

Transcript of Interview of Former Staffer 2  
July 11, 2018

1 Paul Solis: I just want to know if anybody of the current staff has explained to you or  
2 not whether Ethics Committee lawyers have come in and talked to the  
3 current staff about-

4 Former Staffer 2: Like what y'all are doing now?

5 Paul Solis: No, no, about use of official staff time, and-

6 Former Staffer 2: I don't know about that.

7 Paul Solis: Okay.

8 Former Staffer 2: I haven't heard about that.

9 Paul Solis: I guess lastly, I'll just ask have you spoken to anybody in Representative  
10 Garrett's office about our review, any current staffers?

11 Former Staffer 2: Nope.

12 Paul Solis: What about Representative Garrett himself?

13 Former Staffer 2: Nope.

14 Paul Solis: Has he reached out to you about our review, or anyone representing him?

15 Former Staffer 2: No, nope.

16 Paul Solis: Do you know who represents him in anyway? Do you know if he has a  
17 lawyer?

18 Former Staffer 2: I don't know if he has a lawyer.

19 Paul Solis: What about former staffers? Have you talked to any former staffers about  
20 the fact that I reached out to you, or that they've been contacted by me?

21 Former Staffer 2: I haven't contacted anybody. I think Jimmy, in passing, may have said that  
22 he thinks Ethics is going to do stuff, but this is back ... This is weeks ago.

23 Paul Solis: What did he say about that?

24 Former Staffer 2: He said that Ethics is going to open up an investigation. That was it, that  
25 was the extent of it.

26 Paul Solis: That's the only thing he said to you about it?

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1 Former Staffer 2: Yeah, pretty much. I can't ... This was weeks ago though. This was well  
2 before you contacted me. This was like a week before the Politico article  
3 came out or something.

4 Paul Solis: He told you this over the phone or in person?

5 Former Staffer 2: I do not remember.

6 Paul Solis: Or text?

7 Former Staffer 2: Don't think it was over text. Might have been in person, might ... It would  
8 have been in person, because we don't ... Well, he calls a lot, but it would  
9 have probably been in a group setting. I don't know.

10 Paul Solis: Did he say why he thought Ethics was going to be doing something on  
11 this?

12 Former Staffer 2: No.

13 Paul Solis: Did he say how he knew?

14 Former Staffer 2: No.

15 Paul Solis: He just declared Ethics was going to do something about this.

16 Former Staffer 2: Mm-hmm (affirmative), that's ... Going back to your questions about my  
17 communication with Congressman Garrett, as far as what you're doing,  
18 this official process, I've had zero communication with him about it, even  
19 before that. Closest thing that I ever had with him was as soon as that  
20 article came out, prior to him even saying he was not running again, all  
21 right? So there was kind of like a week limbo. I told him ... He talked  
22 about a lawyer, and I was like, "you probably should get one." He was  
23 like, "I haven't done anything." I was like, "Yeah, I know you haven't done  
24 anything, but DC ..." And that's why Jimmy . . . going back to Jimmy  
25 talking about it happening, same reason why the article was leaked in the  
26 first place.

27 From our perspective, once the machinations of the government are put  
28 over your head, they do not stop. I deal with federal investigations and  
29 prosecutions for a living. This isn't a prosecution, this is an ethics thing.  
30 It's an investigation. Once leadership has pushed a narrative into the public  
31 sphere that it percolates its way into your office, it will not stop until it is  
32 done. If he stepped out, or didn't run again, which is what they wanted,  
33 NRCC wanted, then the chances of it going nuclear, and you could say,  
34 "What would that even be?" Nothing, but if you plaster it all in the media,  
35 in politics it doesn't matter if it's true or not. Do you have the resources to

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1 do defend yourself? Not in a court, not in an ethics things, but in the  
2 media.

3 Tom was an underfunded candidate, right? He had the least amount of  
4 fundraising in all of congress, so he had no ability, and the NRCC, and  
5 Jimmy and leadership knew, know that if this type of stuff, that article,  
6 pick another article ... You can write an article about whatever you want.  
7 They wrote an article about Jimmy leaving the office. That wasn't  
8 newsworthy, but they wrote it. Once that starts, and it's a public plastered  
9 witch hunt, you better either get out of the way or get some funds, what  
10 have you.

11 So when Jimmy mentioned it, it was obvious. When that article hit, it was  
12 like, "That'll probably be an Ethics investigation." Ethics has been  
13 investigating stuff since I got there, you know? I mean, look at Blake  
14 Farenthold. Look at all the Me Too Movement, and sexual harassment  
15 that's gone through both chambers. Look at Trent Franks, look what they  
16 did to him. When I say "they" . . . wasn't y'all, it was Paul Ryan saying,  
17 "You need to get out, or we're going to turn it into something." Whether  
18 there's substance in all of these or not, if you pull back the curtain on any  
19 of these offices, you're going to find a lot. This isn't a story in my view,  
20 but Jimmy made it clear. He was like, "Oh, this will probably be a ... This  
21 will be an Ethics investigation."

22 That's to your original question. Your original question was how did he  
23 bring it up? It was in reference to the article. He was like, "Tom's going to  
24 need to get out, or their going to open up an ethics." And I told him,  
25 "They're not going to find anything Jimmy." And he goes, "Yeah, but it  
26 doesn't matter. He needs to get out, or we're going to lose the district. He's  
27 going to lose his seat. He'll be embarrassed, and he won't be able to win."  
28 So, that's how that conversation was had. It's been had in pieces multiple  
29 times.

30 Paul Solis: Jimmy agreed with you when you said there was nothing there?

31 Former Staffer 2: He did the ... No, he pulled the ...he pulled the ... He pulled like, "I don't  
32 know, there might be." Kind of like, "I don't know if there is nothing there.  
33 There is stuff there." I'm like, "Okay, well I don't ..." I'm not fluent in  
34 ethics, or congressional ethics, I mean as far as the code. What applies to  
35 it, and what doesn't. What that can be. Ethics is not inherently criminal. I  
36 mean, sometimes it is, sometimes it's not, right? Sometimes you can be  
37 unethical, and just be a regular person. It's DC, there's plenty of that, right?

38 I'm from a criminal component, there's nothing there. Because unless  
39 you're mixing funds, and using stuff in ways ... unless there's funds issues,  
40 from what I ... I mean, not the only way, there's plenty of ways to do it, but

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1 he didn't say there was nothing there. I didn't ask him if there was anything  
2 there is what my answer should be. My answer should be: I didn't ask him  
3 if there was anything there. I declaratively said that "this was a witch  
4 hunt." Not from y'all's perspective, but from other ... Y'all are doing your  
5 job, I'm not saying you guys, I'm saying the spot light was put over Tom  
6 for a reason, and this is BS. I was very defensive of that, because I found it  
7 to be inappropriate. I thought it was sad, and I think it's sad. Y'all are just  
8 doing your job at this point, but there are reasons why we're even sitting  
9 here. That's the way I would frame it.

10 Paul Solis: And I, again, just want to be very, very clear when I asked you if you've  
11 spoken to anybody at all, current staffers, former staffers, Representative  
12 Garrett about our-

13 Former Staffer 2: This?

14 Paul Solis: ... yeah, our review.

15 Former Staffer 2: No.

16 Paul Solis: Spoken to nobody about it?

17 Former Staffer 2: Y'all emailed Tanner Hirschfeld a couple of days ago, and he sent me a ...  
18 and said, "Have you gotten this?" And I said ... I said ... He texted, and  
19 then he asked for me to call, so it was over the phone. I said, "I did get that  
20 a few weeks ago." Because you had contacted me originally weeks ago. I  
21 told him, "You can do whatever. I'm not ..." He said, "Are you going to  
22 talk to them?" And I said, "I don't know." You know? Tanner's the only  
23 person that knows that this is happening, but he had been ... you contacted  
24 him, and he contacted me, because he's assuming, I guess, that if he's  
25 being contacted, somebody else is getting contacted. So, that's the only  
26 person. That is the only person.

27 Paul Solis: He texted you?

28 Former Staffer 2: Yes.

29 Paul Solis: And you called him back.

30 Former Staffer 2: Yes.

31 Paul Solis: How long did you talk?

32 Former Staffer 2: Two minutes, one minute, less than a minute. I don't know, very quick.

33 Paul Solis: And he asked you if you were going to speak with us?

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1 Former Staffer 2: He asked me if he needs to speak with you, and I said-

2 Paul Solis: What did you tell him?

3 Former Staffer 2: ... I said, "From what I understand, you don't have to talk to them." I said,  
4 "You can do whatever you want." I said, "You're not being subpoenaed.  
5 You don't work there, but you can talk to them." And he said, "Well, are  
6 you talking to them?" And I said, "I don't know." I said, honestly I said,  
7 "Probably not."

8 Paul Solis: And how many days ago did you speak to Tanner?

9 Former Staffer 2: I think it was maybe two days ago, or three days ago, maybe two or three  
10 days ago.

11 Paul Solis: You spoke to him since then?

12 Former Staffer 2: Yeah, but not about this. I mean, we're real good friends. We went on  
13 vacation together like three weeks ago.

14 Paul Solis: I just want to be very clear-

15 Former Staffer 2: I'm answering this because I got to answer that, and-

16 Paul Solis: Yep.

17 Former Staffer 2: ... and I know that you asked me to keep it confidential, but when it was  
18 brought to me in that fashion, I wasn't affirmatively telling somebody,  
19 "Hey, I've been contacted." But he sent me, I think might have been a  
20 Snapshot. It was a similar email, and he contacted me. So, I'm sorry that  
21 might have blown the confidentiality component of this, but generally  
22 speaking, that is the only person I've discussed this.

23 Paul Solis: Okay. You said generally speaking-

24 Former Staffer 2: I'm saying the larger concept of an ethics investigation is known.

25 Paul Solis: About . . . in a similar fashion to what happened to Tanner, have you ever  
26 talked to Representative Garrett-

27 Former Staffer 2: Nope, absolutely not. Absolutely not.

28 Paul Solis: ... about the fact that I reached out to you or-

29 Former Staffer 2: No, absolutely not. I haven't talked to Tom that much really since he said  
30 he wasn't running again.

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1 Paul Solis: And nobody from his current staff you've talked to about our review?  
2 Former Staffer 2: No one.  
3 Paul Solis: Okay, I think that is really all I have. Ali did you have any questions for  
4 Former Staffer 2?  
5 Ali Bazzi: I just want to clarify one thing. You had mentioned that some of the  
6 allegations in the article were out of context. Your interpretation of  
7 walking a dog was something that you would have wanted to do-  
8 Former Staffer 2: Or others wanted to do. I mean, a lot of people are like, "Oh, come sit  
9 here." You know, they want to be with the dog.  
10 Ali Bazzi: So, I guess my question was, are you aware of any kind of staffers who  
11 might have not interpreted it that way, or expressed frustration about it?  
12 Paul Solis: I do not know. I don't, I don't know.  
13 Paul Solis: Well, all right Former Staffer 2, that's all we have for you, so thank you  
14 very much.  
15 Former Staffer 2: Thank you.  
16

# **EXHIBIT 7**

To whom it may concern at the House Office of Congressional Ethics:

In response to a call and subsequent email from Paul Solis, I wanted to provide this document to formally express my willingness to meet with your office and respond to your request for pertinent materials, as well as provide some background that may be useful.

First, and as I told Paul, I am re-joining Rep. Garrett's office in my former role of Deputy Chief of Staff and Communications Director. For transparency's sake I wanted to make sure you understand this – not that it changes your approach, but as a testament that if I bought into or was aware of questionable behavior previously, I would not be coming back. I consider the Congressman both a friend and mentor of sorts and highly valued my time with him.

I initially met Rep. Garrett when I ran for Congress against him in the 2016 primary. After he secured the GOP nomination, he asked me to join his team for the general election at which point I spent nearly every day for the next several months traveling the district with him. Following our election victory, he asked me to join him back on Capitol Hill. As the end of 2017 approached, I was burnt out from the hill and had hit a ceiling with my growth for the office so I took a great opportunity elsewhere. However, in light of everything that has happened and knowing staff will be jumping ship in the months to come with an outgoing member, I agreed to come back and try to help the office maintain a level of constituent engagement and stability to make sure his last few months go as smoothly as possible.

With regard to your request for pertinent documents to include texts, emails, memos, and the like in relation to personal requests for staff – I quite simply do not have any. I have been gone from his office for nearly a year now and even have a new personal phone with my old one wiped and sold. That is not to say I previously had anything that would have been of use to you because to my knowledge, I had none. However, at this late stage, I do not possess any old text threads from my time either on the campaign or official side with the Congressman.

To address the articles that came out, I wanted to highlight a few things that stood out to me that I know to be patently false. But I will preface it by saying that I'd be hard-pressed to find an office on the hill that doesn't have disgruntled current or former staff. On that note, I believe there were things staff or interns volunteered to do that were not asked of them and other personnel that may be bitter for some reason or other anonymously went on record to get back at the office by taking things out of context. Finally, I would add that we had an unusual office in that, most of our original staff were like a family having worked the campaign side by side and grown a very close and personal relationship with both Congressman Garrett and his wife Flanna. This relationship afforded a different environment than many offices are accustomed to and new staff that came in later may have not quite understood that.

My issues are as follows:

- I read somewhere that Rep. Garrett drank on the job. Not sure if it was a blog or elsewhere. I know with absolute truth that never happened during my tenure with him on the campaign or official side – it is an attempt to smear his character but it is false.
- The Congressman never made anyone drive around his family. I remember only one time where an intern drove his daughters somewhere – but that particular intern is one of the most eager and ambitious people I have ever worked with (and continues to be working on numerous campaigns) but he has also grown a reputation for kissing up. In this situation we were trying to re-work the Congressman’s schedule and the intern jumped at the chance to volunteer to pick them up. He was delighted to look like the hero of the day.
- Out of my 6 months on the campaign and 10-11 months on the official side, Sophie the Dog was always very present – as is the case with many members. Me personally, I’ve never been a big fan of her but she is sweet and NOT ONCE have I seen her poop or pee in the office much less had staff clean that up. Again, I have been gone for nearly a year so maybe suddenly the dog began defecating everywhere but I just don’t see how that new trend started. Flanna regularly would bring in Sophie and take her with her when she left. I do not recall any time when staff took her for a walk but that dog was like family to many of the staff so it wouldn’t surprise me. These “anonymous” sources, I suspect, are disgruntled employees embellishing or outright lying about their observations.
- In terms of the Congressman or his wife texting people at night. I would again credit this to the relationship our original staff had. Often Rep. Garrett has so much going on that he uses Flanna to relay messages. Commonly, in fact daily, we would receive texts from Flanna with the opening “TAMMY:” which meant: “Tom asked me to tell you” and it was well understood that he was driving or busy and asking her to send along his requests whether it be setting up an interview or moving a meeting. We have had issues previously with scheduling conflicts and things not being properly put on the calendar and the next day’s final calendar was frequently sent out the evening before in which case they would respond on a group thread trying to sort it out. I do not think there was anything wrong here if anything I and our former Chief should probably take blame for not keeping it a bit more organized.

