing any other tasks to help Dr. Mooney with her
13 work?

14 FORMER STAFFER 1: Her work, I don't think so
15 because she was a stay-at-home, I guess, mother.
16 So she didn't really have a day job. So, no.

17 MR. QUINN: And what was this consulting
18 business? Do you recall?

19 FORMER STAFFER 1: No. I'm sure it's probably
20 medical.

21 MR. QUINN: Okay. Then we can take down
22 this Exhibit A. And then I want to go through --

1 and we'll try to do this quickly -- go through
2 some of the other staffers who also did personal
3 work and for whom you provided some documents.

4 Let's talk about Hannah Menzel first. Can
5 you tell me what her position in the office was.

6 FORMER STAFFER 1: She was -- I think they
7 labeled her as a constituent services
8 representative, and she was part-time. She also
9 went to school.

10 MR. QUINN: And she was part-time in the
11 office and also employed by the campaign?

12 FORMER STAFFER 1: Yes. I think the first --
13 when I first was hired, she was not campaign. And
14 Former Staffer 5 was leaving, and that made her
15 part-time -- she made her the campaign person.

16 MR. QUINN: And what years was she working
17 for Representative Mooney?

18 FORMER STAFFER 1: She was there when I started.
19 So I think she was there from 2017 to '19,
20 probably, or '20. I don't -- I think '19,
21 possibly --

22 MR. QUINN: Okay.

1 FORMER STAFFER 1: -- because I had to find a --
2 when she left, I had to find a replacement.

3 MR. QUINN: Okay. Let's pull up --
4 Harold, pull up Tab 2, and we can mark that as
5 Exhibit B.

6 AV TECHNICIAN: Stand by, please.

7 (Whereupon, Exhibit B was marked for
8 identification.)

9 MR. QUINN: So these are some text
10 messages that you produced to us from -- between
11 you and Hannah. And it looks like in the first
12 text message she is describing needing to help the
13 Mooneys a lot with driving. Do you recall this
14 text message exchange -- do you know who was --
15 who was gone and why was she needing to help the
16 Mooneys out with driving a lot that particular
17 week?

18 FORMER STAFFER 1: Let me see. I think maybe --
19 I don't recall. But I think maybe the -- I don't
20 recall, to be honest, who was gone.

21 MR. QUINN: That's fine. And, then, if
22 you want to scroll down to the next page, another

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1 text exchange -- this looks like Hannah is sending
2 you some texts telling you that she's going to
3 take [Rep. Mooney's son] to his classes. Does that mean she's
4 driving the son to --

5 FORMER STAFFER 1: -- probably Blue --

6 MR. QUINN: -- school? Can you repeat
7 that? I'm sorry.

8 FORMER STAFFER 1: Blue Ridge Community College.

9 Can you still hear me okay? Do I need to
10 change something?

11 MR. QUINN: No. I can hear you.

12 FORMER STAFFER 1: Okay. Yeah, they --

13 MR. QUINN: And so --

14 FORMER STAFFER 1: They attended community
15 college.

16 MR. QUINN: And Hannah frequently would
17 drive them to and from school?

18 FORMER STAFFER 1: Yes.

19 MR. QUINN: And it looks like in this
20 example she's driving him to class at 11:00 and
21 has to be available to pick him up an hour and 45
22 minutes later. Does [Rep. Mooney's son] not drive?

1 FORMER STAFFER 1: This was in 2019. Probably at
2 the time he did not. But even -- he has his -- I
3 think he has his learner's permit now or maybe his
4 driver's license. Staff would still have to
5 drive -- the campaign people would drive him
6 still.

7 MR. QUINN: Okay. Let's scroll down one
8 more. This is another text from Hannah. And here
9 she's telling you that Representative Mooney wants
10 her to work at his house. What does that mean, or
11 what does that entail? Why would she need to work
12 at the house?

13 FORMER STAFFER 1: Well, usually it would be
14 campaign stuff, whatever -- he does campaign often
15 in his house. So that particular instance, I'm
16 unsure what that meant. I took it as she had to
17 do campaign work.

18 MR. QUINN: Okay. And, then, I know you
19 had mentioned the children were home-schooled. Do
20 you know if Hannah helped with their
21 home-schooling?

22 FORMER STAFFER 1: I don't know if she helped

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1 with home-schooling.

2 MR. QUINN: Okay. If you can scroll down
3 one more, more texts from Hannah, and here she's
4 telling you that she's going to be late getting
5 into the office because she's doing some work for
6 the campaign.

7 Was this -- this was pretty common that
8 Hannah, who was an official employee, was
9 unavailable because she was doing campaign or
10 personal work.

11 FORMER STAFFER 1: Extremely common. Hence, I
12 said prior I did not want another -- because I did
13 not want another part-time person who also worked
14 on the campaign because, as you can see, I think
15 it was just -- at the time it was her, maybe John.
16 No, John was no longer there. It was Tara and
17 her, the only people in the office. I don't think
18 [Current Staffer 2] had been hired yet. So -- or Steven may have
19 been there. There was a time he was not there; he
20 had left.

21 So it was just like two people running the
22 office. And there's no -- there's not much

1 coverage. So you could never count on her to do
2 projects, things like that, at no fault of her own
3 because she was going to school. She was going to
4 -- she could not fulfill her official duties
5 because she's pulled away every few minutes.

6 MR. QUINN: Understood.

7 Annie, did you have a question?

8 MS. CHO: Yeah. So Hannah was a part-time
9 employee. Was there ever like a set formal
10 schedule, you know, in terms of, you know, from
11 9:00 to 5:00 she would be at the official office,
12 and then in the afternoon, she'd be working on the
13 campaign stuff or the other way around? Was there
14 any formal, I guess, schedule set for individuals
15 like --

16 FORMER STAFFER 1: Yeah. So it changed with her
17 school schedule each -- with each semester. So we
18 would set her an official schedule during the work
19 -- during the -- I think it was 20 hours a week.
20 And then the other times she would have campaign
21 days. As you can see, that would bleed over, and
22 she was not available a lot of times because she

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1 had tasks like that.

2 And this is -- I could -- she would not
3 always tell me because she'd maybe forget or
4 whatever. He would just call her. So I would
5 have someone call her and she wouldn't be there.
6 I would have to call her and figure out where
7 she's at, or she'd call me, like, "I've got to do
8 this."

9 MS. CHO: Thank you.

10 MR. QUINN: You sent me a list of items
11 that were concerns that you had about personal use
12 of staff. And I think one of them mentioned that
13 Hannah might have also done some grocery shopping
14 for the Mooneys.

15 Do you recall that?

16 FORMER STAFFER 1: She's told me she's done
17 grocery shopping. [Former Staffer 3] has told me that she has
18 like, went to pick up lipstick for Grace. And so
19 there's -- there's been a lot of personal errands.
20 It was not -- because I was really shocked when
21 Hannah was, like, "I grocery-shop for the
22 Mooneys." I'm like, "What do you mean? You

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1 actually" -- she grocery-shopped. And I think it
2 was very common for [Former Staffer 3] to go out to pick up
3 lunch for all of them or -- and go grocery
4 shopping, get milk, things like that. I've never
5 been grocery shopping for them.

6 MR. QUINN: Understood.

7 Let's -- we can pull down this exhibit,
8 Harold. Thank you.

9 And let's talk about [Former Staffer 3] real
10 quick. You mentioned -- again, this wasn't in the
11 list of sort of concerns that you sent me. You
12 mentioned at different times that [Former Staffer 3] babysat
13 and also probably dog-sat or did some sort of
14 tasks with the dog. Could you describe those.

15 FORMER STAFFER 1: You have a preference of which
16 one first?

17 MR. QUINN: Let's do babysitting first.

18 FORMER STAFFER 1: Okay. So, yeah, she would
19 watch -- from my understanding, she would watch
20 the youngest daughter sometimes, but I don't think
21 it was very frequent that she had to, like,
22 babysit. But, now, it was very, very frequent

1 that she would have to drive the kids places,
2 especially, I think, the older boys -- the older
3 son because she actually, I think, didn't feel too
4 comfortable -- I got that feeling. I mean, she's
5 telling me about this, that she just didn't feel
6 great about driving an 18- -- I think he's 18 now
7 -- or 17-year-old boy. Sometimes I think his
8 friends would be with him. I'm not 100 percent
9 sure about that -- around.

10 In particular, we were at a -- we were
11 having a senior staff meeting in the Eastern
12 Panhandle, and she had to drive all the way -- she
13 lived in Virginia, near D.C. so it's almost two
14 hours. She would have to drive there to take him
15 places and have to stay till like 10:00 at night
16 taking him back and forth. That's something that
17 stands out to me that she had done. And I was
18 there when she had to bring him there late at
19 night.

20 But it was very common that she would have
21 to drive the kids to and from school, things like
22 that, to events. Maybe -- I think they did --

1 most were extracurricular activities -- and then
2 on top of getting lunch and stuff for them while
3 they were there.

4 MR. QUINN: Do you know how she was paid
5 for that? Was that just part of her salary pay,
6 or was she reimbursed mileage for that driving?

7 FORMER STAFFER 1: I do believe that he had to --
8 he paid her a couple of times himself, like, for
9 tasks. I don't know to be -- to be -- that to be
10 fact. I think she's told me he's paid her, but
11 not very often. I don't think she got reimbursed
12 mileage to go from Virginia to his house. So
13 that's part of her salary, to answer your
14 question, I guess.

15 MR. QUINN: Okay. And then how about
16 tasks with the Mooney's dog?

17 FORMER STAFFER 1: She has told me she had to
18 drop the dog -- Gipper is his name -- off to the
19 mother, I think, who lives near D.C. So I think
20 she had to do that a couple times. When they'd go
21 away somewhere, she'd take it to the mother -- the
22 mother-in-law, Grace's mother, I think, to watch

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1 or somewhere in Maryland.

2 MR. QUINN: And that would be from their
3 home around Charlestown --

4 FORMER STAFFER 1: Yes, sir.

5 MR. QUINN: -- to someplace in Maryland or
6 around D.C. So that's a --

7 FORMER STAFFER 1: I think so.

8 MR. QUINN: -- multi-hour drive?

9 FORMER STAFFER 1: Yeah.

10 MR. QUINN: Okay. And let's talk about
11 "Rain-er" Kissel, quickly.

12 What was his position with the office
13 and/or the campaign?

14 FORMER STAFFER 1: Rainer is his name.

15 MR. QUINN: Rainer.

16 FORMER STAFFER 1: So when I -- when I was hired,
17 he was there. So he had previously drove the
18 Congressman during the campaign -- his first
19 campaign ever -- everywhere, all over the district
20 campaigning -- campaigning. I think -- he'd also
21 done it freely. So they -- he was hired on as
22 like a -- they called all the staff, when they

1 hired them on, constituent serv- -- constituent
2 services representatives. So he was, I guess,
3 that.

4 He -- Rainer is a nice man; give anything
5 for anyone. But, yeah, he's lacking some skills
6 in terms of professionalism, things like that.
7 And he used to be a mechanic. And he -- so they
8 hired him to work the office. When the chief of
9 staff was hired on, he took him out of the office
10 because he didn't like his -- I guess his -- he
11 was not professional. He didn't have the skills
12 to work in the office. So they made him work from
13 his home and cut him down to part-time.
14 Basically, his job -- when I was hired, we had
15 to -- they only let him because he would do
16 driving assignments for Alex a lot. He would
17 drive Alex back and forth to D.C. on top of a --
18 well, a lot of other things -- worked on cars, get
19 -- I think they'd take the cars to get -- they get
20 inspected.

21 He would -- so he would spend a lot of
22 time just doing things like that for them.

1 Officially, I wasn't -- I'm like, we have to have
2 something for him to work. So I made him do all
3 the mobile office hours in the Eastern Panhandle
4 and other top tasks. He was not very good with
5 computers in terms of turning in reports and
6 stuff. So it was hard to have certain types of
7 tasks that a field rep would do. So he would do a
8 lot of driving assignments. When the Congressman
9 need driven, he would drive him around. But he
10 would do almost all mobile office hours. But on
11 top of that, he would -- and he was hired on by
12 the campaign at the end. This year I think they
13 paid him in 20- -- I guess 2020, to drive the
14 Congressman and pay him for things he would do.
15 Now, I think this also -- that was the only time I
16 know he was paid by the campaign. The rest was --
17 he just done, I guess, for -- he worked part-time
18 for our office, and I guess he'd done freely. I
19 don't -- I'm not -- I'm sure -- I don't know. I
20 think he has told me that the -- I guess the
21 Congressman would pay for parts or whatever, but I
22 don't think -- there may be one time he paid him

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1 to do something. But other than that, I don't
2 think he's ever been compensated for the work he
3 done for Alex.

4 MR. QUINN: Let's pull up Tab 3, Harold,
5 and mark that as Exhibit C.

6 AV TECHNICIAN: Stand by.

7 (Whereupon, Exhibit C was marked for
8 identification.)

9 MR. QUINN: These are some more texts that
10 you produced, Former Staffer 1. It looks like these ones are
11 between you and --

12 FORMER STAFFER 1: Rainer.

13 MR. QUINN: Mr. Kissel -- Rainer. And
14 this -- let's just look at this first one. Rainer
15 sent you a picture of -- it looks like a car
16 that's had the front portion removed. The
17 interior of the motor's exposed. And Rainer says,
18 "This week's project. Hope you all are well."

19 What does Rainer mean there?

20 FORMER STAFFER 1: Well, this is -- so it was
21 very -- there's always been discussions between
22 the Congressman and -- like, our chief of staff

1 wanted to just eliminate his job because there
2 wasn't much for him to do that he could do well.
3 But I think the Congressmen didn't want to get rid
4 of him. So I was constantly like, "Rainer, I need
5 you to do this this, this, and this," which -- I
6 was his supervisor, but any time they needed --
7 the Congressman would go directly to him to do
8 things or have the scheduler go directly to him to
9 schedule stuff for him, like driving assignments,
10 things like that. So he's saying this week's
11 project because I'd say, "Rainer, what did you do
12 this" -- "I need your -- you need to claim this
13 out." And he just really didn't oblige very well,
14 to be honest with you. So I was under the -- my
15 recommendation to Mike and those guys, like,
16 "Let's -- there's not much work for him. We need
17 to -- he needs to be let go." But I think the
18 Congressman -- he liked him for, I think, a number
19 of reasons. And I think it was convenient for him
20 to do things like this. So he kept him on.
21 And --

22 MR. QUINN: When you say -- sorry, not to

1 interrupt you, but when you say "things like this"

2 -- so is this Rainer doing auto repairs on --

3 FORMER STAFFER 1: Yes. I think he told me. Let
4 me go down. I think this was one of Mooney's

5 cars. I think -- I think it was maybe the van. I

6 don't recall. But -- and he could have also been

7 talking about his own personal -- but I think this

8 was -- they were -- he was doing something -- I

9 think this was maybe the van, and it was -- I

10 think Grace got in a wreck. I'm not sure if these

11 add up to the time frame, but I think Grace got in

12 a wreck, and he had fixed something for them. But

13 he was constantly working on cars. So if they

14 needed something, he would work on one of their

15 cars. I think he would work on the campaign car.

16 I think he's done stuff for their own personal

17 cars. But I wasn't 100 percent sure which car

18 this actually was. It was a black -- I thought it

19 was the van.

20 MR. QUINN: Okay. And as far as you know,

21 he wasn't compensated or wasn't frequently

22 compensated for this work. He --

1 FORMER STAFFER 1: Yeah.

2 MR. QUINN: -- just received his salary
3 from the congressional office?

4 FORMER STAFFER 1: Yes, because he was not paid
5 during the campaign until the end, I think, of
6 2020. So this was May. So I don't think he was
7 paid through the campaign for any of that. Now, I
8 think there was a time -- I think he -- I think --
9 I'm pretty sure Rainer told me that the
10 Congressman paid him for a few things. But like
11 -- but not very often or it was barely enough to
12 pay for the parts and stuff like that.

13 MR. QUINN: And then if we scroll to the
14 second page of this exhibit just quickly, this is
15 an e-mail between you and Rainer, and it looks
16 like Rainer is telling you that he's going to get
17 the Congressman's van inspected --

18 FORMER STAFFER 1: Yes.

19 MR. QUINN: -- is that right?

20 And the van is a personal vehicle?

21 FORMER STAFFER 1: Yes.

22 MR. QUINN: Okay. And then one other task

1 you identified for us was that he sometimes --
2 Representative Mooney or the family sometimes had
3 staff pick up medicine for them; is that right?

4 FORMER STAFFER 1: Yeah. They had asked me to --
5 he was in Charleston. He did ask me to pick up
6 some kind of nasal spray. No, it was some kind of
7 -- some kind of -- something for him, and I picked
8 it up for him. He also -- I think he asked Tara
9 one time to get him some medicine when we was on
10 the road. And then -- I know the chief of staff
11 talked to him about that. Like, "You can't do
12 that." But I think -- I don't think I ever
13 stopped. The point is that he did ask us to do
14 things like that, to go get -- for example, he'd
15 be staying at a hotel and say, "I need you to pick
16 me up" -- "can you bring me a Zero Bar on the way
17 in?" "Can you bring me bananas?" or whatever.
18 And that was very common. When he'd come into
19 D.C., they'd have the interns get all his food and
20 stuff ready for him.

21 MR. QUINN: You mentioned Tara. Is that
22 what you said?

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1 FORMER STAFFER 1: Tara Reeves. She's a
2 caseworker in the Martinsburg office. She may not
3 remember, but I do recall him asking her. We had
4 to stop at a Dollar Store and get him medicine. I
5 think she paid for it.

6 MR. QUINN: Is that Reid, R-E-I-D?

7 FORMER STAFFER 1: Reeves, R-E-E-V-E-S.

8 MR. QUINN: R-E-E-V-E-S. Okay.

9 You'd also flagged for us some instances
10 of official staff conducting campaign or political
11 work. And I think specifically you mentioned
12 official staff working on a fundraising event for
13 a pro-life organization.

14 Can you tell me about that.

15 FORMER STAFFER 1: Yes. The -- when you asked me
16 about personal and campaign use on our time,
17 usually if -- I mean, if you're doing something
18 with the campaign, you work around your schedule.
19 You'll do in the evenings, or you'll work later
20 that evening and get him lunch or something like
21 that, which is common among Hill staff. He asked
22 us to put together -- the ProLife, I think,

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1 Alliance was giving out primary checks, I think.
2 Some kind of checks for members. He asked myself;
3 Lynn Hatcher, our old comms director; [Former Staffer 2], I
4 think she was involved; and maybe -- maybe a
5 couple others. But I -- so in the evenings -- it
6 was in the evening in terms of where this was
7 taking place. But we had organized the whole
8 thing. And by -- and he wanted -- yeah. We had
9 organized the check giveaway basically from the
10 organization. The organization didn't ask us to
11 do that. They -- Alex wanted to be the one to
12 give the checks out to all the members.

13 So we had to put together an e-mail for
14 them to send out. We had to -- that evening,
15 which we did on our free time. No, that's -- he
16 asked us to help. Now, the interns -- we asked
17 them to come over, if they wanted to do it. But
18 -- so we had to do it once. He was not happy with
19 the event and made us do it twice. So we had to
20 go and organize another one -- another check
21 giveaway. But Lynn, myself, and, I think, [Former Staffer 2]
22 all worked on getting that put together in the --

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1 it happened in the evening, but we had to do it
2 during work hours, invite people, and put time and
3 effort to get the other members to come.

4 MR. QUINN: Okay. And so the event was in
5 the evening, but some of those --

6 FORMER STAFFER 1: Yes.

7 MR. QUINN: -- some of that work occurred
8 during working hours.

9 FORMER STAFFER 1: Yeah. I think maybe put the
10 e-mail -- because he was -- I think he went back
11 and forth with the language, the way he wanted it
12 in the e-mail, things like that.

13 MR. QUINN: Is -- Harold, can we pull up
14 Tab 5, and you can mark that as Exhibit D.

15 AV TECHNICIAN: Sure. Stand by.

16 (Whereupon, Exhibit D was marked for
17 identification.)

18 MR. QUINN: And, Former Staffer 1, do you have control
19 of this?

20 FORMER STAFFER 1: No. Yes.

21 MR. QUINN: Okay. So this is an e-mail
22 from August 13th, 2020. It's from you to various

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1 staff, including [Former Staffer 3], [Current Staffer 1], Lynn
2 Hatcher, Rainer Kissel, and [Current Staffer 2].

3 Can you take a second to look at this and
4 just tell me what's going on in this e-mail.

5 FORMER STAFFER 1: I'll start from the top and
6 work my way down with the comments, okay?

7 So the Friday 14th event, that is the one
8 I think he asked me to have [Former Staffer 2] come down
9 because she's a scheduler. I think he said he
10 wanted her to learn the district, but he also had
11 [Rep. Mooney's younger daughter] with him, I think. And he wanted her to be
12 there in case -- maybe for [Rep. Mooney's younger daughter]. Rainer drove
13 the kids, the family down to The Greenbrier, and I
14 think he dropped them off. And he's riding back
15 -- he rode back with [Former Staffer 3]. That was for one of
16 the events he spoke at at The Greenbrier, which
17 all I -- I think I was there. Not 100 -- oh, this
18 is "meet the VP." I'm confused on which event it
19 was. So --

20 MR. QUINN: And actually -- can I actually
21 direct you to Tuesday. And there's a couple of
22 different systems discussed here, but essentially

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1 it looks like they're either phone banking or some
2 sort of campaign system fundraising or fund
3 banking system. This is --

4 FORMER STAFFER 1: Yeah.

5 MR. QUINN: Are these campaign -- is this
6 campaign work and events --

7 FORMER STAFFER 1: All of this --

8 MR. QUINN: -- dated on Tuesday?

9 FORMER STAFFER 1: Yeah. So yes and no. This
10 was -- we were putting this together for us to
11 do -- this was -- if I'm -- just give me a minute
12 to get my thoughts together about --

13 MR. QUINN: Sure.

14 FORMER STAFFER 1: -- I'm trying to remember.
15 So, yeah, this was -- the President was coming to
16 town, I think, or the Vice President, for this.
17 [Former Staffer 3] was coming down on her campaign -- she was
18 doing the campaign stuff at that time. So I think
19 she was bringing supplies down, and Lynn was going
20 to ride down with her. So all of this was them --
21 and this was all volunteer for them to do things
22 on the side. So I don't -- I think Alex wanted

1 people to come help, but I think he had -- he left
2 it up to "if you wanted to volunteer or not." I
3 don't think this was made for them to do.

4 MR. QUINN: Was this happening during
5 official work hours?

6 FORMER STAFFER 1: Bank hours was in the
7 evenings, the phone bankings. And even the -- now
8 I do remember that the Miners for Trump he did
9 during the day.

10 MR. QUINN: Okay. But I see a -- sorry.
11 I see at least you're sending this e-mail
12 organizing this, and the e-mail is sent at 1:55
13 p.m. So at the very least, you're doing work
14 organizing for the campaign during an official
15 work period, right?

16 FORMER STAFFER 1: Yeah. And -- yes. It was
17 during that time. The -- now to say on the -- I
18 mean, there's things I've done for the campaign
19 voluntarily during work hours, but I would adjust
20 work hours accordingly. So I couldn't tell you if
21 I worked later that evening or not. It's too far
22 -- I mean, it's too far back. I think the -- the

1 phone banking, all that stuff, was done -- was in
2 the evening, as you can see "planned this evening
3 in Kanawha County."

4 So we -- and then all the -- all the
5 campaign stuff was mostly, I think, in the evening
6 during this time. But I don't remember what
7 official stuff we were doing during the day during
8 this time. If Lynn was coming down, she'd
9 probably done district -- probably done interviews
10 with -- meetings with reports and things during
11 the day and volunteered to do this side. So of
12 all this, I would -- do you get what I'm saying?
13 All of this was, more than likely, volunteer
14 stuff, and this --

15 MR. QUINN: Okay.

16 FORMER STAFFER 1: -- was after hours, except for
17 Wednesday. That was during the day. If I
18 remember correctly, the Congressman met with maybe
19 the governor that morning. I think we actually
20 met with the governor on Wednesday morning. And
21 Dr. Burkes, I think, was coming in due to
22 coronavirus, if this was the same time, because I

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1 think it was the same day. When he left the
2 governor's mansion, we were there with him for
3 that, that morning. He went to that himself. We
4 did not go on Wednesday.

5 MR. QUINN: Okay. So he attended the
6 event, but he wasn't staffed by --

7 FORMER STAFFER 1: [Current Staffer 1] was --

8 MR. QUINN: -- official staffers?

9 FORMER STAFFER 1: [Current Staffer 1] was with him. [Current
10 Staffer 1]. But I don't remember if [Current Staffer 1] was -- I
11 think he was part-time, and I think he'd done that
12 voluntarily.

13 MR. QUINN: Okay.

14 FORMER STAFFER 1: Or maybe about school ending
15 -- he didn't go to school that day and done that.
16 So I don't think he was made to do that. He'd
17 probably done that willingly.

18 MR. QUINN: Okay.

19 FORMER STAFFER 1: To go back up to the -- I
20 wanted to point out the Friday. I think that's
21 when he asked [Former Staffer 2] to go down on the 14th. He
22 wanted her to be there for [Rep. Mooney's younger daughter]. Rainer, on

1 Saturday, drove -- yeah. He drove the family
2 down. So I don't know if he was with the campaign
3 during this time or not.

4 MR. QUINN: Let me just ask you a couple
5 general questions --

6 FORMER STAFFER 1: Okay.

7 MR. QUINN: -- about these sort of
8 personal tasks. Do you remember anybody ever
9 refusing to do these sorts of tasks or pushing
10 back?

11 FORMER STAFFER 1: Pushing back? Yes. One in
12 particular was Curt "Lit-a-plis" (phonetic),
13 whatever his name is. He's an LA in the office.
14 Alex wanted us to -- he would do fund- -- he would
15 do check-ins. They're not all fundraisers with
16 association lobbyists. And if a financial service
17 is -- he wanted Curt to sit in on those calls. He
18 was a financial services LA. Now, a lot of time
19 they were done at lunch. And Curt probably done
20 it on his own free will. I wasn't always involved
21 in that. But he did tell me to have Curt sit in
22 on those calls. So the process was Kate -- Katie

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1 Cannon would send the information to the scheduler
2 to put on the -- to put on the calendar. And then
3 if there was a financial service thing, she would
4 send it to Curt. I think Curt would always just
5 do it. I don't think he had issues with it
6 because I think it was much more -- well, they
7 counted it as his lunch or whatever. But there
8 was an e-mail that he -- that he sent to [Former Staffer 2].
9 "I think this is fundraising, and I guess I
10 shouldn't be a part of this." And that was during
11 the first -- with ethics that -- I think that's
12 when it started getting heated. And she asked me,
13 and I was like, "Well, don't do it. If he doesn't
14 want to do it, don't." And I think I told Alex
15 like Curt -- I think I showed him the e-mail that
16 [Former Staffer 2] sent me. I'm not 100 percent sure. I
17 may have just -- yeah. I don't -- I think I may
18 have showed him or showed the chief, like, "He
19 doesn't want part of this." And they never said
20 to do it. I just told [Former Staffer 2], "If he doesn't want
21 to do it, he's not doing it."
22 MR. QUINN: Okay.

