

Exhibit 5

1 **Former Campaign Manager**
2 **Transcript of Interview**
3 **June 21, 2016**
4

5 Scott Gast: For the record, this is Scott Gast with the Office of Congressional Ethics,
6 joined by my colleagues Helen Eisner and Konstantin Kastens. We are
7 here with Representative Stutzman's Former Campaign Manager
8 ("Campaign Manager"), who's accompanied by his counsel, Jason
9 Torchinsky. We appreciate you being here. Former Campaign Manager
10 has signed the False Statements Act acknowledgement. We appreciate
11 that.

12 Generally, I like to start with a little background information. If you could
13 tell us your current employment situation, what your responsibilities are,
14 and how long you've been in that position.

15 Campaign Manager: I work for iHeart Media. I started the beginning of February. I am their
16 Vice President of Political Strategy.

17 Helen Eisner: Can you spell that for me?

18 Campaign Manager: It's iHeart.

19 Scott Gast: Generally what do you do as VP of Political Strategy?

20 Campaign Manager: I am an outward facing representative with Republican, conservative-
21 leaning organizations.

22 Scott Gast: What did you do before joining iHeart Media?

23 Campaign Manager: I was Campaign Manager for Marlin Stutzman.

24 Scott Gast: When were you in that position?

25 Campaign Manager: Roughly May of '15 through the end of October.

26 Helen Eisner: That would be October 2015?

27 Campaign Manager: Correct.

28 Helen Eisner: So, May 2015, October 2015?

29 Campaign Manager: Correct.

30 Helen Eisner: Okay.

1 Scott Gast: What were your duties as Campaign Manager?

2 Campaign Manager: I oversaw his race for United States Senate.

3 Scott Gast: Did those duties include oversight over spending by the campaign?

4 Campaign Manager: To some extent.

5 Helen Eisner: To what extent?

6 Campaign Manager: To the extent that Marlin gave me the ability to exercise oversight.
7 Ultimately, he's the one running for office.

8 Helen Eisner: Okay.

9 Scott Gast: Would you have oversight over all expenditures made by the campaign?

10 Campaign Manager: Not necessarily.

11 Scott Gast: Who had that authority over spending by the campaign? Disbursements by
12 the campaign?

13 Campaign Manager: I think it would depend on the type of disbursement.

14 Scott Gast: Can you go through that universe of people?

15 Campaign Manager: Sure. Obviously, Marlin was the elected official and candidate so he had
16 the ultimate authority. If it was an expense related to one of our staffers,
17 typically it would go through me.

18 Scott Gast: So, between you and Mr. Stutzman, as the candidate, did anybody else
19 exercise this oversight over campaign spending?

20 Campaign Manager: Chris Marston, our Campaign Treasurer, was also involved. I guess to a
21 minor extent, potentially John Hammond.

22 Scott Gast: Who's Chief of Staff?

23 Campaign Manager: He's Marlin Stutzman's Chief of Staff.

24 Scott Gast: What was his role with respect to the campaign?

25 Campaign Manager: He didn't have a formal role with the campaign.

26 Scott Gast: Was he ... Would you describe him as kind of an informal advisor?

27 Campaign Manager: He was Mr. Stutzman's Chief of Staff.

1 Scott Gast: As far as the campaign?

2 Campaign Manager: I don't think he had a formal role.

3 Scott Gast: Okay.

4 Helen Eisner: What kind of informal role did he play?

5 Campaign Manager: I don't know that he had a role.

6 Helen Eisner: What did he do? Did he participate in any type of campaign activities?

7 Campaign Manager: Any type of campaign activities? I don't know. I don't remember. Maybe?

8 Helen Eisner: Did you ever see him at a campaign event?

9 Campaign Manager: At any campaign event? Not in Indiana. I'm trying to think if there's
10 anything ... He attended a campaign meeting in DC once. I guess he
11 accompanied Marlin to make fundraising phone calls, too.

