don't do it on your time here because you're part
time so if somebody else is doing it and you
don't own the company and so they went and
figured that out themselves.

MR. QUINN: Okay. Let's talk about
John a little bit and the company that you said
he brought up as a potential contractor, Invocq.
You are aware now that John Sample owned part or
all of Invocq?

MR. SU: No, I'm not aware of that.
All I am aware of is what everybody can search.
In the state -- I believe in the State of Texas
where that company was registered. As you know,
Delaware has different rules about putting all
the registrar's names. So all I know is the
company is registered and it shows a Catherine
somebody as the chief executive of that company
which suggests it the owner.

MR. QUINN: Okay. But now, you're
aware from public reporting and what you've seen
in the news that John Sample was at least a part
owner or Invocq; is that correct?
MR. SU: I heard about that. I have not seen the specific reporting.

MR. QUINN: Okay.

MR. SU: Because for it to be factual somebody would have to say they saw the incorporation document and 100 percent ownership of somebody. Without that, how can you be sure?

MR. QUINN: Right. Right. Okay. You were pointing out and directing me to the Texas -- it's I guess the Texas registration entity that lists ownership information about companies. Have you ever looked that up yourself?

MR. SU: Yeah. I briefly looked it up once when the -- when Hagedorn's, you know, own reports start talking about it. So I thought, hey, why don't I take a look. And, like I said, (inaudible) it seems like Catherine somebody is the chief executive and he was -- I don't remember the exact position he had, but he was either a registering agent or something down the food chain.
But as a part-time employee, you know, he's not -- he's certainly free to have other employments.

MR. QUINN: Right. And so at the time that you were employed by Representative Hagedorn and the office was using Invocq, at that time you did not know that John Sample was a part owner of Invocq?

MR. SU: Right. Because the way he told me about it was he knew the company and that -- I did ask who owns it and he said, you know, it's Catherine.

MR. QUINN: Okay. And why did you ask him who owns the company?

MR. SU: Because he was a part-time employee and I just wanted to make sure that he wasn't doing something, you know -- I know that at least -- I know enough that if you are a member -- you're in a job, you cannot have a side job doing this -- you know, getting paid for that lay job. You know, anybody knows that.

MR. QUINN: Okay.
MR. SU: Right. So --

MR. QUINN: And so you asked John who
the owner of Invocq was because you had some
reason to believe that he might be connected to
the company?

MR. SU: No. That was out of
curiosity. I said, well, who owns the company?
Who is the company? And then I said go figure it
out with Melissa whether they can do business
with the House and you know, as you're part time
make sure that this is not done on your time
here.

MR. QUINN: Okay. And what did he say
when you asked him that? Who was the owner of --

MR. SU: Oh, he just gave me the name
Catherine.

MR. QUINN: Okay. And who's Catherine?

MR. SU: I have no idea. And like I
said, later on, after this report came out and I
looked at the report, looked up the companies.
So there is a name, chief executive for the
company is Catherine. So. And the House manual
does not require the office to investigate every
vendor's owner and every vendor's incorporation
documents. So that was just on a whim. I was
just curious. So who's this company? What's
this company?

MR. QUINN: Okay. And then so after
John told you about Invocq and said that
Catherine was the owner of the company just to
your knowledge what happened after that?

MR. SU: Well, he went and checked.
Oh, the company that you are asking other
companies that I can recall the name of, it was
Lidos. Lidos did something for the office and
did one of their presentation and followed up and
said, hey, we can do mailers for you, so.

MR. QUINN: You said Lidos and then
what about their presentation?

MR. SU: Oh they were already a service
provider. We were already buying products form
Lidos. And it was one of their sales reps in one
of their meetings said, hey, we can also do these
mailers for you. But there were many others that
came by the office, including one that does the
business cards for Jim. I don't know their name.

But they said the same thing.

MR. QUINN: And then -- so as far as
you know, John went and spoke to Melissa about
beginning to use Invocq as a contractor?

MR. SU: Yeah.

MR. QUINN: Is that correct? And did
you ever talk to --

MR. SU: So just --

MR. QUINN: -- Melissa or John after
that about that conversation? Or about stating
to use Invocq?

MR. SU: Yeah, of course. Yeah, of
course because Melissa, just like all other
purchases she has to check with House Finance,
House Administration whether it is properly
registered and can conduct business with a House
office. The answer was yes, and John told me the
same thing. Yeah, we can do it. You know, the
company can -- we can do it meaning the office
can do it. Okay.

MR. QUINN: Sure.

MR. SU: And then from there on Congressman Hagedorn somehow in a conversation or a briefing became aware of that. You know, obviously, it was a company that John knew so together we just kind of said hey, just make sure that you don't cross official time and if you're working for any companies outside this is not something you -- this is not something you can be doing. So we just want to make sure. We just wanted to make sure of that. You know, he is not --

MR. QUINN: When did that conversation happen?

MR. SU: Oh, it was early on. Whenever the yes came back that Invocq can properly -- the answer came back from House Administration that Invocq can properly do work for the office.

And the review was very (inaudible) because time an invoice -- before, you know, a vendor can be paid for mailers it's got to -- the
company -- the approval sheet from bipartisan
franking commission, its' got to approve -- it's
got to include the U.S. Postal service mail
logging, you know, exact number of copies that
were sent, you know. And so it's very detailed
as far as accountability of every piece that's
produced.

MR. QUINN: Okay. I just want to focus
a little bit on that conversation. You said you
and Representative Hagedorn had a conversation
with John after Invocq was approved as a
contractor to make sure -- and this is what I
want to clarify that he wasn't doing work for
Invocq on House time; is that what that
collection was about?

MR. SU: No. I think in general it was
hey, you know, make sure that this is not
something that you're doing. Make sure that you
don't have your foot in both boats.

MR. QUINN: Okay.

MR. SU: That was generally the term
that was used.
MR. QUINN: And why -- okay. And why did you have that conversation with him?

MR. SU: Well, I think it's just in general wanting to make sure that, you know, like I said if you're working for a company part time, you can't be working for the same company part time, right? I mean it's just basic logic.

MR. QUINN: Sorry, I'm not sure I understand that. Can you just restate that maybe? You're saying John couldn't work for who part time?

MR. SU: Well first, John told me that it was Catherine's company. So I never assumed that it was John's company.

MR. QUINN: Okay.

MR. SU: So let me clarify that point.

MR. QUINN: Understood.

MR. SU: And he did speak with Melissa and Melissa also did separately verify with House Administration saying that the company is good to go.

MR. QUINN: Okay.
MR. SU: But we just didn't want the -- we just didn't want the -- you know, we didn't want to have a situation where -- because John is employed by the office and at the same time is also employed by the other office. But Melissa's word at the time was, yeah, as long as he's not doing the same thing, that's fine.

MR. QUINN: And the other --

MR. SU: And that --

MR. QUINN: When you said the other office, you mean Invocq?


MR. QUINN: Okay.

MR. SU: So I guess --

MR. QUINN: I think Indhira might have a question for you.

MS. BENITEZ: Okay Peter. I guess I just want to clarify. I know Sean is asking you about this, but I guess if the company -- to your knowledge the company was owned by Catherine, why was there a concern that John Sample may have been working for this company part time?
MR. SU: Well, you don't -- look, you don't want somebody that when they're working -- if you don't work -- if you are working for the Congressman's office, we don't want him to be doing outside employer's work while he's at the office, understand? That's basically what it was.

MR. QUINN: I think we understand that concern. I think the question is, why did you think that John might be doing work for Invocq?

MR. SU: Oh, we tell every part-time employee that. I've been a manager before at other organizations. I tell the employees the same thing. While you are doing work here, I don't want you to be selling Amway products. I don't want you to be making Amway calls because we've seen that before. We've had people doing Mary Kay --

MR. QUINN: Was the conversation with John specifically about whether or not he was doing work with Invocq?

MR. SU: No, no. That that was just
generally speaking. You're part time. Make sure you're not doing anybody else's work in the office on our time.

MR. QUINN: Okay. So what was the connection between that conversation and Invocq becoming a contractor with the office?