In closing, I will say that Rep. Garrett is nowhere near a perfect man or easy to work for. But he is honorable and would never intentionally cross any lines. Most of what I saw in those articles angered me because it was nothing more than hearsay from “anonymous” sources who may or may not have had a motive. The Congressman has publicly admitted his personal struggles and I think it’s borderline outrageous that an investigation would be opened into him based off of these articles. Finally, I have not spoken to him about this and he has no idea I have written this and I was not asked or pressured into doing so. I am happy to meet with your team should you see the necessity to do so.

I hope this provides some level of insight and I look forward to hearing from you.

Sincerely, [REDACTED]

# **EXHIBIT 8**



MESSAGES now

[Redacted]

A lot worse haha

MESSAGES now

**Jimmy Keady**  
To you, Congressman & Flanna  
I do not feel comfortable having [Redacted]  
do that on government time or at all. I  
will take care of this personally, as a  
volunteer.



Earlier Today ✕

NEWS 1h ago

**The Wall Street Journal**  
In California, where cancer warnings  
abound, coffee is next in line

# **EXHIBIT 9**

Transcript of Interview of Former Staffer 5  
July 31, 2018

1 Paul Solis: Speaking is Paul Solis of the Office of Congressional Ethics. I'm joined by  
2 my colleague, Omar Ashmawy. We are here for an interview with Former  
3 Staffer 5. He's joined by his attorney, Todd Jones. It is July 31st, 2018. I  
4 have provided Former Staffer 5 a copy of 18 U.S.C. 1001, and he has  
5 signed the acknowledgement form. We can begin.

6 So, Former Staffer 5, currently, where do you work?

7 Former Staffer 5: I'm currently unemployed. I turned in my resignation to the congressman's  
8 office. I am studying for a test.

9 Paul Solis: When did you ... Let's see, when you said Congressman, what  
10 Congressman are you talking about?

11 Former Staffer 5: Congressman Thomas A. Garrett, Jr, Virginia's 5th district.

12 Paul Solis: So, how long were you employed with Congressman Garrett?

13 Former Staffer 5: Including my internship, I would gather approximately 10 months, the end  
14 of August of 2017 to July 6th, 2018.

15 Paul Solis: And what about your internship? Can you tell me about that? Was that  
16 prior to your employment with Representative Garrett's office?

17 Former Staffer 5: Yes. It was an internship that started in late August. It lasted about a  
18 month before they offered me a stipend. And then I became full time staff  
19 assistant around mid-December.

20 Paul Solis: And that stipend, how much was that for?

21 Former Staffer 5: I'm not exactly sure. I would think it's around a thousand three hundred, a  
22 thousand four, a thousand seven hundred, somewhere in that range.

23 Paul Solis: Per month or-

24 Former Staffer 5: Per month.

25 Paul Solis: Prior to starting as an intern ... Also, I want to ask, during that time you  
26 were an intern, were you also unpaid or were you given a stipend  
27 throughout that time?

28 Former Staffer 5: Pardon me?

29 Paul Solis: The time you were an intern, from August to December, were you paid the  
30 entire time with that stipend, or was there a period where you were  
31 unpaid?

Transcript of Interview of Former Staffer 5  
July 31, 2018

- 1 Former Staffer 5: There was a period where I was unpaid.
- 2 Paul Solis: Okay. What time frame were you unpaid?
- 3 Former Staffer 5: Late August to, I think, the end of September, as best as I can remember.
- 4 Paul Solis: And then, prior to August, did you have any role in Representative  
5 Garrett's office as an intern or any other way?
- 6 Former Staffer 5: No.
- 7 Paul Solis: Did you ever work on Representative Garrett's congressional campaign?
- 8 Former Staffer 5: No.
- 9 Paul Solis: Have you ever volunteered at all, in any capacity, for his congressional  
10 campaign?
- 11 Former Staffer 5: No. I saw him speak at a town hall when he was running for election. That  
12 was about it.
- 13 Paul Solis: Were you ever asked to do any work for the campaign?
- 14 Former Staffer 5: Prior to my employment?
- 15 Paul Solis: Either prior or during your employment.
- 16 Former Staffer 5: I'm not exactly sure what constitutes campaign activity. I think chances  
17 are yes, if it constituted like a small errand on behalf of the congressman.  
18 But, I never was employed by the campaign and I don't recall doing any  
19 full-time campaign work of any sort.
- 20 Paul Solis: When you mentioned small errand ... I think we'll get back to that in a  
21 moment.
- 22 Former Staffer 5: Right.
- 23 Paul Solis: Your job titles, you were an intern, then what was your job title after you  
24 were an intern?
- 25 Former Staffer 5: Staff Assistant.
- 26 Paul Solis: Did you have any other job titles?
- 27 Former Staffer 5: No.

Transcript of Interview of Former Staffer 5  
July 31, 2018

- 1 Paul Solis: What were some of your duties as an intern and also a staff assistant in  
2 Representative Garrett's office?
- 3 Former Staffer 5: As an intern, I would answer constituent calls. I would help with the flag  
4 process for constituents who requested flag requests. I would assist the  
5 legislative team with anything they were doing. I would attend meetings,  
6 take notes, and ... I think that basically covers ... Oh, and help out with  
7 legislative correspondent issues, so writing letters, folding letters, that sort  
8 of thing.
- 9 Paul Solis: Who did you report to?
- 10 Former Staffer 5: I reported to Mackenzie Morales when I was an intern.
- 11 Paul Solis: What about when you were a staff assistant?
- 12 Former Staffer 5: A staff assistant, I reported to Chief of Staff Jimmy Keady, and then  
13 Hallie Pence, Legislative Director.
- 14 Paul Solis: Who were the senior staffers in the office? And I understand that that term  
15 might not have a strict definition, but who were the people in the office  
16 that had sort of the authority to give tasks and delegate responsibilities?
- 17 Former Staffer 5: That would be Jimmy. He would ... Jimmy Keady, he was the ultimate  
18 authority as far as employee actions, and since I reported to Hallie, if she  
19 asked me to do something I'd help her with that, as well.
- 20 Paul Solis: What about like a Communications Director in the office?
- 21 Former Staffer 5: I didn't report to the Communications Director. I think Mackenzie served  
22 as a ... she did work with a lot of press, so she reported to the  
23 communications director. But, not directly to him for me.
- 24 Paul Solis: Who was that?
- 25 Former Staffer 5: Matt Missen, and then Andrew Griffin, briefly before I ... when I started  
26 out as an intern.
- 27 Paul Solis: Did Andrew come back to the office at all?
- 28 Former Staffer 5: Yes, he did. Sometime in June I want to say.
- 29 Paul Solis: Of 2018?
- 30 Former Staffer 5: Right. So, I think he's still the current comms director.

Transcript of Interview of Former Staffer 5  
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1 Paul Solis: What was Hallie's job titles throughout the time you were there? Did she  
2 have the same or did she have some different ones?

3 Former Staffer 5: Right. So, she started out ... She was Legislative Assistant when I first  
4 arrived. I think when our former Legislative Director, Elliot, left ... which  
5 I'm not sure when he did. It was, I think, late 2017. She became  
6 Legislative Director. And those were her job titles.

7 Paul Solis: And as far as you know, does she still hold that position today?

8 Former Staffer 5: Yes.

9 Paul Solis: When you left, she was still the LD?

10 Former Staffer 5: Correct.

11 Paul Solis: Who was the chief of staff when you left the office?

12 Former Staffer 5: That would be Bill Janis.

13 Paul Solis: And when did he start?

14 Former Staffer 5: I'm not entirely sure. It was a couple weeks before I left.

15 Paul Solis: Maybe late June, mid to late June?

16 Former Staffer 5: That ... yeah. Mid to late June. I'm not entirely sure.

17 Paul Solis: So, if Bill started, Jimmy had left?

18 Former Staffer 5: Right.

19 Paul Solis: Okay. How did Jimmy leave or what do you know about Jimmy's  
20 departure from the office?

21 Former Staffer 5: I'm not sure exactly as to any communication between him and  
22 Congressman Garrett. It all occurred during the time of that Politico  
23 article. He was there one day and then the next day he wasn't at work. And  
24 there was a brief interim period where there was ... we're not sure if we  
25 had an official interim chief of staff. I think briefly, Hallie did function in  
26 that role, and officially we kept it open, and then Bill Janis came in.

27 Paul Solis: When you said Jimmy was sort of there one day and not there the next, did  
28 you hear about how he left? Did any of the staff talk about it?

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1 Former Staffer 5: Not that I remember. I think I was told he had some sort of falling out with  
2 the Congressman. And I wasn't exactly sure as to what the circumstances  
3 were, whether Congressman Garrett fired him or whether he decided to  
4 leave on his own accord.

5 Paul Solis: Do you know who you heard that from?

6 Former Staffer 5: No.

7 Paul Solis: Are you friends with any current or former staffers with Representative  
8 Garrett?

9 Former Staffer 5: Yes.

10 Paul Solis: Who are you close with?

11 Former Staffer 5: I would say I stay in contact with Hallie, Marissa, and Mackenzie. Not  
12 very close friends, but still on good speaking terms.

13 Paul Solis: What about John March, do you know him?

14 Former Staffer 5: Yes. He was our legislative correspondent when I was an intern, and we've  
15 texted a couple times in the past few months.

16 Paul Solis: What about Nick O'Boyle, do you know who he is?

17 Former Staffer 5: No.

18 Paul Solis: Okay. Elliot Harding, do you know who he is?

19 Former Staffer 5: Yes. I haven't been in contact with Elliot, that I recall, of course, but yes.  
20 He was Legislative Director when first arrived.

21 Paul Solis: And Jimmy, do you have a personal friendship with him?

22 Former Staffer 5: I would say so. He's a good guy. And I offered to ... when I heard about  
23 what had happened, I'd asked him if there was anything I could do for him  
24 to help him with the transition. That's about it.

25 Paul Solis: When you say you heard what had happened, what do you mean by that?

26 Former Staffer 5: That he was no longer with the office.

27 Paul Solis: So, how often would you say you speak to Jimmy, even currently? Do you  
28 text or-

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- 1 Former Staffer 5: Not recently. He had offered to help me find a job since the Congressman  
2 was no longer gonna be in town. But ultimately, I decided that I wanted to  
3 go back to North Carolina, and I haven't been in contact with him since.
- 4 Paul Solis: How long ago was that?
- 5 Former Staffer 5: I would say ... I'm not sure. Probably mid-June if I had to take a guess.
- 6 Paul Solis: Did you talk about anything else besides him offering to help you out?
- 7 Former Staffer 5: Not that I remember. Just asked him if he was okay, if he needed someone  
8 to help him move his stuff out of his office.
- 9 Paul Solis: Did he respond to that?
- 10 Former Staffer 5: He said he had a hold of it, that he was doing fine.
- 11 Paul Solis: So, his personal effects were still in the office when you left?
- 12 Former Staffer 5: Yes. Or wait, when I left the office as in resigned?
- 13 Paul Solis: Right.
- 14 Former Staffer 5: No, not that I know of.
- 15 Paul Solis: At what point was Jimmy's stuff in the office and then one day it was  
16 gone? What date was his office cleared out?
- 17 Former Staffer 5: I can't exactly remember. If I remember correctly, when Bill Janis arrived  
18 as the new chief of staff, there was still stuff that Jimmy had in the office,  
19 but I'm not entirely sure on that.
- 20 Paul Solis: Do you know when Jimmy's last day functioning as chief of staff in his  
21 official role, when that would have been? When was the last time you saw  
22 him as chief of staff?
- 23 Former Staffer 5: I think it was a Tuesday night. It was right before the Politico article came  
24 out.
- 25 Paul Solis: So, late May?
- 26 Former Staffer 5: Right. Or, I think it was the Politico article, so it would have been late  
27 May, yeah. Around the 25th.
- 28 Paul Solis: Do you know if Jimmy kept receiving a paycheck after he left the office?

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1 Former Staffer 5: That I don't know.

2 Paul Solis: Did anybody talk about ... Did you ever hear the word severance?

3 Former Staffer 5: No.

4 Paul Solis: And with Mackenzie and Hallie, how often do you speak with them?

5 Former Staffer 5: As of right now, I text them, on average, maybe like once a week. Just say,  
6 "Hey, hope y'all are doing well." That's pretty much it. I don't converse  
7 with them in depth on anything.

8 Paul Solis: So, you talked about this Politico article, right? Did you read the article  
9 when it came out?

10 Former Staffer 5: Yes, I did, correct.

11 Paul Solis: What was your reaction to I when it came out?

12 Former Staffer 5: It was a lot to process. You know, I of course was aware that  
13 Congressman Garrett had asked people to do errands before, and yeah, I  
14 just ... It was a little hard for me to interpret the significance of it at the  
15 time.

16 Paul Solis: When it came out, did the staff comment on it as a whole? Did you guys  
17 have a group setting where you read it or talked about it?

18 Former Staffer 5: Yes. I think we were all in the congressman's office when it came out.  
19 And we had either ... one of us had either read it out so everyone could  
20 hear it and we could all know exactly what was going on. But I don't  
21 remember too much discussion of it. I think we kind of, you know, saw it  
22 for what it was.

23 Paul Solis: Do you remember who read the article out loud?

24 Former Staffer 5: I don't.

25 Paul Solis: Was it Paul?

26 Former Staffer 5: Possibly, I don't know.

27 Paul Solis: Or Matt, maybe?

28 Former Staffer 5: Sorry.

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1 Paul Solis: That's okay, no, it's only whatever you remember, what you know for  
2 certain. So, did Representative Garrett have a response to the article? Did  
3 he talk to you all about that article?

4 Former Staffer 5: I don't remember anything immediately after the article coming out. And  
5 again, the timing of this is all very hazy to me. But, I do remember he had,  
6 at one point, got us in his office and he said, "We'll get through it. It's  
7 terrible what happened and we've gotta move on from this." That's all I  
8 remember.

9 Paul Solis: Did he deny the things that were mentioned in the article? Did he say they  
10 weren't true?

11 Former Staffer 5: He ... From what I remember, he mentioned that some of these things are  
12 true, other things are outright lies. That's pretty much how he left it.