12 Helen Eisner: Where was that?

13 Campaign Manager: At a townhouse.

14 Helen Eisner: Where was the townhouse?

15 Campaign Manager: DC.

16 Helen Eisner: Okay.

17 Scott Gast: Would you have discussions with Chief of Staff about the campaign?

18 Campaign Manager: About the schedule.

19 Scott Gast: Any other campaign related matters?

20 Campaign Manager: Sure, if ... I mean it was all ... I say all ... It was essentially related to two
21 things. Well, it was all related to scheduling. We would talk about the
22 scheduling of events, whether in DC or in Indiana. Scheduling of
23 fundraisers. We would talk about call time as it relates to the schedule. So
24 yeah.

25 Scott Gast: Was there a second thing? You said that ...

26 Campaign Manager: Well, I meant it ... Ultimately fundraising and schedule.

27 Scott Gast: Okay.

1 Campaign Manager: Or if fundraising events, all as it relates to the schedule.

2 Scott Gast: Okay. I think you had said he had a limited role with respect to oversight
3 over campaign spending.

4 Campaign Manager: Correct.

5 Scott Gast: Can you describe that role?

6 Campaign Manager: I'd say he was more of a go-between between Marlin and the campaign
7 occasionally. It's not that he had a ... He relayed information.

8 Scott Gast: Okay. Then back to this universe of people who had some oversight over
9 campaign spending. Between the candidate, yourself, the Treasurer, Chief
10 of Staff -- is there anybody else who played a role with respect to that
11 oversight of campaign spending?

12 Campaign Manager: I guess it depends on how granular. I mean ... it's kind of an open ended
13 question.

14 Scott Gast: I'm just trying to get a sense of who was involved in decisions and
15 oversight of the disbursements, the expenditures that the campaign made.

16 Campaign Manager: I mean ... Theoretically any number of people were involved in the
17 spending of resources. Right? If you are ... If someone's going and
18 knocking doors, they're involved in ... that's a ... it ... I don't really have ...

19 Scott Gast: On a higher level, though. Not just the people who spend money but the
20 people who are aware of what the campaign is spending money on, who
21 are involved in decisions about how to allocate campaign resources. That's
22 the universe of people that we're trying to identify here.

23 Campaign Manager: I would say then ...

24 Jason Torchinsky: Scott, you've asked him the same question four times. He's told you the
25 people ... I don't ... If you have something specific that you want to ask, if
26 you have someone specific that you want to ask about, ask your question.
27 Don't keep repeating the same question four times and then leave this
28 weird pregnant pause. Just, what are you trying to get at? He's answered
29 your question.

30 Scott Gast: Jason, I don't think he's given a final answer. I've asked him several times,
31 "Who else is involved?" I've gotten answers about who theoretically may
32 be involved. I'm asking who, in reality, was involved.

1 Campaign Manager: I guess ... Is the question about sign-off on expenditures or about
2 budgeting as a whole, because I think they're two very different ...

3 Scott Gast: Let's start with sign-off on expenditures. Who could sign off on
4 expenditures?

5 Campaign Manager: Marlin signed off on almost all expenditures, which I said.

6 Scott Gast: Who signed off on the ones that he did not?

7 Campaign Manager: Me.

8 Scott Gast: Did anybody else sign off on expenditures made by the campaign?

9 Campaign Manager: I would say that there was a period of time where expenditures were made
10 with nobody signing off.

11 Scott Gast: What period of time was that?

12 Campaign Manager: Well, just from time to time. Periodically. Periodically, not period.
13 Periodically there were expenditures made with nobody signing off.

14 Scott Gast: What percentage of expenditures would you estimate were made with no
15 one signing off?

16 Campaign Manager: I have no idea. I can only sign off on things that I know about.

17 Helen Eisner: How did you come to know that there were expenditures that were made
18 with no one signing off?

19 Campaign Manager: I'm assuming.

20 Helen Eisner: Is there a specific example that you're thinking of?

21 Campaign Manager: There are times where expenditures were made where I did not sign off,
22 and can't speculate on who signed off.