MR. SU: Well, because Invocq was a company that he recommended and we know that he's -- we know that he's very good with technology. And it's a company that he recommended, we don't -- to me, I don't want him to be doing any work for other companies while he's on our time. I want him to focus 100 percent when he is in the office on the office.

MR. QUINN: I don't mean to belabor the point, but what I'm confused about is, was there some reason that when John brought Invocq to your attention as a company and it was approved as a contractor, was there some reason that that event triggered the need to have a conversation with John about not doing other work while he was on House time?
MR. SU: No, not in general. Look, the thing is, John is very capable with a lot of stuff. He was doing -- his primary job is to help maintain the website and help the Congressman take pictures and take some videos whenever he has time. And because the -- some of the pictures -- some of the pictures for the base, sort of the baseline for some of the print products.

So that was -- if you want to see a connection, that's probably what was going on in my mind is that hey, when you do your time here, but I don't want you spending time on stuff that we are paying them to do.

MR. QUINN: Okay. But you believed that he was doing work for Invocq then?

MR. SU: No, I do not believe that I did not say that. I just wanted to make sure that he understood that he shouldn't do that.

MR. QUINN: Okay. And what was his response to that conversation?

MR. SU: He said yeah, yeah. I'm not
his nanny. I don't stand behind every -- I don't micromanage every staff in the office. I've got enough things going on trying to serve the Congressman.

MR. QUINN: Did at that time it come up that he was working with in some way Invocq?

MR. SU: No, I have no proof of that and I have no knowledge of that.

MR. QUINN: Okay. So you've never had a conversation with John about either his role with Invocq or his ownership of Invocq?

MR. SU: Right. The ownership part was that when he recommended the company. I said, who is this company. What's this company? He said oh, it's Catherine's company. It's a lady named Catherine. Okay. Look, like I said, House Rules do not require me to find out who owns it. If he happens to mention it, that's fine. I heard that. I'm reporting to you now.

And my next response, like with any staffers that want to engage in any vendors with any services, it's a go find out from Melissa
whether that company is approved to do business
with House offices. And that's it.

MR. QUINN: Okay. Indhira, did you
have any follow-up questions on just that point?

MS. BENITEZ: I do not.

MR. QUINN: Okay. And just one more
thing --

MR. SU: Like I said --

MR. QUINN: You said that that was a
conversation that you and Representative Hagedorn
had with John Sample?

MR. SU: Yeah. Yeah, Hagedorn was
standing nearby.

MR. QUINN: Okay.

MR. SU: Yeah.

MR. QUINN: And are you aware of when
Representative Hagedorn came to learn that John
Sample did in fact become part of Abernathy -- or
part of Invocq?

MR. SU: I think you would have to ask
him. I have no idea.

MR. QUINN: Okay.
MR. SU: But yes, without seeing -- you know, the incorporation documents that has registration of who owns what share, nobody knows in fact that he owns the company or is part of the company. Right?

MR. QUINN: Right.

MR. SU: And the reason I had that conversation, like I said, as a prior manager of another organization I've seen employees selling Amway and doing Mary Kay while working for me. So that is just a standard reaction. I say hey, make sure you're not doing anything for anybody else while you are here. That's it.

MR. QUINN: Okay. And then I just want to go quickly to touch back on how John was hired by Representative Hagedorn's office. First thing, you had worked with John previously, right?

MR. SU: Yeah.

MR. QUINN: Okay. And where did you work with him?

MR. SU: I worked with them in the
state government and he was doing digital work,
digital media work.

MR. QUINN: Okay. And where in the
state government was that?

MR. SU: It was in Virginia.

MR. QUINN: Okay. And what office in
Virginia?

If you just hold on one second. You
can continue to answer the question. I'm going
to go off screen for one second.

MR. SU: Yeah. He was -- at the end,
the organization had a name change. So it's the
Department of Minority Business Enterprises,
DMBE. But before that it was the department of
business systems.

MR. QUINN: And so you let that office
to become Representative Hagedorn's Chief of
Staff?

MR. SU: Oh, absolutely not. I'm not
that desperate. That was a long time ago.

MR. QUINN: Oh, okay. So that was not
directly before you were employed with
Representative Hagedorn?

MR. SU: Sample and I, we knew each other, work together briefly during those years.


MR. QUINN: Okay. So it was about 2010 that you and John work together?

MR. SU: Right.

MR. QUINN: And then you didn't work with him again until you were both employed by Representative Hagedorn?

MR. SU: Right. Right. Yeah. And I believe -- you know, I believe he was in contact with Hagedorn. Like I said, he was in contact with Hagedorn after -- you know, he was looking for somebody to do websites. It's a new office you need a website. You need somebody to manage that. You need digital media it's a part of the communications team, because he won by less than 1 percent. He wanted to look good. So I told Jim, hey, here's this guy. That's kind of his background. Talk to him and see if you like him.
MR. QUINN: Do you --

MR. SU: Because (inaudible) --

MR. QUINN: So you recommended -- you recommended John Sample to Representative Hagedorn?

MR. SU: I made an introduction only. I did not recommend because he was very particular about who he hires.

MR. QUINN: Okay. Can you describe to me -- so from 2010 when you worked with John Sample and then to 2019 when again you were both employed by Representative Hagedorn, between those two time periods, 2010 and 2019, can you describe your relationship with John Sample?

MR. SU: Very little contacts.

MR. QUINN: Okay.

MR. SU: Very little contact, you know. So I would say very rarely did we cross paths.

MR. QUINN: Okay. Did you speak on the phone?

MR. SU: Very, very rarely. Very rarely. The reason I -- and he stayed on in
Virginia state government long after I left. So
I don't know when he left the Department of
Minority Business Enterprise, but he stayed on
after I left. So there's no reason for me to
stay -- he is just an employee there.
And then later on I think it was like
during Hagedorn's campaign he called me and said
hey -- he called me and we had a conversation.
He was like hey, his stuff looks terrible. That
media stuff looks terrible. Who's doing it. So
I said, well, beats me. Hagedorn is very
particular and he hires his own people.
He doesn't talk to me. I haven't
talked to him in years. So this was before he
got elected. And just before he got elected. So
I said look, if he gets elected, I will make an
introduction and that's how he got connected.

MR. QUINN: Okay. So that was sometime
in 2018 before the election?

MR. SU: Yeah. Yeah, it was very late
in 2018.

MR. QUINN: Late --
MR. SU: I don't know --

MR. QUINN: Before the November election though?

MR. SU: Say again.

MR. QUINN: It would have been before the November election though? Is that correct?

MR. SU: It might have been close. I don't know. And in fact, at the time I told him he's probably not going to win. You know, last time he lost by percent. So he's probably not going to win. So I said hypothetically and wishful thinking, if he wins, I can make an introduction.

But like I said, I had no interest in working for him. I did not ask them for a job. So at the time it wasn't as though that I -- that was not -- under the assumption that I would be working for Hagedorn. I want to make that clear.

MR. QUINN: Okay. Why do you think John Sample called you to talk about Representative Hagedorn's May election graphics?

MR. SU: Well, because John is a
Trumper and Hagedorn is a Trumper. So in the Trump orbit, he's obviously appeared on his radar.

MR. QUINN: But I guess my question is, why did -- were you in contact with John before that about Hagedorn's campaign?

MR. SU: Oh, no. He knew Hagedorn and I worked together like 20 years ago.

MR. QUINN: Before you talked in 2018 about Hagedorn's graphics, when was the previous time or the time before that you had spoken to John?

MR. SU: Yeah, I don't remember. I don't remember. And I also believe Hagedorn might have met John once when John was in Richmond when he was visiting. I don't know. I really don't remember when they -- whether they had met before, but they might have met before too.

MR. QUINN: Yeah, I'm not asking about when John and Representative Hagedorn might have spoken. I'm just interested in understanding how
frequently you and John spoke before you were both hired by Representative Hagedorn.

MR. SU: Rarely. Rarely. Maybe once or twice a year.

MR. QUINN: Okay.

MR. SU: Yeah, and not every year. Let me make sure of that. Because Virginia government, that was 21 years ago. Yeah, so that was 21 years ago. So it's not once or twice a year. He's not that kind of a friend. He goes off in his own world. He was doing his own thing.