13 Paul Solis: Did he specify which things he thought were true and which were lies?

14 Former Staffer 5: Not that I remember.

15 Paul Solis: About when did he talk about the article? How many days after it came  
16 out?

17 Former Staffer 5: I really can't remember that, either. Sorry.

18 Paul Solis: It's alright. Was it a group setting, like he spoke to the staff? Or was it to  
19 you, personally?

20 Former Staffer 5: I think it was a group setting, yeah. It was all the D.C. office. And I know  
21 at some point we were also trying to get the district office in on conference  
22 call. I can't remember how that turned out.

23 Paul Solis: When you mentioned that someone read the article out loud and the  
24 staffers were all together, was Representative Garrett around for that?

25 Former Staffer 5: No.

26 Paul Solis: What were some of the staffers ... the best you can remember, what were  
27 some of the staffers saying about the things in the article?

28 Former Staffer 5: Well ...

29 Paul Solis: Were people saying that happened or that didn't happen?

30 Former Staffer 5: I don't remember a whole lot of discussion based on specific parts. And  
31 you know, there was ... I know at first I was wondering who was the one

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1 who spoke with Politico. And Matt, the Communications Director, says, "I  
2 know who they are, but we're not gonna bring it up. Don't ask me because  
3 I won't tell you who the person is." And that's really all I remember.

4 Paul Solis: Matt Missen said that?

5 Former Staffer 5: Yes.

6 Paul Solis: He said that in the group setting?

7 Former Staffer 5: Yes.

8 Paul Solis: So, why don't we go through some of the things that were in the article  
9 and just tell us what you know about it. If someone was asked to do these  
10 things, whether you personally were asked. We have this document that  
11 you provided to us that kind of outlines and summarizes some of the  
12 things you experienced. And maybe we'll ask you about that, as well.  
13 What about picking up groceries, delivering groceries, were you ever  
14 asked to do that?

15 Former Staffer 5: Yes. So, there was an instance, and it should be in the document, as far as  
16 the specific date that I was able to find. Should be like October, I think. I  
17 had gone with the Congressman's wife to Costco to pick up some items for  
18 the office. From best I can remember, some of those items were personal  
19 items for them, as well. And this would have been while I was an intern.  
20 And ... yeah.

21 Paul Solis: And who's the Staff Assistant in this item here?

22 Former Staffer 5: Mackenzie.

23 Paul Solis: Did she go with you?

24 Former Staffer 5: No.

25 Paul Solis: Did she say if she was asked by somebody to ask you?

26 Former Staffer 5: I don't remember.

27 Paul Solis: Any other times where you picked up groceries or delivered groceries?

28 Former Staffer 5: I can't remember any instances of that.

29 Paul Solis: What about other people in the office? Whether you were aware that they  
30 picked up groceries or delivered groceries? Were you ever aware of  
31 anyone else doing that?

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- 1 Former Staffer 5: No. I don't remember any specific instance involving groceries.
- 2 Paul Solis: What about driving the congressman's family members or himself on a  
3 personal related trip? Were you ever asked to do that?
- 4 Former Staffer 5: I don't ... So, I did drive the congressman's wife very briefly. I mentioned  
5 another instance in December. She was there with her baby and we were  
6 coming back ... Sorry. We were coming back from IKEA, and her baby  
7 was crying profusely. So, I said, "Hey, I'd be happy to drive if you want to  
8 tend to Sheridan." Sheridan is their daughter. So, that particular instance I  
9 did drive. But that was it that I remember.
- 10 Paul Solis: And again, the same question. Anyone else in the office, that you're aware,  
11 drove a car with his wife, their daughter, anywhere?
- 12 Former Staffer 5: Don't remember that. I think one staffer did change their oil. But I can't  
13 remember who it was or when it happened.
- 14 Paul Solis: Was it possibly Stephen down at the district? Stephen Harvey?
- 15 Former Staffer 5: I'm not sure. I don't keep in contact with Stephen.
- 16 Paul Solis: Okay. Do you know if other staffers were asked to change the oil in the  
17 car? Representative Garrett's car. Was it just that one time?
- 18 Former Staffer 5: That's all I remember. And again, there very well could have been a lot  
19 more of those instances before I arrived at the office.
- 20 Paul Solis: Understood. I asked about driving. The article mentioned that one of the  
21 staffers or interns, somebody drove back to the district to pick up  
22 Representative Garrett's daughters and drive them back to D.C., or the  
23 other way around, drove them from D.C. to Scottsville. Do you know  
24 anything about that?
- 25 Former Staffer 5: No. I never heard of that.
- 26 Paul Solis: Do you know who Tanner Hirschfeld is?
- 27 Former Staffer 5: Yes, I do.
- 28 Paul Solis: Now that I've said that name, do you know if Tanner ever drove?
- 29 Former Staffer 5: No.
- 30 Paul Solis: The daughters.

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- 1 Former Staffer 5: He was an intern before I arrived and he had visited the office  
2 occasionally while I was working there. And I knew him before from  
3 UVA, but I never talked with him about anything like that.
- 4 Paul Solis: What about going to Representative Garrett's apartment in D.C. to pick up  
5 clothing or anything like that? Were you ever tasked with that?
- 6 Former Staffer 5: Yes. I think that's another thing that I documented. He had forgotten a  
7 tuxedo. So there was a transition period between him moving out of his  
8 old apartment and a new apartment. The Chief of Staff took over the old  
9 apartment. I had gone back ... I think it was right after they had moved, to  
10 try to look for the tuxedo. He was going to ... It was an important event. I  
11 can't remember what the event was, but I had gone there to look for it.  
12 Was unsuccessful. And then later that night, they needed shoes or  
13 something like that. So, that was after work hours and I went over, looked  
14 around, was able to find ... I think it was Flanna's mom, she gave me what  
15 we were looking for and I brought it back.
- 16 Paul Solis: Any other staffers that you are aware that picked up clothing for  
17 Representative Garrett or his wife?
- 18 Former Staffer 5: I would imagine that it happened, but I can't remember anything specific.
- 19 Paul Solis: Did Mackenzie ever talk to you about it or anybody say, I have to do this  
20 errand? Did they ever mention to you?
- 21 Former Staffer 5: They did, yeah. Mackenzie would ... and I don't know if it was specifically  
22 related to clothing, but she would say "hey, I have to go take care of this  
23 thing for Congressman Garrett or Flanna." And she would go and then  
24 come back. Yeah.
- 25 Paul Solis: You know how often that would occur?
- 26 Former Staffer 5: It's hard for me to say. It could have been once every two weeks, once  
27 every week, once every three weeks, I would think. I don't-
- 28 Paul Solis: There was no frequency. It was sort of sporadic and it's-
- 29 Former Staffer 5: That was certainly my experience, and from the outside looking in, that's  
30 how it appeared to me. Again, I don't know since I'm not Mackenzie.
- 31 Paul Solis: What about the dog? Did Representative Garrett have his dog in the  
32 office?
- 33 Former Staffer 5: Yes. The dog, Sophie. He or Flanna would bring it in every so often. It  
34 wasn't like the dog was going to be there. There was a week that I

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1 remember that the dog was there the full time. I think Congressman  
2 Garrett and his wife were out traveling. And occasionally the dog would  
3 be there and, you know ... yeah.

4 Paul Solis: So, it wasn't every day? Except that one week, it wasn't ... What was the  
5 frequency the dog was there?

6 Former Staffer 5: That's a good question. I would estimate at least once a month. Certainly  
7 before the Politico article came out, maybe twice a month. But it wasn't  
8 every day.

9 Paul Solis: And were you expected to ... Were you ever asked to take the dog out and  
10 walk it or watch it in some capacity?

11 Former Staffer 5: Well, I like dogs, so I was happy to do it. But someone would say, "Hey, I  
12 think Sophie needs to go out." So, either I or another staffer would take  
13 her out for a walk for like a minute or two, then we'd be back, or you  
14 know, ten minutes, however long it took. And then ... yeah. And we had  
15 food there for her, too.

16 Paul Solis: What staffers were primarily responsible for the dog, taking the dog out?

17 Former Staffer 5: Mackenzie did it a lot. Jimmy, I think, also wanted to make sure that the  
18 dog was getting taken care of. I would do it every so often. Interns would  
19 occasionally help out with that. Really whoever was available.

20 Paul Solis: Just going back to this picking up the tuxedo and the groceries, who's  
21 typically asking you to do this?

22 Former Staffer 5: So, a lot of these activities would be Jimmy. He would say, "Hey, I'd  
23 really appreciate your help. Someone needs to do X, Y, Z." Occasionally,  
24 Flanna would text me directly, almost never was it the congressman, that I  
25 remember. Besides like quick, "Hey, I forgot to bring my tie to the house  
26 floor, do you mind getting it?" Or something like that. It was mostly  
27 through Jimmy.

28 Paul Solis: So, you mentioned that Flanna would text you. Would she text you  
29 individually or as part of a group?

30 Former Staffer 5: It varied, I would say.

31 Paul Solis: Did her text ... Did you all have a name for what those texts were? Did  
32 you have like an acronym or something you called them?

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1 Former Staffer 5: Oh, so I didn't write this down, but I know some people referred to it as  
2 TAMMY, which, Tom asked me to tell you. So, yeah, that would be the  
3 acronym, I'd think.

4 Paul Solis: What is the frequency of her texting you?

5 Former Staffer 5: Not very often. Not to me, personally.

6 Paul Solis: I think you mentioned this, but the Congressman himself, personally,  
7 wasn't texting you?

8 Former Staffer 5: Not for any specific instances that I can remember.

9 Paul Solis: If you could ballpark it, how often is Flanna Garrett texting either you  
10 personally or a group setting?

11 Former Staffer 5: I would say once a month, if that. Maybe a little bit more than that, but not  
12 very often.

13 Paul Solis: Do you know if she was in greater contact with other staffers?

14 Former Staffer 5: Yes. I would imagine her and Marissa ... or, sorry. Mackenzie and Marissa  
15 would probably get the bulk of her text messages along with Jimmy.

16 Paul Solis: Why do you say Marissa and Mackenzie?

17 Former Staffer 5: I had heard them express frustration with the Congressman's wife texting  
18 them. I don't know any of the details, but they texted frequently from what  
19 I gathered.

20 Paul Solis: And do you know what the basis of the frustration was? Was it just ... Was  
21 it the message that was conveyed or was it the frequency of the texting?  
22 Do you have any idea of that?

23 Former Staffer 5: I don't. I think a lot of the time it was the content. They just didn't enjoy  
24 her tone a lot of the time. But it's hard for me to say from the outside  
25 looking in as to the exact dynamic of it all.

26 Paul Solis: Understood. How often was Representative Garrett's wife in the office?

27 Former Staffer 5: Maybe, my estimate would be once every week or once every two weeks.  
28 She wasn't there all the time during business hours.

29 Paul Solis: After the Politico article came out, was she there the same amount or ...  
30 Was there a time that you started to see her less or hear from her less?  
31 Either one.

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1 Former Staffer 5: The errands I helped out with, I felt like there was a drop after December  
2 in the amount of stuff that I did. And I think I saw her once after the article  
3 came out. That was about it.

4 Paul Solis: When you say there was a drop in December, can you tell us a little bit  
5 more about that? What do you mean by that?

6 Former Staffer 5: I think the ... what Jimmy was trying to do was have a particular point of  
7 contact for Flanna and what her priorities were within the office. That way  
8 it was kinda centralized. He knew what was going on. He could always  
9 ask someone as to what the specifics were. So that, I think, was kind of the  
10 driver behind that.

11 Paul Solis: What about the time that Flanna would text? Would it ever be late at  
12 night?

13 Former Staffer 5: To me?

14 Paul Solis: Yeah, to you. The ones that you experienced.

15 Former Staffer 5: Not that I remember. I didn't ... I certainly didn't feel obligated to respond  
16 if it was like at 11 or 12 at night. I would just wait 'til the morning.

17 Paul Solis: What about other ... What about like, Mackenzie and Marissa? Do you  
18 know if they were receiving late night texts?

19 Former Staffer 5: That I can't remember.

20 Paul Solis: Well, I want to move into around March of this year. Were you ever  
21 approached to do anything for the campaign? I know earlier in the  
22 conversation I had asked you about being ... any requests that were made  
23 of you to do work for the campaign in any way, and you said ... you  
24 mentioned something about a small errand here or there. Can you ... I want  
25 to talk about, in March specifically, but in general, any errands you ran for  
26 the campaign or any work at all you conducted for the campaign. Can you  
27 talk about that first?

28 Former Staffer 5: Right. Again, I'm not exactly sure what the exact constitutions are. Now in  
29 March, I think it was March, I was approached by Jimmy and then the  
30 Legislative Director, that says, "Hey, we're hoping to create a position  
31 within the campaign." This would be someone who could directly assist  
32 with Congressman Garrett and his wife, in addition to helping Jimmy out  
33 with the campaign activities. I had told Jimmy in other settings that I  
34 thought campaign work sounds neat and I'd be interested in it. I've heard  
35 other staffers within the hill do it. And so, we talked a little bit about

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1 creating the position. I would work during lunch break and then nothing  
2 out. And then, keep everything separate from work.

3 However, I had heard that the Congressman and his wife preferred one of  
4 the female staffers within our office for that position. So, ultimately I  
5 didn't have it. And I don't remember ever being paid by the campaign for  
6 that kind of activity.

7 Paul Solis: Right. So, when you were approached about it, who approached you?

8 Former Staffer 5: I think it was first Hallie who sent me a message, and I can't remember the  
9 exact date. It was just, "Hey, can we chat outside?" And so, went outside.  
10 She said, "Hey, would you be interested? By no means feel obligated or  
11 intimidated to do this. We just really appreciate your work and was  
12 wondering if you'd be interested in any campaign activity?" And I said,  
13 "Yeah, provided it's within the rules, I'd be happy to."

14 Paul Solis: Did she say who she meant by we?

15 Former Staffer 5: I would assume that meant Jimmy, as well. Jimmy was the ... from what I  
16 remember, the second person I talked to about the position.

17 Paul Solis: Okay. So you spoke with him after Hallie?

18 Former Staffer 5: I think so.

19 Paul Solis: Okay. The best you can recall, what did you and Jimmy talk about then?

20 Former Staffer 5: He said, really appreciate your work. We're hoping to create a position,  
21 one, to help the Congressman and his wife with any ... if they need help  
22 with anything, you know. He did mention errands like the dog, just say  
23 hey, it would be great if we could just have someone on call for this sort of  
24 thing. I don't know if he mentioned the dog specifically, but that's kind of  
25 the sense I got. And then you would also be working as someone who  
26 could volunteer for the ... or actually work for the campaign and help out  
27 with that sort of activity.