23 Helen Eisner: Okay. What type of expenditures were those?

24 Campaign Manager: Variety.

25 Helen Eisner: Okay. Variety? Can you categorize that?

26 Campaign Manager: Campaign related.

1 Helen Eisner: Campaign related expenditures ... There are lots of campaign related
2 expenditures. Many different categories when you look at FEC-types of
3 expenditures.

4 Campaign Manager: Through the course of the campaign, you spend a lot of money on
5 everything from pencils to television buys and everything in between.
6 Right? So, a pencil costs 99 cents, a television buy can be 100,000 dollars,
7 and everything in between. Things gets purchased that I did not sign off
8 on, and I can't speculate as to who signed off.

9 Scott Gast: Who ... Did the campaign have a checkbook?

10 Campaign Manager: Probably. I can speculate. I did not for sure.

11 Scott Gast: Did you have check writing authority?

12 Campaign Manager: If I didn't know there was a checkbook, how would I have check writing
13 authority?

14 Scott Gast: Before we go on, I just want to say, we're trying to gather information
15 here.

16 Campaign Manager: Understood.

17 Scott Gast: I don't think the questions we're asking are that difficult.

18 Campaign Manager: I don't think they are.

19 Scott Gast: I would appreciate it if you would take the time to actually think about
20 what it is we're asking, and instead of giving general answers, try to
21 understand what it is we're trying to find.

22 Campaign Manager: Sure.

23 Scott Gast: Okay.

24 Campaign Manager: I would say that I was there for a limited period of time and a lot of stuff
25 happened before my time, and during my time and after my time that I
26 was unaware of and so I can't speculate.

27 Scott Gast: Let's confine this interview then to matters that happened from May to
28 October of 2015, when you were serving as Campaign Manager.

29 Campaign Manager: Sure.

1 Scott Gast: Am I correct that you were not aware of the campaign having any
2 checkbook?

3 Campaign Manager: Correct.

4 Scott Gast: Did the campaign have credit cards?

5 Campaign Manager: Yes.

6 Scott Gast: Who in the campaign had a credit card?

7 Campaign Manager: I had a credit card, and I don't know who else had a credit card.

8 Scott Gast: Did Mr. Stutzman have a credit card?

9 Campaign Manager: I believe Marlin had a card that he ... there was another campaign card. I
10 don't know if it was in Marlin's name or not and I don't know if there was
11 ... there was another campaign card, I don't know if there was more than
12 one additional campaign card and I don't know if Marlin's campaign card
13 was used by other people. Well, I know a card was used by other people.
14 My point is I don't know what name was on the card.

15 Scott Gast: When you say, "Marlin's credit card was used by other people," does that
16 mean that Marlin had a credit card?

17 Campaign Manager: I don't know ... there was another campaign card, at least one, there could
18 have been two. That card was used for purchases. I don't know if it was a
19 single card used for other purchases, or multiple cards. For example, I
20 don't know if there was a card with Marlin Stutzman's name on it and then
21 another staffer's name on it. I don't know if there was a card with Marlin's
22 name on it and Christy Stutzman's name on it. I don't know if there was a
23 card with Marlin's name on it and John Hammond's on it. I don't know if
24 there was just a card with John Hammond's name on it. I knew there was
25 another campaign card, I never asked whose name was on it. I know that
26 card, or multiple other cards, were used for other purchases.

27 Scott Gast: Did you ever submit a request for reimbursement from the campaign for
28 expenses?

29 Campaign Manager: I'm sure.

30 Scott Gast: How were you ... How did you receive that reimbursement?

1 Campaign Manager: Through ... Well Expensify is what we used. The software, Expensify, was
2 use to submit the reimbursements and then our Campaign Treasurer would
3 do the reimbursements.