And it wasn't until he was watching the Trump election that he sees all these Trumpers, Hagedorn was one of them. He's like, yeah, that's the guy you used to work with, right? His media stuff looks terrible.

MR. QUINN: Okay, good. I think I understand that.

MR. SU: Yeah.

MR. QUINN: Then just circling back quickly to a little bit of the process involved
with Melissa Carr. Am I correct that there was no overarching contract with either Abernathy West or Invocq? That they just invoiced you for whatever services they provided?

MR. SU: There is no contract. There is no contract or any of the vendors for the Hagedorn office. And we did check with Melissa that only an invoice was required. So there's no contract with any of them.

MR. QUINN: Okay.

MR. SU: They are all single purchases. And they become repeat vendors if we like their product.

MR. QUINN: Okay. And then for -- I'm going to ask some of these questions for both Abernathy West and Invocq. First for Abernathy West, when you were communicating with Abernathy West about the design of specific mailers or specific projects, who was your point of contact?

MR. SU: I was pretty hands-off other than interfacing with the guy that comes in the office. You know, he shows -- I've really forgot
his name. He shows up periodically. And other
people in the office would have seen him because
he shows up like all of our vendors when they
need --

MR. QUINN: Do you know who -- so for
whoever it was in Representative Hagedorn office
that was, for example, sending drafts of mailers,
or drafts of graphics, or projects that you are
working on, do you know who their point of
contact at Abernathy West was?

MR. SU: No, that's their internal
business. I do not know the business process,
the production process for any of our vendors
including Abernathy West.

MR. QUINN: No, that's not what I'm
asking. I'm just asking -- I'm asking if
somebody at Representative Hagedorn office needed
to speak with somebody Abernathy West about a
draft or about a piece of mail, who do they speak
to.

MR. SU: I believe it was through -- I
believe it was through email or through phone
calls at whatever number they had. It was not me
to go check my contact information. I only deal
with the guy that shows up when he brings -- you
know, when he brings the design. And what
happened is we would sketch out a design on a
piece of paper and any staffers in the office can
validate that.

MR. QUINN: And --

MR. SU: Sketch it out on a -- yeah, I
sketch it out like a storyboard.

MR. QUINN: That's understood. That's
understood.

MR. SU: Yeah.

MR. QUINN: But I just want to clarify,
you were not on communications from
Representative Hagedorn's office to Abernathy
West whether that was an email or a phone call?
You were never on those communications?

MR. SU: Right. Right. Yeah. I would
not -- like I say, I cannot say that I cannot say
that I have never exchanged an email with
Abernathy West. There would have been one or
two. But the one or two was involving invoice.
Somebody had sent me an invoice early on. I said
yeah, those go to Melissa. I don't have
paycheck -- I'm not the paycheck issuing
authority.

MR. QUINN: Okay. And then the same
question for Invocq. Do you know who the point
of contact at Invocq was?

MR. SU: No. No. But I assume John
had a way of contacting them because with every
piece of mail -- every mail piece it starts off
as conversation with a member, with Congressman
Hagedorn. And I would sketch out some of the
storyboard on paper. I said, you know, it's
going to be something like that. And like yeah,
okay. You know, he might -- if you have seen,
the press reporting about his hands-on on the
messaging. He would give it to John and then he
take care of it.

MR. QUINN: Okay. So John was the
primary point of contact between Representative
Hagedorn office and Invocq?
MR. SU: Right. That's my assumption.

MR. QUINN: Okay. So let's just take an example. A draft of a piece of mail, you all would discuss it and draft it, do the -- you know, on the back of a napkin as you described, or a piece of paper. Then who would -- who from your office would send that to Invocq?

MR. SU: I believe John would have.

MR. QUINN: Okay, John -- and who for Abernathy? Then for Abernathy West, same process? Same situation? You've got a draft and (inaudible)?

MR. SU: Yeah.

MR. QUINN: Who from Representative Hagedorn office would send that to Abernathy West?

MR. SU: Well usually, I would have that piece of draft and the guy would come and pick it up.

MR. QUINN: A physical copy?

MR. SU: Yeah. The guy comes to the office. He will stop by once a week. We are not
sending stuff out every week. With these things
with all the edits, these things take turnaround
time probably two weeks.

MR. QUINN: Okay.

MR. SU: So just like vendors that do
business with us, that will come by, they will do
drop ins. Say, hey, how's everything going. Do
you have anything that we can do for you?
Because like I said, it's not a contract. It's a
one off. So once you do the first one, we don't
know when the next legislative issue or debate
pops up. And when it pops up, well then we
quickly do a storyboard and take it and go with
it.

MR. QUINN: So I know there are a lot
of -- obviously there are a lot of mailers with
Abernathy West and you would draft them
physically in the office and then hand them off
directly to this representative from
Abernathy West. But you can't remember who that
was?

MR. SU: No, it was a young guy that
comes. I can't remember his name.

MR. QUINN: Okay. How many times do you think you met this representative?

MR. SU: I don't remember because the number of -- the number of copies versus the number of (inaudible) different things, right. So if you're talking about the number of copies, obviously Hagedorn and sent out several hundred thousand copies. And so as far as number of product, how many products --

MR. QUINN: Again, I'm talking about specific numbers of products. Okay. Would you say you met this representative more than 10 times or less than 10 times?

MR. SU: Well, it depends on how many products. If all together we did -- if all together we had seven products with Abernathy West and the guy, I would have given him seven pieces.

MR. QUINN: Okay. And what -- so (inaudible). Do you know what that number is?

Was it seven products with Abernathy West?
MR. SU: I don't know. I don't have access to any work material anymore. So I don't remember how many exactly was produced by each.

MR. QUINN: Just based on your recollection, the closest that you can get. Is it like a number -- a single digit number? Or are we talking double digits?

MR. SU: I really don't -- I would say possibly five or six.

MR. QUINN: Okay.

MR. SU: Five or six they did. I mean, it could be more. It could be up to seven. I don't remember. Like I said, I've already moved on. I don't remember how many. There were just so many things going on in the office. My job was to make sure hey, you know, I work with Hagedorn. Make sure that I get him drafts to review after he and I start -- it starts off with the storyboard and captures the key message.

The press report at Cambria, he wanted to highlight his work before the International Trade Commission for Cambria. Cambria owner is a
friend of his, a donor. So he wrote down, hey, these are things that we should do a piece on it this. So I would sketch it out and say, okay, what do you want to say. And we worked on the message a little bit. And then there it goes.

It goes to the vendor and the office is calling and I say hey, send it to the vendor. I always left that open. Send it to the vendor. And the vendor comes back with a mockup. In the mockup will put the proper language mocked up with an original design art and with an original picture of let's say Hagedorn at the Federal Trade Commission or Hagedorn at a farm talking to a friend of his who is a donor and he wants to use that picture to feature his work on an ag issue. Then Hagedorn looks at that like, and no. He marks it up and throws it back and then the cycle restarts.

MR. QUINN: Right.

MR. SU: And at some point we get to a product that looks like, yeah, this might be close to final. We would send that to franking.
You know, send that to franking, get the staff assistant or somebody to run it to franking, just to make sure that this piece of original art and the language that the boss has approved or edited up to this point is still with the scope because there is no point in continuing if you are off. If the bipartisan commission won't approve it.

MR. QUINN: Right. Another quick question; you said when you would draft these and you would arrive at a final draft, you would say send it to the vendor. Who were you telling to send it to the vendor?

MR. SU: Well, for the Invocq one, it would be John. And for Abernathy West, because John didn't deal directly with Abernathy West, it's always their -- I called the guy the runner because he runs in and he picks it up and it's like hey, how's things going. And then he leaves and then brings back a draft. It's on a USB. And that's it.

MR. QUINN: And you -- who would call the runner and tell him to come to the office to
pick up a draft?

    MR. SU: We don't have to call him. He shows on a regular timing. He would stop by every other week because like I said, we're not running -- we are not -- Abernathy West -- neither Abernathy West or Invocq were exclusively working on all products. So we got one -- it's kind of alternating, right. So if we got -- Abernathy was doing one while Invocq is busy, then obviously we're not going send the next one to Invocq.