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1 FORMER STAFFER 1: I'm trying to think "push
2 back." And nothing really stands out. I think
3 everyone was under the impression if he tells us
4 to do it, we should just do it or whatever.

5 MR. QUINN: Okay. Let's move on -- let's
6 talk quickly about some --

7 FORMER STAFFER 1: Let me go back.

8 MR. QUINN: Sure.

9 FORMER STAFFER 1: Let's go back. So I think he
10 had [Current Staffer 2] purchase something like -- I think, like,
11 some pies or something at a local market. And he
12 told [Current Staffer 2] to put it on his expense report. And
13 [Current Staffer 2] like, "No. I" -- [Current Staffer 2] didn't tell him that.
14 He told me, like, "I can't -- I'm not putting that
15 on there." And I said, "Well, you need to tell
16 Mike or tell -- he needs to pay you personally for
17 that." And so I guess he told him to put it on
18 his expenses. He didn't do it.

19 Again, I think there was a couple
20 instances where he drove him to -- which I think
21 has happened a few times, that the kid would have
22 ball practice or some kind of thing. And he would

1 go down -- he would do a district trip and then
2 have staff drop him off there. And sometimes
3 they'll -- it just so happens sometimes they would
4 do -- it'd be a -- it'd be very close or whatever.
5 But still not the point that they would not --
6 they wouldn't be able to put that on their
7 expense. You could eat it or -- because I don't
8 think he -- I think one time he paid [Current Staffer 2]
9 personally. There's been a couple times, like,
10 "You need to tell him to pay you personally for
11 that." And he wouldn't. And I think the Chief
12 told the Congressman that he needed to be paid
13 personally, but I don't think he would do it.
14 It's an odd conversation to tell the boss, "You
15 owe me money." Right?

16 MR. QUINN: Right.

17 FORMER STAFFER 1: That "I can't put this on the
18 expense report. So"

19 MR. QUINN: Right. Okay.

20 Let's talk quickly about some -- a couple
21 different trips. The first one I want to talk
22 about is a trip to Aruba from March of 2021.

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1 Do you know much about that trip? Are you
2 familiar with planning that trip?

3 FORMER STAFFER 1: To answer your first question,
4 "much," no.

5 MR. QUINN: Okay.

6 FORMER STAFFER 1: But do I do -- I'm familiar
7 with the -- some of the -- I was in the room a few
8 times and they were talking about logistics.

9 MR. QUINN: Okay. Was this a personal
10 trip, like a vacation?

11 FORMER STAFFER 1: I would say "Yes" because I
12 think HSP Direct was taking their -- like they're
13 taking people there or having a hosting for their,
14 I guess, clients. And so I guess you'd call it a
15 campaign meeting. I don't know what you call, to
16 be honest. But I do recall -- well, if you have
17 any more questions, I can answer them then or I
18 can just tell you what I kind of know.

19 MR. QUINN: Yeah. Why don't you just tell
20 me what you know.

21 FORMER STAFFER 1: Okay. So I remember that
22 [Former Staffer 2] was going back and forth -- [Former Staffer 2] the

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1 scheduler -- many, many times with details trying
2 to get the COVID test and stuff for Grace. She
3 had to work those type of details. Alex had her
4 do that by getting -- calling places, getting the
5 information from HSP. She was the middle person
6 for that.

7 Now, there were some things that I think
8 -- I do recall, like, you -- she would ask Alex,
9 "Do you want me to do this?" And, "No. Grace is
10 doing this." But there are -- I think COVID tests
11 particularly that she would handle.

12 I also remember that they paid for
13 everything, and he had to pay them. And how he
14 determined how much he paid, I think he just put a
15 number out and said, "These are flights," or
16 whatever, and "We'll pay that." He looked online
17 or something. But I don't think they gave him
18 like a detailed receipt. I could be wrong about
19 that. That's just a conversation I remember them
20 having. But I was not part of the process of
21 planning. I don't know that I ever had any part
22 of that that I recall. [Former Staffer 2] was in the weeds in

1 terms of COVID testing, trying to -- going back
2 and forth about stuff that he wanted
3 (indiscernible) HSP.

4 MR. QUINN: Do you know -- do you know of
5 a house on Capitol Hill that HSP owns --

6 FORMER STAFFER 1: Yes.

7 MR. QUINN: -- that Representative Mooney
8 uses?

9 FORMER STAFFER 1: Uh-huh.

10 MR. QUINN: How does -- what does he use
11 that house for?

12 FORMER STAFFER 1: I think he makes calls. I
13 think he takes naps. I think that maybe his son
14 has stayed in that house when he came to town.
15 I've been in the house. He -- when we were
16 putting stuff together for your review, we went
17 over there, I think, twice, frankly, because we
18 wanted peace and quiet, and we just didn't want
19 people to see what we were doing. And it kind of
20 -- it gave us -- but it had cameras in there. So
21 we didn't really feel too comfortable. So we
22 decided not to go back there.

1 MR. QUINN: Okay. What is the -- so HSP
2 provides direct mail and some fundraising services
3 for the campaign; is that correct?

4 FORMER STAFFER 1: I can't tell you exactly what
5 they do for the campaign.

6 MR. QUINN: Okay. What do they -- do they
7 do anything for the official office?

8 FORMER STAFFER 1: I don't know.

9 MR. QUINN: Okay.

10 FORMER STAFFER 1: I know that we get -- I don't
11 know if they do particularly, but I don't really
12 know, to be honest.

13 MR. QUINN: Okay. And then do you know
14 the relationship between Representative Mooney and
15 HSP? Is he friendly with somebody that works
16 there, or is it just a transactional business?

17 FORMER STAFFER 1: Can you give me a name?

18 MR. QUINN: A couple names. You can tell
19 me if they ring a bell. Jamie --

20 FORMER STAFFER 1: Hogan?

21 MR. QUINN: What's that?

22 FORMER STAFFER 1: Jamie Hogan?

1 MR. QUINN: Yes, Jamie Hogan. Do you know
2 the Congressman's relationship with him?

3 FORMER STAFFER 1: I think they're friends.

4 MR. QUINN: Friends. Outside of -- like
5 preexisting the work relationship with --

6 FORMER STAFFER 1: I don't know --

7 MR. QUINN: -- HSP?

8 FORMER STAFFER 1: -- preexisting. I have no
9 idea. I don't know that far back. I know that he
10 goes to their house. I think that he may -- that
11 they have made -- they -- when the President, I
12 think, spoke, or Vice President spoke at The
13 Greenbrier -- the President, I think, maybe -- I
14 think they were there. I remember him telling me
15 that. I think they made donations to the Trump
16 Campaign, and he had gotten credit for it because
17 of the donation. But, yeah, they're personal -- I
18 think they're personal friends. I think they go
19 to their house a lot.

20 MR. QUINN: And Nicole Hall, does that
21 ring a bell?

22 FORMER STAFFER 1: Not -- no. Hall or Nicole --

1 I don't think so.

2 MR. QUINN: Okay. Let's talk about --
3 there's an August 2017 trip to Charleston that you
4 provided some agendas for, to us.

5 And let's pull up, Harold, Tab 6, and we
6 can mark that as Exhibit E.

7 AV TECHNICIAN: Stand by.

8 (Whereupon, Exhibit E was marked for
9 identification.)

10 MR. QUINN: I'm going to try to move
11 through these next few pretty quickly since we've
12 just got 20 minutes left, but --

13 FORMER STAFFER 1: If something happens that we
14 have to --

15 MR. QUINN: -- I just want to --

16 FORMER STAFFER 1: If we have to go over -- I
17 mean, if at all, I can get back on after if you
18 need me to or a different time.

19 MR. QUINN: I think we can finish it up in
20 20 minutes.

21 FORMER STAFFER 1: Okay.

22 MR. QUINN: If I interrupt you, I'm not

1 trying to be rude. I'm just going to focus you on
2 making sure I understand these documents --

3 FORMER STAFFER 1: That's fine.

4 MR. QUINN: -- and we can move on quickly.

5 So Tab 6 or Exhibit E, this is an agenda
6 that you produced to us for a trip to Charleston
7 in August. And all I want you to do quickly on
8 this one -- for that first weekend, they arrive on
9 a Saturday. Can you identify what of the items on
10 that Saturday and Sunday are personal and which
11 are official.

12 FORMER STAFFER 1: Well, I guess -- let me say
13 this: He considered this type of stuff going to
14 his district. So I think you're aware of that.
15 So my perception of official and unofficial are
16 different, right? So what do you want me to --
17 which answer are you looking for?

18 MR. QUINN: Let's go with what your
19 perception of what -- what, in your understanding
20 of the events, was primarily personal of
21 entertainment and family-oriented in nature, and
22 what is related to his Representational duties?

1 FORMER STAFFER 1: Okay. So I think this would
2 be personal.

3 MR. QUINN: That's the Clay Center's
4 performance of Little Mermaid?

5 FORMER STAFFER 1: Yes. Did I go down too many
6 -- yeah. The Clay Center, Little Mermaid. And I
7 don't know if I -- I think I may have called about
8 the tickets purchased or maybe I had had someone
9 do it or the scheduler. I don't know -- too far.

10 The church -- he was introduced at the
11 church, and those are -- yeah. So he met with a
12 lot of church people there. So I would say that
13 could be either. But I think he considered it
14 official. He was introduced to the crowd and
15 stuff. That -- noon, Valley Park -- that, of
16 course, family-oriented.

17 MR. QUINN: And then that's actually -- I
18 just wanted to look at that weekend. It looks
19 like the remainder of the week, at least for the
20 most part, there was some mix of personal and
21 official activities.

22 And then if you scroll down to page 8 --

1 or, actually, not -- sorry -- not 8. Page 9, it
2 looks like an e-mail from Kate Morgan to you. And
3 she says, "I got the tickets with the campaign
4 card and added things to the calendar about them."

5 FORMER STAFFER 1: There you go.

6 MR. QUINN: And below that is highlighting
7 the Clay Center performance of The Little Mermaid.
8 So does that refresh your recollection? Do you
9 think Kate Morgan purchased tickets for the family
10 to see The Little Mermaid with the campaign card;
11 is that correct?

12 FORMER STAFFER 1: In my memory, I don't remember
13 still, but it seems that way. I feel like I said
14 she needs to buy the tickets, talking about Grace.
15 And she probably told Alex that, and he said, "Do
16 that." That's probably exactly what happened.

17 MR. QUINN: Okay. Then we can move to Tab
18 7.

19 FORMER STAFFER 1: Tab -- so go up to 7, or are
20 you talking --

21 MR. QUINN: Oh, no. Sorry.

22 Harold, you can pull up Tab 7 and mark

1 that as Exhibit F.

2 AV TECHNICIAN: Stand by.

3 (Whereupon, Exhibit F was marked for
4 identification.)

5 MR. QUINN: And this Tab 7 is related to
6 the 2018 trip around 4th of July. And this cover
7 e-mail is just transmitting what you described as
8 an LBL, that means "line by line." Is that the
9 line-by-line agenda for the event or actually for
10 the weekend?

11 FORMER STAFFER 1: Uh-huh.

12 MR. QUINN: And then if we look at -- if
13 you keep scrolling and we look at the agenda.

14 FORMER STAFFER 1: Okay. What do you want me to
15 go to?

16 MR. QUINN: I just wanted to know -- so
17 it's a trip from July 2nd to July 5th. And if we
18 could do the same thing here. Quickly just
19 identify for me what was official or appeared to
20 you to be an official-related trip and what
21 appeared to be a family-related --

22 FORMER STAFFER 1: Okay. I got you.

1 MR. QUINN: -- entertainment.

2 FORMER STAFFER 1: Tour of HealthSmart is
3 official. Heritage Farm, that is a big economic
4 driver of that area. You could consider, but I
5 don't -- I don't know if they even went to that,
6 to be honest with you. Something tells me that
7 was canceled, but it may not have been.

8 MR. QUINN: We're going to look at an
9 e-mail in a second, or actually we don't need to
10 look at it. But there's an e-mail shortly after
11 where Representative Mooney e-mails you and says
12 that Grace doesn't want to go to the Heritage
13 Farm --

14 FORMER STAFFER 1: Okay.

15 MR. QUINN: -- and, instead, she wants to
16 go to the Clay Center. And the Clay Center is
17 where The Little Mermaid performed; is that
18 correct?

19 FORMER STAFFER 1: They have a performing arts.
20 They also have a museum.

21 MR. QUINN: And so that would probably
22 have been family-related --

1 FORMER STAFFER 1: Yes.

2 MR. QUINN: -- not official. Yeah. So --

3 FORMER STAFFER 1: So --

4 MR. QUINN: Okay. So Heritage -- my
5 memory is better than I thought. Okay.

6 Greenbrier Airport, is this when the Vice -- I
7 think this is -- maybe the President was coming.
8 Okay. Yes. "Meet the President." "Fireworks at
9 Haddad River Park." I don't think he went to
10 that. "Family Day."

11 MR. QUINN: That would be -- the fireworks
12 would be like a family event. Do you think Grace
13 and the children went to that or --

14 FORMER STAFFER 1: Well, that was outside --

15 MR. QUINN: -- you don't know if they went
16 to that?

17 FORMER STAFFER 1: I think it was outside their
18 hotel, but I don't know if anybody went to that.
19 I don't think they did.

20 MR. QUINN: Okay.

21 FORMER STAFFER 1: Wednesday, July 4th, Family
22 Day -- I don't remember. More than likely,

1 they've also done the parade. Usually we do a --
2 there's an official event before, that he goes to.
3 Before the parade, there's a -- they do a big 4th
4 of July thing. But it says, "Family Day." So I
5 don't remember. And then they leave on the 5th.

6 MR. QUINN: So then just in sum, at least
7 for this trip from July 2nd to July 5th in which
8 the whole Mooney family flies to Charleston, it
9 looks like the only official events are a
10 30-minute meeting on Tuesday, the 3rd, at
11 HealthSmart Benefit Solutions, and then on the
12 afternoon -- in the afternoon of that day, they go
13 to the Greenbrier Airport and see the President
14 arrive at the airport?

15 FORMER STAFFER 1: Yes. And I think that was
16 before the -- I don't know whether the President
17 was in town. I think this was maybe -- it's a
18 tax -- is it 2018?

19 MR. QUINN: 2018, yep.

20 FORMER STAFFER 1: I think this was during --
21 they did a Tax Roundtable.

22 MR. QUINN: Okay. And did he attend that?

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1 FORMER STAFFER 1: Yes.

2 MR. QUINN: Okay. Okay.

3 And then we can take Tab 7 down and go to
4 Tab 9 and mark that as Exhibit G.

5 AV TECHNICIAN: Stand by.

6 (Whereupon, Exhibit G was marked for
7 identification.)

8 FORMER STAFFER 1: He attended the Tax
9 Roundtable, but he was not one of the speakers, if
10 I remember.

11 MR. QUINN: Okay. So as Harold's pulling
12 that up, this Exhibit G is an e-mail from --
13 there's a few people involved on the e-mail. It's
14 August 24th, 2019. And I want you to look at the
15 bottom one from Alex Mooney to [Former Staffer 2] and
16 Mike Hough, and then later you're CC'd on this,
17 Former Staffer 1. I'm just a little confused by what he says
18 here. If you could read it and tell me what's
19 going on.

20 FORMER STAFFER 1: Okay. Give me a second. Am I
21 supposed to -- oh, this is only one. Oh, "On
22 Thursday, August 29th," (in sotto voce)

1 MR. QUINN: So my question here is: He
2 says that he's arriving for a fundraiser and
3 describes that as an official event.

4 FORMER STAFFER 1: No. This, I could see why you
5 think that. The -- he had a fundraiser -- this
6 was -- I think he spoke with an association. He
7 was speaking there. It could be the Contractors
8 Association, possibly. And he had a fundraiser --
9 no. It was during the -- I think during the
10 Chamber event. Well, it doesn't matter. It was
11 some kind of official -- that was official. But
12 he had a fundraiser the evening before.

13 MR. QUINN: Okay. Understood.

14 FORMER STAFFER 1: There was a lot of -- there's
15 a lot of things happening that week at that whole
16 association event. And -- but he only arrived for
17 that one event the next morning, I think. I think
18 it was a Chamber.

19 MR. QUINN: Okay. Then let's talk
20 about -- let's talk about the gift cards, which
21 kind of came up in the first review, and I know
22 we've talked a little bit about that. There was

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1 an e-mail that you produced to us.

2 Harold, it's Tab 10. We can mark that as
3 Exhibit H.

4 AV TECHNICIAN: Stand by.

5 (Whereupon, Exhibit H was marked for
6 identification.)

7 MR. QUINN: And it's from you, Former Staffer 1, to
8 [Former Staffer 3] and [Former Staffer 2], I believe. And if you look
9 below the e-mail from [Former Staffer 3], it's the e-mail from
10 you on July 13th, 2020, and you're apparently --
11 [Current Staffer 2] did some -- [Current Staffer 2], I take it, did some
12 traveling and you want to reimburse him or pay him
13 with a gift card.

14 FORMER STAFFER 1: Yes. So [Current Staffer 2] told me he -- [Current Staffer 2]
15 picked him up, and then -- so we were concerned as
16 to what that -- how does he get paid for that? I
17 don't remember what the event was, to be honest.
18 I think he's been there a bunch of times. Some --
19 I think it might be prayer break -- prayer groups
20 or Catholic groups. I think -- I think the
21 Congressional Republicans were there, too. So I
22 don't even remember which one it was. My concern

1 -- my talk to [Current Staffer 2] was that "You need to be
2 reimbursed." At this time, they were giving gift
3 cards out to cover expenses for official staff.
4 They do something like that. So that was my
5 question, "Can you get him a gift card so he can
6 get reimbursed."

7 MR. QUINN: And do you know why that was?
8 Why they were using gift cards instead of paying
9 from the campaign?

10 FORMER STAFFER 1: I think this is -- what year
11 is it? Is this 2020? So I think Mike was trying
12 to get the campaign book scheduled out, and they
13 were told that you cannot reimburse your official
14 staff for things that you do. You have to -- and
15 then you also can't -- so I think that's where
16 they just said, "We'll give you a gift card to do
17 stuff. If you need to buy stuff for the campaign,
18 we'll do it that way."

19 And then I think that's when they -- I'm
20 not sure they hired the compliance person then
21 because -- this is all secondhand knowledge to me.
22 So I think that was my intent was, like, "Can you

1 pay them for what he's done?"

2 MR. QUINN: Okay. So at some --

3 FORMER STAFFER 1: Does that make sense?

4 MR. QUINN: Yeah. At some point, the gift
5 cards just started being used as a form of --

6 FORMER STAFFER 1: Oh, that was --

7 MR. QUINN: -- payment?

8 FORMER STAFFER 1: Yeah. So even when I started
9 gift cards, they had gift cards. They were
10 sending those out to like -- for example, if we
11 would do a parade, they would send me a gift card
12 to pay for that, to put -- to use. And I would --
13 they would not keep receipts. Because I was,
14 like, "Do you need the receipts back?" They're,
15 like, "No." "Okay." I actually think I
16 questioned Ted about that. I'm like -- he's,
17 like, "No. We don't keep them." I was, like,
18 "Okay."

19 MR. QUINN: And that would be giving you a
20 gift card so you could use it for spending on
21 behalf of the campaign?

22 FORMER STAFFER 1: Yes.

1 MR. QUINN: Okay. Got it.

2 FORMER STAFFER 1: I think my intent in this
3 e-mail is "This guy needs paid. He needs to be
4 reimbursed." So I don't really -- it's too far
5 back. I don't know why he was at Nemocolin.

6 MR. QUINN: And then, Harold, let's pull
7 up Tab 11 and mark that as Exhibit I.

8 AV TECHNICIAN: Stand by, please.

9 (Whereupon, Exhibit I was marked for
10 identification.)

11 MR. QUINN: And these are -- it's, I
12 believe, one or two receipts from Martin's Grocery
13 Store for some items purchased, it looks like, on
14 a gift card. We'll look at that when it comes up.
15 And then for this document, I just wanted to give
16 you an opportunity to tell me why you produced
17 this to us or why it was of interest.

18 FORMER STAFFER 1: If I remember correctly, this
19 is one that they were -- that -- I don't know if
20 they was ever submitted or why it was in the --
21 what's the year? '20. This one, in particular,
22 was flagged, I think, by the Congressman or by

1 Derek or someone. When you asked me, "Was
2 anything ever withheld?" I think this may have
3 been. I don't know if it's part of the filing --
4 it was a gift card. So probably not as a
5 reimbursement. I really don't know why this
6 was -- this was kind of flagged. So I don't know
7 if this is something they wanted to withhold, but
8 I have -- I know this was in question by -- I
9 think by Alex and them.

10 MR. QUINN: So this is a -- these are
11 purchases at Martin's Grocery Store that were made
12 with one of the gift cards that was at issue in
13 the first review. And you know that they were
14 aware of this receipt, looked at it, considered
15 it, but you're not sure whether or not it was
16 produced to us?

17 FORMER STAFFER 1: I really have no idea, yeah.
18 I just remember it was in my stuff, and it was
19 flagged.

20 MR. QUINN: Okay.

21 FORMER STAFFER 1: And so I don't -- I really
22 don't know why I gave it, but it's there.

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1 MR. QUINN: I'll just -- maybe this will
2 remind you of some of the conversations. I'll
3 point out a couple things on page 1 that we're
4 looking at of the receipt. I was just looking
5 through the items on here. There's like 18 --
6 18-pack of eggs. On page 2, there's Goya coconut
7 milk and chicken broth. On page 3, there's yellow
8 potatoes purchased. And so they look like
9 personal groceries.

10 Do you remember any conversations around
11 whether or not Representative Mooney was
12 purchasing his personal groceries with these
13 Martin's gift cards?

14 FORMER STAFFER 1: I mean, that -- no.

15 MR. QUINN: Okay.

16 FORMER STAFFER 1: I guess I could say this:
17 That I guarantee I probably pointed it out to
18 [Former Staffer 2] or someone or even Michael. This is not --
19 this is not -- this does not look good. But in
20 terms of me or Derek, I don't think I've ever had
21 that conversation. I just remember Derek saying
22 "I want to see gift cards." But I don't remember

1 -- the Martin's -- this Martin's gift card. But I
2 don't remember what the conversation I had --
3 happened before that. I don't remember. Now that
4 you say "the groceries," I probably -- that's
5 probably why I flagged it when I saw it.

6 MR. QUINN: Were there any other concerns,
7 or do you have any other recollection or
8 discussions about Representative Mooney -- or let
9 me put it this way: Do you think Representative
10 Mooney was purchasing personal groceries with the
11 Martin's gift cards?

12 FORMER STAFFER 1: My personal opinion. So you
13 think? Yes.

14 MR. QUINN: Okay. And why do you think
15 that?

16 FORMER STAFFER 1: Well, one, the receipt I had
17 seen that was like 700 bucks was, I think, the day
18 before Thanksgiving. What campaign -- I mean, if
19 you use common sense, what kind of campaign event
20 are you having the day before Thanksgiving or on
21 Thanksgiving with that many groceries? I mean, if
22 you look at the receipt here, why -- which

1 campaign volunteer is going to be drinking chicken
2 broth? So --

3 MR. QUINN: Right.

4 FORMER STAFFER 1: -- or making eggs. I guess, I
5 mean -- and I had a lot of concerns when I saw
6 these. I've never seen campaign -- and this is
7 very similar to a personal account, I would
8 imagine. I mean, it was -- my grocery bill would
9 -- probably would look like that.

10 MR. QUINN: Okay.

11 FORMER STAFFER 1: So that's why I was

12 MR. QUINN: Okay. Great. I just wanted
13 to ask you about that.

14 And then let's pull up Tab 12. Almost
15 done here. I got two more quick topics for you --

16 FORMER STAFFER 1: If you run over a couple
17 minutes -- so, yeah. Go ahead. We'll finish.

18 MR. QUINN: Okay. Tab 12 we'll mark as
19 Exhibit J.

20 AV TECHNICIAN: Stand by.

21 (Whereupon, Exhibit J was marked for
22 identification.)

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1 MR. QUINN: So this is a copy of some of
2 the bank records from the campaign account. And
3 if you scroll down to page 3 and look at the
4 transactions on January 23rd, the date of
5 withdrawal is 1/23. There's a charge for \$20 for
6 something called West Virginia Park. If you
7 scroll down again to page 4, on January 30th,
8 there's another \$20 charge for West Virginia Park.
9 And then on 1/31, there's a \$40 charge for
10 West Virginia Park. Are these the charges that
11 you had identified for me as potentially being
12 park admissions?

13 FORMER STAFFER 1: That -- when you ask about
14 concerns while I looked at the records and things,
15 those -- I'm -- [Former Staffer 2] and I and maybe [Former Staffer 3] -- I
16 know [Former Staffer 2] and I had a conversation -- I'm like,
17 "What is this?" She's like, "Oh, I think they
18 took [Rep. Mooney's younger daughter] to the park." I don't know which
19 West Virginia park charges admission. But it's --
20 yes. So I think it's a park near their house.

21 MR. QUINN: Okay. And you saw lots of
22 examples of these charges throughout the

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1 campaign --

2 FORMER STAFFER 1: Yes.

3 MR. QUINN: -- bank information? Okay.

4 And so you, at least as far as you know or

5 you think, that these are the charges for

6 admission to the park that they took [Rep. Mooney's younger daughter] to as a

7 personal trip to entertain [Rep. Mooney's younger daughter]?

8 FORMER STAFFER 1: I would assume.

9 MR. QUINN: Okay.

10 FORMER STAFFER 1: And that's what [Former Staffer 2] told me

11 she thinks. I think she said that's what they do

12 or she thinks. So she might not know for sure,

13 either.

14 MR. QUINN: Okay. And then last thing I

15 want to -- you can take that down, Harold.

16 Thanks.

17 Last thing I want to ask you about quickly

18 is: You mentioned once or twice a former staffer

19 named **Former Staffer 5**.

20 FORMER STAFFER 1: Uh-huh.

21 MR. QUINN: Do you know anything about a

22 financial concern of either her syphoning funds

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1 from the campaign and --

2 FORMER STAFFER 1: Like \$40,000?

3 MR. QUINN: Yeah. Can you tell me about
4 that?

5 FORMER STAFFER 1: I was told that over a few
6 years that she had taken or misused \$40,000, and
7 they identified that. So they had to amend a
8 bunch of reports, from my understanding. Mike
9 told me that she had taken money and that they're
10 no longer on good terms. And I asked -- I asked
11 the question about, "Are you going to prosecute?"
12 And they never did, and -- which I thought was
13 odd. But [Former Staffer 3] told me that she had to work --
14 help on those reports and that they had revised
15 reports, amended reports to -- she used a word
16 "cover it up" or "account for." But I don't know
17 that to be fact.