28 Paul Solis: So, I'm glad you provided a little more detail there. And you had  
29 mentioned there, work for the campaign in addition to things to help out  
30 Congressman Garrett and his wife. Did he give you any more specifics on  
31 what that meant?

32 Former Staffer 5: He, now that I remember, he did mention like, oil change. Someone who  
33 could do that to make sure he can get back and forth between the district  
34 and whatnot. And he ... from what I remember, he indicated it would be  
35 like a 50/50 time type position for that sort of activity.

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1 Paul Solis: Did he talk about how many hours a week or a month this new role would  
2 entail?

3 Former Staffer 5: He did. I can't remember. From my sense, it was like an hour worth lunch  
4 break and then maybe an hour at night or like three or four extra hours  
5 somewhere dispersed throughout the week.

6 Paul Solis: Did he say how you'd be paid?

7 Former Staffer 5: I would think it would be through the campaign, although I can't  
8 remember.

9 Paul Solis: Why do you think it would be through the campaign?

10 Former Staffer 5: Because I would have been a campaign employee.

11 Paul Solis: And that was how Jimmy presented it to you? You'd be a-

12 Former Staffer 5: Right.

13 Paul Solis: Paid campaign employee. Okay. Did he talk about whether or not your  
14 official roles, the hours would be decreased or the pay would be decreased  
15 at all to compensate for this?

16 Former Staffer 5: No. So, after I had received the offer, I went to meet with an ethics  
17 counselor to see if there was precedence for this sort of thing, make sure it  
18 could be doable, and I would maintain my work hours, I would have my  
19 lunch break, and I could do ... From my understanding of the situation, I  
20 could do work outside of official nine to five business hours.

21 Paul Solis: You say ethics counselor, what do you mean by that? Someone on the  
22 Ethics Committee?

23 Former Staffer 5: No. Well, you know the office at Longworth, across from Dunkin'  
24 Donuts?

25 Paul Solis: Mm-hmm (affirmative).

26 Former Staffer 5: That place.

27 Paul Solis: Okay. It wasn't the Ethics Committee staff.

28 Former Staffer 5: Not to my knowledge. It would have been ... what is the field title of the  
29 people across from the Dunkin' Donuts?

30 Omar Ashmawy: So, you're talking about the basement level of Longworth?

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1 Former Staffer 5: Yes, exactly.

2 Paul Solis: That's payroll, possibly.

3 Former Staffer 5: No, the other side.

4 Omar Ashmawy: Yes, there is an ethics office. There's a satellite ethics office there that's  
5 available for staffers who have questions.

6 Paul Solis: Okay.

7 Omar Ashmawy: [inaudible].

8 Paul Solis: Do you know the name of the person you met with?

9 Former Staffer 5: I don't remember. I think it was a female.

10 Paul Solis: Were they, they were a lawyer?

11 Former Staffer 5: Yes.

12 Paul Solis: And they presented themselves as a lawyer?

13 Former Staffer 5: Yes. They said to be very careful. That it was a very tough situation to do.

14 Paul Solis: What guidance did they give you? What did you walk away with from that  
15 meeting?

16 Former Staffer 5: I was in the early stages of being looked at for this position. I got from ...  
17 The sense that I got from the conversation, it was keeping track of my  
18 hours, making sure I kept my work completely separate, that I kept up the  
19 hours that I was doing for the official staff, and then whatever campaign  
20 activity, keep it separate.

21 Paul Solis: Did you talk to them at all about this other 50% of doing things for the  
22 Congressman and his wife that would be part of this position? Did you  
23 bring that up to the ethics counselor?

24 Former Staffer 5: I don't remember bringing up the specific activities. I just presented it as I  
25 was offered an opportunity through a campaign, or by the campaign.

26 Paul Solis: Did they give you any advice about conducting ... doing tasks for  
27 Representative Garrett and his wife?

28 Former Staffer 5: No, I know it sounds crazy in retrospect, but I didn't ... From what I  
29 understood at the time, I didn't think it would be an issue or anything

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- 1 that ... From my understanding, Jimmy was trying to help out with making  
2 those activities be completely above board, so I didn't even perceive it as a  
3 problem at the time.
- 4 Paul Solis: Well, that's ... I guess that would be my next question to you. When  
5 Jimmy ... Not actually doing work for the campaign, again, this 50% of  
6 time spent doing things for the Congressman and his wife, did you at all  
7 feel uncomfortable with that? That you would be getting paid to do those  
8 errands, did you feel-
- 9 Former Staffer 5: The more I heard about the position, the more uncomfortable I felt with it,  
10 which is why I didn't really make a big stink as to when I was ultimately  
11 not selected for it. I was more interested in the intellectual side of  
12 campaign work. And I just kinda let it go after that.
- 13 Omar Ashmawy: This may be ... this is sort of, maybe it's an obvious question, but instead  
14 of assuming the answer. Why did you seek out the advice of the ethics  
15 counselor?
- 16 Former Staffer 5: I had heard that it was very important to keep your work separate and keep  
17 your hours maintained and that ... I had actually brought it up while it was  
18 me ... Well, first Hallie was like, "you should probably speak with an  
19 official employment counselor to make sure what you're doing is correct."  
20 I asked Jimmy's permission. I said, "hey do you mind if I speak with a  
21 counselor before I proceed with this?" He was like "sure, absolutely."  
22 Since being a congressional staffer and a campaign person raises various  
23 issues.
- 24 Paul Solis: Did he ask you not to mention to the counselor, did he ask you not to  
25 mention the doing the things for Representative Garrett and his wife?
- 26 Former Staffer 5: No.
- 27 Paul Solis: Okay. And again, this counselor, they said they were an ethics person?
- 28 Former Staffer 5: I'm pretty sure. Yeah.
- 29 Paul Solis: How did you know where to go? How did you know that this was the  
30 office? Did you ask somebody?
- 31 Former Staffer 5: I had known before. As the flag attendant, I would frequently go down  
32 there to say hey, is the right protocols for these, or any other issues. I also  
33 had receipts and gifts that I had to ultimately return, and I wanted counsel  
34 for that. So, I knew where they were.
- 35 Paul Solis: Did you ... This was an in person meeting you had?

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- 1 Former Staffer 5: Yes. From what I remember, yeah.
- 2 Paul Solis: Was there any emails exchanged with this lawyer?
- 3 Former Staffer 5: I can't remember. I think ... yeah, I can't remember.
- 4 Paul Solis: Okay. So, when you went and talked to this person, did you give it ... gave  
5 it more time to think about whether or not you wanted the role? I mean,  
6 what's happening in the interim after you were presented with the  
7 opportunity, you meet with this lawyer, what happens next?
- 8 Former Staffer 5: And again, this could diverge from what they understood the conversation  
9 to be, but I understood that it was doable if I had a very strict  
10 understanding of what was permissible and what wasn't permissible. And  
11 then, pretty soon afterwards, I found out that they had opted to go for a  
12 different person, which proved to be Mackenzie. Then I kinda let it go  
13 after that.
- 14 Paul Solis: Who told you that, that it was Mackenzie who had been chosen?
- 15 Former Staffer 5: I had found out ... First it was unclear to me if it was her or Marissa. But ...  
16 I can't remember who told me. It was probably Jimmy.
- 17 Paul Solis: Did you talk to Mackenzie at all about that, about her being offered the  
18 position?
- 19 Former Staffer 5: No. And then congratulations, I think that was it. Oh, there was an official  
20 announcement, now that I remember. Just like a group of ... If I remember  
21 correctly, there was a meeting of people that said hey, Mackenzie's gonna  
22 also be helping out with the campaign. And that was it.
- 23 Paul Solis: Who announced that?
- 24 Former Staffer 5: I'm pretty sure it was Jimmy, but I can't replay the exact memory in my  
25 mind.
- 26 Paul Solis: Did Jimmy, in that announcement, talk at all about also this time that  
27 would be required to help out Representative Garrett and his wife?
- 28 Former Staffer 5: I can't remember.
- 29 Paul Solis: Did you ever have any conversations with Mackenzie after she started in  
30 this new role about what she was doing?
- 31 Former Staffer 5: So ... and you know, she never expressly mentioned that this was directly  
32 related to her campaign official duties, but I think she dog sat for the

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1 Garretts for a time. She would leave to help Jimmy occasionally over a  
2 lunch break. And by and large, we didn't speak about it that much.

3 Paul Solis: Do you know whether she ... Again, I keep asking about this, but did you  
4 know whether she, during that time, did any of these errands or did some  
5 sort of running around doing tasks for Representative Garrett and his  
6 wife? Do you know if she did that during that time that she was hired in  
7 this new role?

8 Former Staffer 5: I know she dog sat. I can't remember any specific instances, but I certainly  
9 got the sense that that was going on.

10 Paul Solis: Okay. Do you know why? Why do you have that sense? Other than the  
11 dog.

12 Former Staffer 5: She would occasionally say, hey, Flanna asked me to do something, or  
13 hey, I'm coming from the Garrett's apartment, I'll be 10 minutes late, or  
14 something like that. And of course, she'd stay like an hour or two past the  
15 standard 5 p.m., but that sort of thing.

16 Paul Solis: Did you notice she was out of the office more when she took on that new  
17 role?

18 Former Staffer 5: That's hard to say. She does conduct a lot of meetings with other offices,  
19 you know coffees, networking. So, it was hard for me to tell when she was  
20 working for the campaign and when she was off on other duties slash  
21 interests.

22 Paul Solis: Did she say how much she was getting paid for this new role?

23 Former Staffer 5: No.

24 Paul Solis: When you were offered it, did they put a figure about how much you'd be  
25 paid?

26 Former Staffer 5: They did, and I know this sounds bad, but I really can't remember. It  
27 wasn't double my salary or anything like that. It was just a little extra  
28 money here and there.

29 Paul Solis: About when did Mackenzie start the role?

30 Former Staffer 5: It was pretty soon after I had been offered it, and then they ended up going  
31 with another candidate. And I think you mentioned it might have been  
32 March. That sounds right to me, although I can't remember the specific  
33 date.

Transcript of Interview of Former Staffer 5  
July 31, 2018

1 Paul Solis: Who knew about this offer in the office and this new position? Who knew  
2 about it?

3 Former Staffer 5: Hallie and Jimmy definitely knew about it. Beyond that, I don't know. At  
4 least before it was announced to everyone else.

5 Paul Solis: How much time ... and I know it's difficult for you to say given that  
6 Mackenzie was out of the office doing coffees and all that, but how much  
7 time do you think she was spending in this new position? Is there any way  
8 you could estimate that?

9 Former Staffer 5: It seemed that it was about equivalent to a lunch break during her work at  
10 the office. As far as outside business hours, it's hard for me to estimate.  
11 And occasionally it would spill over other days, like she'd be there from  
12 nine to six or nine to seven, like full time at the office.

13 Paul Solis: In the official office?

14 Former Staffer 5: In the official office. So, I think a lot of it varied by the day and ... yeah,  
15 it's hard for me to estimate.

16 Paul Solis: Did you notice a change, though? I know you can't estimate the hours, but  
17 you noticed a change in her being in the office?

18 Former Staffer 5: Again, it's really hard for me to say. A lot of dynamics shifted between  
19 when I first arrived and then that point afterwards, and especially with  
20 everything that came out. It was hard, again, hard for me to tell when she  
21 was arriving late to work just because she had missed the bus or slept in,  
22 what have you, or if she was conducting official duties.

23 Paul Solis: Do you know if Mackenzie, after she started the new role, do you know if  
24 she actually did campaign work for Representative Garrett?

25 Former Staffer 5: I would think so, yeah. I think I recall her mentioning that she worked on  
26 specific events.

27 Paul Solis: Do you know what events? How many times?

28 Former Staffer 5: Actually, going back to your second or third question back, I did notice  
29 she wouldn't come into the office on time as much as she did when I first  
30 started working with her. Again, I don't know if that was related to her  
31 duties, but that was definitely a thing that concerned me. Well, what was  
32 your ... sorry.

33 Paul Solis: My question is, specifically campaign events, that were you had direct  
34 knowledge that she was out of the office working on campaign type

Transcript of Interview of Former Staffer 5  
July 31, 2018

1 things. Were you aware of that happening when she started this new role?  
2 Did you have any certainty that she was working on campaign issues?

3 Former Staffer 5: Yeah, I was pretty certain she was working on campaign issues. And I got  
4 the sense that she was working on media related stuff for the campaign,  
5 too, but nothing concrete.

6 Paul Solis: Right. Do you know why you had that sense with her?

7 Former Staffer 5: Right. She had a laptop on ... yeah, I'm pretty sure it was a campaign  
8 laptop that she had in her possession. And then she had mentioned to me  
9 that ... She was like, oh, I was helping Congressman Garrett and Jimmy  
10 out with an event this past weekend. It was really nice. We met some  
11 good, solid people, and that's ... yeah. So I knew she was ... almost 100%  
12 positive she was working on the actual campaign stuff.

13 Paul Solis: It looks like I asked you this at the beginning, but you obviously ... you  
14 left, you said, in July, this month of this year, correct?

15 Former Staffer 5: Yes.

16 Paul Solis: Why did you tender your resignation at the office?

17 Former Staffer 5: So, I had submitted my letter of resignation about three weeks in advance  
18 from the time that I ultimately left. For me, it was a lot of things. I knew  
19 Congressman Garrett wasn't gonna be here in ... or wasn't gonna be there  
20 in Washington the following year. I had kinda seen and gotten the Capitol  
21 Hill experience and I was ready to move back to North Carolina and start  
22 studying. So, it just seemed like everything was kind of coming together to  
23 a point where I was like, alright, I'm ready to move on. It was past the  
24 initial blow of the Politico article, where I felt like I wasn't leaving them in  
25 a bad spot. So, I'd say it would be a lot of things.

26 Paul Solis: Generally, the nature of that article, and I think even the title was  
27 something like Turning Staffers into Personal Servants, or something like  
28 that. I've asked you about the specifics of things that were talked about in  
29 that article, but generally, did you agree with that tone of the article, that  
30 narrative that staffers were being made into personal servants to do all  
31 kinds of personal errands? Do you believe that that happened?

32 Former Staffer 5: I personally would disagree with classifying the staffers as servants. I  
33 certainly never felt that way. To me, one ... And again, I feel stupid for not  
34 knowing the rules better when I first arrived. I never felt like I was  
35 pressured to do anything. I thought I was just being helpful. And yeah, I  
36 think the characterization that I saw in the article, well, definitely some of

Transcript of Interview of Former Staffer 5  
July 31, 2018

1 it, I would say him asking staffers to perform errands is true. I just thought  
2 it kind of misrepresented, I guess, my personal experience.

3 Paul Solis: Would you say that Mackenzie and Marissa ... this is going back to what  
4 you mentioned earlier. Mackenzie and Marissa, did they do the most of  
5 that type of ... those types of requests, those types of tasks?