    MR. QUINN: Yeah. Okay. Do you know if Abernathy West or Invocq provided similar services to any other members of Congress?

    MR. SU: No, I'm not aware of interactions by our vendors with any other offices. It's not my job.

    MR. QUINN: Yeah, I understand it's not your job, but I just didn't know if through conversations with the runner or through conversations with anybody, if you -- you know, sometimes you just know who else they are doing
business with. But you don't know?

MR. SU: No. Like I said, all vendor companies have runners and all runners go to offices whether they are doing businesses with the office or not. They are staying in touch and showing you a face. Hey, you know, do anything for you? You know, just keeping a face present sometimes goes a long way. So when the office needs the next service or purchase they might think of you.

MR. QUINN: Okay. All right. We are --

MR. SU: (inaudible) so often you get annoyed by these runners. They are coming -- congressional meetings with the office usually are 10 minutes, 15 minutes. These runners show up. I mean, he would be lucky if I give him three minutes.

MR. QUINN: Right. Okay. I just have a couple of questions for you also about -- I think you mentioned earlier that you knew that Representative Hagedorn had hired outside counsel
or had hired another -- an attorney to look into
some of these issues. You've heard of that
process or that internal review?

MR. SU: Yeah, he posted the report.

MR. QUINN: And do you know who the
attorney was that did that review?

MR. SU: I think it was Elliot
something. I don't remember exactly.

MR. QUINN: Yeah, it was -- yeah, I can
let you know. His name is Elliot Burke. Have
you ever spoken to Elliot Burke?

MR. SU: Yeah.

MR. QUINN: Okay. And when did you
speak to Elliot? Or to Mr. Burke?

MR. SU: Well, it was on the same day
that I quit. Either June 18th or 19th. I can't
remember. And then I don't remember if I spoke
with him once or twice. But he was on a call
when Hagedorn was like, hey, you know, maybe we
can have you just take a break. But don't -- you
know, just take a break and then when we get
through this -- he was like, you have to take a
break for 10 days. Something like that.

MR. QUINN: And so Elliot Burke was on that phone call?

MR. SU: Uh-huh.

MR. QUINN: And was anybody else on that phone call?

MR. SU: I don't know. I just heard --

MR. QUINN: Okay.

MR. SU: I just heard --

MR. QUINN: So Representative Hagedorn, his attorney, Elliot Burke, and you had the conversation about you taking a break. And during that conversation you told him that you were just going to resign?

MR. SU: Right. But again, this thing -- this all started with the LegiStorm reports that came out in, what, May 2nd. So this is not -- this was not the first time that Hagedorn was trying to figure out what to do. This was when I decided to quit. I said no, no, no. I don't want to take a leave of absence. Let me just get out of your way. I think that's
almost exactly what I said, let me just get out
of the way.

MR. QUINN: Okay. Were you ever
contacted by Elliot Burke after that
correspondence?

MR. SU: Yeah, I think he called one
more time because I had a -- he might have left a
message. And I, at the time, I had already
retained counsel just so I know what my rights
are. And I sent him the name of, I believe the
number of the -- the number for the attorney and
then they got in touch.

MR. QUINN: Okay. And who was your
attorney?

MR. SU: Mr. Kilgore.

MR. QUINN: Kilgore, and what's his
first name?

MR. SU: Terry.

MR. QUINN: Terry Kilgore, okay. Is he
currently representing you?

MR. SU: Yes.

MR. QUINN: He has, okay. Was Mr. --
has Mr. Kilgore, to your knowledge, represented your brother?

MR. SU: I don't think so, but it's attorney-client privilege. I'm not going to get into that. I don't think he represents my brother. I can tell you that based on my gut check. That's all.

MR. QUINN: Okay.

MR. SU: Because they don't know each other.

MR. QUINN: So did -- so after you had that initial conversation with Mr. Burke and then you had a second conversation where you gave him Mr. Kilgore's contact information. Did you have any other -- did you have any further conversations with Mr. Burke?

MR. SU: Nope, Mr. Kilgore told me he spoke with him and that's it.

MR. QUINN: Okay. And did you, either yourself or through Mr. Kilgore, participate in the review that Mr. Burke conducted?

MR. SU: No. Mr. Kilgore knew the
extent of -- Mr. Kilgore, as my counsel, knew the
extent of the facts as I have shared with him.
So whatever conversation they had, I do not have
insights to, but they had a conversation. But we
fully expected that they came out with a
narrative to blame me.

MR. QUINN: Have you seen the report
that Mr. Burke came out with at the end of his
review?

MR. SU: No, I haven't. There's a PO
(ph.)

MR. QUINN: Okay.

MR. SU: I've only read what was
reported on the report by the media.

MR. QUINN: Okay.

If we can -- Crystal, if you can pull
up tab 2 and we will mark that as exhibit D.

(Exhibit D was marked for
identification.)

MR. QUINN: Yeah. Peter, I'm just
going to -- I'm going to show you Mr. Burke's
report. It's a short five page report. And
there is one section that I want to draw your
attention to and just get your reaction on.
Maybe you can tell me if you think the report is
accurate on this point. Hold on one second while
it gets pulled up.

So Peter, if you -- can you see this
document now?

MR. SU: Yeah, I don't know what
section you are referring to though.

MR. QUINN: I'm going to -- I will tell
you in one second. So this is the report that
Mr. Burke came out with on September 5, 2020
after he conducted his review.

And Crystal, if you can, scroll to page
3. And yeah, if you can, zoom in on that section
about -- the subsection entitled Abernathy West.
You can zoom in a little bit more. There you
go.

Peter, if you want to take a minute
just to read those two paragraphs. This is what
Mr. Burke wrote about his contacts with you and
your counsel. If you can, just read that let me
know when you're finished.

MR. SU: Yeah, go ahead.

MR. QUINN: What was that?

MR. SU: Oh, just go ahead; what's your question.

MR. QUINN: Okay. Yeah, I just -- so as you see in paragraph two, he says -- Mr. Burke writes, over the next few weeks, both Mr. Su and Mr. -- and both Szu-Nien Su through counsel promised cooperation on multiple occasions. That cooperation never materialized. Mr. Su's counsel authorized direct contact with Mr. Su, but Mr. Su did not respond.

Do remember being contacted by Mr. Burke?

MR. SU: No, I don't, because I ceased using all emails. That was a private email that was used in this OCE with Mr. Hagedorn. And those will be -- refers specifically to emails that we used for political stuff, which in my role, I was exempted and able to use those emails (inaudible) purpose.
MR. QUINN: Okay. So are you saying that if Mr. Burke tried to contact you through email, you didn't see that email?

MR. SU: Right.

MR. QUINN: Okay. And did he ever try to contact you by phone?

MR. SU: No.

MR. QUINN: Okay. Did you ever talk to Mr. Kilgore about contact that Mr. Burke was trying to make with you or with Mr. Kilgore?

MR. SU: No, the only contact he had was with my attorney. And he did tell me that he spoke with him, but he didn't give me the details of it. That was my recollection.

MR. QUINN: Okay. Did Mr. Burke ever ask to interview you?

MR. SU: I don't remember.

MR. QUINN: Okay. Do you remember ever speaking to your attorney, Mr. Kilgore, about interviewing with Mr. Burke?

MR. SU: Nope.

MR. QUINN: Okay. So when Mr. Burke
says that Mr. Su and your brother through counsel
promised cooperation on multiple occasions,
you're not -- you don't know what Mr. Burke is
talking about there?

MR. SU: No. If my lawyer had said
something to him, that was between the two
gentlemen. I gave my counsel a full statement as
far as what I remember just as we were going
through today. And he said he would communicate
that with Hagedorn's attorney, Elliott.

MR. QUINN: Just to clarify, you told
Mr. Kilgore about our interview today and he said
that he would speak to Mr. Burke about that?

MR. SU: No, no, no. I'm saying in
reference to Elliott's report, I gave Mr. Kilgore
my recollection of the work involving the print
pieces, the mail pieces. And if Mr. Elliott has
any questions, you can feel free to speak on my
behalf about these facts, but because I don't
have any additional first-hand information, all
the computer, everything is left at the office,
this is all I remember.
MR. QUINN: So any conversations
that -- or any information that Mr. Burke
obtained would've been through your counsel, Mr.
Kilgore?