18 MR. QUINN: Okay. And do you know when
19 **Former Staffer 5** left?

20 FORMER STAFFER 1: It was not long after I
21 started. She -- yeah. So I think she was
22 part-time, but I don't know, to really be honest

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1 with you. She was one of those that was always
2 pulled around, too.

3 MR. QUINN: Okay. But you did overlap
4 with her. So

5 FORMER STAFFER 1: Okay.

6 MR. QUINN: Okay.

7 FORMER STAFFER 1: I guess I was her supervisor,
8 which I really never supervised her.

9 MR. QUINN: So of the folks that you know,
10 you think [Former Staffer 3] would be most knowledgeable --

11 FORMER STAFFER 1: On this?

12 MR. QUINN: -- on what happened? Yeah, on
13 the **Former Staffer 5** --

14 FORMER STAFFER 1: Yeah. And I think --

15 MR. QUINN: -- **Former Staffer 5** solution?

16 FORMER STAFFER 1: -- Hannah would know, too.

17 MR. QUINN: Okay. Okay. Great.

18 I think that's -- unless Annie has
19 anything for you, I think that's everything that I
20 have. Annie, any questions? No?

21 MS. CHO: No, I'm okay.

22 MR. QUINN: Okay. Then that's all we've

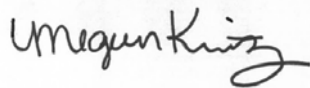
1 got for you. I think we are -- Megan, we can go
2 off the record, by the way.

3 (Off the record at 12:05 p.m.)
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1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

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

13 IN WITNESS WHEREOF, I have hereunto set my hand
14 and affixed my notarial seal this 24th day of
15 October, 2021.

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18 
19 _____

20 Megan Kurwit
21
22

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

ERRATA SHEET

Page	Line	Correction	Reason
12	21	Reeves should be Reid	Misspelling
13	4	Menzel should be Mansell	Misspelling
17	12	I should be he	Incorrect transcription
19	6	"phone" should be in front of bank	word left out
19	10	report should be reporters	Incorrect transcription
19	12	"Litaplis" should be Bliamptis	Incorrect transcription
19	14	"fund" should be fundraiser	Incorrect transcription
24	12	"scheduled" should be figured	Incorrect transcription
25	1	Derek should be Dirk	Misspelling
25	20	Derek should be Dirk	Misspelling

This errata sheet is submitted subject to 18 U.S.C. § 1001 (commonly known as the False Statements Act).

Witness Name: _____

Witness Signature: _____

Date: _____

EXHIBIT 2

Transcript of Interview of Former Staffer 2

Review No. 21-6998

October 12, 2021

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

Interview of FORMER STAFFER 2

Conducted Virtually

October 12, 2021

OCE Review Number 21-6998

9:00 a.m.

Job No.: 403722

Pages 1 - 127

Reported by: Jacalyn Mann

1 Interview of FORMER STAFFER 2, conducted
2 virtually.

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8 Pursuant to agreement, before Jacalyn Mann,
9 Notary Public in and for the State of Florida.

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A P P E A R A N C E S

ON BEHALF OF HOUSE OFFICE OF CONGRESSIONAL
ETHICS:

SEAN T. QUINN, ESQUIRE

HELEN EISNER, ESQUIRE

OFFICE OF CONGRESSIONAL ETHICS (OCE) of the
U.S. HOUSE OF REPRESENTATIVES

425 3rd Street, S.W.

Suite 1110

Washington, D.C. 20024

(202) 225-9739

ALSO PRESENT:

Matt Weedon - Planet Depos Technician

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C O N T E N T S

INTERVIEW OF FORMER STAFFER 2

Page

By Mr. Quinn 5

E X H I B I T S

(Attached to the transcript.)

DEPOSITION EXHIBIT	PAGE
Exhibit A E-mail	44
Exhibit B E-mail Chain	48
Exhibit C Receipt	107
Exhibit D E-mail	114

Transcript of Interview of Former Staffer 2
Conducted on October 12, 2021

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1 I N T E R V I E W

2 FORMER STAFFER 2,

3 BY MR. QUINN:

4 Q [Former Staffer 2], just quickly for the record,
5 I have a little bit of a read-on that I do. So today
6 is October 12th, 2021, and we are conducting an
7 interview of [Former Staffer 2] by Zoom. [Former Staffer 2]
8 is not represented today. Speaking is Sean Quinn,
9 Investigative Counsel at the Office of Congressional
10 Ethics, and I'm here with Helen Eisner, Deputy Chief
11 Counsel at the OCE. [Former Staffer 2] has been given
12 a copy of 18USC1001, and we've discussed the Act and
13 the acknowledgment form, and they'll be sending the
14 signed form to us when they gets access to a printer
15 later today.

16 So [Former Staffer 2], thanks very much for your
17 time this morning. We appreciate your cooperation very
18 much. I know certainly on a busy day when
19 everybody's back in session, I appreciate that.

20 And like I said earlier, I'm happy to
21 answer any questions you have or take any breaks
22 that you need throughout this interview. Feel free

1 to stop me whenever you want to, or if you need me
2 to reword a question or clarify anything for you,
3 just let me know.

4 A Thank you.

5 Q Also then -- also, like the court reporter
6 said, the main thing is that we try not to talk over
7 each other. So I'll try to finish my questions
8 clearly and then let you start your answer.

9 A Okay.

10 Q Does that sound good?

11 A Yes.

12 Q Okay, great. Then I'd like to start with
13 just a little bit of background. Could you tell me
14 how you came to work for Representative Mooney?

15 A Yes. So it was 2019, I think. I don't
16 even remember. Yeah. 2019. I was just looking for
17 jobs on The Hill. I never worked on The Hill. I'd
18 never been an intern. And then I found him on the
19 Heritage Foundation job bank, and it didn't even
20 have his name listed. And then I just applied, and
21 then Michael called me and the rest is history.

22 Q Okay. And that's Michael Hough?

1 A Yes, yes.

2 Q Okay. And what was your title when you
3 were working for Representative Mooney?

4 A It started out as scheduler, and then I
5 got it bumped to executive assistant, I think, in
6 November 2020.

7 Q Okay.

8 A Around then.

9 Q And then when did you stop working for
10 Representative Mooney?

11 A I think it was June 12th, because my
12 first day with my new job was June 14th. That
13 would make sense. I could be wrong. I just don't
14 exactly remember.

15 Q Okay. And that's June 12th, 2021?

16 A Yes.

17 Q Okay. And when you were with
18 Representative Mooney, we just talked about your
19 official employment. Did you ever work for the
20 campaign?

21 A No, I never door knocked or anything. No.
22 I mean, all I would do for campaign is, you know,

1 oh, there's a meeting to put on the calendar.

2 That's the extent of that.

3 Q Okay. And then where are you currently
4 working?

5 A I work for Representative Lee Zeldin.
6 He's in New York.

7 Q All right. So with that background
8 information, one of the first topics I want to talk
9 about is just the first review that the OCE did
10 that, I believe, you were involved in to some
11 extent. Can you just kind of generally -- we'll
12 start generally -- describe your involvement with
13 that review?

14 A Yeah. So basically, all it was, we were
15 just told to gather the receipts. I didn't know
16 where these receipts were saved. Probably the
17 campaign office, which is his basement in his house.
18 Probably just somewhere in that room, they had a
19 bunch of receipts, and then we were just told to
20 find -- because you all sent a list of things you
21 wanted to see, and that's -- that was our basis.
22 And that's when we were looking for all the receipts

1 and matching them to whatever you all had listed. I
2 don't even remember, but that was what we were
3 doing; just compliantly receipts, receipts,
4 receipts. And then it got to be, I think, we -- and
5 yeah.

6 We were putting our -- figuring out our
7 own system. Mainly, it was [Former Staffer 1]. He
8 is very smart. Matching the receipts, and then with
9 the date, and, you know, we wanted an explanation why.
10 Maybe you all wanted that. I don't know. We had a
11 little column in our Google Doc of why. And we were
12 just going through all these and matching them with
13 the calendar to see if they were all campaign-related
14 and that kind of thing. I'm pretty sure that's
15 basically all we were doing, is scanning the
16 receipts to you guys and putting them in Google Docs
17 and all that.

18 Q And when you say we, can you tell me who
19 the folks --

20 A Yeah.

21 Q -- you worked with on that project were?

22 A Yes. Sorry. I didn't realize you were --

1 [Former Staffer 1], [Former Staffer 3], and me,
2 [Former Staffer 2].

3 Q Okay.

4 A And Michael Hough may have helped a little
5 bit, but it would have been towards the end, so
6 closer to June. So we don't really count him in our
7 little group as helping, but, yeah.

8 Q And so you said that you would -- based on
9 the request that we made, you found receipts and
10 then were matching them up to particular dates or
11 purposes for those expenditures?

12 A Yes. So like, if they had probably
13 happened beforehand, and, you know, we would compile
14 the amounts, and hopefully, you know, reach that
15 amount you all were looking for. I think that's
16 what it was.

17 Q Okay. And you were referencing a schedule
18 or calendar -- am I right -- to match up those
19 receipts to certain events?

20 A Yes.

21 Q Okay. Can you describe just that
22 calendar, how it's used?

1 A Yes. It's just a Google Calendar. That's
2 what he likes because it's user-friendly. So we
3 would just look at the receipts first and compare
4 them to his calendar -- all his calendars -- just to
5 see where he was at the time. Like was he -- well,
6 I mean, obviously it would tell us if he was
7 traveling for a campaign event basically. Like, was
8 he in California raising money, and that's why there
9 was a California receipt. I don't know. That may
10 not have happened. But I'm just -- like as an
11 example. But that's just -- like, this was his
12 official calendar that I always used for scheduling
13 -- just everything on this Google Calendar.

14 Q Okay. And on that calendar it sounds like
15 there were campaign events, also official events.
16 And then did he also put personal appointments on
17 that calendar?

18 A Yes.

19 Q Okay. So I know at some point you let us
20 know in earlier conversations that you noticed that
21 edits were being made to this calendar at the same
22 time that you were matching up receipts to events

1 that were on the calendar; is that right?

2 A Yes. And that's when -- I was actually
3 thinking about this last night. I don't know
4 exactly the one edit that I kind of remember. It
5 was something involving Christmas, and then we
6 noticed the title changed. And I think it changed
7 to something like Christmas party with constituents,
8 or it may not have been that at all, because I can't
9 even remember which year it was. But that's what
10 prompted us -- and I forgot to tell you this earlier
11 -- but that's what prompted us to print out the
12 calendar from 2017 to, I guess, 2021, just so we
13 could make sure there were no other edits made.

14 And I don't even know if I can actually
15 give you firm, you know, evidence of that one edit.
16 But, you know, if we all -- if [Former Staffer 3]
17 and [Former Staffer 1] and I all believed that we
18 think we saw that, you know, maybe there's
19 something to that.

20 Q Okay. And when -- do you recall when you
21 saw that edit being made?

22 A It would have -- okay. This started in

1 May, right? So maybe it was May or April.

2 Q March was --

3 A Oh.

4 Q March was actually the beginning of the
5 first OCE review.

6 A It could have been March or April, because
7 it was, you know, one night we were compiling
8 everything and we saw this.

9 Q Okay. Maybe if -- go ahead. Sorry.

10 A No. Sorry. I just remember we were
11 comparing the calendar with the receipt, and that's
12 when we saw the one Christmas item. Like, okay,
13 when -- and we asked for a reason. What were you
14 doing here if it was a campaign -- if it was a
15 Christmas party for family. And that's what I think
16 was prompted to change the title. If that even
17 happened. You know, I don't have evidence. I don't
18 want to accuse him.

19 Q Maybe if you can't remember a specific
20 date, at least you can say it happened sometime
21 after you all received the request for OCE and you
22 began collecting receipts?

1 A Yes.

2 Q Okay. I think at one point you might have
3 spoken to us also about a basketball tournament that
4 happened in Virginia with his son? Was that another
5 calendar edit that you might have noticed?

6 A I don't know. I don't think anything was
7 touched on that. But again, I don't know. Unless,
8 the only thing he would have changed was how he
9 would have gotten there. But no, I don't think
10 anything was changed.

11 Q Okay. I think Helen has a question for
12 you.

13 BY MS. EISNER:

14 Q Yeah, sorry. Just a few questions about
15 that. Who had access to the calendar?

16 A Access, I think it was like the LD, John
17 Caddock, Coms Director, Lynn Hatcher, LA, Curt
18 Bliamplis (phonetic), but they didn't have editing
19 power. Just John and Lynn had editing power, and me
20 and Michael Hough. [Former Staffer 1] had editing power.
21 I think I gave [Former Staffer 3] editing power,
22 because one day I might have been traveling and I

1 needed her to do something. I don't remember. And
2 Grace Mooney had viewing power at least. Yeah, so
3 quite a few people.

4 Q And you had said earlier that we were
5 told, just talking about this project in general and
6 what you are working on. I know you talked about
7 who you were working on the project with related to
8 the review, but who were you told by to sort of go
9 about this project of gathering materials?

10 A It was secondhand via [Former Staffer 1], I
11 believe. So Michael Hough told [Former Staffer 1], and
12 [Former Staffer 1] told us, because [Former Staffer 1]
13 was working in the D.C. office at the time because
14 he was deputy chief, because Michael Hough was away
15 on session. Because he's a state senator in Maryland,
16 so when he's away, the deputy comes and watches over
17 the office. So I think it was [Former Staffer 1]
18 that came to us and said, we got to, you know --
19 we've got a situation. I don't think I spoke
20 directly to Michael.

21 MS. EISNER: Okay. Go ahead, Sean.

22 BY MR. QUINN:

1 Q I just wanted to go quickly back to the
2 one example of the Christmas edit that you did
3 remember just to make sure I have that clearly. Do
4 you remember what originally the calendar entry
5 said?

6 A It would have been something like
7 Christmas party, and then it might have said family.
8 I don't even know. And then -- I wish I had taken
9 better, you know, notes on these little things we
10 had more questions on. But no, maybe Christmas
11 family party or just Christmas party at my house,
12 because he would, you know, say that for parties.
13 Party at my house. So it could have just been that.
14 And then maybe it was changed to with constituents.
15 I don't know.

16 Q Okay. And then you mentioned that you had
17 printed out a paper copy of the calendar. Do you
18 remember ever comparing that paper copy to the
19 electronic calendar later?

20 A No, never did. It was just for
21 safekeeping until -- in case nothing happened with
22 OCE. I'm like, well, now we have it in case

1 anything changed later on. And it was also so I
2 could -- I wanted to look back at the mileage thing,
3 because I didn't want anything to get changed.

4 And then what was your original question?

5 Q Just did you ever compare that physical
6 printout of the calendar to the electronic calendar
7 later?

8 A No, but this was -- we wanted to print
9 that out as well just in case we did see another
10 edit and then we could go back.

11 Q And I know you also told us that at some
12 point you were getting notifications of edits to
13 your Gmail; is that correct?

14 A Yes.

15 Q And I know you went back and looked at or
16 tried to collect those notifications. Were you not
17 able to find that Christmas edit, or did you look
18 for that one specifically?

19 A No, I didn't find that one. Because I'm
20 pretty sure I had made that calendar adjustment
21 beforehand, because I know I sent you some from
22 November 2020. So it would have had to have

1 happened. So that makes me think, did it even
2 happen, or maybe I deleted it. And I don't know.
3 Does Gmail not save things in the trash, because
4 there are some things that I cannot find that I
5 think I even told you in the little notes I sent you
6 of, like, rooms I booked and I just can't find
7 anymore. So I don't know, Sean. So maybe it was
8 all in my head, but we could have sworn we saw that.

9 Q Understood. I think you listed everybody
10 that had editing access to the calendar. Did
11 Representative Mooney also have editing access to
12 the calendar himself?

13 A Yes.

14 Q Okay. And to the extent you formed any
15 opinion about who was doing the editing to the
16 calendar, did you have an indication of who that was
17 that might have edited that Christmas event?

18 A Oh, I only ever had one indication of who
19 it could be. It would have been Alex Mooney.

20 Q Okay.

21 A If he did it.

22 Q Okay. And why were you relatively sure it

1 would be him?

2 A Just because we were questioning so much,
3 the receipts. Like what was this for? Why did you
4 do this? In our little Google Docs where we were
5 keeping everything even, we had the column of what
6 was it for -- like, the receipt. What was that
7 charge for, and why did you do it? And I think
8 that's what was prompting him, because at one point,
9 [Former Staffer 1] told us that the Congressman was
10 reading through our Google Docs. Like, why are they
11 typing it like that? Why are they asking a question
12 like that? He could sense our tone. So, I mean, I
13 don't know, but I'm wondering if that's why.

14 And, you know, there was -- he would have
15 these long conversations with [Former Staffer 1] a
16 night while we were looking through the receipts,
17 and he would say, take that one out; take this one
18 out. Meaning, he didn't want it to be submitted to
19 OCE. He wanted it taken out. But he did pay for it.
20 He did reimburse it. He just wanted the receipt
21 taken out so it wouldn't be seen, what was
22 purchased.

1 But then, I do think at one point the
2 lawyers said to put it back in. Or maybe I just
3 heard secondhand that Dirk wanted all the receipts
4 put back in, because it would look worse, I think.

5 Q Okay. And who else did you have
6 conversations with about this issue of potential
7 changes being made to the calendar?

8 A Just [Former Staffer 1], [Former Staffer 3]
9 and myself.

10 BY MS. EISNER:

11 Q Can you give an example of -- in the
12 Google Doc -- a question -- you've raised it as a
13 question -- that you would have had that
14 Representative Mooney might have communicated to
15 [Former Staffer 1] that he wanted to take it out or
16 edited?

17 A It would have just been phrased as why did
18 -- like, what was this charge for? What was this
19 for? Or what were you doing? Where were you going?
20 Something like that.

21 Because there was one -- well, now I
22 remember. It was a movie ticket in Lynchburg,

1 Virginia. And it was just for one movie ticket, and
2 he used the campaign card, I assume. It must have
3 been, because we had the receipt for it. We had the
4 movie ticket actually, and I put in the column --
5 the what's this for column, like what was this for
6 -- like why did you use campaign funds for this.
7 That's not verbatim what I wrote, but it was along
8 the lines of, you know, why was this movie ticket
9 charged.

10 Q Okay. And then what would you have
11 changed that to in the column afterwards?

12 A I don't think -- I don't know if it was --
13 well, yeah, it must have been changed. It may have
14 just been changed to entertainment, or maybe it was
15 taken out completely. That may have been one of the
16 ones that -- I think we do have copies of the
17 scribbles that [Former Staffer 1] made to take out,
18 because he was on the phone with the Congressman.
19 So that could have been one of the ones, but I
20 don't remember if we changed that.

21 Q And the communication to you, was it
22 through [Former Staffer 1], or was it ever directly

1 with the Congressman?

2 A It was probably through [Former Staffer 1].
3 If the Congressman or Mike gave us direction, it
4 would have been over the phone, like, over speaker
5 to talk to us all, I think. But I think it was
6 mainly through [Former Staffer 1], because, you know,
7 he was the boss. He was overseeing the process at
8 the time. So it was just easier to give it to him,
9 passed down.

10 Q Okay.

11 BY MR. QUINN:

12 Q Other than the calendar itself, did you
13 have any other concerns as you were gathering
14 documents and responding to our requests of anything
15 being tampered with or deleted or altered?

16 A No, just the -- when the Congressman would
17 talk to [Former Staffer 1] when they were going
18 through the doc, he would just say, take this out;
19 take this out. Which I don't know if I actually heard
20 that, but because [Former Staffer 1] would go through
21 line by line and then he would tell us what happened.
22 Just like, yeah, he wanted all these receipts taken

1 out. And that's when I had to go rescan stuff to
2 remove the receipts, and then rescan to keep the
3 receipts he wanted to keep in. So that's also how
4 I found out.

5 But I think that was mainly it, just
6 seeing the receipts, that was, you know, the main
7 concern of seeing what was charged and corresponding
8 it with the calendar. I'm like, well, you were not
9 in Richmond, Virginia on a campaign trip. So, you
10 know.

11 Q Okay. Just on that point, that was just
12 -- was that an example, or are you now recalling a
13 calendar entry that said he was in Richmond,
14 Virginia when you know that he wasn't?

15 A It just would have been the basketball
16 thing. And I don't even know if he made any
17 charges. There may have been -- it may have been --
18 there may have been a Chipotle charge in Richmond,
19 and I don't know if it was the same time, but I kind
20 of remember it. Now I'm getting confused with
21 whether there was a Lynchburg trip, because there
22 were some food things charged in Lynchburg during

1 that, and that was for a basketball thing as well.

2 Q Okay. And let me just clarify and make
3 sure I understand that. So you do remember a
4 calendar entry related to a basketball tournament;
5 is that right?

6 A Yes.

7 Q Okay. And that was described as a
8 campaign event on the calendar, but you knew that it
9 was not? Am I understanding that correctly?

10 A No, it was not described as a campaign
11 event. It would have just been basketball game with
12 [Rep. Mooney's son], or [Rep. Mooney's son's]
13 basketball game if it -- it should have said it on there --

14 Q Okay.

15 A -- if it was a game with [Rep. Mooney's son],
16 but it never said campaign.

17 Q Okay. And so you remember on that
18 calendar entry that it was the basketball
19 tournament, but it was the receipts from around that
20 time were not described as related to the basketball
21 tournament, but instead described as related to a
22 campaign event; is that correct?

1 A Yes, because if they were charged with the
2 campaign card, you know, he would just -- maybe he
3 did make some calls. I don't know if that counts.
4 I don't know. I don't want to tell you something
5 that may not be true, because, you know, I can't
6 remember what was on for the Richmond trip for the
7 basketball, but it would have had to have said
8 something with [Rep. Mooney's son] and basketball.
9 BY MS. EISNER:

10 Q And to clarify, is that the Chipotle
11 charge that you're remembering? You mentioned
12 Chipotle a few moments ago.

13 A Right. It may have been, or I may have
14 been getting it confused with the Lynchburg trip
15 from, I think, 2019, because they went down there
16 for a basketball thing near Liberty University. And
17 I want to say I think that's when the movie ticket
18 came about, and there may have been a Chipotle
19 charge around then, unless I'm getting it confused,
20 which is highly possible. I'm sorry, you guys. But
21 I do want to say it had to do with Richmond. I
22 think there was a Chipotle and a Zoey's charge, but

1 again, I don't exactly remember.

2 BY MR. QUINN:

3 Q Okay. But just in general, there were two
4 basketball trips, one in Richmond, one in Lynchburg,
5 that were personal trips, and there were also
6 campaign charges associated with those trips --

7 A Yes.

8 Q -- that you collected receipts for?

9 A Yes.

10 Q Okay, great. The other thing I want to
11 talk about from the first review -- unless, Helen,
12 did you have anything -- questions about the
13 calendar before I move on?

14 MS. EISNER: No. Go ahead.

15 BY MR. QUINN:

16 Q Okay. The other thing I want to talk
17 about from the first review are incidents that you
18 learned of any staff members speaking to the press
19 about the review, or any of the documents
20 Representative Mooney received during the review.
21 Did you ever hear of that occurring?

22 A Yes, but it was not during. Wait. No.

1 you know, I don't exactly remember, but it may have
2 been during. It was with [Former Staffer 6]. He was
3 the legislative correspondent at the time.

4 This is also something I remembered last
5 night, Sean, that I wrote down that I want to tell
6 you. I think that was one of the reasons I had
7 given -- I don't think. I know it was one of the
8 reasons I told [Former Staffer 6] about the mileage
9 that we're probably going to get into, because it was
10 one night after the Congressman got back from an OCE.
11 It was on a Friday. An OCE discussion, I think, with
12 his lawyer and you all. And then I came back to the
13 office, and [Former Staffer 6] was still there, because
14 we all stayed, because the Congressman said he was
15 going to come back to the office to work. So that's
16 why [Former Staffer 6] was there.

17 So I get back to the office. The
18 Congressman didn't stay, and I was talking to [Former
19 Staffer 6], and I guess he was asking me about what
20 happened. And I think it got to be where he already
21 kind of knew, because we left all the documents on
22 this little cart in Michael Hough's office. So, I

1 mean, it wasn't -- we just left it in the office.
2 You know, we were working there. So I guess he had
3 seen some things, and, like, it was all over on our
4 desks in that office, just out keeping it safe --
5 keeping it organized, I mean. And so I think he had
6 seen some things, and he was like, [Former Staffer 2],
7 what's going on. And that's when I told him, like,
8 you know, there's not some good things happening, and
9 I think that's when he kind of got into it, like, I
10 already know the Congressman's not a good man.

11 I think he told me about an instance when
12 he was an intern, and he had to go to the
13 Congressman's birthday party on a Saturday. I think
14 it was a Saturday, because they did some tours for
15 the attendees.

16 And that's when we started going into
17 [Former Staffer 6] and him knowing a reporter. And
18 like it was our thinking that if it didn't go any
19 further with a OCE, like we wanted to find another
20 way to tell you, Sean. So it might have been to the
21 press. So we were literally -- like [Former Staffer 1]
22 and [Former Staffer 3] and I, like, were like, we got

1 to tell Sean. He's got to ask the right questions.
2 I'm serious. So, like, this was our way, if it
3 didn't go any further, it was like, get it through
4 the press, or get it flagged to the press, I mean.
5 And yes, that was the extent of talking about the
6 press. And that's when, like, I was telling
7 [Former Staffer 6] this is, you know, I think the
8 Congressman is not doing the right things with
9 mileage, and am I crazy. Look at this.

10 And then I did give -- like that was
11 another reason I printed out -- well, it became the
12 reason later. Like, I did give the printed out
13 calendar to [Former Staffer 6] so he could look
14 through and cross reference with the mileage, and
15 then give it to his reporter friend.

16 Q Okay. Understood. And quickly, just
17 about where you were storing documents. I know you
18 said you had them all organized on a desk somewhere.
19 Who else would have had access to that room or that
20 area where the documents were being stored?

21 A Everybody. Even the cleaning crew. You
22 know, they come in every night. Yeah, because we

1 all have office keys. And honestly, Lynn Hatcher,
2 Curt Bliamplis, John Caddock, they really didn't
3 want to know what we were doing. Like, they knew it
4 was something, you know, and Lynn would even joke,
5 like, don't tell me, don't tell me. So, yeah.

6 Q And then other than [Former Staffer 6], were
7 you ever aware of anybody else speaking to the press?

8 A No.

9 Q Okay. And same is true after the OCE
10 review, didn't hear of anybody else speaking to the
11 press?

12 A No, it was just -- we would read all those
13 articles that came out from Chuck DeCaro saying I
14 wonder if somebody's -- the later ones were, like,
15 oh, it's gotta be somebody talking; somebody in the
16 office, because Michael had the office bugged at one
17 point. Not bugged, but he would go through the
18 e-mails from the House, e-mails from the employees.
19 But, you know, I never -- I figured [Former Staffer 6]
20 would tell me if it was him, but I don't know.

21 Q Okay.

22 A He denies it, but then some of the other

1 staffers think it was [Former Staffer 6], because
2 articles, some of the later ones, got so detailed.