4 Scott Gast: How would that be accomplished?

5 Campaign Manager: Could ... I ...

6 Scott Gast: How did you get the money?

7 Campaign Manager: Through our Treasurer.

8 Scott Gast: Was it in the form of a check?

9 Campaign Manager: Oh, I'm sorry.

10 Scott Gast: Was it in the form of a direct deposit?

11 Campaign Manager: Direct deposit.

12 Scott Gast: What about people who did not have a bank account set up through this
13 Expensify software? How did they receive their reimbursements?

14 Campaign Manager: All of the staff had accounts set up through Expensify.

15 Scott Gast: You said you left the position in October of 2015? Is that correct?

16 Campaign Manager: I gave my resignation in the beginning of October and I stayed on through
17 the end of the month.

18 Scott Gast: Why did you leave the position?

19 Campaign Manager: We had a difference of opinion on the strategy of the campaign.

20 Scott Gast: Did that difference of opinion include anything related to campaign
21 spending?

22 Campaign Manager: That ... Yes, we had a difference of opinion over campaign spending.
23 That's not why I left.

24 Scott Gast: What was that difference with regard to the campaign spending?

25 Campaign Manager: It related to how we used campaign resources to pay for travel.

26 Scott Gast: How were campaign resources used to pay for travel that you disagreed
27 with?

1 Campaign Manager: Travel was booked and paid for with the campaign that I felt like should
2 have been covered personally.

3 Scott Gast: What travel are you referring to?

4 Campaign Manager: A trip to California.

5 Scott Gast: Do you recall the date of that trip?

6 Campaign Manager: I don't. I believe it was in August.

7 Scott Gast: Aside from the August trip to California, were there other instances of
8 travel that were paid for by campaign resources that you believe should
9 have been paid for personally?

10 Campaign Manager: Can we step outside real quick?

11 Jason Torchinsky: Yeah.

12 Helen Eisner: We're going to pause the recording.

13 [BREAK]

14 Scott Gast: We're back on the record with Scott Gast, Helen Eisner, Konstantine
15 Kastens, Campaign Manager, and Mr. Torchinsky.

16 Campaign Manager: There's potentially another trip when the family came back to Indiana for
17 an event.

18 Scott Gast: When you say the family came back to Indiana ...

19 Campaign Manager: Christine with her boys.

20 Scott Gast: Were there children involved?

21 Campaign Manager: Yeah, two boys.

22 Scott Gast: Oh, I'm sorry. When you say they came back to Indiana, where were they
23 coming from?

24 Campaign Manager: D.C., Virginia.

25 Scott Gast: Do you recall the date of that travel?

26 Campaign Manager: No.

27 Scott Gast: Do you recall an approximate time frame?

1 Campaign Manager: Around his birthday.

2 Helen Eisner: When is that?

3 Campaign Manager: I don't know.

4 Helen Eisner: Around the Congressman's birthday?

5 Campaign Manager: Yes.

6 Scott Gast: What was the event that they came from D.C. to Indiana for?

7 Campaign Manager: It was a campaign event around his birthday. So it was like a campaign/
8 birthday event.

9 Scott Gast: Where was that held?

10 Campaign Manager: I believe it was in Marion County. That's not correct. It was in the county
11 that Bloomington, the University of IU, is in. I believe. It was Monroe. I'm
12 speculating what the county is. I don't remember the map that well.

13 Scott Gast: Did you attend?

14 Campaign Manager: I did not.

15 Scott Gast: Was it at a person's home? Was it at an event space? A hall?

16 Campaign Manager: It was at a ... It was at the farm ... Ah, what's her name? It was at Mary, his
17 scheduler's family farm.