MR. SU: Right.

MR. QUINN: Did you ever have Mr.
Kilgore stop communicating with Mr. Burke? Did
you ever ask them to break off communications?

MR. SU: No.

MR. QUINN: Okay. And do you ever
remember Mr. Kilgore talking to about why or when
Mr. Burke stopped contacting him?

MR. SU: No.

MR. QUINN: And when -- as far as you
know, when was the last time Mr. Burke tried to
get in touch with your attorney?

MR. SU: I don't remember. This was
stuff that happened a year ago. So I've already
moved on.

MR. QUINN: Okay. Was it -- or do you
know if it was before or after this report came
out? This report came out September 5th, 2020.
MR. SU: No, there was no contact last year. I know that for a fact. Every -- all the contacts were near the date of my resignation.

MR. QUINN: Okay. So then maybe let's look and just, again that second paragraph. He says, counsel for your brother and Abernathy West consistently stated that their clients would cooperate with internal review, but never responded to multiple requests for information and Congressman Hagedorn has authority to compel said information at this time. This recalcitrance served to frustrate the internal review and delay Congressman Hagedorn's self-report to the Ethics Committee by several weeks.

But it's your understanding that all of the contact between Mr. Burke and your counsel happened in 2019?

MR. SU: Correct.

MR. QUINN: And have you -- do you have any information about or knowledge of Mr. Burke's contact with either your brother or anybody at Abernathy West, or their counsel?
MR. SU: No, I'm not involved in the business of any vendors.

MR. QUINN: Okay. Did you ever have a conversation with your brother about this? Like call him and say, hey, we're both getting calls from the same attorney? What's going on?

MR. SU: No, there is no coordination between him and I. In fact, I don't even know who his counsel is.

MR. SU: Okay. But I will tell you the Hagedorn phone call that came on August 7th, he pretty much contradicted his own report and revealed that that's his plan and that his Press Secretary statement that I was terminated the day after, as soon as he found out about this from all the press fact check, you know that that's not true.

MR. QUINN: Okay, right.

And Crystal, you can take that document down. Thank you.

Yeah, let's -- in one second we will talk quickly about that recording and then
hopefully that's kind of the last topic I have. But quickly just on the report. Were all the contacts that you had with Mr. Burke also before that August 7th conversation that was recorded?

MR. SU: I only had one, probably two contacts with Mr. Elliott and that's it. I never heard from any (inaudible) again.

MR. QUINN: Would they all be before that August 7th recorded conversation?

MR. SU: Yeah. Yeah. Like I said, they all occurred around the time that I resigned, unless (inaudible) I can't remember.

MR. QUINN: Okay. Let's talk about that audio recording, that recorded conversation. How did -- what you just first -- tell me generally how that came about?

MR. SU: It was a surprise. Like I said, I was not terminated from the office. Let's just get that fact. I think by now you understand I was not terminated.

MR. QUINN: I understand that, yeah.

MR. SU: If somebody were terminated
under the circumstances they described in the
report, that person would not answer Hagedorn's
call, right?

    MR. QUINN: Right.

    MR. SU: So he called. I recognized
the number and I was thinking, okay, well, what
do you want. You just, you know, through all
your interviews, you just threw me under the bus
and put mud all over me. What is there to talk
about? So I was actually pretty annoyed when he
called when I saw his number show up. So I was
going to let him have it. That was the context.

    He called up, but he was pretty -- he
was pretty apologetic. He was like, hey, how are
you doing. Sorry about all this that's going on.
    And so I just listened. Then he starts to go on
about things that -- he's like, yeah, this
stuff -- we should be able to get through this.
    If your brother was doing to work -- and this was
reported in the newspaper, right. If your
brother was doing the work and he and I did not
have personal relationships and all that stuff
going on, I don't believe there was a problem
there.

And he said that his attorney had also
analyzed the House Rules and that would -- you
know, and that would also support that statement.
So I say yeah, yeah. But you've made it very
difficult for me with all the nonsense that's out
there.

MR. QUINN: Right. And so the August
7th conversation was the first conversation you
had with Representative Hagedorn after that June
18th or 19th conversation where you resigned; is
that correct?

MR. SU: Correct. Correct.

MR. QUINN: Had he made any attempts to
call you before August 7th?

MR. SU: Not that I remember.

MR. QUINN: Okay. And how did you
record that conversation?

MR. SU: Well, I had an app on my
phone. So I was pretty annoyed. So I always had
an app on my phone to do this kind of stuff.
Unrelated, I used to work in the wire room of the federal agency as a contractor. So I know how these things work. So for my own protection, in the line of work that I've engaged in, the app was used to record congressional hearings so I don't have to take notes. So it's the same app that I used.

MR. QUINN: Okay. And what's the name of that app?

MR. SU: I don't remember. I think this is called voice recorder or something. But I sent him --

MR. QUINN: Okay. And you said you deleted the app; is that correct?

MR. SU: Yeah.

MR. QUINN: How did you delete the app?

MR. SU: I just hit delete.

MR. QUINN: No, not how. Why did you delete the app?

MR. SU: Oh, because it was taking up a lot of space.

MR. QUINN: Okay. Does the app itself
store the recordings?

MR. SU: Yeah, I think so. It was taking up a lot of space and I was cleaning up my phone and it said, hey, here is an app that's taking up a lot of space. I deleted it along with other apps.

MR. QUINN: Okay. And then at some point you sent that recording. Or there are some reporters that listened to that recording or got a hold of that recording, right?

MR. SU: Yeah, I didn't send them any recording. I played it for them because immediately I knew that what he said on that phone call contradicted his report and he kind of acknowledged that it was his project that he wanted to send mail pieces to every DM household out there.

MR. QUINN: Okay.

MR. SU: And there were no House Rules that would have precluded me or him from using Abernathy West as long as there's -- as long as he didn't have any professional relationship and
I didn't benefit from it.

MR. QUINN: Okay.

MR. SU: So that was all very telling.

And I thought for my own protection and for my own reputation, I've got to find a way to clear this out. So I played this for the oldest newspaper in Minnesota, which is very established and very objective, the Star Tribune.

MR. QUINN: Okay. And did you reach out to those reporters?

MR. SU: Yeah, the reporter, he talked to me before to see if I wanted to comment on it and I said look, I've already moved on from this. But if something else comes up, I will call you back. So this was the time I thought, okay, I have something here.

MR. QUINN: Okay. And how did you let them hear that recording?

MR. SU: Oh, I just played it. I called from another phone and I played it just like this.

MR. QUINN: Okay. And when did that
happen?

MR. SU: I don't know. Whenever the story was published. It would've been a few days before that.

MR. QUINN: Okay.

MR. SU: Or it would've been -- yeah, I don't remember. It was very close to -- very close to when he made the phone call. So it might've been the next day or whenever it was. I don't remember. It's almost a --

MR. QUINN: Around August 2020?

MR. SU: It's almost -- yeah, it's almost a year ago, you know.

MR. QUINN: Okay.

MR. SU: And the fact that he called me six weeks after, obviously if I was fired, I wouldn't take his call. But I was thinking, what do you want to talk about now. You know, this is like -- yeah, he just trashed my reputation all over and also in conjunction with your fixer. So what do you want?

MR. QUINN: Right. And did you share
that recording with anybody else other than the reporter?

MR. SU: No. And that's why -- you know, the recording was very accurate. And he didn't deny that those were things he said. He didn't believe there was any problems. He said that it was his -- his intention to send mailers to every household down there. And he was -- his narrative was basically saying that we did everything by the book, and they are coming after me even though there is no problems about it.

But I understand it's a tough election and that's how I kind of interpreted the conversation. And because every word is a fact was appropriately reported by the Star Tribune.

MR. QUINN: Okay. Had -- just --

MR. SU: That all -- and that conversation clearly contradicted -- it clearly contradicted, I believe the -- yeah, it clearly contradicted the spin that was in his internal report.

MR. QUINN: Okay. Just to go back to
the deletion quickly. When did you delete that app and the recording?