3 Q Okay. Moving on a little bit from that
4 first review, you also produced to us some documents
5 about a trip to Aruba that the Congressman took.
6 Can you just start generally by telling me about
7 that trip?

8 A Yes. Sorry. Got an e-mail. Okay.

9 Yeah. So that trip, that was an HSP trip
10 they were invited on, and I was just told to -- I
11 guess I was told, or I just kind of knew -- to work
12 with the contact, Anne Carpenter, to get everything
13 set up, you know, their vaccine proof or
14 documentation. They needed travel insurance, I
15 think, and like a little visa to get into the
16 country. It's basically like a ticket. You just
17 get it all online. Anne had it all sent to all the
18 attendees -- all the people that were going on the
19 trip. Like she sent us step-by-steps so we knew
20 what we needed to do, very straightforward. But
21 basically, you just get online, go to these links,
22 register with Vault.

1 Vault was -- Vault had the Covid tests.
2 They would send you the clean tests, and then I set
3 it up -- or I sent it to the Congressman's house,
4 and gave him instructions, e-mailed Grace that they
5 had to do it on the camera on Zoom with a Vault
6 personnel -- someone, and then ship it UPS
7 immediately after. Yeah, it was just getting the
8 visa, the vaccine proof, and the trip insurance, I
9 think. That was, like, the main thing I had to do.

10 Q And who first told you about this trip, or
11 who did you first hear it from?

12 A Probably Alex Mooney.

13 Q And what sort of trip was this? How would
14 you describe it? Was it a personal trip? A
15 campaign trip? Did he describe it as an official
16 trip?

17 A It would have been personal. I don't
18 think -- I didn't question that, though, because he
19 did -- I do believe that I used a personal card for
20 all this. And so I do think it was all personal, as
21 much as I can recall.

22 Q Okay. And so you mentioned Anne Carpenter

1 as one of your points of contact. Was there anybody
2 else at HSP that you were talking to about the trip?

3 A Not talking to directly. I know Nicole --
4 I forget her last name. I can find out for you
5 later. Nicole, she is like the CEO of HSP, or she's
6 high up with HSP. Her name was mentioned, that the
7 Congressman would talk to her, maybe something about
8 ethics, or that Nicole mentioned something to Anne
9 about involving ethics. I don't even know. I think
10 there's a train of e-mails I sent you, Sean. I just
11 don't remember what they are. But I think that's
12 the only time another person was mentioned, other
13 than, like, his family.

14 Q Yeah, we can look. We'll look at that
15 e-mail chain in a minute. Do you know, is it Nicole
16 Hall? Is that the name you were trying to think of?

17 A Yes. Yes.

18 Q Do you know who invited Representative
19 Mooney on that trip?

20 A I don't, but it was probably Nicole or
21 Jamie Hogan. Nicole Hall, Jamie Hogan, and Alex
22 Mooney are very close friends, or at least they're

1 friends. So it was probably Jamie Hogan or Nicole
2 Hall, because I think they're on a texting basis
3 with Congressman Mooney.

4 Q And do you know how Representative Mooney
5 knows Jamie Hogan?

6 A I'm sorry. Could you repeat that?

7 Q Do you know how Representative Mooney
8 knows Jamie Hogan?

9 A I do not.

10 Q Okay. Do you think their relationship
11 preexisted the office's relationship with HSP? Like
12 were they personal friends before he started working
13 with HSP?

14 A I don't know, but now that you mention it,
15 HSP is a direct mailing, so maybe we used them for
16 direct mail, you know, for the Congressman's
17 campaign. Maybe that's how they got to know each
18 other. I don't know though.

19 MR. QUINN: Go ahead, Helen.

20 BY MS. EISNER:

21 Q You mentioned that Jamie and the
22 Congressman were on a texting basis. How do you

1 know that?

2 A Good question. I think I just assumed it
3 when he would maybe -- oh, gosh. Good question. I
4 don't know. I just always assumed they were
5 friends. I think they're friends. Because, you
6 know, I think he lives close-by to the Congressman,
7 and I think they would go over to their house to do
8 some things with the kids. I don't know. Maybe I'm
9 wrong, but I do -- I mean, I'm 90 percent sure they
10 are on a texting basis.

11 Q Okay. And also about the relationship
12 with HSP, you were talking about that a little bit a
13 moment ago. But is there anything else we should
14 know about the relationship with the company, not
15 just with Nicole or with Jamie?

16 A Not that I know of, but the Congressman
17 would use their -- what's it called? It's in D.C.
18 It's just a little townhouse. It's called the HSP
19 house. They let clients go there and -- like, to
20 stay in the house or work in the house. And the
21 Congressman -- I think they did -- the family did --
22 use that overnight sometimes. I would just text --

1 no, not text -- e-mail Nicole Hall and say, hey, is
2 HSP house open right now? Can the Congressman go
3 make some calls or go work? Or can the family stay
4 there for this span of time? But that's it.

5 Q Where is the house?

6 A It's near the Senate side. I'd have the
7 address probably somewhere in my calendar, honestly,
8 and I can give that to you guys later, or I can
9 look.

10 Q Have you ever been there yourself?

11 A Yes.

12 Q Can you describe it to us in a little bit
13 of detail?

14 A Sure. There was three floors. The main
15 floor. I don't think it was a basement. No, I do
16 think there was a basement, but I don't know if I'd
17 ever gone down there. It's like an English
18 basement, if there was one. I don't remember
19 exactly. But the main level was just a living room.
20 There may have been a TV. There's a kitchen always
21 full with drinks, you know, like Coke and water and
22 stuff, coffee. And then there was a kitchen table,

1 a walkway, and then there was an upstairs. I think
2 it had an office. I don't know if there was a
3 bedroom on the second floor, you know, a couple
4 bathrooms. And then there was a third floor, I
5 think there was another area for sleeping
6 arrangements.

7 Q Okay. And when you were there, what was
8 the reason that you were there?

9 A It would mainly be just to do scheduling
10 with the Congressman. If he was -- like in between
11 votes, he would just go to HSP house and do work or
12 -- I don't think he ever went there to rest, at
13 least not to my knowledge. One time there was a
14 campaign event. I think it was -- I think it was
15 after like the inauguration this year or something
16 for the members of Congress. So it was like
17 January 12th. It was sooner than January 20th, I
18 think. They did have -- they used the space for new
19 members of Congress and their families to just come
20 and hang out. Probably not just even new members.
21 Probably any person he wanted to come over -- Alex
22 just wanted to invite. And I ordered food on the

1 campaign card and had -- I think I had Potbelly
2 sandwiches delivered. I had Kevin, I think, and
3 somebody -- Kevin was a staff assistant -- Kevin
4 (inaudible) to go pick up on his way to work that I
5 had already paid for on the campaign card, like pick
6 up from Harris Teeter, I think, but that was the
7 only time, like, the house was also used.

8 Q How often would you say the Congressman
9 worked there? How often did he use it?

10 A Not much. Maybe once a month, if that.
11 You know, it could have been if there was a hectic,
12 you know, D.C. work week, maybe more. I just don't
13 remember exactly, and I wasn't always there.
14 Sometimes Michael Hough would go to make calls at
15 the HSP house.

16 Q Is that the only place that he would
17 perform campaign work or other work that he needed
18 to perform off site, or did he have another place
19 that he would also perform campaign work off site,
20 outside of Congress?

21 A No, he would go to the -- I think he would
22 go to the CHC sometimes. I don't think he went to

1 the NRCC. I don't think he went there very often.
2 He may have gone -- there was another house,
3 Eastgate House. I don't think he went there very
4 much. I don't even know who owned Eastgate House.
5 I know the name of the contact. I don't know if he
6 owned it. His name was Jorge Rosa. I think I still
7 have his contact information, just to give you like
8 his actual name. I think mainly it was just the HSP
9 House.

10 Q And you mentioned there were bedrooms.
11 How many bedrooms were there in the house in total?

12 A I never actually went to the third floor.
13 If I did, it was only once.

14 Q Okay.

15 A There may have been three bedrooms, maybe
16 four.

17 Q We won't hold you to that. That's fine.
18 Did the Congressman ever sleep there?

19 A I don't know. I do know the family did,
20 so maybe he did as well. But he would mostly stay
21 in his office. But if they were ever there, I think
22 they only stayed in the HSP house one or two times

1 in my time with Alex, and I don't remember if he
2 went there with the family.

3 Q And that's the family stayed there one or
4 two times?

5 A Yes, the family as in Grace, [Rep. Mooney's
6 son], [Rep. Mooney's older daughter], and [Rep.
7 Mooney's younger daughter].

8 Q And on those occasions, was there any type
9 of payment exchanged for the arrangement of staying
10 at the house, to the best of your knowledge?

11 A No, ma'am.

12 Q Okay. Do you know that there was no
13 payment, or are you just not aware if there was
14 payment?

15 A Correct, I'm just not aware if there was.
16 I don't think there was, because I think that I
17 would have been the one to probably, you know,
18 handle that, but I could be wrong. Unless we were
19 clients of HSP at the time, because they had that
20 house for their clients. So I guess it could have
21 been already kind of paid for, if we were using them
22 as direct mail.

1 MS. EISNER: And just one more question,
2 Sean, unless you want to jump in, but one more area.

3 BY MS. EISNER:

4 Q The Eastgate House you mentioned involving
5 Jorge Rosa is also a place where people would stay
6 overnight?

7 A Not overnight, to my knowledge, but we did
8 have the Christmas parties there. And I think a
9 couple of campaign meetings there as well, because I
10 was there for one of them. Yes. He was meeting
11 with Mark -- not Mark -- someone we used for
12 mailing, I think. His name was Mark. I can find
13 his name somewhere. And then another guy. I don't
14 remember his name. Dan. Maybe it was Dan. Don't
15 hold me to that, because I think Dan Hazelwood is in
16 Arizona, and this guy was not Dan Hazelwood. But
17 yeah, it was a campaign meeting.

18 They were just discussing -- it was near
19 Christmastime, and they were just smoking cigars and
20 discussing campaign stuff, and the Congressman was
21 like, [Former Staffer 2], do you want to stay and
22 listen to this? So I had to stay and listen to that.

1 I don't know. So I don't remember what they were
2 talking about, you know, political strategies.

3 And the other time we used it was like the
4 Christmas party. Last year's Christmas party it was
5 used. I coordinated that with Jorge. I paid Jorge.
6 I guess I sent him a check. No, I think I sent him
7 a check or had the campaign person [Former Staffer 3]
8 sent him a check, I think, because she had, you know,
9 the campaign checkbook. Or maybe it was Brendan
10 Mahoney who was the campaign person at the time. He
11 may have paid Jorge for the Christmas party. And
12 then that was for 2019. And then last year's
13 Christmas party, 2020, [Former Staffer 3] 100
14 percent did send the Christmas check to Jorge,
15 because we did use the Eastgate House as well.

16 MS. EISNER: Okay. Sean, I'll hand it
17 back to you, if you have more questions along those
18 lines.

19 BY MR. QUINN:

20 Q Sure. The only thing on the HSP House,
21 did you know of any other members who used the house
22 in a similar way, either to stay overnight or to do

1 work during the day there?

2 A I do not.

3 Q Okay. Going back to the Aruba trip
4 specifically, other than that e-mail that you
5 mentioned where ethics was brought up -- and we'll
6 look at that in a second -- did you ever have any
7 other conversations with anybody at either HSP or
8 with Representative Mooney about how the trip was
9 going to be paid for?

10 A I know Anne probably asked me at the time.
11 She just said -- or maybe she said, we'll pay for it
12 and then you reimburse us. I'll give you an invoice
13 later. But I don't know. Because I don't think I
14 -- oh, gosh. I don't remember. I don't know if I
15 paid for it with a personal card or campaign. Yeah,
16 I don't remember how I paid for it, or if he just
17 took care of it.

18 Q Okay. Did you ever see -- after the trip
19 did HSP ever send an invoice or a list of anything
20 that they covered?

21 A I don't think so. The only thing that I
22 was sent as a receipt was, he was overcharged for

1 something at the hotel they stayed at in Aruba. And
2 then I gave that person -- or I gave Anne the credit
3 card number, and she reached out to the lady in
4 Aruba in the hotel where he was overcharged and he
5 would get the card reimbursed, and I do think that
6 was his personal card.

7 Q Okay. I think we can actually pull up
8 that document and maybe that e-mail, and if you want
9 to look at it to see if it jogs your memory at all.

10 MR. QUINN: Let's see. Matt, can you pull
11 up Tab 5?

12 THE TECHNICIAN: Just give me one second.
13 Sorry about that. I'm having an issue with my PDF
14 reader.

15 MR. QUINN: That's okay. Okay, you can
16 mark that as Exhibit A. It looks like you already
17 did.

18 (Exhibit A was marked for identification
19 and is attached to the transcript.)

20 MR. QUINN: And just quickly for the
21 record, we have a Bates number applied to this
22 document, and it's HSP 000103. Matt, can you give

1 [Former Staffer 2] control of the document so she
2 can scroll through it?

3 THE TECHNICIAN: Sure.

4 Q If you want to take just a second to look
5 at that, [Former Staffer 2].

6 A Oh, yeah, that was where the overcharge
7 came from, I think.

8 Q Okay. And so it looks like -- and correct
9 me if I'm wrong -- but it looks like Representative
10 Mooney paid for this on his personal card. And then
11 at some point after the trip or during the trip, he
12 asked to be reimbursed for that payment; is that
13 right?

14 A I don't know, but the only reason I would
15 maybe think that is because the Congressman started
16 -- he started paying for things with his personal
17 card, but then I would send those receipts to
18 Michael. And that's why I think he was getting
19 reimbursed for some of this. I don't know if he got
20 reimbursed for this trip, but --

21 Q When I say reimbursed, it looks like, if
22 you look at this e-mail chain, I mean a

1 reimbursement from HSP Direct to Representative
2 Mooney. Is that what happened? Why don't you take
3 a second to review that e-mail and see if it jogs
4 your memory. And if you still can't recall, that's
5 fine.

6 A Yeah, I don't recall.

7 Q Okay. Why don't we look at --

8 MR. QUINN: Or actually, Matt, you can
9 pull this down.

10 Q Do you remember how the family -- or how
11 the flights were arranged to Aruba? Just give me a
12 rundown of that as far as what you remember.

13 A Yes. HSP or Anne Carpenter said they
14 chartered a flight. So all I had to do was tell the
15 family this is when you need to be here. That's
16 all. And they drove themselves to the airport, to
17 Dulles. The ride back, the family came back with
18 the rest of the group. I don't remember when that
19 was. Yeah, I don't remember at all when that was.
20 But the Congressman had to come back early because
21 of votes. And I asked [Current Staffer 3] if I
22 could pay for that with the MRA because I was

1 getting him back for votes, and I think he said it
2 was a tricky thing because of it being
3 international. I don't think I ended up using MRA
4 for that. I think it was campaign to get him back,
5 but it may have been personal. I do not remember at
6 all. But yeah, the Congressman did have to come
7 back early, and I booked that flight. And I think
8 I -- I think he got a ride with somebody to the
9 airport, or he cabbed it. I don't remember how he
10 got to the airport, though.

11 Q Okay. Do you remember if you booked that
12 flight on a personal card, or was it a campaign or
13 official card?

14 A I don't, but maybe I could -- the e-mail
15 confirmation would have come to me. I need to see
16 if I can find that, actually. Let me write that
17 down.

18 Q Yeah, sure. If you're able to look for
19 that and see if you can see how that payment was
20 made.

21 MR. QUINN: And then while you're taking
22 that note down, Matt, if you could pull up Tab 6.

1 (Exhibit B was marked for identification
2 and is attached to the transcript.)

3 MR. QUINN: This is going to be the e-mail
4 chain that you were talking about, the ethics
5 communication. Helen looks like she has a question.

6 MS. EISNER: I do, but I'll wait till
7 you're finished making that note.

8 THE WITNESS: Okay, I'm good.

9 BY MS. EISNER:

10 Q Just one point of clarification. You
11 talked about the charter flight going to Aruba. Was
12 that the whole family and the Congressman who were
13 on the charter flight?

14 A Yes.

15 Q Okay. So they all flew together with the
16 other HSP individuals who were going to Aruba?

17 A To my knowledge, yes, because that was the
18 chartered flight to get everyone to Aruba. Unless
19 some came on their own, I do not know.

20 Q Okay.

21 MR. QUINN: Okay. And you should now be
22 able to see this. We've marked it as Exhibit B.

1 There's no Bates number on this document, but this
2 was an e-mail that you produced to us, and it's a
3 printout from Gmail, and the first e-mail on the
4 chain is on February 26, 2021, at 10:00 a.m.

5 BY MR. QUINN:

6 Q Again, if you want to just take two
7 seconds to look at the e-mail, familiarize yourself
8 with it. I just have a couple of questions for you
9 about that.

10 A Yeah, I don't even know if they sent me an
11 itemized receipt. Maybe it was to him. I can go
12 back and look.

13 Q Okay. But as it is right now, you don't
14 remember if there was something itemized, a list --

15 A I don't. They probably just sent it to
16 him, if they sent it, but I do not remember one.

17 Q Okay. I want to just kind of hear about
18 some of the context for this e-mail or discussions
19 that happened around this time. It looks like these
20 all got exchanged on a Friday afternoon. Do you
21 remember any conversations with Representative
22 Mooney about the Ethics Committee's involvement with

1 this trip?

2 A Only that -- so this was the first I'd
3 heard about it was from Anne. And I'm like, what
4 are you talking about, ethics? This is not an
5 official trip. Why would they need to be involved?
6 So I make a note of it, probably somewhere, to ask
7 the Congressman the next time I see him, hey, Anne
8 mentioned something about you talking to ethics or
9 Nicole said to talk to ethics, whatever, in that
10 e-mail chain to Anne. And then he said, don't worry
11 about it. Like, I'll handle that or something. Or
12 I think that's what he said. I don't even know if
13 he even mentioned ethics, like there's no need for
14 that. I don't know if he said that, but it was all,
15 he'll handle that with Nicole, or he'll just handle
16 that.

17 Q But so you do recall a specific
18 conversation where he told you he would deal with
19 the ethics committee?

20 A Yes.

21 Q Okay.

22 A Or I don't even know if he said I'll deal

1 with the ethics committee, but, like, he'll just
2 handle that. Like, there's no reason for me to be
3 involved in that, basically.

4 Q And do you know -- did you ever hear from
5 him or anybody else if he did handle that? Do you
6 know if he ever spoke to anybody at the ethics
7 committee?

8 A I don't recall if he did -- if I heard
9 that, and I don't remember. Like, it does not even
10 ring a bell.

11 Q Okay. Did either Anne or Nicole ever
12 bring it up to you again around this time outside of
13 the context of this e-mail?

14 A I don't believe so. No, because that
15 would have been it. I said, hi, Anne. The
16 Congressman spoke to Nicole about this. And then
17 that's -- yeah, that's the last I've talked about
18 it, I believe.

19 Q Okay. And then if you scroll up to that
20 first e-mail, this says, hi, [Former Staffer 2].
21 We can put the Congressman's family's transportation
22 expenses to the airport on our bill with ECO DMS.

1 Do you recall whether or not the family used HSP
2 Direct to get to and from the airport?

3 A They probably -- expenses to the airport.
4 I do remember asking the hotel about transportation
5 to get the Congressman back, but I don't recall --
6 but then I kind of do recall talking about how to
7 get the family back to the airport, but they
8 probably just went with everybody else -- the family
9 -- to return to the airport, is what I'm guessing.
10 Because the Congressman didn't end up using
11 transportation when he flew back early. He rode
12 with somebody else. But I don't exactly remember
13 how I got the family back, other than they just went
14 with HSP or ECO DMS.

15 Q I want to talk a little bit about the work
16 that you did to prepare the family for this trip. I
17 know you discussed setting up the visas. You helped
18 them set up the Covid testing. I think you might
19 have also mentioned travel insurance. Is that --

20 A Yeah, I think that was one of the charges.

21 Q And then obviously, you produced some
22 e-mails, and we're looking at this one right now,

1 where you were sort of the point of contact between
2 HSP and Representative Mooney. Are there any other
3 sort of categories of work that you did to help the
4 Mooney family prepare for this trip?

5 A Oh, oh, oh, well, it may not count really,
6 but each Vault, each Covid test for Vault, had to
7 have their own e-mail. You couldn't use two e-mails
8 for one. So [Rep. Mooney's younger daughter], being
9 five or six years old at the time, you know, she
10 didn't have her own e-mail address. So I made her
11 an e-mail address.

12 And then I sent all the passwords over to
13 Grace. You know, I was coordinating with them,
14 making sure, did you receive your confirmation
15 e-mail from Vault or something. You know, just
16 little things like that. That's probably about it,
17 though.

18 Q Okay. And I just want to get a little bit
19 of an understanding about kind of how much time you
20 think you spent helping the family with this. Can
21 you estimate that in any way, either a number of
22 days, or a number of hours?

1 A Well, so as soon as Anne would send out
2 the e-mails, I would try to get started on as much
3 as I could. So I could probably find you her
4 e-mails of giving us step-by-step stuff or when to
5 do these certain things. She was very detailed
6 about that. You couldn't do the Covid test until,
7 you know, a couple of days before they left. You
8 couldn't get the travel visa, I don't think, until
9 the week of the trip, or something like that.

10 But it mainly got to be a lot of work when
11 I was doing the visas, the Covid -- setting up the
12 Covid thing -- the Covid tests, and there was
13 something else. I don't know. But yeah, you know,
14 it was several hours one night, like, getting
15 everything ready for the trip, because they were
16 leaving the next day. So I was in contact with
17 Grace. I was texting her. She was all stressed
18 out. I'm like, girl, you're not doing anything.
19 Why are you so stressed? I'm stressed. So I did
20 stay up, you know. I got home from work at, you
21 know, like 6:00, and I stayed up one night till
22 10:00 -- or 10:00 or 11:00. You have in the e-mail

1 stamps when I was sending the e-mails to her, or
2 maybe it was 9:45. I don't know. But it was gosh
3 -- I don't know. It wasn't no 40 hours. Maybe like
4 12 hours. I don't know.

5 Q Okay. And did some of that work happen
6 during official work time, so around 9:00 in the
7 morning till 5:00 in the afternoon?

8 A Probably. Oh, I would do it. As soon as
9 I got instructions from Anne, I would try to get on
10 top of it immediately, because traveling outside of
11 the US, just, you know, trust me. I wanted to get
12 everything ready and how they needed it and stuff.
13 So most likely, yes, I was probably at my desk in my
14 congressional office using the computer doing this.
15 100 percent.

16 Q And did that concern you, or did you have
17 any conversations with Representative Mooney about
18 the fact that you were doing all this work for a
19 personal vacation?

20 A I was scared of the Congressman, so I
21 never really -- I would never question him, or try
22 to question him. No, I thought schedulers -- see, I

1 never worked on The Hill before. I didn't know what
2 was proper etiquette for this kind of thing. I just
3 did whatever he said. I didn't know I could say no.

4 Q I guess you didn't know you could say no.
5 I was going to ask, did you ever feel like you could
6 say no if there was a personal task that he asked
7 you to complete?

8 A I don't think I would have if I could.
9 Like I was just too scared to say no. Like he asked
10 me to take home a shirt and a towel to wash one
11 time. Like, I'm not going to say no to such an easy
12 task, but I'm like, I don't want to do this, but,
13 you know. It's such a little thing. I didn't mind.
14 So --

15 Q So that was an incident where you took his
16 laundry to your house and washed it like in your own
17 washer and dryer?

18 A Yes.

19 Q We'll come back and talk a little bit more
20 about some other types of personal tasks. But on
21 this point, were there any other vacations that you
22 helped the Mooneys plan or prepare for?

1 A Sometimes when they would go to the
2 Florida trips. There was some kind of approved
3 congressional institute. I don't know. I think he
4 paid for that with campaign card. But that -- the
5 family would go too. House Republicans
6 Congressional Institute. I don't know if you're
7 familiar. I think that's the title. They kind of
8 turned those into vacations, because, I mean, the
9 family went. I kind of picture that as a vacation
10 if your whole family goes.

11 But maybe -- I don't even know if I rented
12 a car, but I would just book the plane tickets for
13 that. Maybe they took a train one time. The South
14 Dakota trip, I did do all the booking for that, even
15 though I probably used their personal card at one
16 point. But I booked a rental car. I booked train
17 tickets. And then I booked -- I don't know how the
18 family got back. Maybe I booked flights, rooms.

19 Q When was the South Dakota trip?

20 A 2020, July.

21 Q And can you just describe that generally?

22 A Sure. One day we were just sitting down

1 talking about it, and she, Grace -- Grace Mooney was
2 just going through, you know, scheduling that kind
3 of thing. And what was it? And they were just
4 telling me when they wanted to go, how they wanted
5 to go. I think they wanted to -- maybe she had
6 found train tickets, or they said let's try the
7 train, because maybe plane tickets would have been
8 expensive. And so I got like an overnight train on
9 the Amtrak. I think I got two rooms probably. I
10 don't think all of them could fit in one room.

11 And I do think -- I think Maggie and Ed
12 Fusey (phonetic) may have gone. And that is Grace's
13 sister, Maggie, and her brother-in-law Ed, Edward
14 Fusey. I want to say they went on this trip to
15 South Dakota, but I'm not positive. I think they
16 took care of all their own thing. I may have booked
17 a train. I don't know. But yeah, so the South
18 Dakota trip, I booked the train out there. I booked
19 their room. And like I said, I think I couldn't
20 find a hotel for that, or maybe I did. I thought
21 there were some I couldn't find for you, Sean. And
22 I did get a rental car. And I think the Congressman

1 probably took them back to the airport to fly home.

2 And then he and [Rep. Mooney's son] took that rental
3 car and did -- they drove up to -- I think I sent you
4 some hotel receipts that shows they were in Illinois
5 maybe. Like, they did a cross country thing, and I
6 did book all those rooms on the campaign. He would
7 just call me the day of and say I want this room in
8 this city, and I would just Google some rooms. And
9 I think they drove -- oh, gosh. How did they get
10 home? I think they drove to a train station in
11 Chicago maybe, and that may have been the start of
12 another trip in Pennsylvania. It may have been this
13 Republican retreat thing. I'd have to look at my
14 calendar to see if I have the names of these things.
15 I know I'm talking in circle, guys, but maybe I've
16 chased a rabbit on your question, Sean.

17 Q No, no. I'll ask. I'll go back quickly
18 to clarify. So the South Dakota trip that was
19 followed by the road trip, were there any official
20 or campaign stops on that trip, or was that purely a
21 personal trip with Grace and her family?

22 A So the road trip would have been -- I know

1 he wanted me to try to get in touch with this man
2 named Richard Uline. I think he owns this company
3 called Uline. And I know he never ended up meeting
4 him, but I know he wanted to travel that way to try
5 to meet with him in person. I know that didn't
6 actually happen, because I never got in touch with
7 Richard, or we never scheduled anything. But I know
8 -- I want to say he may have asked me to call a few
9 people maybe in Chicago or near Chicago to try to
10 set up a meeting. I don't know if they ever took
11 place. Or I don't remember. I don't know if there
12 were any actual stops. He probably, you know, made
13 some calls, but I do not remember at all.