6 Former Staffer 5: I'm not sure about Marissa, but I would definitely say Mackenzie handled  
7 a lot of them, greatly, by the end of the spring.

8 Omar Ashmawy: Yeah, just ... these are more for the record, questions. So, this timeline of  
9 documented events that your attorney provided us, I just want to clarify  
10 the timeframe extends from 2017 to 2018?

11 Former Staffer 5: Correct.

12 Omar Ashmawy: Okay. And it's in chronological order?

13 Former Staffer 5: Yes.

14 Omar Ashmawy: The instance on October 26th when you went to Costco, you went with the  
15 Congressman's wife?

16 Former Staffer 5: Yes, correct.

17 Omar Ashmawy: And that was on a week day?

18 Former Staffer 5: Yes.

19 Omar Ashmawy: November 21st, when you were asked to help move the Congressman  
20 from his ... from one part of town to another, was it only just you, the  
21 legislative director, and the Chief of Staff?

22 Former Staffer 5: That's all I can remember. It was Chief of Staff, me, the Legislative  
23 Director, his wife was there, you know, Congressman Garrett's wife.  
24 Congressman Garrett was there. And I don't remember anyone else.

25 Omar Ashmawy: And that would ... That would ... Otherwise, if you hadn't been doing that,  
26 that would have been a regular work day.

27 Former Staffer 5: Right. I had been notified by the Chief of Staff, said hey, we'd really  
28 appreciate your help tomorrow. If you want, you can wear jeans and a t-  
29 shirt. And obviously, over the course of time I worked there, even as an  
30 intern, I would stay 'til 6 p.m. I would arrive at 8:30. Most of those  
31 instances, I think, could be swallowed up by a lunch break, and I never  
32 took a lunch break. I would eat at my desk. And that was the only incident

Transcript of Interview of Former Staffer 5

July 31, 2018

1 that took up a day. And over the course of several months, I think I more  
2 than made up for it.

3 Omar Ashmawy: Oh, I'm sure you did. Like I said, I just wanted to ... just again, for the  
4 record, I just wanted to go through these.

5 So, I guess ... So, December 1st, I know you said you didn't remember if it  
6 actually happened when the chief of staff texted you to see if you were  
7 available to help the congressman's wife move items for a few hours.

8 Former Staffer 5: Right.

9 Omar Ashmawy: That would have been, just for the sake of my clarity, does December 1st  
10 represent the date of the text or would that have been the day, if you did,  
11 that would have been the day that you would have done it?

12 Former Staffer 5: That was the text. I had completely forgotten about the text until I was  
13 called about this matter, and I was going through all my texts and I found  
14 it. I was like, I don't remember that. But, I thought it was worth including  
15 just in case it did happen.

16 Omar Ashmawy: I appreciate that. December 12th, when the Chief of Staff asked you if you  
17 could help the Congressman's wife move some IKEA furniture items, that  
18 was also on a typical work day?

19 Former Staffer 5: Correct, yes. Would have been at the end.

20 Omar Ashmawy: The time you helped ... when you were trying to help set up the-

21 Former Staffer 5: Early afternoon, sorry. Not towards the exact end, but like during the work  
22 day, yes.

23 Omar Ashmawy: I understand, yes. The May 8th instance when you were working, trying to  
24 get their wife up and running, that also was on a ... that also was on a work  
25 day?

26 Former Staffer 5: Yes. It, again, took up a lunch break. And they compensated me for my  
27 time in cash. I actually didn't even get the wife to work, but they still-

28 Paul Solis: Who's they, you mean Congressman?

29 Former Staffer 5: Yes. Well, the Congressman's wife was there.

30 Paul Solis: And they handed you cash?

31 Former Staffer 5: Right.

Transcript of Interview of Former Staffer 5  
July 31, 2018

- 1 Omar Ashmawy: And lastly, this July 2nd contact, you said that Representative Garrett  
2 contacted you with questions about specific activities that you did while  
3 working in his office. Could you just elaborate on that?
- 4 Former Staffer 5: Right. So, at that particular point, Congressman Garrett said, "I need  
5 information. They're looking into what I've done and I'm trying to get a list  
6 of everything that has happened so I can disclose what occurred." And so,  
7 to the best of my knowledge, I tried to relay that information. He had  
8 asked about the Costco trip, what was purchased, and I think he asked  
9 about IKEA, as well, or some other instance.
- 10 Omar Ashmawy: Do you recall if our investigation, the Office of Congressional Ethics  
11 investigation was brought up on that call?
- 12 Former Staffer 5: So, this was text message. From what I remember, he said ethics is  
13 investigating. Again, I can look at the exact text message to give you the  
14 exact information. But he didn't mention OCE specifically, from what I  
15 remember.
- 16 Omar Ashmawy: Has anyone brought up to you ... I mean, not your attorney, but anyone  
17 from ... any of your former colleagues at Representative Garrett's office,  
18 anyone you're still in contact with. Has anyone brought up our review?
- 19 Former Staffer 5: No. Yeah, I had been contacted by the Congressman. I had called the  
20 Chief of Staff, Bill Janis, the following day, say, "Hey, is everything  
21 okay? What should I expect?" They said, "They'll probably contact you in  
22 a couple weeks. Just tell the truth, or do whatever," well, since he said it  
23 was voluntary, he said, "I can't tell you what to do. Just be honest,  
24 whatever you do, is my advice." And that was it.
- 25 Paul Solis: He mentioned that it was voluntary?
- 26 Former Staffer 5: Yes.
- 27 Paul Solis: Did he reference the OCE in that conversation or was it the Committee on  
28 Ethics?
- 29 Former Staffer 5: I can't remember.
- 30 Paul Solis: I just had a question about the last page here. It says, "After reviewing my  
31 personal calendar, text messages, phone, email," or sorry, "personal email  
32 and Gchat messages, I found eight likely relevant instances of personal  
33 tasks." Is that representative of the previous-
- 34 Former Staffer 5: Right, that's the previous stuff.

Transcript of Interview of Former Staffer 5  
July 31, 2018

- 1 Paul Solis: It's not eight extra.
- 2 Former Staffer 5: No. Yeah. I think what I was getting at there is, those are the ones that I  
3 could document. There were a couple other instances, like, "hey Former  
4 Staffer 5, I'm out" ... It would be Jimmy, and he'd be like "hey, I think the  
5 Congressman forgot his cigarettes. Could you hunt those down?" That  
6 would take like a minute. Or, you know, I would ... I, or someone, would  
7 mention "hey, someone needs to walk the dog." I don't have any  
8 documentation of those, but it did happen. It wasn't a big time  
9 commitment as far as those ones that I couldn't document.
- 10 Paul Solis: And this just goes back to at the beginning, I had just mentioned any  
11 campaign work you'd done throughout your time with the Congressman.  
12 You mentioned it possibly was a small errand. Is there any specifics you  
13 can give on ... and what do you mean by that? Did you ... What kind of  
14 small errand would you do for the campaign?
- 15 Former Staffer 5: So ... and this is an area where I'm a little unclear as to what it constitutes.  
16 I think it's actually in the document or the documents that I listed. There  
17 was an instance where Congressman Garrett had had these gifts that he  
18 wanted distributed to other members. I'm not sure if those gifts were some  
19 sort of things that he personally paid for, or if these gifts, which were also  
20 sent to non-members of Congress. If this was like, more ... I don't know if  
21 this makes sense, but like politics, establishing goodwill. I helped deliver  
22 those and I would classify that as something that I don't know.
- 23 Paul Solis: And that was ... Was that December 14th?
- 24 Former Staffer 5: Sounds about right.
- 25 Paul Solis: There's, you mentioned, Mark Meadows' office.
- 26 Former Staffer 5: Right, right.
- 27 Paul Solis: Okay. That's what you're talking about?
- 28 Former Staffer 5: Yes. And then in January, as well. I think there were a couple extra gifts  
29 that were distributed, that didn't get a chance to before Christmas.
- 30 Paul Solis: And that's what you meant by possibly a small errand for the campaign.
- 31 Former Staffer 5: Right.
- 32 Paul Solis: But other than that, no volunteer or paid work for the campaign?
- 33 Former Staffer 5: Not that I can remember.

Transcript of Interview of Former Staffer 5  
July 31, 2018

- 1 Omar Ashmawy: Anything else? Obviously you've got a sense of what we're asking about.  
2 Is there anything that you thought we would ... a question you thought we  
3 would ask that we didn't, something you thought we would bring up and  
4 may not have?
- 5 Former Staffer 5: I thought you would bring up alcohol. I'd never seen the Congressman  
6 drink. There was one time that I saw him with a Solo cup, but I couldn't  
7 tell you what was in it. Obviously, I know he may have had a different life  
8 outside of work, but as far as what happens next, do y'all have any ideas to  
9 what the process looks like?
- 10 Paul Solis: Well, we can conclude our time here, then talk about our process and  
11 timelines in a moment. I just have one more question, kind of generally,  
12 about the Congressman's time in the office. Was there a point in time  
13 where you just really didn't see him at all coming into the office?
- 14 Former Staffer 5: That would be often. I got the sense that he preferred to work ... to hold  
15 meetings in the office and then primarily work either by voting or working  
16 in other spaces. So, it wouldn't be unusual for me not to see him,  
17 especially in an out of session week, it wouldn't be unusual at all for me to  
18 not see him come in to work.
- 19 Paul Solis: Was there a time though where you just didn't see him at all? A couple  
20 weeks or longer where you just didn't see him?
- 21 Former Staffer 5: Definitely out of session weeks. It would almost be certain that he  
22 wouldn't be in the office except for like maybe an hour or two. Hard for  
23 me to judge. In session weeks, I didn't notice anything abnormal.
- 24 Paul Solis: One question I forgot to ask you, but I just remembered. Did the Ethics  
25 Committee staffers ever come into the office to talk to the staff as a  
26 whole?
- 27 Former Staffer 5: They did.
- 28 Paul Solis: Okay, when did that occur?
- 29 Former Staffer 5: I can't remember the exact date. I know the congressman had everyone  
30 sign a sheet of paper that says yes, we had people come in and talk to us. I  
31 think it was sometime in the spring, before the article.
- 32 Paul Solis: 2018?
- 33 Former Staffer 5: Right. And ... yeah.
- 34 Paul Solis: What was the topic of the discussion with the ethics staffers?

Transcript of Interview of Former Staffer 5  
July 31, 2018

1 Former Staffer 5: I really can't remember. I'm sorry.

2 Paul Solis: No, that's okay. That's okay. Do you know if-

3 Former Staffer 5: Workplace rights and responsibilities. That kind of thing is the general  
4 sense I got.

5 Paul Solis: Did campaign work and official work and sort of how staffers deal with  
6 those two worlds, was that discussed at all in the meeting with the ethics  
7 staffers?

8 Former Staffer 5: I really can't ... It's very possible that it was. I would assume so, but I don't  
9 have any specific memory to back that up.

10 Paul Solis: In the context of those Ethics staffers coming in to talk to you guys, was  
11 your proposed arrangement with the campaign at all brought up?

12 Former Staffer 5: Not that I can remember. I don't know if Mackenzie's arrangement was  
13 referenced to, and what was actually existing. But, I can't really remember.

14 Paul Solis: Do you know whether that meeting occurred after you'd been offered the  
15 new position?

16 Former Staffer 5: I'm pretty sure it was after.

17 Paul Solis: And then after the ethics staffers left, did anybody talk to you about that  
18 offer or Mackenzie's offer? Jimmy, Hallie, did anybody say how that offer  
19 related to the ethics committee coming up in any way?

20 Former Staffer 5: Not that I can remember, no.

21 Paul Solis: That's all we have for you, Former Staffer 5. So, thank you.

22

23

# **EXHIBIT 10**

Transcript of Interview of Former Staffer 4  
July 23, 2018

1 Paul Solis: Speaking is Paul Solis with the Office of Congressional Ethics. It is July  
2 23, 2018. I'm joined by my colleague Omar Ashmawy. We're here for an  
3 interview of Former Staffer 4. I have provided Former Staffer 4 a copy of  
4 18 U.S.C. 1001 and he has signed the acknowledgement form stating that I  
5 did provide him a copy of the statute, and we can begin with the interview.  
6 So, may I call you Former Staffer 4?

7 Former Staffer 4: Absolutely.

8 Paul Solis: Okay, Former Staffer 4. Where are you currently employed right now?

9 Former Staffer 4: I'm currently employed as a Legislative Director for [REDACTED]  
10 [REDACTED].

11 Paul Solis: Okay. And how long have you been there, in that role?

12 Former Staffer 4: Since, I believe, May 1st or May 3rd of 2017.

13 Paul Solis: Have you held the same title in that office the whole time?

14 Former Staffer 4: I have.

15 Paul Solis: And prior to your current job where were you?

16 Former Staffer 4: I was a legislative fellow for approximately two weeks with Congressman  
17 John Rutherford. And prior to that I was the Legislative Director for  
18 Congressman Tom Garrett.

19 Paul Solis: So in that role in Representative Garrett's office, what were some of your  
20 job responsibilities?

21 Former Staffer 4: Well I started the legislative program, so a lot of it was focused on  
22 educating the new staffers in the leg shop who didn't have quite as much  
23 legislative experience. I ran the legislative program for the congressman. I  
24 staffed committee hearings, things of that nature.

25 Paul Solis: And when did you start with Representative Garrett?

26 Former Staffer 4: January 3, 2017.

27 Paul Solis: And that was his first day in office?

28 Former Staffer 4: Yes.

29 Paul Solis: Did you work at all on the campaign with him?

Transcript of Interview of Former Staffer 4  
July 23, 2018

- 1 Former Staffer 4: I was not employed on the campaign. I volunteered tangentially during my  
2 free time.
- 3 Paul Solis: And that's with his congressional campaign?
- 4 Former Staffer 4: Yes.
- 5 Paul Solis: And what are the dates that you volunteered with his congressional  
6 campaign?
- 7 Former Staffer 4: I don't have specific dates.
- 8 Paul Solis: Okay. Was it in 2017, or 2016?
- 9 Former Staffer 4: 2016.
- 10 Paul Solis: 2016. And is that the months leading up to November election or earlier  
11 on in the year?
- 12 Former Staffer 4: The months leading up to the November election. There was a specific  
13 instance that I can recall that I went down to Warrenton on a Saturday to  
14 help knock some doors.
- 15 Paul Solis: What would you estimate your time on the campaign in 2016, how much  
16 time were you spending?
- 17 Former Staffer 4: A total of probably ten hours.
- 18 Paul Solis: In total, in all of 2016?
- 19 Former Staffer 4: I would say so. Ten hours.
- 20 Paul Solis: And then in 2017 when you were actually an official employee, did you do  
21 any volunteer campaign work there? With Representative Garrett's  
22 campaign committee?
- 23 Former Staffer 4: I don't believe so, no.
- 24 Paul Solis: So back to your official position as Legislative Director, who did you  
25 report to in that position?
- 26 Former Staffer 4: I reported to the Chief of Staff, Kevin Reynolds.
- 27 Paul Solis: Did you have any other Chiefs of Staff while you were there?
- 28 Former Staffer 4: While I was there, no.