   MR. SU: I don't know. It was probably a month after something like that. I have -- my phone doesn't have a lot of memory. So if you clog it up with stuff like that -- I would rather have pictures of my kids than his stupid voice.

   MR. QUINN: Okay.

   MR. SU: But the story has already been written about. What's the point of holding on to that?

   MR. QUINN: Okay. Did you have any other conversations with anybody in Representative Hagedorn office or anybody connected with Abernathy West or Invocq that you recorded?

   MR. SU: No.

   MR. QUINN: No?

   MR. SU: I had already --

   MR. QUINN: Okay.

   MR. SU: You know, in his recording --

   thistells you his state of mind. It's a
statement of fact. And he said that it was
presented, that means the allegations by other
press reporting, as if y'all shouldn't have done
the work, that your brother shouldn't have been
hired because that was unethical, which is not.
So he said those things in the recording.
Clearly he knew about it and it's not unethical.
He just didn't know how to handle the crisis
communication. So in the end he dumped it all on
me.

MR. QUINN: Right. I have a couple
questions about -- and we are nearing the end
here. So I appreciate you letting us have this
time. But can I ask you just about preparation
for this interview? Did you do anything to
prepare for our conversation? Look over any
documents or speak to anybody to refresh your
recollection?

MR. SU: No.

MR. QUINN: Okay. You --

MR. SU: The only thing that I pulled
up was the news articles that I was referring to.
But the article, I had printed them back when it was published. So I already had that.

MR. QUINN: Okay. And then -- but you did say you spoke to your attorney about this interview?

MR. SU: Yeah, of course.

MR. QUINN: Okay. And what did you talk with him about?

MR. SU: I just told him that you guys were making an inquiry. I'm not the target and it's my understanding that House Rules, I did not break -- my understanding that House Rules, as long as the employee at the time did not have ownership in the company that it did business with, I didn't break any House Rules. So if you want to (inaudible) that's fine.

MR. QUINN: Understood. And then did you -- did you tell anybody else about this interview other than your attorney?

MR. SU: No.

MR. QUINN: Let me -- if you can, just give me two or three minutes. I'm just going to
check over my notes real quick and make sure that we've covered everything. And then I'll just come back and ask one or two closing questions and then I can be out of your hair. So if you just -- you can just stay on the line. I'm just going to mute my video and --

And actually Kevin, if we want to go off the record for a second, we can do that.

Just hang around for a minute Peter, okay?

THE COURT REPORTER: Off the record, 1:30 p.m.

(A recess was taken.)

MR. QUINN: Okay, Kevin, we can go back on the record.

THE COURT REPORTER: Back on the record, 1:32 p.m.

MR. QUINN: Okay, so Peter, just a couple of follow-up questions. Hopefully it won't take more than 5 or 10 minutes more of your time. I think Indhira had the first couple of questions for you.
MS. BENITEZ: Yes Peter, so in reference to Melissa Carr, you mentioned that she -- most of the vendors went through her and she checked whether or not they were properly registered. Could you just shed some light on that? What does that mean exactly? Properly registered in what way?

MR. SU: I don't have any light to shed other than Melissa told me for a vendor to provide services, they needed to be properly registered with the House to be a vendor. So any time we're going to purchase service from anybody, tele-town hall, business cards, mail pieces, if it's the first time that we purchased from a vendor, I say hey, can you check. And we asked the vendor, are you properly registered. And the answer that came back, if it's yes, then we will proceed.

MS. BENITEZ: Okay. So to your knowledge, do you know whether or not Melissa Carr looks into the ownership of the companies?

MR. SU: I have no way of reading her
mind on this. And it's not -- in the House
manual. That is not a requirement. So whether
she did or not, I don't know.

MS. BENITEZ: Okay.

MR. QUINN: Okay. Crystal, if you
could, pull up Exhibit C one more time. Well
actually, hold on one second. I'm pulling that
up.

So Peter, Exhibit C is that document
that you sent me that shows that your brother was
the 100 percent owner of Abernathy West. Do you
recall that document?

MR. SU: I just, like I said, I
recall -- perhaps might have seen an early
invoice. That's about it.

MR. QUINN: No, no. Sorry. If you
look at your screen, I'm talking about this
document, the one that you sent me.

MR. SU: Yeah, what about it?

MR. QUINN: Yeah. So I guess I'm just
a little bit confused with this document. Maybe
you could help me understand it. Delaware, it
does not generally make public the owners of
corporations that are registered through third-
party agents like Zoom.

MR. SU: Right. For Zoom --

MR. QUINN: I'm just very confused
about how you got this document from the
Secretary of State of Delaware.

MR. SU: Because they have to file.
They have to file the documentation, what's
called an annual report. I mean, (inaudible)
I've had an LLC myself before. So after leaving
the office you do the same thing. You file the
report. It doesn't matter what state you're in.
You file the report. And if you inquire about
it, they tell you yes through Zoom and this is
what you pay. Then they send you a -- if they
can send it to you. It's like getting a document
from the Corporation Division.

MR. QUINN: Okay. So I think you are
probably aware one of the benefits of filing or
incorporating in Delaware is that the ownership
of the corporation doesn't need to be disclosed.
And --

MR. SU: Well, then How does Elliot Burke know that Abernathy West is owned by my brother --

MR. QUINN: If he --

MR. SU: It's not that -- you can find out. You can find out.

MR. QUINN: Well, I guess what I'm -- I guess what I'm telling you is that I have requested these documents from the Secretary of State of Delaware. I've had conversations with them. And I know that this is not a publicly available document.

MR. SU: They told --

MR. QUINN: So fill the gap for me how you got this document.

MR. SU: Right. I had the same conversation with them. I paid my money. They said normally it's not available, but this is a Zoom request. Sorry, not a Zoom. This is a -- what is that name of the registering company?

I'm drawing a blank.
MR. QUINN: Zoom Legal.
MR. SU: Oh, Legal Zoom, yeah.
MR. QUINN: Yeah.
MR. SU: So they (inaudible) there.
But like I said, get -- come look at my financial transactions. I have nothing to hide. Come take a look.
MR. QUINN: Well --
MR. SU: We don't need a go (inaudible). Come take a look. I welcome (inaudible) there's nothing that transacted between him and I.
MR. QUINN: No, no. I understand that and take that for what you said. I'm just confused about this document. Because I can tell you that I've made that request and being given all the documents that the Secretary of State is allowed to disclose to the public. So did you maybe go through your brother to get this document?
MR. SU: No, I didn't go to him directly. Okay? I went and asked the Delaware
corporation. They told me that Zoom Legal has it. Then the Zoom Legal, I asked them about it. I believe he had to release it. So he released it and that's probably how I got it.

MR. QUINN: So originally you told me you got it from the Secretary of State. Are you now saying that you got this from somebody at Zoom Legal?

MR. SU: The -- I was not specific to which document I got from the Secretary of State. I was referring to your request and I got that -- Secretary of State has this document too because they filed it.

MR. QUINN: Peter, we can ask the court reporter to go back and look at the record before, but I asked you specifically, did you receive this document from the Secretary of State. And you told me that you did. So if that -- if I didn't understand that or maybe that didn't come across clearly on the record, then --

MR. SU: Yeah, they --

MR. QUINN: I will ask the question
again. How did you get this document?

MR. SU: Yeah, maybe that didn't come
across clearly. So I had a conversation with --
I had a conversation with Delaware Corporations
Division. They give me the same runaround that
you got. And they say hey, this is a Zoom Legal
filing. I contacted Zoom Legal. He said that
the company would have to release it in order for
you to get it.

MR. QUINN: Okay. And did the company
release that?

MR. SU: Yeah.

MR. QUINN: And how did that happen?
MR. SU: I contacted the company.
MR. QUINN: Who did you contact at the
company?
MR. SU: I sent an email to Abernathy
West email, which is the only one that we have
used in contact with the company.
MR. QUINN: What's that email address?
MR. SU: I think it was
sales[REDACTED].
MR. QUINN: And do you have the email still?

MR. SU: No, I don't.

MR. QUINN: You don't have it in like a sent mailbox?