14 Q Okay. But otherwise, largely a personal
15 trip with the family?

16 A That's what it always sounded like to me.

17 Q Okay.

18 MS. EISNER: And just a few quick
19 clarifications there.

20 BY MS. EISNER:

21 Q What was the date range of that, just so
22 we can -- you might have said this earlier, but

1 approximately, your memory of the month when that
2 would have occurred?

3 A July 2020.

4 Q Okay. And you said you used the campaign
5 credit card to pay for the hotels?

6 A I don't remember. I may have. I know I'm
7 pretty sure I used the campaign to pay for the
8 rental car, because he was traveling with [Rep.
9 Mooney's son] on -- I was given the -- I think it
10 was campaign card for at least the rental car.

11 Q Okay. And at whose direction did you use
12 the campaign card? Was that the Congressman? How
13 were you, you know, informed that you should use the
14 campaign card for at least the rental car charge?

15 A It was Alex Mooney. I was sitting at
16 their kitchen table, and I was saying, okay, how do
17 I pay for this. And I would just write it down, you
18 know, get my notes.

19 Q Okay.

20 BY MR. QUINN:

21 Q And then you said that road trip maybe
22 ended with a trip to Pennsylvania? Is that the

1 Nemaacullam (phonetic) trip?

2 A Yes, maybe. I don't know, but I kind of
3 remember that somebody had to take a train and then
4 Reiner picked them up. I don't know. Reiner is the
5 driver. Reiner Kissel was the driver. I may have
6 my dates all mixed up, because I don't remember how
7 they got home.

8 Q Okay.

9 MR. QUINN: We might return to this in a
10 little bit, that detour, but getting back to that
11 Aruba trip now. And Matt, I think you can --
12 unless, Helen, do you have any other questions about
13 that ethics e-mail?

14 MS. EISNER: No. Go ahead.

15 Q Okay. Just one more time, I know we asked
16 you if there were any other kind of services or
17 trips that HSP provided Representative Mooney, but
18 do you remember Representative Mooney being invited
19 by HSP on any other trips?

20 A Yes. That would have been -- yeah. It
21 was like their Christmas party things. I think they
22 were only maybe one or two nights, and I don't even

1 -- I don't remember him going to all of them. I
2 don't even know if he took the family with them. It
3 may have been just him and Grace. But I do think
4 HSP had a couple of Christmas parties in my time
5 there. And he may have -- maybe one of them was at
6 Salamander. I don't even know where -- I think
7 Salamanders is a resort in Virginia, I think. I may
8 have that all wrong. But I do believe that they
9 went to -- I at least put things on the calendar
10 that were related to HSP and a Christmas party. Or
11 maybe -- I do think there was one at least that
12 there was an overnight thing, and I don't remember
13 if he went, though.

14 Q Okay. So an overnight Christmas party
15 that may have been at the resort in Virginia. Any
16 other trips or some other types of events?

17 A I think that would have been it. It's
18 just their little -- yeah, I think that would have
19 just been a one-nighter thing or two nights around
20 Christmas, I think.

21 Q Do you remember which year that Christmas
22 party would have been?

1 A Well, there probably would have been, you
2 know, one in 2019 and one in 2020. I don't know if
3 you went to these. Maybe the 2021 was canceled. I
4 could maybe see if it was on my calendar, because I
5 think I would put things on mine as a reminder for
6 me to do certain things. So I can look for you
7 guys. Let me write that down.

8 Q Yeah, sure. If you could look for any
9 other details around those Christmas trips or
10 parties, that would be great.

11 MR. QUINN: Helen, did you have a
12 question?

13 MS. EISNER: I did.

14 BY MS. EISNER:

15 Q You know, you've talked about the trip to
16 Aruba as a personal trip. And, you know, viewing it
17 as a personal trip. It would be helpful if, you
18 know, you could walk us through or help us
19 understand, why did they go with HSP? This was a
20 personal trip, you know. To the best to your
21 knowledge, if you could sort of explain that to us,
22 why did they go with HSP?

1 A The best of my knowledge would be that he
2 and Jamie Hogan and Nicole Hall are all friends and
3 they invited the Mooneys. Because I don't know if
4 we were still a client. Were we really ever a
5 client of HSP? I don't really know. So maybe that
6 was another reason. But that's all I can see why
7 they would go on the trip.

8 MS. EISNER: That's all.

9 BY MR. QUINN:

10 Q Other than that e-mail chain we just
11 looked at where HSP was going to pay up front and
12 Representative Mooney was going to reimburse them,
13 did you ever have any indication that HSP was going
14 to be paying for part of the trip for Representative
15 Mooney, like there was a financial incentive to go
16 on the trip?

17 A It never crossed my mind.

18 Q Okay.

19 BY MS. EISNER:

20 Q In general, you know, in your
21 interactions, whether it was, you know, related to
22 the road trip we were talking about, or the

1 Christmas party, or the Aruba trip, did you get the
2 sense that financial considerations were -- and
3 having perhaps another source of payment were
4 important to the Mooneys?

5 A If I did, I don't remember ever thinking
6 that. I don't think I ever went this far. I was
7 just told to, you know, here, book this; I'm going
8 here. That's where it stopped with me. I don't
9 think I really processed through any of that.

10 Q Understood.

11 BY MR. QUINN:

12 Q Okay. Last thing I have on the Aruba
13 trip. Did you ever hear anything about
14 Representative Mooney's kids staying with Jamie
15 Hogan when they were in Aruba?

16 A I don't remember, but, like, there were
17 instances where, like, you couldn't have so many
18 people in one room. So one of the kids would stay
19 with another family. So that may have been this
20 instance. I don't remember. It wouldn't surprise
21 me.

22 MR. QUINN: Okay. I think we can move on

1 from Aruba, unless, Helen, you have any other
2 general questions about that?

3 MS. EISNER: Nope. Go ahead.

4 BY MR. QUINN:

5 Q Okay. So let's go to other instances of
6 staff being used for what seemed like personal
7 errands, or there are a couple instances in some of
8 the documents that you produced to us that I wanted
9 to ask about. One had to do with an FBI teen
10 academy for one of Representative Mooney's
11 daughters. Can you just tell me about that? What
12 sort of work did you do that related to that FBI
13 teen academy?

14 A Sure. I don't remember if Alex initiated
15 it with me first, but it may have been that Grace
16 called me directly, or texted me. I know we spoke
17 on the phone several times about it, and then she
18 would call and text and ask for an update on it.
19 But so it was a teen academy thing with the FBI. I
20 don't even exactly know. It was for [Rep. Mooney's
21 older daughter], the oldest daughter, and it was
22 probably -- she wanted it -- because they had

1 different locations apparently. So one could
2 have been -- I think the closest one Grace told
3 me was in Pennsylvania, and I didn't understand
4 what it was exactly. I was like, oh, is this a
5 day thing? Is this a week thing? I don't know.

6 And so I was figuring out a way to get in
7 touch with the FBI. I think I -- I think I looked
8 at -- we have this big old House directory. Maybe
9 there was something I found there, or I looked on
10 House net for foreign affairs -- I mean, FBI
11 affairs. I don't know. I was trying to figure that
12 out.

13 And then [Former Staffer 6], bless him, tried.
14 And he was like, well, my parents worked for the FBI,
15 and so I'll just ask them. I don't know if he
16 actually ended up asking them, because I think he
17 just Googled teen academy on the FBI website, and
18 I think he found it. And I don't think he actually
19 asked his parents, because that's how he got involved
20 in that. And then I got the website. I looked at
21 teen academy, and I think I found an e-mail. I sent it
22 it from my House e-mail, so they knew it was important.

1 And I just -- I think I sent you these transcripts.
2 I just told them -- not transcripts, e-mails of what
3 my boss's wife, or what my boss was looking for. I
4 think I was trying to say mostly Alex, so they knew
5 it wasn't just the spouse.

6 But yeah, and then I think I just said
7 their daughter's interested in this, and I may have
8 spoken to Kelly or -- I think her name was Whitney
9 or Kelly. You may see it on the e-mail chain,
10 someone who worked on the FBI, the teen stuff. I
11 think I spoke to one on the phone just asking, you
12 know, how it all worked.

13 And to begin with, they didn't have an FBI
14 teen academy in West Virginia or near the house, and
15 they said if there's an interest, we will schedule
16 one. Apparently they found interest, and they were
17 going to schedule one in Martinsburg. I think
18 that's still in the e-mail chain. But then I left
19 Alex's office, and that's the last I -- I didn't
20 forward it, and that was it.

21 Q Okay. And did you help at all with the
22 application for the teen academy or did you have any

1 further interaction with that after that e-mail
2 chain?

3 A No, because it was all the preliminaries,
4 just trying to find an actual location and then when
5 it was going to be and all that.

6 Q Okay. Another instance that showed up --
7 well, actually, I don't think we need to look that.
8 Another instance that showed up and that we've
9 talked briefly about before is a visit to the
10 African-American Museum that you helped plan. Can
11 you tell me about that?

12 A Sure. It all started with Grace. I don't
13 know if she called me, texted, don't remember, but
14 probably call, and she wanted [Rep. Mooney's son], their
15 son, had a school project on Carter G. Woodson, and
16 she wanted to go to the African-American Museum to,
17 I think, find information on him. And then she
18 wanted a curator tour or a tour with museum
19 personnel so [Rep. Mooney's son] could ask questions or
20 see stuff on Carter G. Woodson, maybe. So they wanted
21 a tour.

22 And I think this is the instance where

1 they were asking -- I was talking to someone named
2 Philip Lipco or something, and then I got
3 transferred to a woman named Kathleen, and I think
4 they wanted to know if the Congressman was actually
5 going to be there. And then I would just say, yeah,
6 of course. I don't even know if I asked the
7 Congressman if he was going to go or not. I don't
8 even think I realized if he was going to go or not.
9 But you know, I would keep that because I wanted
10 them to think the Congressman was coming so they
11 would give the wife and the son a tour, or like they
12 were coming as a family. I think that was the
13 extent of me setting up that tour with them. I
14 never talked to them on the phone. I talked to
15 Philip on the phone, I believe. And then they may
16 have given me some times. I don't know.

17 I think it was near Christmas. I'm almost
18 positive it was December. And I just relayed all
19 this to Grace. I don't even know if it was e-mail
20 or not. I may have just called her and told her,
21 but that's how I set up that tour.

22 Q And was there also a lunch at the museum

1 that was involved?

2 A Yes. I found that out in March or April
3 when I was looking through the receipts.

4 Q Can you tell me about that -- can you tell
5 me about that lunch?

6 A Sure. Well, I mean, I don't think it was
7 anything campaign related. It was just -- there was
8 a café inside the African-American Museum, and I
9 don't even know what it's called. So that's a
10 point. We have the receipt probably. And I
11 realized when I saw this receipt, I'm like, this is
12 in December. This is the Museum, and I'm like,
13 wait, like, you guys. And I'm saying, like, you
14 guys, as in [Former Staffer 3] and [Former Staffer
15 1]. I'm like, this is the tour that I booked for
16 them. And I do believe at one point that receipt
17 came up with the Congressman, and [Former Staffer 1]
18 -- and [Former Staffer 1] may have relayed to us,
19 like, why couldn't I go to a museum with my family,
20 or like it was an official trip is what it came down
21 to. That's how -- either [Former Staffer 1]
22 worded it like that, or the Congressman directly

1 worded it that way. I think it was an official
2 trip or official tour. I think he maybe was
3 thinking that because he was a member of Congress
4 and he was on it. I don't really know why he
5 would say that is an official trip, but that's
6 all I know about the lunch, I think.

7 Q Okay. And do you know if that amount was
8 one of the amounts that was reimbursed, or this was
9 not one of the reimbursed amounts?

10 A I think it should have been one of the
11 reimbursed ones, because of who we were working
12 with. And I don't know if it's one of the ones he
13 wanted taken out, because like I said, all of them
14 were eventually left in. But I do believe this was
15 all part of the reimbursement.

16 BY MS. EISNER:

17 Q And just to step back, because I think
18 this might be one thing that hasn't been said yet.
19 What was it about the receipt that was a concern?

20 A Sure. It's because I knew he was just on
21 a tour with Grace and [Rep. Mooney's son], and it
22 was just a school thing for [Rep. Mooney's son].

1 And that's how I knew -- like this, I didn't like
2 what I saw. I think that actually may have been
3 when I realized he was with them. I don't even know
4 if I knew in December when I booked it that he
5 actually went on the trip with them. I do not
6 remember. I wonder what the calendar says for that
7 day now, if it says working in D.C. I don't know.
8 That wouldn't be on my calendar, I don't think.
9 He may have ended that, but, yeah, when I saw
10 that receipt, like I knew.

11 Q Let me just jump in. And help me
12 understand, is it because the receipt was a campaign
13 receipt? Is that what we're talking about? I mean,
14 how was it paid for is the concern?

15 A Yes, it was either paid by his card or the
16 campaign card. Like, it may have been in the pile
17 for reimbursement receipts. Like, why would we have
18 it if he paid for it personally and that was the end
19 of it? I don't know if I remember looking at the
20 card numbers. If you gave me the receipt, or if I
21 -- you know, if I had a copy of the receipt, I may
22 be able to tell you the last four digits and if that

1 was campaign or personal. But he may have -- he
2 usually would write reimbursed or campaign
3 reimbursement on these receipts. So I guess whoever
4 -- the campaign person would know, oh, I need to
5 reimburse Alex for this. But because it was in the
6 pile of what we were working with, I knew he had
7 probably got reimbursed for this.

8 Q So it was the potential source of payment
9 that was the problem?

10 A Probably, yes, ma'am.

11 BY MR. QUINN:

12 Q Can you think of any other similar types
13 of tasks that you did for the Mooney children,
14 either helping them with school work or school
15 projects or getting them enrolled in programs or
16 anything like that?

17 A A few instances I do remember. I mean, I
18 did babysit [Rep. Mooney's younger daughter] a bit.
19 And I did play with her at the house once. He gave
20 me the phone to Facetime [Rep. Mooney's younger
21 daughter] at one point so he could make some calls,
22 and I could keep her company on Facetime.

1 And then I did set up [Rep. Mooney's younger
2 daughter's] 529 account. Now, I didn't set up -- like,
3 I didn't put the money in her account or anything.
4 I just set up all the -- like, you need her
5 background information. You need her social, I think,
6 and the parent's social; all those little things to
7 set the account up. I did do that, and I don't even
8 remember if I finished it. I want to say I did, like
9 I'm pretty sure I did. I would have had to, because
10 he told me a few weeks later, oh, yeah -- I think he
11 did say, oh, yeah, I did finish [Rep. Mooney's younger
12 daughter's] 529 or something. I don't know.

13 BY MS. EISNER:

14 Q And who asked you to set up the 529?

15 A Alex Mooney. So I set up a phone call
16 with someone from the credit union -- Federal Credit
17 Union, I think, down in Rayburn. I set up a phone
18 call with someone named Mikael. He may not have
19 even been with the credit union, but I got his
20 contact information from David Lansing in the credit
21 union, I think. And then I e-mailed with Mikael
22 saying, hey, can we set up a call about 529. I

1 think I specified 529. I don't remember. And then
2 the Congressman and Mikael had a phone call. I sat
3 in on that call. The Congressman wanted me to take
4 notes, and that's when Mikael told us how to go on
5 to West Virginia 529 website, and that's when he
6 said you have to set it up, so I set it up.

7 Q Did any of these events, the phone call or
8 the request, come during the official workday, you
9 know, the traditional 9:00 to 5:00 workday?

10 A Yes. We took that phone call -- the
11 conference call with Mikael in his office one day.
12 It must have been a session day, because he was
13 there.

14 Q And what was your reaction when the
15 Congressman asked you to set up that account and to
16 assist him in the process?

17 A Zero reaction. I'm like, I'm the
18 scheduler. This is what I do. I thought that's
19 what -- you know, I just do anything that the member
20 asks.

21 Q Did you have any conversations with other
22 people in the office about this request and the fact

1 that you were assisting him with that type of
2 project?

3 A I don't believe so. I don't remember if I
4 did, but I'm pretty sure I wouldn't think the 9:00
5 to 5:00 incident was something, you know, noteworthy
6 at the time.

7 Q Okay.

8 BY MR. QUINN:

9 Q And maybe describe to us why that wasn't
10 noteworthy to you. Do you mean there wasn't really
11 a line between personal work and congressional work?

12 A Correct. I would just do whatever was
13 asked if it was, you know, scheduling. I became
14 more and more like his personal assistant usually.
15 I mean, that's what I kind of thought a scheduler
16 was. It was anything the member needed.

17 BY MS. EISNER:

18 Q You mentioned earlier that you were
19 somewhat scared of the Congressman. Can you unpack
20 that a little bit?

21 A Yeah. He just had a way about him. He
22 was very direct. There's nothing wrong with being

1 direct, but it was the way he just kind of came off,
2 very rough. And I'm just -- I fully admit it. I'm
3 a sensitive person. And so he was just direct in a
4 couple incidents.

5 Like, I had done some things wrong when I
6 first started, you know, of course, but the way he
7 kind of brought -- like, told me I had done things
8 wrong was -- it just, you know, it zaps your
9 confidence a bit. And so later on, it just kind of
10 made me afraid of him whenever I saw him.

11 Q How did he tell you you'd done something
12 wrong?

13 A Like, I mean, he's very direct. So it
14 came about in my first review. Like, they didn't
15 tell me the things I had done wrong from when I
16 started in July 2019. They told me in my review in
17 January 2020 of some of the things I had done wrong.
18 I'm like, why didn't you just tell me this earlier.
19 So when it all came to me at once in his direct
20 voice, and just the way he just delivers -- and he's
21 just not very nice sometimes. And I'm not trying to
22 whine. I'm just sensitive. And so that's --

1 because when I cried -- and it was just the whole
2 thing.

3 Q We understand.

4 A From then on, I was just a little -- I was
5 always afraid of what had I done, possibly, because
6 I wouldn't be told I had done something wrong until
7 my next review. So I was always just on egg shells
8 in my mind.

9 Q Did you have the same feelings when you
10 were asked -- whether it was related to the 529 or
11 helping with some trips or babysitting, did those
12 same feelings ever impact you?

13 A No. It was just -- well, maybe it did.
14 It was just a steady just do whatever he says and I
15 won't cause any ripples, or I won't, you know, get
16 in trouble later in my next review. I don't know.
17 Maybe I did. It makes sense that that was probably
18 what my thought pattern was.

19 Q What about when you received requests from
20 the Congressman's wife? Was it a similar thought
21 process?

22 A No. It's just when Grace asked me to do

1 something, it was just I need to do it immediately.
2 I did figure that out when we were at our first
3 staff retreat. It was in October 2019, and Grace
4 had e-mailed me a few things, and I wasn't answering
5 her because Michael Hough said, don't be on your
6 phones. Don't be working. I'll handle if the
7 Congressman gets angry or something, or, you know,
8 tells you to work. You know, we're here to pay
9 attention to the speaker at the time. And that's
10 when I knew -- the Congressman said, my wife
11 e-mailed you. I'm like, yeah, I know. I'll get to
12 it. And he's like, just do it now. And that's when
13 I kind of got the gist, I better just do things
14 immediately when he tells me to do it. So that --
15 from then on, it was just whenever she called,
16 texted, immediate.

17 Q How frequently did she call and text?

18 A Not much. She was not high maintenance.
19 It was just for things that she needed. She told me
20 when I first met her, like, I won't ever contact you
21 unless I really need something. So and it was like
22 a tour, the FBI thing. There may have been a couple

1 other things, but -- I think there was another tour
2 I did set up, I think. I don't remember which
3 museum, or if it even happened. It may have even
4 just been a phone call. I think that's what it was,
5 a phone call with a museum curator and [Rep. Mooney's
6 son] and maybe Grace, but I think it was just those
7 little kind of things. Not much.

8 BY MR. QUINN:

9 Q Was some of the fear or concern that you
10 had over completing these tasks related to a fear
11 that you wouldn't be able to keep your job if you
12 weren't doing these personal tasks for him?

13 A Yeah, that was always a fear, like, I
14 don't want to get -- he never yelled. He never did
15 that, but I was like, I don't want to get in
16 trouble, and I don't want to ever get fired so, yes,
17 I would just do things immediately to be -- because,
18 like, they hired me, and I had never been a
19 scheduler before. And so I was like, I have to do
20 everything, you know, to keep him happy.

21 Q It sounds like you would obviously
22 normally do these tasks for him. Was there anybody

1 in the office that, you know, put up a fight about
2 these tasks or opposed him on them ever?

3 A Not to my knowledge, no.

4 BY MS. EISNER:

5 Q Did you ever discuss with any other
6 coworkers a similar type of fear when they were
7 asked to do tasks about potentially losing their
8 job? Was that something that was a point of
9 discussion with your coworkers?

10 A I don't believe so. No, I just think that
11 was me in my head.

12 BY MR. QUINN:

13 Q You mentioned babysitting for the
14 Congressman. Can you tell me a little bit about
15 that?

16 A Yeah, it was just twice when [Rep. Mooney's
17 younger daughter] was brought to D.C. with him just
18 to spend the night with him in the office, and he went
19 home the next day. But when he got there in the
20 afternoon, [Rep. Mooney's younger daughter] was with
21 me. And then I would just stay with her. We would --
22 I think -- like at one point, we -- I don't remember

1 where she was for the afternoon, but it became in the
2 evening when he was voting. We went to this room in
3 the Capitol where they had some toys, and it was
4 across from like the House floor. We were there maybe
5 a few hours waiting for him. And then, when he
6 finished, she wanted to play some more. So we
7 stayed there a little longer.

8 And then the next time I played with her
9 outside on the Capitol steps waiting for him to come
10 down, because he was going to drive home that night.
11 And at one point, one of the times -- I think it was
12 just talking about the time with the little room, a
13 little earlier that afternoon, I think, [Former Staffer
14 3] and I took her around to like the Library of
15 Congress. And then at one point, I had to leave both
16 of them, [Rep. Mooney's younger daughter] and [Former
17 Staffer 3]. I had to go back and do some work. And
18 then maybe that's when I took over after [Former
19 Staffer 3] left. I don't know. But I'm pretty sure
20 it was those two incidences that I actually babysat.

21 Q And those both -- that was occurring on
22 the Capitol grounds?

1 A Yes, either in the House building or in
2 the Capitol, yes.

3 Q Okay. And do you have an estimate for
4 each of those incidents about how long you were
5 babysitting [Rep. Mooney's younger daughter]?

6 A Oh, gosh. Maybe three hours a piece in
7 the evening. I don't remember the earlier afternoon
8 portions. I just remember when he was gone for
9 votes, because I was with her constantly. I would
10 say no longer than three hours per time, at least in
11 the evening part.

12 Q And when you were babysitting [Rep. Mooney's
13 younger daughter], did that prevent you from doing your
14 official Congressional work?

15 A Yes.

16 Q How old was [Rep. Mooney's younger daughter]
17 at the time?

18 A She is -- I think she was five. She may
19 have been six. Five or six, yeah.

20 Q And then you said [Former Staffer 3] also
21 might have done this with you, or [Former Staffer 3]
22 did it with you once?

1 A I'm pretty sure [Former Staffer 3] did it other
2 times as well, because she was the campaign side as well.
3 So she would go to the Congressman's house. So I do
4 think there was a lot more instances where she was
5 babysitting [Rep. Mooney's younger daughter]. I could
6 be wrong, but I do think so. But yeah, [Former Staffer
7 3] and I were just with her that one afternoon in the
8 Library of Congress for maybe two hours, and then I
9 left them, and I don't know what they did between that
10 and the evening when I took over for [Rep. Mooney's
11 younger daughter], I think -- with [Rep. Mooney's
12 younger daughter].

13 Q Other than you and [Former Staffer 3], can
14 you think of anybody else that you know that might
15 have babysat for the Mooneys?

16 A No, I don't believe anybody. They just
17 preferred either me or [Former Staffer 3], at least
18 from the staff.

19 Q Okay. Let's go through just a few other
20 types of other personal errands, and you can tell me
21 if you ever performed these sorts of tasks, or if
22 you know any other staffers that did. Actually,

1 first I want to take it by family member. Do you
2 remember ever seeing requests for tasks from
3 Representative Mooney's mother, Lala?

4 A Not personal tasks. They would just be,
5 hey, can you help me maybe set up this pro-life
6 march, breakfast, or lunch or something. I didn't
7 ever actually end up doing that. But, like, she
8 would e-mail us a lot, or maybe send me a flyer, or
9 can you get me some of my books.

10 We had some of her books. She wrote some
11 books about her time in Cuba, and we had some in the
12 office. We had to deliver her books. I didn't have
13 to do it, but the interns did deliver her books to
14 members of Congress. We did do that. I mean, she
15 would call, and I would actually ask her a lot to
16 drive the Congressman, but that's mostly -- I don't
17 think she really gave me any task that I had to do.
18 I mean, there were some instances, but I just don't
19 remember. And then, yeah, I don't remember a ton of
20 them, if there were.

21 Q You mentioned an event related to a
22 pro-life rally? I think I saw it in some of the

1 documents. Was that a reception at the Heritage
2 Foundation maybe?

3 A Yes, I think that -- yes, you're right. I
4 didn't have anything to do with it. I don't know.
5 I do remember one scheduler -- I don't remember --
6 it may have been -- I don't remember the scheduler,
7 honestly. It wasn't Anita. I don't even remember
8 Anita's last name. Anita Dunkel. She was not
9 involved, I don't think, but there was a scheduler
10 who did really get involved with the Heritage lunch
11 thing with the Congressman's mother. I don't know
12 if she ever completed it, or if it actually
13 happened, but I do think there was lot of that. But
14 no, I never did that. I think it still went on, the
15 lunch. I don't know who finished it, but it wasn't
16 me.

17 Q Okay. Do you recall by any chance whether
18 or not the Congressman attended that event?

19 A I don't recall at all.

20 Q Just moving down to the other family
21 members, any other tasks from Grace that you
22 remember that we haven't talked about yet?

1 A There could have been, but it's just --the
2 museum things were the most that sticks in my mind.

3 Q How about driving for the member? Did you
4 drive him?

5 A I did. One time I think I drove him home
6 after votes one day. That was only one time. And
7 then I did drive him to Richmond. I would drive him
8 to the airport.

9 Q What did you drive him to Richmond for?

10 A That was the basketball game with [Rep.
11 Mooney's son]. [Rep. Mooney's son] was not in the
12 car. I drove him from votes to Richmond, and then
13 I drove home back home alone. I did drive him --
14 I did pick him up at the Wolf's Lodge, which is
15 an indoor waterpark in -- I think it's in
16 Williamsburg. And [Former Staffer 3] went with me
17 to pick him up. It was one morning, and then we
18 drove directly back for votes. I did drive him on
19 a couple -- or maybe I think it was just once.
20 There was a day trip -- a campaign day trip -- not
21 a campaign, excuse me. Just we went into the
22 District. He had a couple of official meetings,

1 like meeting, I think, with small business owners.
2 I think, like, there was one at a strawberry field
3 that I drove his car. But I drove to his house in
4 West Virginia, and then we drove his car deep into
5 Virginia, just, you know, a few hours away, and then
6 came back the same day. That may have been the
7 extent of that.