Transcript of Interview of Former Staffer 4  
July 23, 2018

- 1 Paul Solis: Okay. Who were the other senior staffers in the office at that time?
- 2 Former Staffer 4: The Deputy Chief of Staff and Communications Director was Andrew  
3 Griffin, and I believe Kevin Reynolds would be the other senior staff, the  
4 Chief of Staff.
- 5 Paul Solis: So, why did you leave that position?
- 6 Former Staffer 4: I had a disagreement with the Chief of Staff over the direction of the  
7 legislative program. Specifically on personnel. So, we had a legislative  
8 correspondent who wasn't performing. He would take long breaks, not do  
9 his job. So I talked to his previous office that he interned in to see best  
10 practices of how to manage him. And that was around the end of January.  
11 And over the next month he improved substantially, so I believe I got  
12 good information. The Chief of Staff didn't appreciate that I went to that  
13 other office without talking with him first. So we had a disagreement over  
14 that, and that's why I left the office.
- 15 Paul Solis: Who was that Legislative Correspondent?
- 16 Former Staffer 4: James Vandenberg.
- 17 Paul Solis: And then the Chief of Staff was Mr. Reynolds?
- 18 Former Staffer 4: Yes.
- 19 Paul Solis: Are you friends with any current staffers in Representative Garrett's office,  
20 like personal friends?
- 21 Former Staffer 4: I am former colleagues with Hallie Pence, the current Legislative Director.  
22 She was in a previous office with me. I'm in contact with her maybe once  
23 a month. I didn't talk to her about this at all.
- 24 Paul Solis: Anybody else that's currently in the office that you keep communication  
25 with?
- 26 Former Staffer 4: I'm not sure if they're currently employed still, there's been a lot of  
27 turnover in that office. MacKenzie Morales, she's a staff assistant there.
- 28 Paul Solis: How often do you speak with MacKenzie?
- 29 Former Staffer 4: I think I talked with her once in the past month.
- 30 Paul Solis: All right. And what did you guys speak about?
- 31 Former Staffer 4: Personal things.

Transcript of Interview of Former Staffer 4  
July 23, 2018

1 Paul Solis: So, unrelated to Representative Garrett's office or official duties, anything  
2 like that?

3 Former Staffer 4: Correct.

4 Paul Solis: What about, once in the past month, what about prior to this month? In the  
5 past month, prior to that, how many times are you speaking with  
6 MacKenzie?

7 Former Staffer 4: Probably once a week. It's just been a busy summer, that's why we haven't  
8 kept in touch.

9 Paul Solis: And is that over text, email, phone calls?

10 Former Staffer 4: Mostly text.

11 Paul Solis: And when you all chat, have you ever talked about Representative  
12 Garrett's office or what's happening in the office?

13 Former Staffer 4: We have.

14 Paul Solis: Well I might get back to that in a moment. So Hallie, MacKenzie,  
15 anybody else? And we can also talk about former staffers. Anybody  
16 associated with Representative Garrett's office, current and former  
17 staffers, that you have some communication with.

18 Former Staffer 4: In the D.C. office, none come to mind. There are some former colleagues  
19 of mine in the district office. I haven't really kept in touch with them since  
20 I've departed. But I do have a previous relationship with them.

21 Paul Solis: Okay, and can you give me the names of those people?

22 Former Staffer 4: Denise Van Volkenburg and Esther Page.

23 Paul Solis: So, I want to move on to this May, at the end of May 2018, there was  
24 some public reports that came out in I believe Politico and maybe some  
25 other publications as well, that talked about Representative Garrett's office  
26 and some things that were happening in the office related to tasking  
27 staffers with personal errands and things like that. Did you see that article?

28 Former Staffer 4: I saw the Politico article, yes.

29 Paul Solis: Okay. You read it?

30 Former Staffer 4: I did.

Transcript of Interview of Former Staffer 4  
July 23, 2018

- 1 Paul Solis: Okay. What was your reaction to that article?
- 2 Former Staffer 4: Shock. Some outrage.
- 3 Paul Solis: What's the basis for the outrage? Can you explain a little bit more, what do  
4 you mean by that?
- 5 Former Staffer 4: I mean, Members of Congress are supposed to be held to a higher  
6 standard.
- 7 Paul Solis: Was any of that that was alleged in the article, was that surprising to you,  
8 or was it ... did you feel that that made sense to you in any way? Explain  
9 to me the nature of the allegations that were made in the article.
- 10 Former Staffer 4: I think it was surprising to me because I did not firsthand see it when I was  
11 employed in the office. Other than that, I think the article speaks for itself,  
12 but there were allegations that were put out there that were serious.
- 13 Paul Solis: And when you say firsthand, while you were there you didn't firsthand  
14 experience some of that, some of the allegations that were made in the  
15 article, you didn't witness it firsthand or didn't experience it firsthand.  
16 What about indirectly? What about someone telling you about some of  
17 those things? Did that happen while you were there?
- 18 Former Staffer 4: While I was there no one told me anything. If they did I would have  
19 reported it. I would have worked out a solution, because I feel that that's  
20 highly inappropriate. After I read the article, reflecting on my time there,  
21 there was a instance where a junior staffer, or an intern, I forget which,  
22 was talking with Mr. Vandenberg about weekend plans, and he made the  
23 statement, "No I can't, I have to look after the dog." And I was not a part  
24 of the conversation, just I heard it, I didn't take any characterization away  
25 from it. I didn't know if he had volunteered to do it or if he was getting  
26 compensated by Congressman Garrett personally to do so. But that is all in  
27 hindsight. I didn't take anything away from it at the time that I overheard  
28 that.
- 29 Paul Solis: And you overheard that while you were employed in the office?
- 30 Former Staffer 4: Correct.
- 31 Paul Solis: And what is the name of the intern?
- 32 Former Staffer 4: I don't recall who initiated the conversation. But I know that it was James  
33 Vandenberg who responded.
- 34 Paul Solis: And was Mr. Vandenberg an employee of the office at the time?

Transcript of Interview of Former Staffer 4  
July 23, 2018

1 Former Staffer 4: He was, he was the Legislative Correspondent.

2 Paul Solis: But you do not recall the intern who made the statement to Mr.  
3 Vandenberg?

4 Former Staffer 4: No.

5 Paul Solis: So, what about then, after you left the office? What have you come to  
6 understand about some of the allegations made in the article, through any  
7 discussion of people you know who work there, in text or email.  
8 Discussion with friends, former colleagues, what do you know about the  
9 allegations since you've left the office?

10 Former Staffer 4: I mean, a lot of it center around the Politico article. As far as things that I  
11 know of, I know that there was some angst about personal errands being  
12 run. I know that MacKenzie started being paid for campaign work. Didn't  
13 really hear too much about more about the dog until the Politico article  
14 came out.

15 Paul Solis: So, let's talk about two of those things you just mentioned.

16 Former Staffer 4: Sure.

17 Paul Solis: You mentioned about angst about some of the personal errands that were  
18 being tasked to official employees. How did you come to know that?

19 Former Staffer 4: Through my discussion with MacKenzie.

20 Paul Solis: Anybody else?

21 Former Staffer 4: No.

22 Paul Solis: And when MacKenzie would relay this angst that was going on in the  
23 office at the time, was that prior to the Politico article coming out, or  
24 after?

25 Former Staffer 4: To my best knowledge, before.

26 Paul Solis: Before. Okay. How many times did she relay a message like that to you,  
27 about angst.

28 Former Staffer 4: Just once.

29 Paul Solis: Just once. And what was the substance of that discussion?

Transcript of Interview of Former Staffer 4  
July 23, 2018

1 Former Staffer 4: It was centered around how much she should be getting paid by the  
2 campaign for the campaign work.

3 Paul Solis: Around what date did she make this ... communicate this to you?

4 Former Staffer 4: I don't have an exact date off the top of my head-

5 Paul Solis: Best you can estimate.

6 Former Staffer 4: March.

7 Paul Solis: Of 2018?

8 Former Staffer 4: Correct.

9 Paul Solis: So, was that over text, or email?

10 Former Staffer 4: Possibly text, definitely a phone call.

11 Paul Solis: So there were multiple discussions about this same topic you had with  
12 MacKenzie?

13 Former Staffer 4: Not necessarily multiple discussions, it was possibly a text that led to a  
14 phone call. It was in the same conversation. If there was a text.

15 Paul Solis: Do you think you still have that text?

16 Former Staffer 4: I can certainly check.

17 Paul Solis: Okay. Well maybe we'll follow up afterwards about that. So, now getting  
18 to more of the substance of MacKenzie being paid by the campaign. Can  
19 you talk to me a little bit more about that? What did she mean by that?

20 Former Staffer 4: So, she was being paid for campaign work on her own time. I'm not privy  
21 to the exact amount of how much she was getting paid, she just thought  
22 she should be paid more. As far as the responsibilities, I believe that there  
23 might have been some district work involved. Like going down to the  
24 district. But as far as the actual job description, I'm not too familiar with  
25 what it exactly was.

26 Paul Solis: Well, I want to try to understand how angst about the personal errands is  
27 connected to this arrangement-

28 Former Staffer 4: I think some of the personal errands might have been classified as  
29 campaign work.

Transcript of Interview of Former Staffer 4  
July 23, 2018

- 1 Paul Solis: And why do you think that?
- 2 Former Staffer 4: That's just the characterization that she gave. Some of the dry cleaning,  
3 things of that nature.
- 4 Paul Solis: Did she say why that was occurring?
- 5 Former Staffer 4: Why-
- 6 Paul Solis: This classification that's being made, these personal errands are being  
7 classified as campaign work. Why were they being classified as campaign  
8 work?
- 9 Former Staffer 4: I don't know the answer to that.
- 10 Paul Solis: What did she say about how this arrangement came to be?
- 11 Former Staffer 4: It was a discussion that was had with the Chief of Staff at the time, Jimmy  
12 Keady, and her about assuming more unofficial responsibilities.
- 13 Paul Solis: Did she express concern with you that this might have been impermissible  
14 or problematic in some way?
- 15 Former Staffer 4: I believe so. I know that I counseled her to make sure that campaign duties  
16 were campaign duties.
- 17 Paul Solis: Can you expand upon that a little bit more? What do you mean, you  
18 wanted to counsel her that campaign duties were campaign duties. What  
19 you mean by that?
- 20 Former Staffer 4: I mean that the actions she was performing were directly related to the  
21 campaign committee. Whether that's making phone calls, knocking on  
22 doors, traditional campaigning activities.
- 23 Paul Solis: And why did you make her aware of that?
- 24 Former Staffer 4: Well, I know as a former junior staffer, I didn't necessarily understand the  
25 bright line between official duties and unofficial side of things. And being  
26 up here for as long as I have, you come to know that very well. Because  
27 you don't want something like this to happen. So, that's why I counseled  
28 her as such.
- 29 Paul Solis: And was it because you felt that she was relaying something to you that  
30 crossed that line you just talked about?

Transcript of Interview of Former Staffer 4  
July 23, 2018

1 Former Staffer 4: I think it was just a word of warning in general. I don't think there was  
2 anything specific that I could necessarily think of. Besides some of the  
3 errands that might have been asked for her to run.

4 Paul Solis: What did she relay to you about the types of errands that she was being  
5 asked to run?

6 Former Staffer 4: Specifically dry cleaning. That's all that I heard.

7 Paul Solis: Did she talk about Representative Garrett's role? I know that she discussed  
8 a meeting she had with Jimmy Keady regarding this topic. Did she  
9 mention Representative Garrett's role in any of this?

10 Former Staffer 4: Not specifically, no.

11 Paul Solis: And who would she be performing the errands for?

12 Former Staffer 4: I believe it would be for the Congressman.

13 Paul Solis: Did she talk about whether the errands would be for his wife at all?

14 Former Staffer 4: Not to my recollection, no.

15 Paul Solis: Was there a figure discussed about how much she'd be paid?

16 Former Staffer 4: Yes. I can't recall the specific amount per month, but I remember it being  
17 somewhere around \$1000 a month.

18 Paul Solis: And this is from Representative Garrett's congressional campaign  
19 committee?

20 Former Staffer 4: Correct.

21 Paul Solis: I asked you if she mentioned to you any concern about the permissibility  
22 of this arrangement, and you said yes. What else did she say about that? I  
23 mean, as specific as you can be about what she relayed to you that allowed  
24 you to give me an affirmative answer to that question. What did she say  
25 specifically about her concerns?

26 Former Staffer 4: Specifically her concerns were being paid too little for the amount of time  
27 that she was using in her free time to do the activities, along with the  
28 nature, specifically picking up dry cleaning for the Congressman.

29 Paul Solis: Did she feel that she should be paid more for the amount of time she was  
30 spending?

Transcript of Interview of Former Staffer 4  
July 23, 2018

1 Former Staffer 4: Yes.

2 Paul Solis: Did she talk about how much time she was spending doing that type of  
3 work in comparison to her official role?

4 Former Staffer 4: The official role typical 40 plus hour week. Her concerns, I believe, were  
5 putting in an additional ten hours or so a week. I believe that ten hours was  
6 what was discussed.

7 Paul Solis: And so, I want to make sure I understand this. That's ten hours doing these  
8 sort of personal errands?

9 Former Staffer 4: Yes.

10 Paul Solis: And that she was concerned whether she'd be able to make up that extra  
11 time on the official side to get to her 40 hours?

12 Former Staffer 4: No, this would be ... she was concerned that it was impeding on her free  
13 time outside of all of those arrangements.

14 Paul Solis: Was there any concern that she relayed to you about not being able to  
15 make up enough hours in her official role?

16 Former Staffer 4: No.

17 Paul Solis: How many times did you speak with her? I know we talked about a text,  
18 and then maybe that text led to a phone conversation. Were there any other  
19 phone conversations about this topic?

20 Former Staffer 4: Not that I can recall.

21 Paul Solis: What about texts or emails?

22 Former Staffer 4: No emails, and besides the one text ... there might be a text. I can confirm  
23 that for you, obviously. But we did speak over the phone once on it. Same  
24 with text. I think. I have to double check.