MR. SU: No.

MR. QUINN: Okay. So then what happened? What was your request to the email address?

MR. SU: I said I want to get a -- I needed to get proof from a document that proves the -- that shows the ownership of the company, if it's 100 percent, if it involves any other stakeholders of the company.

MR. QUINN: Okay. And that did somebody -- and then how did you receive this document?

MR. SU: Then my brother called me.

MR. QUINN: Okay. And what did -- so your brother received the email that you sent?

MR. SU: Yeah, I don't -- yeah, I don't
know. It is his company. It doesn't surprise me
that whether it goes through somebody or he has
access to the email. He's like, yeah, it's not a
problem.

MR. QUINN: Okay. So he got the email
and then he gave you -- and then he called you on
the phone? And then what happened?

MR. SU: Then I got the document.

MR. QUINN: How did you get the
document?

MR. SU: From Zoom.

MR. QUINN: Somebody from Zoom sent you
the document? Or did your brother send you the
document?

MR. SU: Zoom gave him -- he has to
release the document because this is a -- the
document is meaningless unless it came from Zoom.
So Zoom gave it to him and he dropped it off
with me.

MR. QUINN: Okay. So your brother gave
you the document?

MR. SU: Right.
MR. QUINN: Okay.

MR. SU: And like I said, you're welcome to check my financial records. There is no transaction between him and I.

MR. QUINN: Did -- when your brother gave you the document, did you have a conversation with him about why you are asking for this document?

MR. SU: Yeah. I said you guys are asking questions about it and I just wanted to clear my name. I have no ownership in the company. You and I (inaudible) any transactions.

MR. QUINN: Okay. Does your brother have access to the 13 pages prior to this document?

MR. SU: I don't know. I would assume.

I would assume it would have to be the same request for him to release it and Zoom would give it to him.

MR. QUINN: Okay. Well, I guess I just want to level with you a little bit here. I'm confused about why when I first asked you about
this document, why you didn't give me the
complete story on how you got the document. Can
you tell me why you were -- why you didn't want
to disclose that you got this document from your
brother?

MR. SU: No, there was no rhyme or
reason. It's a factual document.

MR. QUINN: Is there any other -- have
I asked you any other questions where you have
similarly either concealed or chosen not to
disclose the full answer of the -- the full and
correct answer to the question?

MR. SU: No. I think this -- there was
not a full understanding and it just didn't come
through as it was. So it is what it is. It is a
factual document.

MR. QUINN: If --

MR. SU: And (inaudible).

MR. QUINN: I think maybe you
understand why have I questions about this
document now and why would like to see the first
13 pages of this document and a complete version
of it. I'm now making that request of you. Could you get the complete document from your brother?

    MR. SU: I will talk to him about it and we will see if we can get him to talk to Zoom to get it released.

    MR. QUINN: Okay. So that's one thing I would need to have the complete document for us to be able to rely on it. Obviously, given the source of the document, now I have some additional questions. I would like to get in contact with your brother as well. Can you give me his contact information?

    MR. SU: Yeah, I sent it from sales. That's how I've always contacted with him.

    MR. QUINN: Okay. If you can, just hold on for one minute.

    Crystal, you can take the document off the screen.

    Peter, can I ask, have you ever recorded the -- any of our conversations that
we've had on the phone?

MR. SU: No, I've taken very good notes and that's it.

MR. QUINN: Okay.

MR. SU: And it would -- yeah.

MR. QUINN: I just want to remind you when you answered that question any other questions in this interview --

MR. SU: Right.

MR. QUINN: We spoke about earlier and the first thing we spoke about this interview is that False Statements Act, 1001.

I understand that you didn't sign the acknowledgment, but the False Statements Act applies to our conversation whether or not you signed that acknowledgment. So I just want to ask you again one more time if you've recorded our conversations.

MR. SU: No.

MR. QUINN: Okay.

MR. SU: And you will not see a press story about that. I know why you're asking.
MR. QUINN: Is there any other --

MR. SU: I --

MR. QUINN: With that 1001 statement in mind, with that 1001 False Statements Act in mind, is there any other question that I've asked you today that you have not answered truthfully?

MR. SU: No. I can say, I want to fully cooperate with you guys, clear my name. If I didn't have any ownership in there, there's no way that I had conducted anything inappropriately in this case. I even offered for you to look at my financial statements. There is zero transaction whatsoever between my brother and I.

MR. QUINN: And --

MR. SU: I do not have --

MR. QUINN: I would like to take you up on that offer to view your financial statements. How would you like to accomplish that?

MR. SU: I can -- let's see. I can print my statements out if that's what you wanted to see.

MR. QUINN: Who is -- who do you bank
with?

MR. SU: Bank of America.

MR. QUINN: Okay. I can make that request directly at Bank of America, and with your signoff they will send me those documents. Would you agree to do that?

MR. SU: Yeah, sure. Yeah, for the -- for this? I just want to clear my name. I have not benefited from -- there is zero financial transactions with my brother.

MR. QUINN: Okay. And then I want to just ask the question what time again, that you have -- you have deleted and do not have the recording with Representative Hagedorn and have no way of obtaining it now?

MR. SU: Right. It was an app that was holding (inaudible) on my phone. I deleted it.

MR. QUINN: Okay. Have you ever had any email correspondence with John Sample?

MR. SU: Not recently. Not since I -- I don't recall.

MR. QUINN: Have you had email
correspondence with him ever about Invocq or Abernethy West?

MR. SU: No, not to my knowledge.

MR. QUINN: Have you spoke to John Sample since the public allegations regarding Invocq and Abernethy West came out?

MR. SU: Nope. Since I left, I think one time he stopped by and that was about it.

MR. QUINN: Stopped by where?

MR. SU: He stopped by -- he stopped by the office. He told me he stopped by the office. And so I said, well, you know, we are going separate ways. I left already. Whatever you're doing, I don't want to know about. Whether you are still working for Hagedorn, if you're going to ask me questions on Hagedorn's behalf, I don't want to know about it.

MR. QUINN: Oh -- that conversation --

MR. SU: So I made a clean --

MR. QUINN: When did that conversation happen?

MR. SU: That was a few days after I
left.

MR. QUINN: Okay. And did that happen over the phone?

MR. SU: Yeah. Yeah, this would've been the month after I left.

MR. QUINN: Okay. And what did you talk about during that conversation?

MR. SU: That was very -- it was very short. He called me. He said, hey, I'm going to be stopping by the office. I said, hey, you know, I've already left. I resigned. Do whatever you want. Because he was -- I believe, based on press reporting, that he was also -- had to take a leave of absence. So he called me and I said, hey, I quit. So there is no -- you don't work for me anymore. So, you know, that's it.

MR. QUINN: Okay. And why did John call you?

MR. SU: I don't know. I think he was just checking in.

MR. QUINN: Okay. And you haven't spoken --
MR. SU: Because there was --

MR. QUINN: And you haven't spoken to John since then?

MR. SU: Yeah, there was no correlation between him and me about this, any of this.

MR. QUINN: Yeah, I'm not asking specifically about coordination. I just want to know, have you spoken to John Sample since that conversation that occurred on the phone about a month after you left.

MR. SU: No.

MR. QUINN: Okay. And John will say the same thing when I talk to him?

MR. SU: Uh-huh.

MR. QUINN: Okay.

MR. SU: Yeah, this is all -- you're asking me about specific dates, whether I talked to him, ran into him. All I can say is based on my recollection.

MR. QUINN: Right. Right. Okay. If you'll hold on for one more second, I'm just going to mute and pause my video for one second
and then I'll be right back and we can conclude
the interview. Just hold on one second.

    All right Peter. So just a couple
follow-ups. I will follow up with you about that
request to Bank of America and have you sign a
release to allow them to release financial
information to us.

    And then also, just because I know you
told me that originally you hadn't had any
conversations with your brother about Abernethy
West after you left Representative Hagedorn's
office. Then we have now discussed the phone
call that occurred when you needed to get the
ownership documents that you sent me.

    So I need to ask you one more time,
have there been any other conversations between
you and your brother about Abernethy West in the
last --

    MR. SU: No.

    MR. QUINN: In the last two years?