8 I'm sure there were other little instances
9 that I would drive around the city, like maybe to go
10 to the HSP house and back, or pick him up from the
11 HSP house and take him to votes. Those kinds of
12 things.

13 Q Okay.

14 MR. QUINN: Right after you told me about
15 the Richmond trip, my earphones actually cut out. I
16 won't ask you to repeat the things that you listed,
17 but Helen, do you have any questions about those
18 specific trips? I was going to ask about mileage
19 related to those, but if you have --

20 MS. EISNER: No, I actually don't think
21 so. I think that actually sort of covered all the
22 questions that I had, so you can move on.

1 BY MR. QUINN:

2 Q So let's take the Richmond trip for an
3 example. If you were driving him to that basketball
4 tournament, did you or anybody claim mileage for
5 that sort of driving activity?

6 A I did not claim for the Richmond trip. I
7 know I told you that in, like, my Google document,
8 but he did say, you can take mileage for this
9 because it's like you were taking me home. And then
10 I did think about it for, you know -- like I told
11 him a few days later when I saw him for the next
12 D.C. workweek, no, I'm just going to take the cash.
13 I had even written that down on my like notepad, and
14 then he responded, like, how much, like when I saw
15 him the next morning. Yeah, so that's beside the
16 point, but, yeah, I did get cash for that trip.

17 Q And who did you get cash from?

18 A Alex. Alex Mooney gave me cash for
19 driving down to Richmond.

20 Q And what was he -- was he paying for gas,
21 or did he pay some for your mileage also?

22 A No, just the gas. I just told him what it

1 cost me to fill up.

2 Q Okay. And was that pretty common for
3 other staffers as well, to drive him to those sorts
4 of personal events?

5 A I'm actually the only one with a car. I
6 was the only one in the office with a car besides
7 Michael, and Michael was a really, you know -- he
8 wasn't there like I was. So it was just me.

9 Q Okay. Were there more folks on the
10 campaign side that would drive him? Like, for
11 example, I know you named Reiner Kissel drove him to
12 and from some events?

13 A Yes.

14 Q Okay. Who else? Can you maybe list for
15 me the people you can think of that frequently drove
16 him places?

17 A Sure. So I know that Reiner -- Reiner was
18 a Congressional staffer, and so he did drive the
19 Congressman a lot. I'm sure that -- and I know it
20 overlapped with campaign driving, because they used
21 to pay Reiner in gift cards.

22 That was when Ted Dacey was around, so he

1 handled that side. And then I think they stopped
2 that, because you weren't supposed to be doing that
3 apparently. And then Reiner retired, and Reiner
4 would still drive the Congressman sometimes, because
5 he was just happy to do it. You know, he's a sweet,
6 sweet older man, and I don't know if they paid him,
7 because we couldn't pay him with a credit card -- I
8 mean gift card. So I'm not sure.

9 And then [Former Staffer 3] would drive him all
10 the time. Or as far as I know, it was all the time.
11 She was the one campaign person with a car. Brendan
12 Mahoney, he was the previous campaign person I think
13 drove him sometimes. Michael drove him sometimes,
14 because Michael Hough lives near his house and would
15 drive him to D.C. sometimes. Pick him up on the
16 way, because sometimes he would leave his car. The
17 Congressman would leave his car in Rayburn. I think
18 that was probably the gist of it. [Former Staffer 3],
19 Reiner, me, when he was in D.C., but, yeah.

20 Q Okay. You mentioned that they paid Reiner
21 in gift cards. Do you know why they did that?

22 A When it was on the campaign side, they

1 did, and I don't know why they used gift cards. I
2 didn't even ask. I was just like, oh, okay, gift
3 card.

4 Q And when you say gift card, do you mean
5 like a prepaid Visa card, or was it like a gift card
6 to a specific store?

7 A Right. I'm pretty sure it was probably a
8 prepaid Visa because that was -- when I did say, I
9 did purchase one of the Visas for the birthday
10 party. I purchased the gift card Visa, so I do
11 think it was probably that.

12 Q Okay.

13 A That's what they bought Reiner, I mean.

14 Q And then, for that example, for the
15 birthday party when you purchased the gift cards to
16 pay for part of that event, did you have any
17 impression about why they were asking you to do it
18 through a gift card as opposed to just the campaign
19 card?

20 A I'm almost positive I remember asking
21 Michael. I said, we're not supposed to do this
22 anymore, right? I thought that's what -- we weren't

1 supposed to buy anymore gift cards, because this
2 was, like, June this year. And Michael was like, I
3 don't know what else to do, because I can't take his
4 credit card from him for a couple of days, I think
5 was the issue. He couldn't take the campaign card
6 from the Congressman, I guess, for those few days
7 that he needed to buy party supplies and the cake.
8 So that's why he sent just get the gift card. Now
9 maybe he was right to do this. I don't know, and
10 that's why, you know, he saved the receipt.

11 Q When you said you were told not to use
12 gift cards like that anymore, who told you that?

13 A I don't even remember. It just became --
14 it may have been Ted saying -- it may have been me
15 when I scheduled a drive with Reiner. I told either
16 Mike or Ted, oh, we'll need to give Reiner a gift
17 card, and they were like, oh, we can't do that
18 anymore. It may have been something like that.

19 Q Do you remember around the time frame when
20 you --

21 A Before -- before Ted quit, so it was
22 probably late 2019.

1 Q Okay.

2 A Also, just a heads up. I have like a
3 three-minute call at 11:00 a.m. to go through the
4 schedule with the district staff. Would that be
5 cool if we took a break right then for just, like,
6 five minutes?

7 Q Yeah, absolutely. And then just to let
8 you know, I think we've got maybe another 20 or 30
9 minutes. But if we want a little bit of a break,
10 and then we'll try to get you out of here quickly.
11 Sorry, this has run a just a little longer than we
12 initially thought. But yeah, just let us know when
13 you need to stop, and you can get on your call, and
14 then we'll get off the record, and you can take your
15 call, and then we'll come back.

16 Okay. We just talked about driving tasks.
17 You said that you once did the Congressman's
18 laundry. Any other dry cleaning or laundry-related
19 tasks that you can think of?

20 A Yes. So whenever the Congressman -- he
21 would put his -- like his dress shirts or his suit
22 pants or coat on my desk chair. That means he

1 wanted it to get to the laundry, so I would take it
2 to the back and, you know, just that was my own
3 reminder, like I'm going to take this later.
4 Because it -- but I would just have an intern do it,
5 honestly, because I didn't have time for that. And
6 then it got to where he would just leave it on his
7 couch in his office. If you just left shirt, coat,
8 trousers, and that was me to take it. And then it
9 got to where sometimes he would just leave it at the
10 bottom of his closet on the floor, and then that was
11 my cue to take it to the laundry. He did tell me at
12 one point, like, if I leave clothes on the floor of
13 my closet, that they needed to be taken to the
14 laundry.

15 Q Okay.

16 BY MS. EISNER:

17 Q Would he tell you when he left the clothes
18 at the bottom of his closet, or were you just
19 routinely checking his closet to see if there were
20 clothes that were there that you needed to take to
21 the dry cleaner?

22 A The closet thing with the laundry didn't

1 happen until maybe late last year, or early, early
2 this year. I don't even remember. But it was
3 either just my chair or his couch. And then the one
4 time he said, if I have clothes in the bottom of the
5 closet, that's when I want them taken. And then I
6 made it a point to just check the bottom of the
7 closet, or I would just check his office. When he
8 would leave for fly out day, I would just check
9 everything and see if there were any clothes strewn
10 about, I would take them.

11 Q And then when you say take them, where
12 would you take them?

13 A Downstairs in the Longworth laundry place.

14 Q Okay.

15 A And then, I had petty cash in my desk
16 drawer that would pay for that laundry. He would
17 give me petty cash whenever I asked for it. Like,
18 hey, we're running low on petty cash. We need
19 another, you know, hundred dollar bill to pay for --
20 when he would send us to get his lunch or the
21 laundry, or when a staffer had their birthday, we'd
22 get them donuts; that sort of thing.

1 Q Besides sort of your involvement in that,
2 were there any other staffers who helped with
3 laundry or, you know, dry-cleaning requests, if you
4 could tell us about that?

5 A Sure. Yes. I'm almost positive it always
6 would be an intern who would take it down and pick
7 it up. I don't think I ever picked up or took down
8 laundry for him. It was just either Kevin -- Kevin
9 Care, the staff assistant -- or one of our interns
10 at the time. And they never questioned the logic
11 either, so maybe it's a common thing.

12 BY MR. QUINN:

13 Q I can either -- I wanted to ask you
14 something about Representative Mooney's birthday
15 parties. Would you like to pause for your call, or
16 you have a few more minutes?

17 A I have to get on at 11:00 a.m. Like at
18 10:59, I can hop off and dive right in.

19 Q Great. Then can you tell me, I know you
20 were involved in helping plan Representative
21 Mooney's birthday party recently. Was that 2020 or
22 2021?

1 A 2021.

2 Q Okay. And can you just tell me about what
3 you did for planning that event, and then tell me
4 about the event itself?

5 A He's the one that found the venue. I
6 called a few places, I believe, and they weren't
7 doing, you know, the number he wanted, I guess
8 because of their Covid precautions. And then he
9 found the venue, Clarion Hotel in Harpers Ferry,
10 that could hold the event. And he put me in contact
11 with the young lady there. Her name was Crystal
12 Bowser, and we discussed, you know, a number of
13 people, the food. She sent me a menu -- a liquor
14 menu. Then he said, you know -- and I would just
15 bring all this information to him, like, hey, how do
16 you want this. We wanted the prices on the liquor.
17 So they just decided to do a beer and wine thing.
18 We didn't do a package. And then Katie Cannon, the
19 fundraiser, she became involved because I didn't
20 know how to do, like, a little fundraising party.
21 So she helped me choose the menu items. He wanted
22 it to be an all-day thing from 12:00 p.m., I think,

1 till midnight, because he wanted -- it wasn't his
2 actual birthday that day. It was the 5th. His
3 birthday was the next day, and that's why he wanted
4 it to go till midnight. And then he wanted it to be
5 a dance party at one point, I think. He ordered the
6 DJ. I did not have anything to do with that. It
7 was mainly -- my portion was just basically setting
8 up the food, like ordering that, which I did, and I
9 filled out the, you know, credit card authorization
10 form, you know, with the credit card number to pay
11 for the food and the drink and the room rental, the
12 projector rental. I think he wanted to show
13 pictures of him growing up or something. I'm not
14 sure. I think Grace was in charge of getting
15 pictures of him and getting that to Crystal or
16 something. That was the extent, I believe, on mine.

17 Well, then I did -- there was some
18 instances where I was -- they were making campaign
19 calls to people. Not campaign calls, but they were
20 calling donors to invite them, and I was writing
21 down a list of people for me to call, like they're
22 like, [Former Staffer 2], can you call these people,

1 which I actually never got a chance to do, thank
2 goodness, because I didn't feel comfortable doing
3 that after all these OCE things. But yeah, they
4 were just giving out lists. They -- I mean, Katie
5 Cannon, and Alex Mooney, and Mike were giving out
6 who was going to call people to remind them about
7 the birthday party. I did participate in making
8 the invitation to send out to people, and I sent
9 it out to Katie Cannon. I think that was basically
10 the gist of my portion in it.

11 Q And can you just describe the fundraising
12 portion of this event? You know, did people have to
13 buy tickets, or were they just asked to pledge
14 certain amounts? If you can describe that.

15 A Yes. They were asked to pledge. There
16 was a \$50 portion just because it was his 50th
17 birthday, like \$50 for friend level. You know,
18 there were higher levels. I think it went up to
19 2,500, I think, and then they had lower levels, 500.
20 I don't know what they're called. But you did have
21 to pay. Some people to get in for free. I got in
22 for free. Michael would have got in for free,

1 Michael Hough. The staff would have been able to
2 come, because they were, you know, expected to work
3 it. And then some did travel from the Charleston
4 office. They traveled to Harpers Ferry one night,
5 or two nights, and they came and worked the birthday
6 party. It was [Current Staffer 1], Susie Azavedo
7 (phonetic) and Jane Potter. I think that was all
8 that came to the birthday party to work it.

9 Q Okay. And those are all official
10 Congressional employees?

11 A Yes. And actually, now that I think about
12 it, I don't think Jane Potter came, so don't write
13 her down. Maybe there was just two staffers. Oh,
14 no. I got it. There was an intern from the
15 Charleston office who came back. And I need to dial
16 in, you all.

17 MR. QUINN: Okay. Jackie, let's go off
18 the record for now.

19 (Whereupon, a recess was taken.)

20 BY MR. QUINN:

21 Q I think we're back on the record. So we
22 were talking about the 2021 birthday party in

1 Harpers Ferry. Just a couple of other quick
2 questions. So you mentioned that staff --
3 Congressional staff worked the birthday party?

4 A It was all voluntary, yes.

5 Q Okay. Can you go into a little bit the --
6 I guess the question I have is how voluntary was
7 that? Were people told to participate in the party,
8 or did you truly believe that that was an option
9 that people had to turn down attending or working
10 the party?

11 A Yes, I do. The only one who would have
12 been voluntold was me, I think, because Michael was
13 -- he had forgotten that I had vacation planned, and
14 he said, wait, what, no. He was like, I needed you
15 to be there to help me. So that was my cue of I
16 would have been there anyway, which I was not going
17 to volunteer for. And I may have had the backbone
18 to say no. I don't know, because I never had to --
19 I had to cop out. So I had my vacation, but for
20 everyone else, yes, it was voluntary.

21 Q Wait. So sorry. I'm confused. You did
22 attend and staff the party?

1 A I did not. I had vacation days. I was
2 out of the state.

3 Q Okay. Got you. And then were there any
4 other official staff that helped plan the party?

5 A No. I think it was just me.

6 Q Okay.

7 A And Michael.

8 Q And Michael, okay. And then for those
9 official staff that volunteered to work the party,
10 can you describe what they would have done there?

11 A Yes. They were just going to, I think,
12 you know, sign people in. I think they were going
13 to take payment maybe, or take their checks. I
14 don't know exactly, but I do know there would have
15 been a sign-in table and probably, you know,
16 mingling. But I never asked what their job would
17 be, other than to sign in the RSVP list. Because I
18 had to send [Current Staffer 1] the RSVP list that I
19 had, or give him access to it via a Google doc. I
20 don't even remember, but I do think I sent it to him.
21 And I may be able to find where I e-mailed him that
22 document. Let me see. I'll write it down.

1 Q And then for the work that you did in
2 planning the party, did some of that work occur
3 during normal office hours?

4 A Yes.

5 Q Okay. And if you can, ballpark for me,
6 about how much time you spent on the birthday party.

7 A 10 hours or less. That may be way over.
8 Maybe not. I don't know. Just all combined,
9 because we did start, like, a couple months earlier
10 -- at least a month early. Probably ten hours or
11 less. I would say max, ten.

12 Q All right. Just on the point of personal
13 errands, any other either particular tasks or people
14 who were doing these sorts of tasks that we haven't
15 talked about yet that we should know about?

16 A I think it would have just been me and
17 [Former Staffer 3] doing that. And, you know,
18 [Former Staffer 1] did do some stuff, I think,
19 in the beginning, like when he first started. I
20 think I'd heard some stories, but I don't know.
21 You'd have to talk to him about all those. I'm
22 sure he's got plenty. I'm probably forgetting

1 some things, but I think the things I told you
2 out were the main things that stuck in my mind.

3 Q Okay. Great. We've talked a little bit
4 about mileage already. There's just one or two
5 specific incidents I want to ask you about.

6 MR. QUINN: If we could pull up -- Matt,
7 if you could pull up Tab 9. And then you can mark
8 that also, Matt.

9 (Exhibit C was marked for identification
10 and is attached to the transcript.)

11 Q Okay. So [Former Staffer 2], can you see that?

12 A Yes. Okay, I remember this, yes.

13 MR. QUINN: And Matt, can you scroll to
14 the bottom of the document? I can't remember if
15 this one -- okay. This document has a Bates stamp
16 of CM_1403. We just marked it as Exhibit C.

17 Q [Former Staffer 2], this is an e-mail from
18 you where you cc yourself and sent the e-mail to
19 [Former Staffer 6], and there's some receipts here.
20 Can you just tell me about these receipts?

21 A Yes. So the reason I mentioned Morgan
22 Griffith is like because I know Morgan would be able

1 to say, yeah, he brought me food this night and
2 maybe he would see the time stamp that he didn't go
3 home from when Morgan said he got the food. I don't
4 know.

5 So we did -- the Congressman drove in to
6 D.C., and then he took the Metro out to Pentagon
7 City or Crystal City, and I picked him up to -- I
8 think we went to go get his bulletproof vest, if I'm
9 not mistaken.

10 And then we went to this Mission Social to
11 get dinner and then to do scheduling. We did
12 legitimate Congressional scheduling, because I had a
13 bunch of questions for him to go through the
14 calendar, all that. And so that's when -- and so he
15 charged the meal, and he got Morgan Griffith a meal
16 to go. And so this was right before, I think --
17 yeah, right before January 20th, so the 19th, like
18 that should be time stamped on these receipts
19 somewhere, I hope, unless it's too blurry. And so,
20 like, this was something that stuck out in my mind
21 because I knew he did not go home when he took the
22 mileage to go home that night. And I think the

1 mileage from -- I don't know. I've sent it to you
2 guys. The mileage from January 20th should show a
3 trip to D.C. and then back home, when in reality, he
4 never came in on the 20th. He came in on the 19th,
5 and he didn't go home on the 19th. Yeah.

6 Q Right. Got you. Okay. Understood. Can
7 you think of any other instances where you know for
8 a fact that Representative Mooney claimed mileage
9 that he didn't actually drive?

10 A I know there were some things. I don't
11 know when, but I do know he would just say, oh, I
12 would go home anyway that day; just give me the
13 mileage to go home, when in reality he would go
14 somewhere else. I guess he would drive somewhere
15 else to -- you know, I don't even remember the
16 instances, but you could find them, probably
17 correspond them on the mileage -- the mileage
18 documents -- and then the printouts of the calendar.
19 I don't think that would be a problem. I think it
20 would just be time consuming, but that's where I
21 think all the evidence would be.

22 Q Right. Great.

1 MR. QUINN: Matt, you can take down this
2 Exhibit C.

3 A Because on his calendar he would say who
4 drove him. Reiner picked me up. Mom picked me up.
5 Or I would say Lala picking AXM, at Alex Xavier
6 Mooney, at the Wheeling Reston station. It was
7 usually always noted who picked him up, or if he did
8 the driving. So you could see if he did the driving
9 or someone else, which he did try on occasion, and I
10 may have -- I probably signed off on that too. You
11 know, if he told me to, I did it. Yeah.

12 Q You don't still have access to the
13 calendar, right?

14 A No, I don't.

15 Q Okay. And then could you -- I know
16 there's also a situation where he would sometimes
17 claim mileage for trips to a physical therapist that
18 were in the same -- the physical therapist was in
19 the same building as the campaign office; is that
20 correct?

21 A No, the Martinsburg District office. They
22 were in the same building at one point, but that --

1 the physical therapy did move. I think that was
2 after my time. But yeah. So he wanted me to
3 schedule certain -- like maybe he could go take a
4 Zoom meeting on the same day that he was going to
5 get his physical therapy so like he could claim
6 mileage for that, is what I started to think. And
7 then at one point I do think he -- I want to say he
8 changed or he took off where he was going to the
9 physical therapy. I think he took it off so it
10 didn't show -- I know I'm talking in circles, but
11 something sticks in my mind that he removed
12 something from the calendar involving his physical
13 therapy, or he took off the location, or something,
14 to show that it wasn't corresponding -- like, you
15 know, it wasn't showing that it was in the same
16 building or nearby. I could be dead wrong, but --

17 Q When -- do you recall when you noticed he
18 was doing that?

19 A It was just one time, and I want to say, I
20 think I told you this over the phone months ago, but
21 I want to say it came to my e-mail. I don't even
22 think I was working there at the time. I don't

1 know. Now I just can't find it. I'll look again,
2 but maybe I did find it, and I found that I was
3 wrong and I'm just not remembering that. But it
4 would have been the summer. So either May or June,
5 I think, or maybe even July. I want to say it
6 happened after my time, but I'm not positive.

7 Q Okay. Do you think it was after the --
8 you finished working collecting documents for the
9 OCE request?

10 A Yes, I do believe so.

11 Q Okay. I wanted to ask you about Former Staffer 5
12 [REDACTED]. Do you know who Former Staffer 5 is?

13 A I think she just worked on the campaign
14 side. I don't know if she was campaign manager. I
15 don't even know if she was the accountant. I don't
16 even know her title. I was probably told at one
17 time, and I don't remember. All I know is the
18 scandal with Former Staffer 5 was she stole money,
19 and I don't even know if she paid it back. She may
20 have. She may not have. I don't know why she stole
21 it. Maybe she thought she was owed it. I don't
22 even know -- because they were all -- Michael just

1 didn't even want to tell me, and then he would just
2 -- because I was asking. I was trying to get to the
3 bottom of it during the OCE investigation. I was
4 like, oh, what did she do? Like, tell me the tea.
5 But I didn't like get anything concrete, I don't
6 think, other than she just stole money, and I don't
7 know why she did. I don't even know if she paid it
8 back, or they wanted her to pay it back. I don't
9 know. But it was campaign money.

10 Q Okay. Got you. Stole campaign money.
11 Did you ever hear anything about trying to paper
12 that over or cover up that event?

13 A I don't, but that's why I think I wanted
14 to know. Like, I wanted to get to the bottom of it,
15 because I'm like, we're going through this
16 investigation so how would you cover up 12 -- if it
17 was \$12,000. I don't know. That sticks in my mind.
18 It may not have been that. How would you cover up
19 \$12,000, if she didn't pay it back, but she may
20 have.

21 Q Okay. Great. Another event -- sorry.
22 Now I'm just moving through a list quickly, and then

1 hopefully we'll have you out of here.

2 But another event that I want to ask you
3 about quickly was the May 2021 NRCC event. There
4 were some e-mails, and I could pull them up so you
5 could look at them quickly, but just to jog your
6 memory. You had e-mailed [Current Staffer 3] about his
7 transport to the airport, and whether or not he
8 could charge that to the MRA. I'm just going to
9 pull up the e-mail, because I could tell from your
10 face --

11 A Yeah.

12 MR. QUINN: Matt, can you pull up Tab 10?
13 And can you give [Former Staffer 2] control of that
14 document?

15 (Exhibit D was marked for identification
16 and is attached to the transcript.)

17 Q Just let me know once you've had a chance
18 to look at those e-mails.

19 A Okay. Yeah. Yeah. Yeah, I don't
20 remember this trip exactly. I'd probably remember
21 if I saw, like, the calendar things and stuff -- the
22 calendar events. But --

1 Q Okay.

2 A -- this definitely does sound like
3 something that the Congressman would ask me, can I
4 claim mileage from here to here. I think he did.
5 I'm almost positive now that the Congressmen asked,
6 can I claim mileage to and from the airport, and
7 that's when I asked [Current Staffer 3].

8 Q Okay. Just for the record, this Exhibit D
9 is Bates stamped DL0392. And if you don't have any
10 specific recollection about this, then we could move
11 on.

12 A Sometimes the Congressman would ask me,
13 hey, can you ask [Current Staffer 3] if I can do this,
14 or sometimes he would not get mad about, you know,
15 asking [Current Staffer 3], and this was one of them.

16 MR. QUINN: Okay. Great. Matt, you can
17 pull down Exhibit D.

18 Q Back on birthday parties. Do you recall
19 ever hearing anything about the 2018 birthday party
20 that was on the speaker's porch or speaker's
21 balcony?

22 A Only thing I ever remember hearing is that

1 -- I think because [Former Staffer 6] told me that
2 interns were asked to come in, and I guess it was on
3 a Saturday, like I said earlier. I'm guessing it was.
4 I haven't even looked up that date. To come work it.
5 To come give people tours. That's all. I don't
6 even know how they paid for food, if they had food,
7 drink. I have no idea, unless it was told to me and
8 I've just forgot because it just wasn't important
9 for me to keep stored.

10 Q Then I think we are getting to the end.
11 The last couple questions I want to ask you just are
12 sort of general questions. If there's anybody we
13 haven't talked about yet that you think we should be
14 talking to that you can think of.

15 A Definitely [Former Staffer 1], if you all
16 haven't already, because I know he's probably -- I
17 don't know how long he's worked for Alex, or had
18 worked for Alex, but I know, like that instance I
19 said about the Congressman -- we went to our staff
20 retreat back in February 2021 and [Former Staffer 1]
21 was supposed to get gas money, and the Congressman
22 said, hey, I paid [Former Staffer 1] for gas, and

1 the Congressman never did. That's another instance
2 when he took the mileage, was for the staff retreat
3 back in 2021.

4 Q Okay. And what happened there?

5 A Let me see if I wrote this down. Oh,
6 well. I just didn't want to contradict anything I
7 have already said. I mean, I'll probably say the
8 same thing.

9 That was -- so [Former Staffer 1] picked
10 the Congressman up from the Congressman's house in
11 February to begin the staff retreat. So [Former
12 Staffer 1] drove in from Charleston, West Virginia
13 picked up the Congressman, drove him to Annapolis,
14 where we were having our staff retreat, because
15 Michael is a State Senator in Maryland, I think
16 still, and he was in session that month. And so
17 if he was going to participate in the staff retreat,
18 it had to be in Annapolis. And we cleared that with
19 [Current Staffer 3], like we could go anywhere in
20 like the DMV area. So we went to Annapolis, and I
21 think the Congressman, at the end, said we can look
22 at the mileage, but I think that when I did his

1 mileage at the end of February, that he took the
2 mileage from like where [Former Staffer 1] drove
3 him. Like I could be wrong. Like we really need to
4 look at that to make sure.

5 But yeah, and then I'd asked the
6 Congressman when we were doing his mileage at the
7 end of the month, I was like, oh, [Former Staffer
8 1] drove you from here to here. And he said, oh,
9 I paid [Former Staffer 1] gas money. Then I made
10 a mental note, like I just want to just see. I'm
11 just curious. And then [Former Staffer 1] said,
12 no, he didn't pay me any gas money. And then I'm
13 pretty sure the Congressman took mileage whenever he
14 was driven around that week. And then [Former
15 Staffer 3] took him home. So [Former Staffer 1]
16 took him to Annapolis, and then from Annapolis, he
17 took him back to, I think, our -- I don't know where
18 he took him back to. You could see in the mileage.
19 He either took him home, or he took him to Priestville,
20 to the second part of our retreat, which is in West
21 Virginia, right near the Congressman's house. And
22 then I think [Former Staffer 3] picked him up from

1 home maybe and drove him, and he may have taken
2 that mileage. It was just that night.