25 Paul Solis: Walking back a little bit about the nature of some of the allegations that  
26 were in this Politico article, besides MacKenzie, did you speak with  
27 anybody else, current or former staffers, about the nature of those  
28 allegations?

29 Former Staffer 4: I contacted Hallie and I asked her what was going on, she didn't reply.

30 Paul Solis: When did you reach out to her?

Transcript of Interview of Former Staffer 4  
July 23, 2018

- 1 Former Staffer 4: After the Politico article was published.
- 2 Paul Solis: And was that over text?
- 3 Former Staffer 4: Yes.
- 4 Paul Solis: Have you spoken to her since that time?
- 5 Former Staffer 4: Yes.
- 6 Paul Solis: About the substance of the article?
- 7 Former Staffer 4: Not so much the substance of the article as just generally commiserating  
8 about her situation.
- 9 Paul Solis: Tell me more about that. When you say commiserating about her situation,  
10 what do you mean?
- 11 Former Staffer 4: I mean, the nature of the Hill I guess. We talked about what her next steps  
12 were, how she was feeling. That sort of thing.
- 13 Paul Solis: Did she confirm to you whether or not some of things that were alleged in  
14 the article occurred?
- 15 Former Staffer 4: No.
- 16 Paul Solis: I just want to get a better understanding when you say commiserating.  
17 Was Hallie relaying to you that she was having a difficult time since the  
18 article came out?
- 19 Former Staffer 4: Yes. I think that the conversation was based around the Chief of Staff,  
20 Jimmy Keady leaving and other people who might be leaving the office.  
21 And the article created an unpleasant atmosphere for the office, and a lot  
22 of responsibility was falling on her.
- 23 Paul Solis: What did she say about Jimmy leaving?
- 24 Former Staffer 4: She really liked Jimmy and was disappointed and a little upset that he left.
- 25 Paul Solis: Was Jimmy, do you know if Jimmy was fired, or whether he left  
26 voluntarily or resigned?
- 27 Former Staffer 4: I don't know firsthand. I've heard both from, I don't want to say sources,  
28 but just around. I couldn't pin down who I heard either from.
- 29 Paul Solis: Did Hallie characterize whether or not Jimmy was fired or resigned?

Transcript of Interview of Former Staffer 4  
July 23, 2018

1 Former Staffer 4: She did not.

2 Paul Solis: Did you talk about why ... I'm sorry. Was this over text, or phone?

3 Former Staffer 4: This was in person.

4 Paul Solis: This was in person? And when was this? In early June or late May?

5 Former Staffer 4: So the article came out-

6 Paul Solis: I believe it was May 28th. I think. Late May, 2018.

7 Former Staffer 4: It would have been probably second or third week of June.

8 Paul Solis: Where did you guys meet?

9 Former Staffer 4: I believe we were at Bullfeathers. It was after work.

10 Paul Solis: Was it just the two of you?

11 Former Staffer 4: There was a group of people, but we had a private conversation.

12 Paul Solis: Did she say to you why she didn't respond to your text?

13 Former Staffer 4: Due to the chaos that was going on in the office, they were directed to  
14 have communication embargo.

15 Paul Solis: And who directed her to have a communications embargo?

16 Former Staffer 4: I do not know.

17 Paul Solis: Did Hallie express to you her desire to leave the office?

18 Former Staffer 4: She did not.

19 Paul Solis: You talked about that you guys talked about next steps for her, so I just  
20 want to know what you meant by next steps?

21 Former Staffer 4: I guess I maybe mischaracterized that. We had a conversation later on,  
22 after Garrett announced that he was resigning, what she wanted to do. I  
23 believe I got ahead of myself there and I apologize.

24 Paul Solis: That's okay.

25 Former Staffer 4: Next steps in this instance referred to, are they hiring a Chief of Staff, that  
26 sort of thing.

Transcript of Interview of Former Staffer 4  
July 23, 2018

1 Paul Solis: I'd asked you whether or not she confirmed in any way, and this is again  
2 going back to your personal conversation with her you had in June,  
3 whether she confirmed or not some of the allegations or facts alleged in  
4 the Politico article. She didn't confirm it, but did she discuss at all with  
5 you the substance of the article? Or disavow some of those allegations and  
6 say that they weren't true?

7 Former Staffer 4: I believe she called them bullshit. That was as far as that conversation  
8 went. I didn't probe into or anything. Again, it focused on commiserating  
9 about the situation as a whole, and her wellbeing.

10 Paul Solis: Did she discuss other people in the office that might be leaving?

11 Former Staffer 4: I can't recall their names. She inferred that the communications director  
12 might be leaving. Other than that, I can't recall if we discussed anyone  
13 specifically.

14 Paul Solis: Do you know who that communications director was?

15 Former Staffer 4: I can't recall his name.

16 Paul Solis: Do you know who Representative Garrett's wife is? Have you ever met  
17 her?

18 Former Staffer 4: I met her a handful of times.

19 Paul Solis: Did she come into the office?

20 Former Staffer 4: She did.

21 Paul Solis: Did she ever ask you to run a personal errand?

22 Former Staffer 4: No.

23 Paul Solis: Did Representative Garrett ever ask you to run a personal errand?

24 Former Staffer 4: No.

25 Paul Solis: Pick up groceries, deliver groceries?

26 Former Staffer 4: No.

27 Paul Solis: Walk the dog?

28 Former Staffer 4: No.

Transcript of Interview of Former Staffer 4  
July 23, 2018

1 Paul Solis: Do you know, other than the one instance of overhearing an intern say he  
2 had to watch the dog over the weekend-

3 Former Staffer 4: May I clarify that point?

4 Paul Solis: Sure.

5 Former Staffer 4: So the intern asked James Vandenberg if they could do something that  
6 weekend, and James Vandenberg said, "No, I have to watch the dog."

7 Paul Solis: I was confused about that.

8 Former Staffer 4: I just wanted to clarify that.

9 Paul Solis: I was confused about that, and maybe it was a mischaracterization on my  
10 part and maybe before you had switched, but I was under the impression  
11 the intern said he had to watch the dog.

12 Former Staffer 4: No, it was James Vandenberg.

13 Paul Solis: Got it. So other than that instance, do you have any, again, secondhand,  
14 this is someone relaying to you in the office that they were tasked with a  
15 personal errand. Groceries, walking the dog, picking up an item for  
16 Representative Garrett or his wife. Did you ever hear secondhand of that  
17 happening?

18 Former Staffer 4: While I was employed in the office?

19 Paul Solis: Yes.

20 Former Staffer 4: No.

21 Paul Solis: What about after you were employed in the office?

22 Former Staffer 4: I mean just the conversation that I had with MacKenzie about campaign  
23 stuff, that we discussed previously.

24 Paul Solis: What about Representative Garrett's children, picking them up, back in the  
25 district, delivering them somewhere. Was that ever tasked to you?

26 Former Staffer 4: No.

27 Paul Solis: Did you ever hear or know of anybody being tasked with that specific-

28 Former Staffer 4: No, the only time that I heard about it was through the Politico article.

Transcript of Interview of Former Staffer 4  
July 23, 2018

- 1 Paul Solis: Going back to that conversation you had with MacKenzie. So she talked  
2 about personal errands and the specific one you recall is dry cleaning.
- 3 Former Staffer 4: Yes.
- 4 Paul Solis: Picking up dry cleaning. Did she talk about any other staffers who were  
5 tasked to do personal errands in the office?
- 6 Former Staffer 4: Not to my knowledge, no.
- 7 Paul Solis: Did the staffers ... I guess I should be specific. While you were there, did  
8 you ever receive a text from Representative Garrett's wife?
- 9 Former Staffer 4: No.
- 10 Paul Solis: Do you know if other staffers did?
- 11 Former Staffer 4: Not to my knowledge, no.
- 12 Paul Solis: Have you spoken with Jimmy at all since he left?
- 13 Former Staffer 4: Yes. Once. In person. Also at Bullfeathers. He ... I don't know who he was  
14 employed with at the time, but he came across the street when he saw me,  
15 and we had a brief conversation. I asked him how he was, he said "Doing  
16 better." And I told him, "If you need anything, let me know." And that was  
17 the extent of the conversation.
- 18 Paul Solis: When did you see him personally?
- 19 Former Staffer 4: This would have been after Garrett announced his resignation. I don't have  
20 a specific date.
- 21 Paul Solis: June 2018?
- 22 Former Staffer 4: Late June of this year. Maybe early July.
- 23 Paul Solis: And, did the topic of his termination or his resignation come up at all?
- 24 Former Staffer 4: No.
- 25 Paul Solis: What about any of the allegations made in the Politico article?
- 26 Former Staffer 4: No.
- 27 Paul Solis: Did he mention to you anything about him leaving and how he was paid?

Transcript of Interview of Former Staffer 4  
July 23, 2018

1 Former Staffer 4: No.

2 Paul Solis: His severance package, anything like that?

3 Former Staffer 4: No.

4 Paul Solis: Has anybody else told you about the circumstances of ... I asked you about  
5 whether he resigned or whether he was fired, but have you spoken to  
6 anybody else about how he left and how he was paid when he left?

7 Former Staffer 4: No.

8 Paul Solis: Omar, do you have any questions for Former Staffer 4?

9 Omar Ashmawy: I don't.

10 Paul Solis: Former Staffer 4 I think that's really all we have for you.

11 Former Staffer 4: Okay.

12 Paul Solis: Thank you very much.

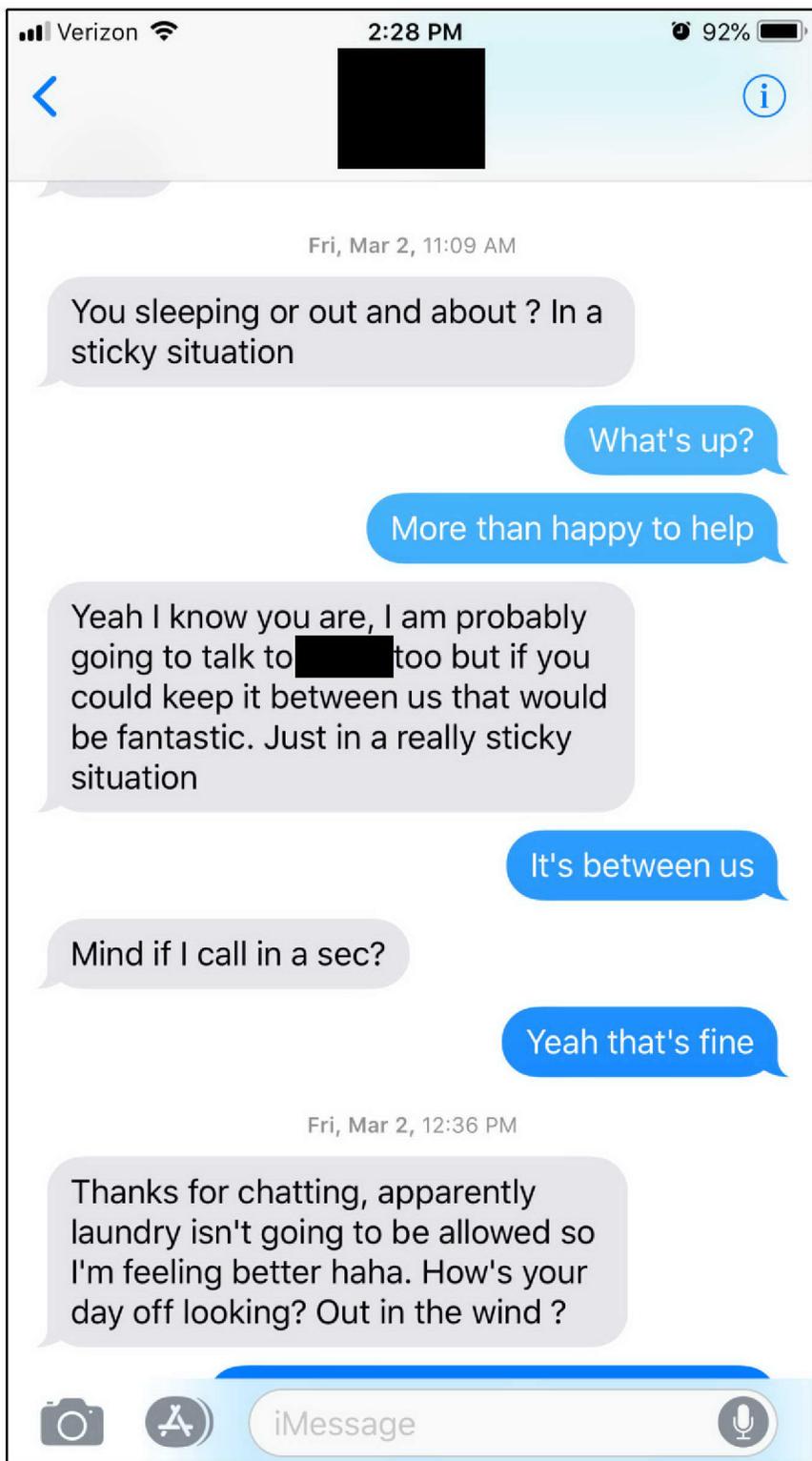
13 Former Staffer 4: And I'm happy to provide anything additional that you'll need.

14 Paul Solis: Okay, thank you very much.

15

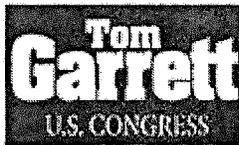
16

# **EXHIBIT 11**





# **EXHIBIT 12**



This Agreement is made between Tom Garrett for Congress ("CAMPAIGN"), a duly organized political campaign under the Federal Election Commission, located in the Commonwealth of Virginia, and [REDACTED] ("STAFF"), and will be effective March 1, 2018.

**1. Services to Be Performed**

Staff agrees to perform the duties of Campaign Assistant on behalf of the CAMPAIGN, to include, but not limited to, any duties as prescribed by the CAMPAIGN from Jimmy Keady, or other personnel as instructed by Mr. Keady.

**2. Payment**

In consideration for the services to be performed by STAFF, the CAMPAIGN shall pay STAFF \$400 per month on the 15<sup>th</sup> day of each month, beginning on March 15, 2018. STAFF needs to complete the required W-9 as soon as able.

**3. Expenses**

STAFF shall have a campaign card to handle all necessary campaign expenses. For all purchases greater than \$100, STAFF shall notify, via e-mail, the campaign Treasurer, Chris Woodfin, and Jimmy Keady of the expenditures. For any purchase greater than \$250, STAFF needs to get prior approval from Jimmy Keady. If STAFF is asked to drive his/her own vehicle for campaign business, the CAMPAIGN shall reimburse STAFF at a rate of \$0.38 per mile. STAFF should maintain a ledger documenting mileage and submit to the Campaign Treasurer, Chris Woodfin, on at least a monthly basis.