    MR. SU: No, that's the -- sorry.

That's the only conversation. Because I was
trying to obtain the document, they told me that he had to ask -- what you call that? Legal Zoom to release it. Look, we still share parents. I see him. It's not like we don't talk. But we don't talk about these things. He has his own counsel. We've moved on and there was simply -- it was simply that hey, I needed that document to show that you are the hundred percent owner so I can clear my name. That's it.

MR. QUINN: Okay. I mean, I guess I just have to say it seems a little odd to me that when this news broke, that you wouldn't call your brother or your brother wouldn't call you and you wouldn't have a conversation about what was going on. That --

MR. SU: No, no, no. Well, when this news broke, Elliot -- Mr. Elliot also called him, I believe. Okay?

MR. QUINN: Okay.

MR. SU: So -- and then that's the only thing we talk about at a family gathering, I say look, you know, I'm going to get myself a lawyer
and he said he's going to get himself a lawyer.

And I said let's work all this through our
lawyers because I don't want any perception that
we are -- they are out alleging that we are
working on this from the beginning. I just want
to make sure that there is no perception. So he
got his own lawyer and I got my own lawyer and
that's it.

MR. QUINN: Okay. And do you know his
lawyer was?

MR. SU: No, I really have no idea who
his lawyer was.

MR. QUINN: You don't, all right.

MR. SU: And it's not my lawyer because
they don't know --

MR. QUINN: Okay. Do you have contacts
for your lawyer Mr. Kilgore? Can you give me his
contact?

MR. SU: Yeah. Hold on one second. I
have to look it up. It's T Kilgore.

MR. QUINN: T, K-I-L-G-O-R-E?

MR. SU: Yeah, at Kilgore Law Office.
MR. QUINN: Law office?

MR. SU: Right.

MR. QUINN: Singular?

MR. SU: Yeah, Kilgore Law Office.

MR. QUINN: Dot com?

MR. SU: Uh-huh.

MR. QUINN: Okay.

TKilgore?  

MR. SU: Right.

MR. QUINN: Okay. Oh, you know what? I actually did have one or two other things to ask you. Sorry.

On the topic of the Minnesota office, you raised that on your last call with me and asked if we were looking into allegations about the office he rented in Minnesota. Do you recall that?

MR. SU: Yeah, I read that in the newspaper.

MR. QUINN: Okay. Have you ever been to Representative Hagedorn's offices in Minnesota?
MR. SU: Yeah.

MR. QUINN: You have, okay. Which office have you been to?

MR. SU: I've been to the district office and I've been to -- there is an office in the basement.

MR. QUINN: Okay. You've been to the basement office?

MR. SU: Uh-huh.

MR. QUINN: When did you go to the basement office?

MR. SU: I think it was at the beginning of the term when I went out there and met with the staff. And they showed me -- they showed me the offices that were accessible for storage and for a conference room.

So there was a conference room in the basement and then there was a separate office that would've been the campaign office that had computers stored there, campaign materials, and stuff of that nature.

MR. QUINN: And that was also in the
basement?

MR. SU: Yeah.

MR. QUINN: Was that connected to the conference room?

MR. SU: No, it was like two doors down.

MR. QUINN: And the room that had computers and campaign material in there, was a computer set up for use in that office?

MR. SU: I don't remember. I didn't use the computer.

MR. QUINN: Okay. Yeah. Do you know -- can you just describe to me that office? How was it used? What did it look like?

MR. SU: So at the time, there was nobody down there. That was part of the tour and they took me down there, the locals, the local folk.

MR. QUINN: And did they (inaudible) --

MR. SU: Yeah, I believe in the press reporting there was a picture because he had previously posted on social media, come to the
campaign office. And the picture resembled the office that I visited.

MR. QUINN: Yeah, I've seen that. I'm just interested what your experience was when you went there. So just your first-hand knowledge of the office. You said you've seen the office, correct?

MR. SU: Yeah. Yeah.

MR. QUINN: So can you describe to me --

MR. SU: I've seen (inaudible).

MR. QUINN: Describe to me what you saw?

MR. SU: It had an (inaudible) campaign materials stored there. They had some computers, some TV. It didn't look like it was actively being used because he had just won the election.

MR. QUINN: Right. Were there seats in the office? Like either chairs or couches that you could sit on?

MR. SU: Oh, yeah.

MR. QUINN: Okay. And were there --
MR. SU: The --

MR. QUINN: -- any desks? Like either a desk or cubicle that can be used by somebody?

MR. SU: Yeah, there were desks, yeah.

MR. QUINN: Okay. So it looked like --

MR. SU: Yeah.

MR. QUINN: -- desks that could have been used for staffers that were working on the campaign?

MR. SU: Sure, yeah. And there were campaign mail there.

MR. QUINN: Okay. And what was -- when, about approximately was that was it?

MR. SU: Probably the first three months.

MR. QUINN: Okay. So sometime between January and March of 2019?

MR. SU: Uh-huh.

MR. QUINN: Okay. And then at that time, I believe he also has offices above ground on the third floor --

MR. SU: Right.
MR. QUINN: That he had at that time.

MR. SU: Uh-huh.

MR. QUINN: Okay. And you also toured those?

MR. SU: Yeah.

MR. QUINN: Okay. And is that the district office that you were referring to?

MR. SU: Yes.

MR. QUINN: Okay. Did -- how did they -- how did the people that gave you the tour describe those two offices? Like did they have names for the office? Like upstairs was the district office? Or how did they refer to them?

MR. SU: Well yeah, clearly district office for official use and the other was used for the campaign.

MR. QUINN: Okay. And are you aware of any other campaign offices at that time that Representative Hagedorn had?

MR. SU: No. I had heard there was one. I had heard that they had shared a state party office, at one time, in Rochester, but by
the time I showed up there was no -- there was no
such office for me to visit.

    MR. QUINN: Okay. Do you remember who
gave you that tour?

    MR. SU: No, I don't remember. It
was -- I really don't remember. It was a lot of
people, a couple of people there. So I don't
remember who it was.

    MR. QUINN: Was it somebody employed by
Representative Hagedorn's official office? Or
was it a campaign person?

    MR. SU: There were folks from both --
his entire district office were all campaign
folks. So yeah, you can say they are all
campaign people. Some of them -- yeah. Some had
been onboarded. Some had not.

    MR. QUINN: Okay, understood.

    MR. SU: Yeah.

    MR. QUINN: Anything else you can tell
me about that basement office? Do you -- or just
go ahead. Anything else you can tell me about
that basement office?
MR. SU: No, it was good size. It was really good-sized. And later when I saw the press reporting, it looked like the picture of the campaign office where he had posted it on social media. And it still had campaign material in it. It had campaign mail. So I just assumed that that was the campaign office.

MR. QUINN: Okay. And did anybody tell you that it was the campaign office?

MR. SU: Yeah, they said this is where the campaign was. Because I was not part of his campaign. So I had no background.

MR. QUINN: Okay. They said this is where the campaign what?

MR. SU: This is where the campaign was.

MR. QUINN: Okay. So that was the campaign headquarters as far as you were aware?

MR. SU: I would just as I can only generalize by this is where the campaign was. That's how it was framed.

MR. QUINN: Okay.
MR. SU: So it's -- I interpreted it as the campaign office.

MR. QUINN: Okay.

Indhira, do you have any follow-up questions on that or anything else?

MS. BENITEZ: No, I have nothing further on my end.

MR. QUINN: Okay.

All right. Well then, like I said, I will follow up with you Peter, about the Bank of America issue. And of course, as you think about this interview, if anything comes up that you would like to let me know, either that maybe an answer was incomplete or inaccurate, please feel free to reach out to me.

MR. SU: Sure.

MR. QUINN: Okay. So I think with that, we will conclude.

Kevin, we can close the record.

(Off the record 2:03 p.m.)
CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

I, Kevin James Kiser, the officer before whom the foregoing deposition was taken, do hereby certify that said proceedings were electronically recorded by me; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this ______ of __________, 2021.

Notary Registration No.: 7637508
My Commission Expires: 9/30/2024

Kevin James Kiser, Notary Public
for the Commonwealth of Virginia