18 Scott Gast: That's Mary Wells?

19 Campaign Manager: Yes. Her family has a farm in that area.

20 Scott Gast: Was it a fundraiser?

21 Campaign Manager: Sure. They were.... There was a solicitation for campaign donations.

22 Scott Gast: Was it a ticketed event? Did you have to buy a ticket to attend?

23 Campaign Manager: No, you did not have to contribute to attend.

24 Scott Gast: Was there a solicitation made at the event for campaign funds?

25 Campaign Manager: I was not there.

26 Scott Gast: When you say there was a solicitation-

27 Campaign Manager: I believe on the invitation there was a ... I don't know if that's true or not.

1 Scott Gast: Okay.

2 Campaign Manager: I believe that at some point people were asked to give money.

3 Scott Gast: Prior to the event? At the event? After the event?

4 Campaign Manager: Yes. I couldn't tell you the specifics. I don't know what the invitation
5 looked like. I was not there. It's not uncommon ... It would be uncommon
6 for no solicitation during the event.

7 Scott Gast: What was the nature of your concern about the family coming back?

8 Campaign Manager: How the trip was paid for back to the state.

9 Scott Gast: Can you be more specific?

10 Campaign Manager: I did not think the campaign should be paying for the family to fly back to
11 Indiana.

12 Scott Gast: The campaign paid for the, was it, airplane tickets?

13 Campaign Manager: I believe so. I will say that I flagged for Marlin that I did not think that the
14 campaign should pay for the flights. I don't remember the details after that
15 of when and if and how the flights were booked.

16 Scott Gast: Did you discuss your concerns with anyone else?

17 Campaign Manager: Yes.

18 Scott Gast: Who did you discuss that with?

19 Campaign Manager: Probably Brooks Kochvar.

20 Scott Gast: Who is that?

21 Campaign Manager: Our general consultant.

22 Scott Gast: Anyone else?

23 Campaign Manager: Aside from Marlin? Probably John. I probably mentioned something to
24 John.

25 Scott Gast: That's Chief of Staff?

26 Campaign Manager: Correct.

27 Scott Gast: Okay. Just to fully understand this, why did you believe that the campaign
28 should not pay for the family members to come back to Indiana?

1 Campaign Manager: Based on my understanding of FEC rules.

2 Scott Gast: Was this event prior to or after the August trip to California?

3 Campaign Manager: I don't remember when his birthday is, so I think it's after, but ...

4 Helen Eisner: When you say you flagged for Marlin, for the Congressman, this particular
5 event, what was the nature of that conversation? What was the
6 conversation?

7 Campaign Manager: For this one particularly? I don't remember, because I don't remember if I
8 flagged this ... I don't know if this was something I flagged after I found
9 out flights were purchased, before I found out flights were purchased, or
10 during the process.

11 Helen Eisner: When you say flagged, is that a communication? What type of
12 communication is that? Can you explain that to us?

13 Campaign Manager: Yeah, probably a phone call or if I visit with him ... If he was in Indiana, it
14 was probably an in-person conversation. If he was in D.C. it was probably
15 a phone conversation.

16 Helen Eisner: Okay. What was the Congressman's response when you flagged this
17 particular travel issue?

18 Campaign Manager: I don't remember.

19 Helen Eisner: Was anyone else present for that conversation?

20 Campaign Manager: Maybe. John Hammond could have been present. A lot of times if I flag
21 something for Marlin, I would also flag it for John. Then typically if we
22 get a conference call, Brooks is also on the conference call sometimes.

23 Helen Eisner: We were asking a little bit about the potential solicitation and invitations
24 for this event, what campaign funds were generated from the event?

25 Campaign Manager: I don't know the answer to that.

26 Helen Eisner: Okay. Do you know if any donations were generated from the event?

27 Campaign Manager: Not for sure.

28 Jason Torchinsky: If you don't recall –

29 Campaign Manager: Yeah, I don't recall. I have a fundraiser who – finance director, whose job
30 is to...

1 Scott Gast: Who was that at the time?

2 Campaign Manager: Welsey Scott.

3 Scott Gast: Do you recall then, just to close the loop on this, the resolution after you
4 had flagged this for Mr. Stutzman?