**4. Independent Contractor Status**

STAFF is an independent contractor, and shall not be deemed the CAMPAIGN'S employee.

**5. State and Federal Taxes**

STAFF shall be responsible for filing and paying all state and federal taxes associated with the payments from the CAMPAIGN. The CAMPAIGN will send Staff a 1099 by January 30, 2019. It is STAFF'S responsibility to provide the CAMPAIGN with an updated physical address and e-mail address, if STAFF relocates before January 30, 2019.

**6. Term of Agreement**

This agreement will be effective upon signing and retroactive to March 1, 2018. Either party can terminate this agreement with 30-days written notice.

**7. Entire Agreement**

This is the entire Agreement between STAFF and CAMPAIGN.

**8. Modifying the Agreement**

This Agreement may be modified only by a writing signed by both parties.

**9. Resolving Disputes**

If a dispute arises under this Agreement, the parties agree to first try to resolve the dispute with the help of a mutually agreed-upon mediator in Richmond City, Virginia. Any costs and fees other than attorney fees associated with the mediation shall be shared equally by the parties.

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**10. Confidentiality**

STAFF acknowledges that it may become necessary for CAMPAIGN to disclose certain confidential and proprietary information to STAFF in order for STAFF to perform duties under this Agreement. STAFF acknowledges that disclosure to a third party or misuse of this proprietary or confidential information would irreparably harm the CAMPAIGN. Accordingly, STAFF will not disclose or use, either during or after the term of this Agreement, any proprietary or confidential information of the CAMPAIGN without CAMPAIGN'S prior written permission except to the extent necessary to perform services on CAMPAIGN'S behalf.

Proprietary or confidential information includes:

- the written, printed, graphic, or electronically recorded materials furnished by CAMPAIGN for STAFF to use
- CAMPAIGN plans and strategies, all voter list and voter identifying materials, and all other list of documents generated by the CAMPAIGN for use by the STAFF

Upon termination of STAFF'S services to CAMPAIGN, or at the CAMPAIGN'S request, STAFF shall deliver to CAMPAIGN all materials in STAFF'S possession relating to CAMPAIGN'S business.

STAFF acknowledges that any breach or threatened breach of Clause 10 of this Agreement will result in irreparable harm to CAMPAIGN for which damages would be an inadequate remedy. Therefore, CAMPAIGN shall be entitled to equitable relief, including an injunction, in the event of such breach or threatened breach of Clause 10 of this Agreement. Such equitable relief shall be in addition to CAMPAIGN'S rights and remedies otherwise available at law.

**11. Applicable Law**

This Agreement will be governed by the laws of the Commonwealth of Virginia, without giving effect to conflict of laws principles.

**Signatures**

CAMPAIGN:

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

STAFF:

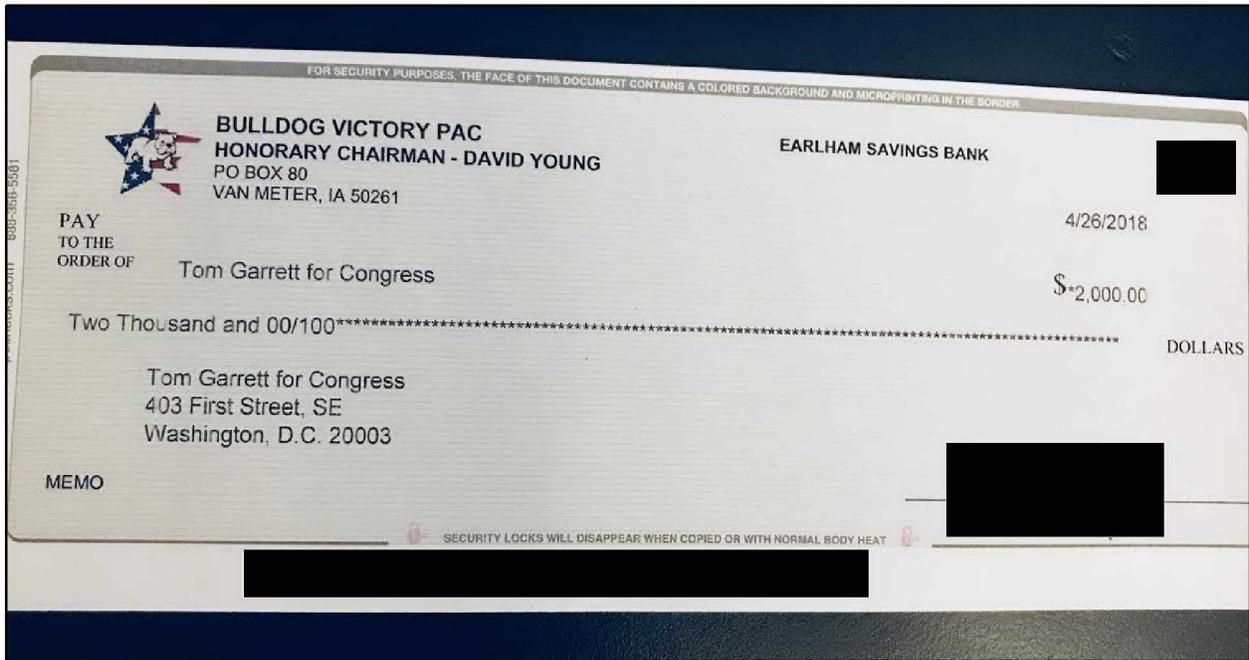
\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

[Redacted Signature and Date]

# **EXHIBIT 13**



**Final Details for Order #** [REDACTED]

[Print this page for your records.](#)

**Order Placed:** May 1, 2018  
**Amazon.com order number:** [REDACTED]  
**Order Total: \$287.94**

**Shipped on May 2, 2018**

**Items Ordered**

6 of: Hubs Salted Virginia Peanuts 2 Pack of 40oz Cans  
Sold by: Hubs Peanuts ([seller profile](#))

Condition: New

**Price**

\$47.99

**Shipping Address:**

[REDACTED]  
WASHINGTON, DC 20002-6333  
United States

Item(s) Subtotal: \$287.94  
Shipping & Handling: \$0.00  
-----  
Total before tax: \$287.94  
Sales Tax: \$0.00  
-----

**Shipping Speed:**

Standard Shipping

**Total for This Shipment: \$287.94**  
-----

**Payment information**

**Payment Method:**

Visa | Last digits: [REDACTED]

Item(s) Subtotal: \$287.94  
Shipping & Handling: \$0.00  
-----

**Billing address**

Christopher M Woodfin  
[REDACTED]  
WILLIAMSBURG, VA 23188-1038  
United States

Total before tax: \$287.94  
Estimated tax to be collected: \$0.00  
-----

**Grand Total: \$287.94**

**Credit Card transactions**

Visa ending in [REDACTED]: May 2, 2018: \$287.94

To view the status of your order, return to [Order Summary](#).



trip.docx



**THURS MAY 10-SUN MAY 13 NEW ORLEANS TRIP:**

Thursday May 10:

Flight # AA4462

- [redacted] already checked you both in
- Boarding passes on mobile ([redacted]@gmail.com )
- Printed boarding passes in folder
- [redacted] already registered your TSA number

American Airlines

Boarding Time: 5:45pm

Departing DC 6:15pm

Ronald Reagan Airport

Thursday May 10

Arrive at 8:12pm to New Orleans

Tom TSA # [redacted]

Flanna TSA # [redacted]

Hotel:

**Hampton Inn & Suites New Orleans Convention Center**

**Phone # 504 566 9990**

1201 Convention Center Blvd, New Orleans

By GPS:

320 Gaiennie Street, New Orleans, LA 70130

Sunday May 12:

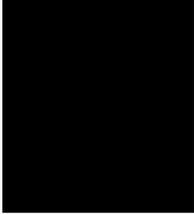
[redacted] can send boarding passes Saturday night or Sunday morning

Flight #AA4500

American Airlines

Depart NOLA 5:47 pm

Arrive Reagan DC 9:28pm



me



to jimmy

Hide details

From



[Redacted]@gmail.com

To

jimmy keady [Redacted]@gmail.com

Date

May 10, 2018, 1:19 PM

Will print this for them!

Thanks,



trip.docx



Doc



me



to Tom

Hide details

From



[Redacted]@gmail.com

To

Tom & Flanna [Redacted]@gmail.com

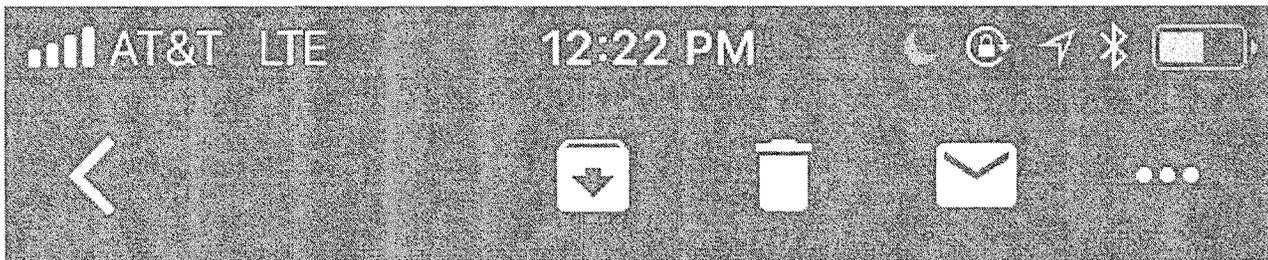
Date

Apr 30, 2018, 9:44 PM

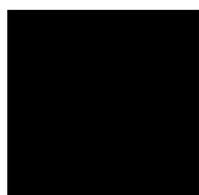
Please let me know if I need to make any modifications or you have any issues.

Reservation is under Tom Garrett and I put Flanna Garrett as guest so either one can check in.

I will send full itinerary closer to



Deposit **Inbox**



me



to Chris

Hide details

From



[Redacted]@gmail.com

To

Chris Woodfin [Redacted]@gmail.com

Date

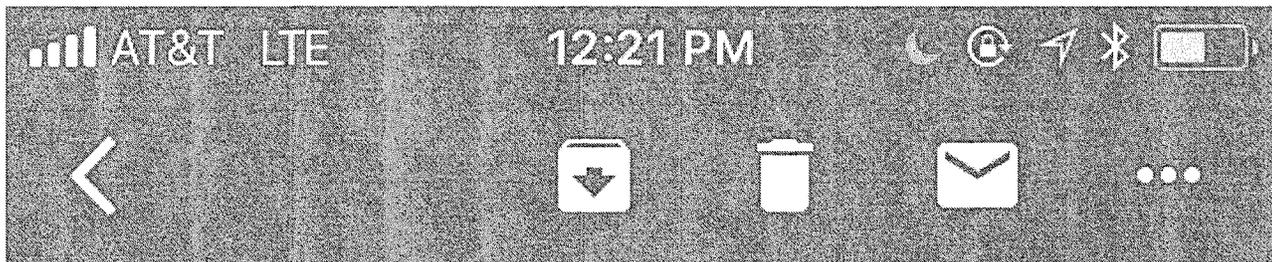
Apr 26, 2018, 4:04 PM

Chris,

Per Jimmy I just deposited \$6,000 check from Fredoms Defense Fund.

Thanks,





From [REDACTED]  
[REDACTED]@gmail.com

To jimmy keady [REDACTED]@gmail.com

Date Apr 9, 2018, 8:10 PM

Hey Jimmy,

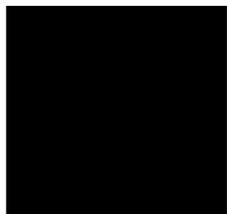
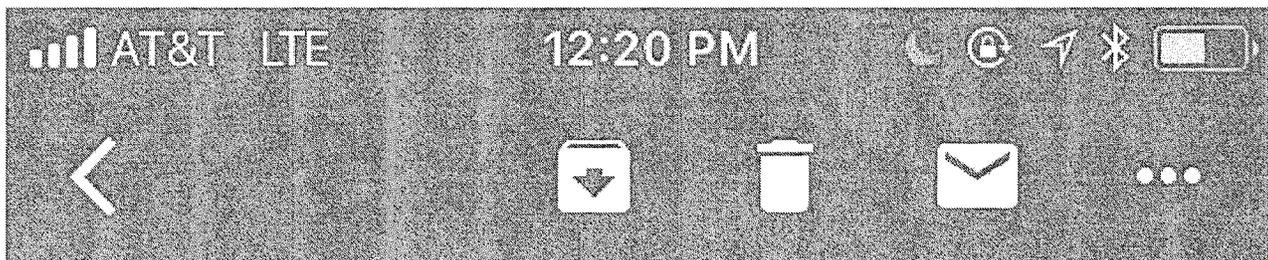
Attached is the list of contacts from this weekend. Happy to send via email if that is better for you!

Thanks,

...

Tom Garrett for  
Congress\_April 6...

 Doc



me



to Chris, jimmy

Hide details

From



[Redacted]@gmail.com

To

Chris Woodfin [Redacted]@gmail.com

jimmy keady [Redacted]@gmail.com

Date

Apr 5, 2018, 12:05 PM

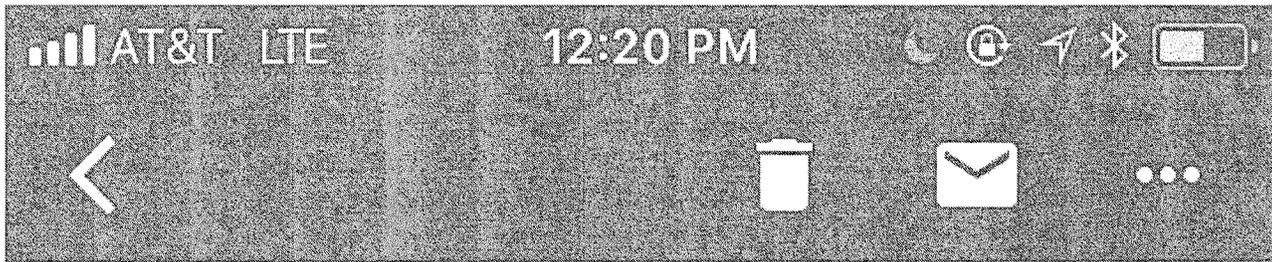
Hey Chris,

I just deposited the \$500 at Wells Fargo DC.

I have paper receipt.

Thanks,

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me



to jimmy

Hide details

From



[Redacted]@gmail.com

To

jimmy keady [Redacted]@gmail.com

Date

Mar 5, 2018, 7:47 PM

Jimmy,

The 5th was mentioned on NBC 29  
6pm news.



**3.5.2018 Dem Money NBC 29.mp4**

Thanks,