3 Q So it sounds like I remember during a
4 Richmond trip when you drove him and apparently
5 maybe with this [Former Staffer 1] trip, but
6 sometimes the Congressman would claim mileage
7 that one of you all drove and pay you just for
8 the amount of gas -- like the specific amount
9 you might have spent for gas, and then he would
10 himself claim the mileage reimbursement rate;
11 is that correct?

12 A Yes, except that the only one instance
13 that he gave me gas money was when -- like physical
14 cash -- was when I went to Richmond. And I don't
15 know if you remember, the night I took him home one
16 night during session to West Virginia. It was the
17 middle of a week in session. I drove him home, and
18 we did stop for gas, and he did fill up my tank, but
19 I looked in my rearview mirror, and I saw him put
20 the campaign card in like the gas thing. And like I
21 just felt weird thanking him for it, because it's
22 really not your money, but anyway. But that was

1 another instance where he did pay for gas, and I
2 don't think he claimed mileage for it, because you
3 can't actually claim mileage going home in between.
4 You only can do the flight in and the flight out.
5 You can't do it -- claim it in between, and he knew
6 that. But he did use campaign card to get me gas.

7 And then the only other time I know about
8 him offering gas money was when I asked him, did you
9 pay [Former Staffer 1], or he said, I gave [Former
10 Staffer 1] gas money when he drove me to Annapolis
11 and back, but then he didn't. So those are really
12 the three instances about gas money that I recall.

13 Q Okay. I guess what I'm trying to get at
14 is, normally the mileage reimbursement rate is some
15 amount for gas, and then there's also, you know, a
16 little additional for like wear and tear on your
17 car. So what was happening -- or I'm asking was
18 what was happening was he just paid for the gas and
19 was getting reimbursed a higher amount by the House?
20 Like was he making money on those trips?

21 A You can't get -- according to [Current
22 Staffer 3], you couldn't get reimbursed for gas

1 money, or if you filled up your car, you couldn't
2 submit the receipt to get reimbursed for that.
3 You can only do the mileage.

4 Q Right.

5 A I think he would get more from mileage,
6 because if I drove from here to his house in West
7 Virginia and back, I think that was like \$70. I
8 don't remember exactly. It could be less. It's
9 less than a hundred, I know that. But I do think,
10 you know, it would have been more beneficial to me
11 to take the reimbursement to take him home than to
12 just ask him for gas money for the Richmond trip.

13 Q Right. That's what I was asking.

14 A Okay. Okay.

15 Q Basically, he was taking the benefit of
16 the mileage and just paying you back for just the
17 gas?

18 A Yes.

19 Q Okay.

20 A You know, I don't think he got -- I don't
21 know if I -- when I did for his Richmond trip, I
22 don't know if he got mileage for that. We'd have to

1 look back at it.

2 Q Right.

3 A It would be super easy to find that out,
4 but there were instances like that where he would
5 take the mileage and say, you know, while in
6 reality, so and so, like, his mom picked him up, but
7 he would take the mileage, yes.

8 Q Okay. You might have said it earlier, but
9 do you recall the date of that Richmond trip? Or
10 ballpark?

11 A I think I did look for this in my own
12 calendar, and I don't know, but it may have been --
13 like, I'm trying to think what I was wearing, and I
14 think it was a skirt. So I think it was warm.

15 Q Which year? Was it this past year?

16 A It would have been 2020.

17 Q Okay. So summer, spring-summer of 2020?

18 A I think so. But maybe -- when is
19 basketball season for kids or for teenagers, so
20 maybe that would be a better indication.

21 Q Oh, and then quickly, you mentioned Ted
22 Dacey. What is his role again? Is he in that

1 Congressional office?

2 A He was. So he was the communications
3 director, and he was also the deputy chief of staff.
4 But he will also work a lot on the campaign side. I
5 don't know exactly what he did, because I was still
6 you know, getting used to my role when I knew him,
7 and I didn't, you know, think to ask questions about
8 what else he did.

9 Q I'm sorry. Did [Former Staffer 1] replace
10 him as deputy chief?

11 A Yes.

12 Q Okay.

13 A And the only reason I think Ted did a lot
14 with the campaign was because when he was a teenager
15 he knew the Congressman, and he would work on the
16 campaign, I believe. And then because he dealt with
17 the -- giving Reiner the gift cards with the
18 campaign card. That's another reason I'm led to
19 believe he did campaign stuff on the side. And I
20 don't know if he was paid through the campaign, or
21 anything like that.

22 Q Okay. And do you know why he left?

1 A He'd been with the Congressman for five
2 years or so. I don't know if that was while he was
3 in Congress or he had just known the Congressman
4 that long, but he moved to Targeted Victory, I guess
5 just a better position. I think he was just over
6 The Hill, maybe.

7 Q Okay. Great. Well, I think that's all I
8 have.

9 MR. QUINN: Helen, do you have any final
10 questions for [Former Staffer 2]?

11 MS. EISNER: Yeah, just two final things.
12 BY MS. EISNER:

13 Q There's a document that you're looking at
14 occasionally. It sort of looks like notes or
15 something that's written out. Can you tell us what
16 that is? Is that your personal notes, as far as
17 recollections of this issue, or what is that
18 document?

19 A It's just -- so I told Sean that I have
20 just memories, and I don't actually have physical
21 evidence of that. And so I wrote it all down. I
22 typed it all up, and I sent it to him. And it

1 helped me so when I'm looking through it to tell you
2 about the February staff retreat trip, and when the
3 Congressman had [Former Staffer 1] drive him, it was
4 just so thick that I wanted to read it or, you know,
5 give you a better chronological order because I'm
6 sure I flip-flopped a bunch, and that's why I was
7 looking through it.

8 BY MR. QUINN:

9 Q And that's just the document you produced
10 to us?

11 A I just printed it out for my own sake.

12 BY MS. EISNER:

13 Q Okay. And then final question. I know
14 that you had a list of a few things that you had to
15 follow up with, look at your records and get back to
16 us, and you had mentioned this to us, but I just
17 wanted to confirm that it would be helpful if you
18 could get us the HSP house information, including
19 address. I think you said you probably had that in
20 your record somewhere. So, you know, to the extent
21 that you're looking back for any additional
22 information, that would also be helpful. That's all

1 I have.

2 A Just the address?

3 Q Anything you have about the house, any --
4 yeah.

5 A Okay. I got it.

6 MR. QUINN: Okay. Then with that, I'll
7 e-mail -- I'll give you a couple of days to look
8 through that list and see what you can gather. I'll
9 get in touch with you sometime around the end of
10 this week, and we could see if you have anything
11 else to produce to us.

12 A And I'll get to the document right when I
13 get to work.

14 Q Okay. Perfect. Awesome.

15 Then with that, I think we can go off the
16 record.

17 (Off the record at 11:42 a.m.)
18
19
20
21
22

CERTIFICATE OF REPORTER - NOTARY PUBLIC

I, Jacalyn Mann, the officer before whom the foregoing deposition was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me and thereafter reduced to typewriting under my direction; that reading and signing was not requested; 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.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 19th day of OCTOBER, 2021.

My Commission Expires: December 22, 2024.

Jacalyn Mann

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

ERRATA SHEET

Page	Line	Correction	Reason
102	6 & 11	Jean Potter	Her name is not Jane
61	15 & 16	Rainer Kissel	spelling of name
91	10, 16, 20	Rainer Kissel	spelling of name
92	2, 17, 19	Rainer Kissel	spelling of name
93	12	Rainer Kissel	spelling of name
94	14 & 15	Rainer Kissel	spelling of name
109	3	Rainer Kissel	spelling of name
122	10	Rainer Kissel	spelling of name
98	8	Kevin Carugati	spelling of last name
107	9	Mason Social	spelling of restaurant

This errata sheet is submitted subject to 18 U.S.C. § 1001 (commonly known as the False Statements Act).

Witness Name:

Witness Signature:

Date:

11-10-2021

EXHIBIT 3

Transcript of Interview of Former Staffer 3

Review No. 21-6998

October 29, 2021

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

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INTERVIEW OF FORMER STAFFER 3 :

: OCE REVIEW

: NO. 21-6998

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Interview of FORMER STAFFER 3

Conducted Virtually

Friday, October 29, 2021

10:03 a.m. EST

Job No.: 410251

Pages: 1 - 74

Recorded By: Ashby Everhart

1 Interview of FORMER STAFFER 3,
2 conducted virtually.

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10 Pursuant to agreement, before Ashby Everhart,
11 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 OTHER:

SEAN M. QUINN, ESQUIRE

ANNIE CHO, ESQUIRE

OFFICE OF CONGRESSIONAL ETHICS (OCE)

OF THE U.S. HOUSE OF REPRESENTATIVES

425 3rd Street, SW, Suite 1110

Washington, DC 20024

202.225.9739

C O N T E N T S

INTERVIEW	PAGE
By Mr. Quinn	5

E X H I B I T S

(Attached to transcript.)

HEARING EXHIBIT	PAGE
Exhibit A Emails	27
Exhibit B Emails	52
Exhibit C Receipts	55
Exhibit D Bank Statement	67

1

P R O C E E D I N G S

2

EXAMINATION BY COUNSEL FOR THE OFFICE OF

3

CONGRESSIONAL ETHICS

4

BY MR. QUINN:

5

Q Great. So today, just for the record,

6

is October 29th, 2021, and we're conducting the

7

interview of Former Staffer 3 by Zoom. Former

8

Staffer 3's not represented today. Speaking is

9

Sean Quinn, Investigative Counsel at the Office of

10

Congressional Ethics. I am here with Annie Cho,

11

also at the OCE. The witness has been given a

12

copy of 18USC1001, along with the acknowledgment.

13

We've discussed that and she'll be returning the

14

acknowledgment as soon as she can.

15

So first, Former Staffer 3, just thanks again

16

for your cooperation and for being here today and

17

for all the time you spent collecting documents.

18

I know that's not an easy process. But I

19

appreciate it very much.

20

A Yeah. Of course.

21

Q Looks like we have Sean back. Do you

22

want to go off the record for a second?

1 (Whereupon, a discussion was held off
2 the record.)

3 A Yes.

4 Q Okay. Great. So as I was saying,
5 Former Staffer 3, just thanks very much for being
6 here today and for all your time. Appreciate it.

7 A Thank you. Thank you.

8 Q Throughout our discussion today, feel
9 free to stop me if you have any questions or if
10 something's not clear. I'm always happy to reword
11 a question or just repeat the question if -- if
12 you didn't understand it. And then also if you
13 need a break at any point, like a bathroom or
14 water break, just let me know.

15 A Okay.

16 Q After going for about an hour, sometimes
17 it's good to take a break. And then also, as I
18 mentioned, Ashby will be -- transcribing our
19 conversation. So if we can try to speak, you
20 know, kind of a regular pace, not speed up too
21 much for him, and then also try not to speak over
22 each other --

1 A Okay.

2 Q -- it'll make it easier for him to
3 record everything or transcribe everything.

4 A Okay. That sounds good.

5 Q Does that all make sense? Any questions
6 for me before we start?

7 A Uh-uh. Nope.

8 Q Okay.

9 A No.

10 Q Great. So let's just start with a
11 little bit of background information. Former
12 Staffer 3, can you tell me how you started
13 working for Representative Mooney?

14 A So I started interning for him November
15 of 2019, and I was a senior in college at that
16 point. And then he knew I was graduating and
17 looking for a job, so he took me on to help out
18 with his campaign. So I worked as a staff
19 assistant slash, like, part-time campaign up until
20 July. And then from July to November, I was
21 full-time campaign. So I met him through an
22 internship.

1 Q Okay. Sorry. You worked -- so after
2 the campaign -- sorry. Just -- just tell me, when
3 -- when did you start as a staff assistant?

4 A So I started -- I was part-time -- it's
5 so confusing. I was part-time staff assistant and
6 part-time campaign assistant/manager from April
7 until July. And then from July until November
8 election day, I was on the campaign full time.

9 Q And that was in 2019?

10 A '20. Yeah.

11 Q So 2020?

12 A December, 2019.

13 Q 2020.

14 A Yeah. 2020. Sorry.

15 Q Got you. Okay. And then -- so what
16 period of time were you both an official House
17 employee and also a campaign employee?

18 A April 2020 until July 2020.

19 Q Okay.

20 A From -- most -- all.

21 Q Got you. And from -- so from December
22 2019 until, I guess, about April 2020, you were

1 just an -- an intern?

2 A Yeah. Intern. Yeah.

3 Q Got you. Got you.

4 A (Inaudible) and stuff.

5 Q Understood. Okay. And then did you
6 receive -- for -- for that period that you were
7 employed both by the campaign and at the House,
8 did you receive a salary from the campaign?

9 A Yes. Yeah.

10 Q Okay.

11 A I received -- in total, I was making
12 \$30,000 a year, but I was being paid from both the
13 campaign and the official side during that time
14 frame. So two separate --

15 Q And then let's just take your roles in
16 the House and then in the campaign separately.
17 And if you can just explain your duties as a staff
18 assistant.

19 A So just as a staff assistant, I would
20 help with official office work, assisting with
21 flag orders. Tours, obviously, were not a thing.
22 Just basically constituent communication, helping

1 communications director print out 499 letters,
2 just administrative standard duties as a staff
3 assistant. So --

4 Q And then how about for the campaign?
5 What -- how would you describe your duties?

6 A So campaign, I would help door-knock for
7 the candidate. I would also help with FEC
8 reports. I would help get -- pick up checks from
9 the PO Box. I would -- just basically I'd help
10 put out yard signs, help with the campaign office,
11 phone banking. I would do a lot of phone banking.
12 Just standard campaign work.

13 Q Okay.

14 A And so I would go (inaudible) and part
15 of the week in DC.

16 Q Sorry, repeat. That cut out for a
17 second. I didn't hear the last word.

18 A Oh, sorry. I -- so I was working in
19 West Virginia part of the week and then DC part of
20 the week when I was --

21 Q Okay.

22 A -- working both roles.

1 Q And where were you -- where were you
2 living at the time?

3 A I live in Virginia. I live in Northern
4 Virginia.

5 Q So how far is your drive to West
6 Virginia?

7 A It would -- I think, like, an hour, 15
8 or so. It was a long commute. Yeah. But an
9 hour, 15. And then to DC is about (inaudible.)

10 Q Okay. And then can you explain to me
11 how you split your time between the two roles?
12 Did you have certain days that you were working
13 for the campaign and certain days you worked for
14 the official office? Or how did that work?

15 A Yeah. So it was a fluid schedule.
16 Usually the chief of staff wherever I was most
17 needed. So if I was more -- more -- if we were
18 more busy in DC, I would go to DC and help out
19 with whatever they needed at the campaign. If it
20 was a little more busy then I would obviously go
21 to the campaign in West Virginia. So I had a
22 pretty -- I didn't have necessarily a set

1 schedule, but I -- you know, wherever I was most
2 needed, basically.

3 Q Okay. Where do -- was it 50/50 split or
4 how did you think your work allocation ended up
5 working out?

6 A You know, honestly, I couldn't really
7 give you a number. About 50/50, though. I -- I
8 -- I don't really recall.

9 Q Did it just -- it just depended on kind
10 of the day and --

11 A Yeah. On the week. Like, some weeks I
12 was more in DC, others I was in campaign. So I
13 don't -- I'm not totally sure.

14 Q Okay. And then --

15 A It was kind of a wash.

16 Q Who -- did you report to the same person
17 for both those -- those roles or to different
18 people?

19 A I reported to the same person, usually
20 the chief of staff, Alex, directly, or the
21 congressman, I should say.

22 Q Okay. So normally it was either Mike

1 Hough, the chief of staff, or the congressman who
2 was telling you what to do --

3 A Yeah.

4 Q -- on a given day?

5 A Yeah. Yep.

6 Q Were there other shared campaign and
7 official employees when you were in that role?

8 A No. No. That I can think of, no. They
9 would sometimes help out, like, on their personal
10 time, but I don't believe they were paid, like,
11 from both -- like, salary from both.

12 Q Do you know -- before you, are there
13 other employees that were both official and shared
14 employees?

15 A Oh, gosh. I don't know.

16 Q Like, was -- like, was Hannah Mansell a
17 shared employee; do you know?

18 A I know she did help him out, like, on
19 the campaign side. To be -- honestly, I don't
20 know. I never really spoke with her about her
21 role per --

22 Q Okay.

1 A Because I knew she was a little bit
2 before --

3 Q Okay. And did you work closely with
4 [Former Staffer 1]?

5 A Yes. Yes.

6 Q Okay.

7 A Yes. He was Charles Town guy.

8 Q Okay. So he -- [Former Staffer 1]
9 described to us that sometimes it was hard for
10 the shared employees -- the campaign and
11 official employees to kind of --

12 A Uh-huh.

13 Q -- navigate that situation, that you
14 were kind of pulled in both directions. And --

15 A Yeah.

16 Q -- sometimes it wasn't -- sometimes it
17 wasn't clear whether or not you should be working
18 on the campaign or you should be working in the
19 official office at a certain time. Did you find
20 that to be the case?

21 A Yeah. Definitely at times, because --
22 like, for instance, I couldn't check my campaign

1 e-mail in the official office, so there was times
2 I'd have to, like, walk off campus to go check
3 something. So it's definitely, like, a bit of a
4 struggle to maintain that balance with the
5 campaign and the officials. Sorry. I kind of
6 laugh, but -- yeah.

7 Q And then did you have specific work
8 spaces for each position? Like, you got a DC
9 office and a Martinsburg office?

10 A Yeah. Yeah. So I had the DC office in
11 Rayburn, and then -- which is for, obviously,
12 official business. And then in West Virginia we
13 have a campaign office, and then I would work out
14 of there for campaign.

15 Q And the campaign office was in
16 Martinsburg; is that right?

17 A They had a location in Martinsburg and
18 in Charles Town.

19 Q Okay. And were you in the --

20 A And sometimes we worked out of his
21 house, too.

22 Q Okay. So Charles Town, Martinsburg, and

1 --

2 A Yeah.

3 Q -- the congressman's house?

4 A House. Yeah.

5 Q Okay. Where did you work most
6 frequently?

7 A He just -- his house. I would
8 definitely say his house.

9 Q Okay. Was that the -- was that, like,
10 the campaign headquarter? Or where was their --
11 was their headquarters?

12 A For him, there isn't really a specific
13 headquarters. I know the Republican candidates in
14 the eastern panhandle of West Virginia, they all
15 kind of share those campaign offices in
16 Martinsburg and Charles Town with him. If it was,
17 like, directly him, usually it would be at -- just
18 at his house. If it was something, like,
19 (inaudible) that would be directly at his house.
20 Yeah.

21 Q All right. So another thing I want to
22 talk about kind of in your set of

1 responsibilities, I guess, are not official duties
2 or campaign duties. But we've heard from other
3 staff members that there are another -- or -- or a
4 number of sort of personal errands or tasks that
5 everybody would do for the member. I see -- I see
6 you're laughing.

7 A Uh-huh.

8 Q I see you laughing. Is that --

9 A Yeah, a bit.

10 Q What's that?

11 A It was -- yes. Sometimes we'd help out
12 a little bit personally. So it's -- yeah. So --

13 Q So that was -- that was pretty common as
14 well?

15 A Yeah. It was relatively common. Just
16 like if he needed to be somewhere and he needed
17 help, like, driving somewhere, like, his kids or
18 whatever, then I would help out. Like, if he
19 needed to make a meeting in DC and didn't have
20 time to drop off so and so, I would help go drop
21 them off at practice or something.

22 Q Okay. And that -- you mean the -- the

1 kids sometimes?

2 A Yeah. Yeah.

3 Q Okay. Let's -- let's talk about that
4 generally first, and then I've got a couple of
5 different types of tasks that we can kind of run
6 through and you can tell me if -- if you either
7 ever did those or heard of anybody doing them.

8 A Okay.

9 Q But why don't you -- why don't you first
10 just try to describe generally, as much as you can
11 remember, the sorts of tasks that you did for
12 Representative Mooney that seemed more personal as
13 opposed to campaign or official.

14 A Okay. Okay. Are you -- am I speaking?

15 Q Oh, yeah. Yes. Yeah. You can -- yeah.
16 Just go ahead and give me whatever you can recall,
17 and then I'll go through a list and we can try to
18 remember some more.

19 A Okay. One example being I would -- if
20 he knew I was driving in -- and, like, he -- he
21 was super busy. He would ask me to pick up
22 cartons of milk at the local grocery store and

1 then just take it to his family. I would
2 sometimes drive [Rep. Mooney's son] to Walkersville
3 for his English classes -- English courses. Yeah.
4 So I would just help out, like, driving kids at
5 times.

6 Q Okay. Let's talk -- so when you were
7 doing these sorts of tasks, which seem to involve
8 driving a lot of times, did you -- how -- how did
9 you get paid for the activity? Did you claim
10 mileage? Were you reimbursed for gas?

11 A No. No.

12 Q Okay.

13 A He would sometimes fill up my tank with
14 the campaign money, but, no. I would -- I would --
15 I was not tracking mileage. No.

16 Q Okay. Did you feel like you were
17 driving kind of a lot for some of these personal
18 errands?

19 A At times, yes. Some definitely were a
20 little bit further than others but, yeah.
21 Definitely at times.

22 Q Can you give me an idea of some of the

1 longer trips that you had to take and if any stand
2 out in your memory as, like, a particular long
3 detour?

4 A The longest, I believe, I want to say
5 about two hours. But I don't -- I wouldn't say
6 that was necessarily for a personal errand. I was
7 driving him back from, is it -- a staff retreat.
8 That was probably my longest though. It was,
9 like, two and a half hours. So I wouldn't
10 necessarily -- for a personal errand, I want -- I
11 would say about 45 minutes, was about it.

12 Q And 45 minutes round trip or 45 minutes --

13 A (Inaudible) to the next.

14 Q Okay. Got you. So that could end up
15 being, like, an hour and a half --

16 A Yeah.

17 Q -- detour.

18 A It was a round. Yeah.

19 Q That example you gave of driving him
20 back from a staff retreat, that does sound a
21 little more official. But even in that case, you
22 wouldn't claim mileage for that?

1 A No. No. I don't -- I -- I probably
2 could have through the official side. I --
3 honestly, that's probably my fault. I should have
4 probably claimed mileage through the official side
5 since that was more official business. But I
6 don't believe I claimed mileage for that trip.
7 No.

8 Q Okay. Do -- do you know if the
9 congressman would have claimed that mileage?

10 A I don't think so. No.

11 Q Okay. Let' see. Just staying general,
12 still, for the moment. Were there other people
13 around the same time that you were employed and
14 doing these sorts of tasks that were also asked to
15 do these sorts of personal errands, driving tasks,
16 and that kind of thing?

17 A Yeah. Yeah. Definitely. They would
18 help drive for sure. If you had a car and were in
19 DC, or wherever, yeah. They would definitely help
20 out with driving.

21 Q Okay. And who -- who else did that sort
22 of thing?

1 A I know [Former Staffer 2]. She would
2 sometimes help drive him, whether it be to, like,
3 a reception or driving him home from DC. She
4 would sometimes do that.

5 Q How about [Current Staffer 1]? Do
6 you know if he --

7 A Oh, gosh.

8 Q -- ever did those sorts of tasks?

9 A I'm not totally sure. I'm not really
10 sure, to be honest with you.

11 Q Okay. Yeah. That's fine. At any point
12 you just don't know something, that's --

13 A Yeah. I don't want to give you --
14 sorry. You're still -- but, yeah --

15 Q No.

16 A I know he (inaudible) of Charles Town,
17 but, yeah, I'm going to have to (inaudible.)

18 Q Okay. I have kind of a list of sorts of
19 tasks that either other witnesses have told us
20 they've done for Representative Mooney or -- or
21 referred that you might have done for
22 Representative Mooney, and I just kind of want to

1 go through them and -- and talk about each one.
2 So how about, like, babysitting tasks? Did you
3 ever watch any of the Mooneys' kids for them?

4 A Yes. Yes. I would help.

5 Q Okay. And can you tell me about that?

6 A If, like, Grace was busy, his -- his
7 wife, or he was busy just too much going on, I
8 would help watch their 5-year-old, agreed -- just
9 -- Grace to help watch her for a couple of hours
10 or so.

11 Q Okay. And would that be, like, during
12 -- during the workday, 9:00 to 5:00, or was that
13 on weekends?

14 A That would be workday. Sometimes on a
15 campaign, I worked on Saturdays. That's just the
16 nature of the campaign. But usually during the
17 week, workweek.

18 Q And how -- how often would you say that
19 that happened?

20 A About once or twice a week or so.
21 Sometimes not for long. Literally, like, 20
22 minutes, but, yeah, about once or twice a week.

1 Q Okay. How about -- the -- the Mooneys
2 have a dog; right? Is that correct?

3 A Yes. Yes.

4 Q Okay.

5 A I forget the dog's name. But, yes.

6 Q Did -- did you ever do any tasks related
7 to the dog, help take care of the dog, or anything
8 like that?

9 A Yeah. I would help -- if they knew I
10 was going into DC, I would sometimes -- they have
11 a, I don't know, I think it's Grace's family's
12 house, I would drop the dog off at their house on
13 my way into DC. They had the house outside
14 Bethesda or in Bethesda.

15 Q Okay. And but you live in Northern
16 Virginia; right?

17 A Yeah. Yeah.

18 Q Okay.

19 A Yeah.

20 Q So a little bit of a detour to go up to
21 Bethesda and come back down to DC?

22 A Little. Yeah. A little bit.

1 Q Okay. Do you have a guess how much time
2 that would add to your commute if you were
3 dropping off the dog?

4 A I want to say about 30 minutes or so.

5 Q Okay.

6 A 30.

7 Q And then also, I guess, did -- the dog
8 is in Martin -- or Charles Town; right?

9 A Yeah. The dog primarily lives in
10 Charles Town. Yeah.

11 Q Okay. So you would take the dog from
12 Charles Town to Bethesda --

13 A Bethesda.

14 Q -- and then --

15 A Yeah.

16 Q -- and then -- and then you would go in
17 to work in DC?

18 A Yeah. Or -- or just go home.

19 Q Or you'd go home. Okay. Got you.

20 A Yeah.

21 Q And how often did -- did you pick up or
22 drop off the dog from the -- from Grace's family's

1 house?

2 A Several times. But I don't have a
3 number to give you. I -- I don't know the exact
4 number. Definitely several.

5 Q Okay. And then I think you mentioned
6 some driving tasks, you would take [Rep. Mooney's
7 son] to and from school sometimes; is that right?

8 A Yes. Classes. If, like, Grace or Alex
9 were busy, just to help out, but --

10 Q And how old is [Rep. Mooney's son] or
11 was [Rep. Mooney's son] at the time?

12 A I probably know this. I would
13 definitely want to say 17 -- 17. I know he's
14 probably about 18 now. But 17, 16 -- 17, 18. My
15 best guess 17.

16 MR. QUINN: Okay. And then I just want
17 to look quickly, Sean or Ashby, if we can pull up
18 tab 1.

19 Q So these are a couple documents that
20 you've produced to us. I think it's --

21 A Uh-huh.

22 Q -- two -- two e-mails or screenshots of

1 e-mails. I just want to look at those with you
2 quickly. I think Sean is working on pulling them
3 up. Awesome.

4 MR. QUINN: And, Sean, you can mark this
5 as Exhibit A.

6 (Exhibit A was marked.)

7 Q So this -- it's two pages, a combined
8 two documents and you sent me one. This first one
9 is a June 18th, 2020, e-mail from Representative
10 Mooney to you. And he says, Likely having you
11 drop [Rep. Mooney's son] off at this on your way
12 home this evening. Take note of address. And
13 the e-mail below is --

14 A Uh-huh.

15 Q -- cut off. But it looks like it's an
16 event called Dad -- Dads, Dudes, and Hoops. Can
17 you --

18 A Yes.

19 Q -- tell me -- can you tell me what this
20 was or what -- what happened here?

21 A So this is just, like, just an example.
22 I was going home from the campaign and [Rep.

1 Mooney's son] needed to get dropped off at an
2 event with his friends, like, a basketball event.
3 And he just asked me to drop [Rep. Mooney's son]
4 off on my way home.

5 Q Okay.

6 A For him. It -- it wasn't too much of a
7 detour. But it was just, like, an example that I
8 could find that you guys were requesting for.

9 Q Right. And was this a pretty -- was
10 this a pretty common occurrence?

11 A Yeah. It would probably have happened a
12 couple of times a week or so.

13 Q Okay. And then if we can scroll to page
14 two. This says -- it looks like coming -- excerpt
15 from an e-mail --

16 A To Renee.

17 Q -- from -- from you to, yeah. It says
18 to LaFever -- LaFaver.

19 A Yeah.

20 Q Who is Renee?

21 A She worked on campaign stuff for a
22 little bit with us.

1 Q And so it says -- you told Renee, this
2 is on September 8, 2020, I'm going to be right
3 there. I left the door open for you. I
4 apologize. I had to drop [Rep. Mooney's son] off
5 in Martinsburg. Is -- can -- do you remember this
6 happening or can you tell me what happened here?

7 A Yes. I had to drive [Rep. Mooney's son]
8 to -- I -- to something scheduled he had and then
9 just drive back. So that's -- and I was alerting
10 Renee that I maybe a little late because I had to
11 drop him off somewhere.

12 Q When we spoke to -- when we spoke to
13 [Former Staffer 1], he told us that he had heard
14 of you also driving [Rep. Mooney's son] and his
15 friends around at some point or that you were
16 asked to drive [Rep. Mooney's son] and other kids
17 of his age. Do you recall that?

18 A Yes. One time, I don't have a specific
19 date, but one time I had to drive them, him and
20 one of his friends, back to their house after a
21 basketball practice.

22 Q Okay. [Former Staffer 1] described a

1 situation, it maybe a -- it was a particular
2 meeting where I think you expressed that you were
3 a little bit uncomfortable, maybe because of
4 [Rep. Mooney's son]' age and the age of his
5 friends and you were pretty close in age to him.
6 Did you ever experience that or was -- was there
7 ever any kind of uncomfortability over that issue?

8 A No. I -- I wouldn't say I was totally
9 uncomfortable. But sometimes I would be like, oh,
10 you're at driving age. I feel like you should be
11 able to do this. But I was never -- no. [Rep.
12 Mooney's son] was such a sweetheart. I honestly
13 didn't have a problem with it. I just was, like,
14 oh, maybe you can drive yourself. Maybe.

15 Q Did -- did he have a driver's license at
16 the time?

17 A I recall him just getting one. I
18 believe it was -- I don't know when he got it, but
19 I know he was new (inaudible.)

20 Q So sometimes it -- it wasn't that you
21 were uncomfortable, it was just a little
22 frustrating that somebody couldn't drive --

1 A Yeah.

2 Q -- themselves?

3 A Okay. Like -- yeah. No. It was not --
4 I was never, like, total -- uncomfortable. But I
5 was just, like, okay.

6 Q How about any other driving tasks for
7 any of the other children that you can recall?

8 A Sometimes I would take the daughter,
9 [Rep. Mooney's older daughter] to -- I want to say
10 it was, like, a English class that was in Bluemont,
11 Virginia. I -- that I can recall in Bluemont,
12 Virginia. I would just help drive her to class.

13 Q Okay. And how far was Bluemont from
14 wherever you were starting?

15 A About 15 minutes from the house to the
16 class. And that would be from point A to point B.
17 So it was probably 30, round-trip.

18 Q Okay. And you said that most of the
19 time when you were working for the campaign, you
20 would work from Representative Mooney's house?

21 A Yes.

22 Q And do you think that was in part

1 because it was easier to have you around the house
2 to be doing personal errands also? Like, driving
3 the children or watching the children?

4 A Yeah. I do believe it was more
5 convenient just to do it directly from his house
6 so we wouldn't have to go, like, go to campaign
7 office. Because I knew they were super busy. So
8 I think it was just, yeah, out of convenience.
9 Yeah. Just to do it right directly from the
10 house.

11 Q Let's see. You mentioned -- you
12 mentioned picking up milk or grocery sometimes for
13 the Mooneys. Can you -- can you tell me a little
14 bit more about that?

15 A So if they ran out of milk or something,
16 I would help go pick up milk from the local
17 grocery store up the street. The grocery store
18 is, like, five minutes away from their house so I
19 didn't mind too much. But, yeah. I would
20 definitely pick up groceries for them.

21 Q How about picking up medicine? Did you
22 ever pick up the congressman's medicine or

1 medicine for anybody?

2 A No. No. I never picked up
3 congressman's medicine.

4 Q Okay. How about -- so we talked about
5 driving the kids to and from school. Were you
6 ever asked to help the kids with school projects?

7 A No. No. No. No.

8 Q And then how about any tasks that you
9 can think of for Dr. Mooney, Representative
10 Mooney's wife, Grace?

11 A One of -- probably the one that comes at
12 the top of my head, she had me water all the
13 plants and, like, take the dog out. When they
14 were out of town, she requested me to do that. At
15 times I would run to the local FedEx office and
16 drop off something personal she needed sent out,
17 whether it would be, like, returning a dress.
18 But, yeah. So she needed me -- if she knew I had
19 to go to the post office, she would give me
20 personal items for her to -- for me to send out
21 for her.

22 Q When you would water the plants and take

1 the dog out when they were out of town, did you
2 have to commute from Northern Virginia to do that
3 or were you already in town?

4 A I was there anyways for the campaign.
5 So I was just sort of an add-on to my campaign
6 duties.

7 Q Okay. And -- and all these things that
8 we're discussing, I want to clarify a little bit
9 about the time that you were only working for the
10 campaign versus time that you were working for the
11 official office and the campaign. All these
12 things that we've discussed, were they happening
13 during both those times? Like, were you --

14 A Yeah.

15 Q -- driving the kids and -- okay.

16 A Yeah.

17 Q So it's not it's -- it's not like those
18 sort of things stopped once you started working
19 for the official office?

20 A No. No.

21 Q Okay. Anything else like that sort of
22 household -- household chores like watering the

1 plants or taking out the dog that you can ask --
2 either Representative Mooney or his wife asking
3 you to do?

4 A Not that I can recall. No. That's
5 about it.

6 Q Okay. And then how about the
7 Congressman's mother, Lala? Do you know Lala?

8 A Yes. I do know Lala.

9 Q Okay. And how about for her? Can you
10 think of any sorts of tasks that you might have
11 done for her that seemed somewhat personal in
12 nature?

13 A No. With her, it was more -- she was --
14 she was probably more involved with the campaign
15 than me. But no. Not for her that I recall. It
16 was definitely mostly the congressman --
17 congressman's family -- like, immediate family.

18 Q A lot of the tasks that we've talked
19 about seemed like they were more focused on, at
20 least geographically, in Charles Town when you
21 were at the congressman's home?

22 A Yes.

1 Q Did -- can you think of any other sorts
2 of personal tasks or tell me if you did some of
3 the ones we've already talked about in DC?

4 A Well, I would drive them to receptions,
5 which I -- I don't know if I'd qualify that as a
6 personal task. But most of the personal tasks
7 remains in -- remained in West Virginia for the
8 campaign site.

9 Q So when the family was -- how about when
10 the family was visiting DC, did you ever babysit
11 the kids while they're in DC or --

12 A Yeah. I would help watch the younger
13 one while he was working and he had her in the
14 office. So I would definitely help watch the
15 younger one, me and [Former Staffer 2].

16 Q And was that -- would you watch the
17 younger one on The Hill, like, in the office?

18 A Yes. Yes. I would walk her around the
19 -- and to the Library of Congress. They have a
20 little section there.

21 Q Let's see. Do you know Rainer Kissel?

22 A Yes. Yes. He would help --

1 Q Okay.

2 A -- drive a lot. Yeah. I think it's
3 Rainer.

4 Q Okay. So he also -- Rainer. Yeah.
5 Sorry. Couldn't --

6 A Yeah.

7 Q -- really remember the correct
8 pronunciation.

9 A No. No. I used to (inaudible) too, so
10 --

11 Q So Rainer also helped a lot of with
12 driving tasks?

13 A Yes. Yes. He was a big driver and then
14 he retired about a year ago. But yeah. He would
15 help drive the congressman often.

16 Q Okay. Do you know -- I know you
17 mentioned that you didn't normally get reimbursed
18 for mileage, that sometimes the -- the congressman
19 would fill up your tank with the campaign card.
20 Do you know if Rainer -- Rainer, sorry, ever got
21 reimbursed for mileage?

22 A I don't know. I honestly don't know. I

1 never spoke with Rainer or about that. I'm sure
2 he did. But I honestly don't know.

3 Q When -- did it ever seem odd to you or
4 did you ever want to be able to claim mileage or
5 receive some sort of compensation for the personal
6 tasks that you were being asked to do?

7 A Yeah. Absolutely. I -- I kind of went
8 into a little naive though. So I didn't know to
9 ask. I just thought that was like an expected
10 duty of mine. To be quite frank, I just was
11 naive. I definitely should have been more
12 assertive about mileage and getting reimbursed.
13 But I was being a little naive about it.

14 Q Okay. Did --

15 A Now I know.

16 Q Did the -- yeah. Did the congressman
17 ever talk to you about mileage and discourage you
18 from claiming mileage?

19 A He never discouraged me. I -- like, one
20 time he was super nice. I was, like, could I fill
21 up -- because I had the campaign card with me and
22 my gas was low and I was, like, Oh, can I fill up

1 my tank with the -- campaign card? And he was,
2 like, nice about it. He was, like, Yeah, go
3 ahead. Like, Of course anytime you have the card
4 and need it. But I had to keep -- like, I can
5 only refill my tank if I had the card and was
6 located in West Virginia. Like, I can't refill my
7 -- in Virginia or Maryland or DC.

8 Q Right. Okay. Did you ever hear of
9 Rainer doing, like, auto repair work on the
10 family's cars? Personal cars?

11 A Yeah. Yeah. Okay. Rainer would help
12 with that.

13 Q What other sorts of things --

14 A He had --

15 Q -- go ahead. Sorry.

16 A Sorry. So what other personal things
17 with Rainer?

18 Q Let's start with car -- let's start with
19 car duties and then --

20 A Okay.

21 Q And then we can add onto that
22 afterwards.

1 A Okay. Rainer usually I -- Rainer was
2 very savvy with cars. So he was, like, helpful
3 with whatever issues the family's cars were
4 having. I know the boss would get his oil changed
5 in downtown Charles Town. But with, like,
6 anything else I believe Rainer was the main point
7 of contact. I'm not a cars person. So I don't
8 have, like, the specific language. But, yeah.
9 Rainer would definitely help out fixing cars,
10 their older vehicles.

11 Q And do you know was -- was Rainer an
12 official or a campaign employee or both?

13 A That -- he may have been both. Now that
14 I think about it, I think -- I do believe he was
15 both. I wasn't -- I didn't -- because I would
16 sometimes write checks for him out of the campaign
17 as salary. So I'm not sure if he was on official
18 salary, too.

19 Q So as we -- as we keep talking about
20 this, let me know if you think of any other
21 specific tasks or duties that we haven't -- that
22 we haven't talked about. But, in general -- in

1 general, did you find that there were times that
2 you had to either work a longer day or got home
3 later because you were doing some of these
4 personal errands?

5 A Yes.

6 Q Okay.

7 A Yes.

8 Q And did -- did these personal errands
9 sometimes get in the way of doing work that you
10 would have done, like, let's say from 9:00 to 5:00
11 that was official work or campaign work?

12 A Yeah. Definitely at times. It would
13 just be, like, another responsibility during the
14 day. So I couldn't solely focus necessarily on
15 campaign work, whether it'd be getting yard signs
16 out or -- yeah. So failing my campaign duties,
17 door-knocking. So sometimes it would intrude on
18 the -- that business, so yeah.

19 Q And is that the same for the official
20 side? Sometimes these tasks would get in -- in
21 the way of official work that you might have for
22 that day?

1 A Usually on official side, my days were a
2 little more organized, a little more structured.
3 So not necessarily on the official side, but
4 definitely on the campaign side.

5 Q Okay. Did -- do you think they tried to
6 not give you those sorts of tasks when you were
7 doing official work or it just happened to be that
8 you were in DC instead of in West Virginia?

9 A I was just in DC so the family wasn't
10 around. So I think my -- yeah. So I -- there's
11 just less for me to do personally in DC.

12 Q Okay. And then I guess I just want to
13 understand a little more again, like, how you
14 decided which days you were going to do campaign
15 work or official work. Was it just you would wake
16 up -- you would just wake up that morning and
17 check with Mike or how did that work?

18 A Usually I would check in with Mike in
19 the afternoon to plan out my schedule or they'd
20 just tell me during the day prior. And then they
21 would make the decision, like, oh, maybe you
22 should just come to West Virginia, because I -- we

1 have an FEC report due or maybe you should go to
2 DC because we're in session that week and will be
3 super busy. So usually it just depended where,
4 again, where I was needed most and I would check
5 in with them before I made any moves.

6 Q Were -- were there ever any other sort
7 of personal tasks that were just particularly
8 inconvenient or, you know, that for whatever
9 reason you didn't want to do that task? Did you
10 ever have a situation where you tried to turn the
11 congressman down and say, no, I can't do that?

12 A No. I was -- I was a little too nervous
13 to say no. I did not want to say no. So I -- I
14 always agreed. Unless, like, I had off, like, the
15 day of the (inaudible) but -- like, one time I was
16 -- I had to stay home because I was sick. So I
17 couldn't do it. But, yeah -- no. I usually was
18 pretty agreeable with the -- task.

19 Q Can you tell me a little more or add a
20 little more detail about -- about why you felt
21 like you didn't want to say no?

22 A I was -- I was new to the job. I -- I

1 just graduated. So I was just trying to, like,
2 look my best for my -- just be like the best
3 employee I could possibly be. I know they were
4 very, like, particular. I'm sure past staffers
5 have mentioned they were very particular about
6 their staff and with, like, employee reviews and
7 everything. So I always just tried to put my best
8 foot forward and look good. So yeah.

9 Q Okay. Just in speaking with other
10 witnesses, you know, like [Former Staffer 2] and
11 then the sorts of tasks you told me about, did
12 you ever have the feeling that the congressman
13 was assigning these to you or was more likely to
14 assign these sorts of tasks to women that were in
15 the office as opposed to men?

16 A Yeah. I -- I do feel like women took on
17 more of the, like, babysitting roles. I don't
18 know if it was necessarily true for driving. But,
19 like, definitely babysitting and those types of
20 roles. Which maybe because their daughter, I
21 don't know. But, yeah. Women were more likely to
22 be asked to do that.

1 Q Okay. And -- and I know you -- I know
2 you said it was one of your first jobs out of
3 college. I think also --

4 A Yeah.

5 Q -- and I think also, you know,
6 [Former Staffer 2], similarly situated, a
7 young woman, one of her first jobs.

8 A Yeah.

9 Q Were there other people -- did you --
10 did you feel like that was part of the -- the
11 issue, that he assigned these tasks to people that
12 didn't know that they could say no or should say
13 no?

14 A I -- I don't know. I -- I didn't really
15 speak with him about it. So I don't know. But
16 I'm -- I'm sure just, like, the nature of it,
17 that's -- me and [Former Staffer 2] are definitely
18 more people-pleasers. So I could definitely see
19 why he would want to ask us as opposed to, like,
20 a man in the office who's a little more sure
21 of themselves. So, yeah.

22 Q Right. Okay. Did you ever have any

1 sense of what would happen if you said no to these
2 tasks? Like, if you told him that you wouldn't
3 watch the children or wouldn't drive the children
4 to school anymore?

5 A I would be worried I would hear about it
6 in the employee review which happened about, I
7 think, twice a year. So I just -- I just didn't
8 want to cause any waves or any issues just because
9 I felt so novice of everything. So I just wanted
10 to make sure I was doing every -- I just wanted to
11 make sure I was doing everything right. So, yeah.
12 I just -- I would -- a little backlash.

13 Q Okay. Did -- did you ever receive any
14 negative comments in these employee reviews
15 related to your willingness or not-willingness to
16 do personal tasks?

17 A No. I -- they didn't say -- I remember
18 Mike once said, he was, like, You're just very --
19 I think I got, like, a five out of five because I
20 was, like, very agreeable with everything. Like,
21 I never -- like, I accepted criticism or -- well,
22 so. Yeah. They did mention I was very agreeable

1 in my employee review.

2 Q And do you ever remember any employees,
3 campaign or official while you were there, that
4 did try to say no to these sorts of tasks?

5 A No. Not from what I can recall. I
6 haven't heard of anyone say no to him. Again, I
7 -- I'm probably to -- I can be wrong. But I'm not
8 -- me personally, I have never spoken with anyone
9 about that, if they were to say no.

10 Q Or how about anybody that was upset by
11 asking -- being asked to do these sorts of
12 personal tasks?

13 A Oh, yeah. I mean, people would
14 definitely be a little irked if they -- they were
15 asked to be -- asked to run personal errands. I
16 know when I first came on, a former staffer
17 mentioned that. I believe his name was, like,
18 Brendan (phonetic). He said, like, You will be
19 doing, like, personal stuff. And I was totally
20 fine with it. But, yeah.

21 Q Okay. Anybody else that you remember
22 specifically that had a --- was upset by these

1 sorts of requests?

2 A [Current Staffer 1], he -- I knew he
3 had some grievances with the personal tasks being
4 associated with, like, the work tasks. But, no.
5 That's about all I can think of.

6 Q Can you go into a little more detail
7 about that? What did -- what specifically did
8 [Current Staffer 1] complain about?

9 A Just because he knew the congressman
10 would have me drive people, like, for personal.
11 So I would sometimes talk to him about it, and he
12 would just be -- he would kind of agree with me,
13 like, That's so ridiculous. But I don't know.

14 Q Understood. So [Current Staffer 1] was
15 more upset that -- that you were being asked to
16 do these things. It wasn't -- it wasn't him
17 being asked?

18 A Yeah. I -- I'm sure when the
19 congressman was in Charles Town, he would have
20 him. But, yeah. No. I was definitely the main
21 -- I was probably, like, the first one to contact
22 for the congressman in regards to those matters.

1 Q Okay. I think we can move on from that
2 general topic unless anything has come to mind as
3 we've been discussing? Any other sorts of
4 personal errands that you can think of that we
5 haven't talked about?

6 A Not in the moment. Not that I can
7 recall in the moment.

8 Q Okay. Okay. A couple other general
9 topic. So we've talked a little bit about mileage
10 and how you didn't normally claim mileage. And --
11 but I know that congressman does and has claimed
12 mileage. Do -- did you ever hear of any -- did
13 you have any discussions with anybody or hear
14 anybody discussing the congressman claiming
15 mileage that he didn't actually drive or any other
16 sort of irregularities about how he was claiming
17 mileage?

18 A No. Because I wasn't the one handling
19 the mileage. Sorry. I don't know. But, yeah.
20 No. I was not handling his mileage.

21 Q And then also -- so I know you said you
22 wouldn't normally claim mileage, but sometimes

1 your -- you would get your gas tank filled with
2 the campaign funds.

3 A Yeah. Yeah.

4 Q Do you know of any other staffers that
5 -- do you know of any other staffers that either
6 the congressman personally filled their gas tank
7 or used the campaign card to fill their gas tank?

8 A No. Possibly Mike Hough. But I don't
9 know.

10 Q Okay. That's one thing I'll ask
11 actually about the personal errands. Do you think
12 Mike was aware that these sorts of requests were
13 being made of staffers?

14 A Yes. Yes. He was aware.

15 Q And what did -- what did he say about
16 that or did he ever say anything about it?

17 A He didn't really have a comment on it.

18 Q Okay.

19 A But, yeah. I know he was aware.

20 Q Another kind of general topic. I want
21 to talk a little bit about this, the use of gift
22 cards for the campaign.

1 A Uh-huh.

2 Q And my impression so far is that there
3 were kind of two sorts of gift cards that were
4 used. One was either gift cards to a specific
5 vendors, like Martin's grocery store. And then
6 also there were gift cards that were, like,
7 prepaid Visa cards, basically cash; is that right?

8 A Uh-huh.

9 Q Okay.

10 A Yeah. Yes.

11 Q Can you tell me how the prepaid Visa
12 cards were used? Or what did you guys use those
13 for?

14 A So we would hit the campaign with the
15 (inaudible) card, buy these gift cards at the
16 grocery store, and then -- because he didn't want
17 to create multiple debit cards because we had
18 issues prior with that, so he would rather just
19 use the gift card. And then we -- that -- from
20 that gift card, we would keep the receipts and
21 then report that to the FEC from the receipts from
22 the gift card. This is kind of confusing.

1 Q Did -- when you went to go pick up
2 groceries for the Mooneys, did you use -- how did
3 you pay for those groceries?

4 A So I would use my personal card, then he
5 would pay me back in cash.

6 Q Okay.

7 A Yeah.

8 Q Did you ever use one of the Martin's
9 gift cards for what seemed like personal groceries
10 for the Mooneys?

11 A No. That I can think of, no.

12 Q Okay. Let's pull up --

13 MR. QUINN: Sean, if you can pull up tab
14 2 and you can mark that as Exhibit B.

15 (Exhibit B was marked.)

16 Q So, Former Staffer 3, can you see this
17 document?

18 A Let me see if I -- a little bit. Is it
19 already zoomed in?

20 Q Yes. I can zoom in. Okay.

21 A Oh, yeah.

22 Q If you want to take a second and see

1 what you can read of that e-mail, just let me know
2 once you've been able to; okay?

3 A Former Staffer 3, please see below. Do
4 you think you can get a gift card sent to [Current
5 Staffer 2] for his expenses of traveling? Okay.
6 Yes.

7 Q So -- and it looks like below [Former
8 Staffer 2]'s, I think she's e-mailing [Former
9 Staffer 1] and she says, I spoke with Mike and it
10 was unofficial. And then [Former Staffer 1]
11 responds to [Former Staffer 2] and says, Okay.
12 Adding [Former Staffer 3]. And he asks you to
13 get a gift card for [Current Staffer 2] for his
14 expenses for traveling. Do you -- this e-mail
15 was from July 2020. Do you remember this
16 e-mail or incident at all?

17 A Slightly. Yes.

18 Q Okay. And so is [Current Staffer 2],
19 [Current Staffer 2]?

20 A Yes. [Current Staffer 2]. He worked in
21 Martinsburg.

22 Q Do you remember what -- what he was

1 traveling for? What he was doing in July -- July
2 13th, 2020?

3 A I don't know. I know it was, like, a
4 long trip. I recall it being a long trip. But
5 I'm not sure where he was -- [Current Staffer 2] was
6 specifically dropping -- the congressman off.

7 Q Was there -- does it ring a bell -- was
8 there a trip to Nemaquin maybe that [Current Staffer 2]
9 would have drove the congressman or not ring a bell?

10 A That -- that does not ring a bell.

11 Q Okay.

12 A I know Nemaquin, but I -- I -- doesn't
13 ring a bell.

14 Q Yeah. So was this -- was this common
15 that gift cards would be used to pay staffers for
16 this sort of activity?

17 A Yes. We would definitely give staff --
18 like, if staffers were operating on the campaign,
19 we would give them gift cards. Like, for
20 instance, for the 4th of July parade, I brought
21 gift cards to buy candy for the parade because I
22 couldn't have access to, like, the official -- or

1 official campaign card. So I would definitely
2 disburse gift cards just so they would -- just so
3 it -- we -- to avoid the whole reimbursement
4 process because that could get kind of annoying.

5 Q Right. And so this was probably -- this
6 was probably one of the Visa prepaid cards? Not,
7 like, a Martin's Grocery Store credit card?

8 A Yeah. So I'm sure -- like, [Current Staffer
9 2] paid for gas on his personal and this is just
10 helping reimburse him for that.

11 MR. QUINN: And then, Sean, you can take
12 this one down, Exhibit B down, and mark it -- or
13 sorry. And then if you can pull up tab 3 and mark
14 that as Exhibit C.

15 (Exhibit C was marked.)

16 Q So, Former Staffer 3, this is a receipt to
17 Martin's Grocery Store --

18 A Okay.

19 Q -- that you produced -- that you
20 produced to us. And are you able to see this now?

21 A Yeah. I see it.

22 Q Okay. So on the first page, there's two

1 receipts and at the top of one of them it says,
2 Alex gift card receipt. And then they both say,
3 File, on them. Does that mean that these were
4 groceries purchased with a gift card by the
5 congressman?

6 A Yes. If it had gift card written on the
7 receipt, then we would report what was on that
8 receipt to the FEC.

9 Q Okay. And it says Alex -- and it says
10 Alex at the top also. So does that mean that the
11 congressman used that gift card? Or --

12 A Yeah. Likely. It looks like his
13 writing, too.

14 Q Okay. So I'm -- I'm curious. Some of
15 the items on here certainly seem like personal
16 groceries. For example, an 18-pack of eggs,
17 butter, buttermilk. If you look on page 2, some
18 of the charges are for Goya coconut milk and for
19 chicken broth. And then on the next page, there's
20 some for yellow potatoes. Do you recall any --
21 either official or campaign events where, like,
22 were you baking or, like, what -- do you recall in

1 the campaign where that -- those sort of
2 ingredients would have been used? Chicken broth
3 or eggs or --

4 A No. I -- I do not.

5 Q Okay. Did you ever see that --

6 A Usually there was, like --

7 Q Go ahead. Sorry.

8 A Oh, sorry. Usually if it -- it'll be
9 like soda, those sorts of items. But, no, not
10 these.

11 Q Okay. Is -- did you ever see any other
12 receipts like this that had personal item -- or
13 items that seemed, like, personal grocery items as
14 opposed to items for an event?

15 A One or two. But that's about it. I've
16 only probably seen one or two other that are like
17 this.

18 Q Okay. And then let's just talk about
19 this document again for a second. So Exhibit C,
20 it's a -- it's a gift -- or, sorry. The receipt
21 is for Martin's from 9/6/20, so September 6, 2020.
22 Do -- and -- and you produced this receipt to us.