5 Campaign Manager: I don't.

6 Scott Gast: Do you know if any action was taken after-

7 Campaign Manager: I don't.

8 Scott Gast: -you flagged that? Did you have any further conversations with Marlin
9 after flagging it?

10 Campaign Manager: Are we talking about-

11 Scott Gast: About this, about your concerns with the family travel expenses for the
12 birthday fundraiser.

13 Campaign Manager: For the birthday fundraiser.

14 Scott Gast: I think we're just going to note for the record that the witness is conferring
15 with counsel.

16 Campaign Manager: I think this was around the time that I was leaving.

17 Scott Gast: Okay, so you don't recall any further conversations with Mr. Stutzman
18 after raising the flag, flagging this worry?

19 Campaign Manager: I don't recall.

20 Scott Gast: Do you recall any conversations with anyone else about this particular
21 issue?

22 Campaign Manager: I think I said that there was the potential that I had conversations with
23 Brooks and John, but I don't ... This was a long time ago.

24 Scott Gast: Okay. I want to move on to talk to you about the California trip in August.
25 What was your level of involvement with that trip?

26 Campaign Manager: Pretty minor. The trip was planned prior to my ... Well, the skeleton of the
27 trip was planned before I joined the campaign.

28 Scott Gast: Who was involved in planning that skeleton?

1 Campaign Manager: Marlin decided that he was taking a trip before I joined the campaign.

2 Scott Gast: Who then helped put that together prior to your joining the campaign?

3 Campaign Manager: I don't know that there was necessarily details, per se. I think that they
4 picked a week and said we want to do a California trip, and that was ... I
5 don't ... I was not on the campaign then.

6 Helen Eisner: Who's the "they" that you're referring to? "They" picked a week? Who's
7 the "they"?

8 Campaign Manager: Marlin and his wife.

9 Scott Gast: Was Chief of Staff involved in the planning of that trip prior to your
10 involvement? Prior to your joining the campaign?

11 Campaign Manager: Yes.

12 Scott Gast: Who else?

13 Campaign Manager: I wouldn't know.

14 Scott Gast: What was your understanding of the primary purpose of the trip?

15 Campaign Manager: This happened before my ... I think the purpose of the trip was determined
16 before I joined the campaign.

17 Scott Gast: What was your understanding of that?

18 Campaign Manager: That it was meant to be a campaign trip.

19 Scott Gast: How did you come to that understanding?

20 Campaign Manager: I believe that I was instructed that he was going to do a California
21 campaign trip.

22 Scott Gast: Who instructed you that?

23 Campaign Manager: Marlin or John.

24 Scott Gast: What was said to you when you were instructed what he was doing on this
25 California trip?

26 Campaign Manager: I think that it, it was just a ... Probably in a conversation about the
27 schedule. He will be in California for a campaign trip on these dates.

28 Scott Gast: Are you aware how this idea for a California trip came up?

1 Campaign Manager: No.

2 Scott Gast: Okay. We have looked through a number of documents related to this trip,
3 emails and other documents. Various items describe the trip in various
4 different ways. You may have read in the newspaper that some things
5 describe it as the “Stutzman family vacation.” Others describe it as a
6 political trip. There's some suggestion that this was part of a tour package
7 organized by a radio host. Were any of those purposes of the trip
8 something that was discussed in your interactions around this trip?

9 Campaign Manager: I'd never heard about the radio host part before. I think that there was
10 conversation about whether the trip was political or family in nature, or a
11 combination.

12 Scott Gast: Who was involved in those conversations?

13 Campaign Manager: Myself, Brooks, John, Marlin.

14 Scott Gast: Is there anyone else you can think of?

15 Campaign Manager: There were other people involved in aspects of the California trip probably
16 without being directly involved in the details of it.

17 Scott Gast: Okay. What about Representative Stutzman’s Spouse (“Spouse”)? Was
18 she involved in those discussions?

19 Campaign Manager: I can't ... I don't remember hearing her and Marlin talk about it. I would
20 assume so.

21 Scott Gast: Were you involved with any discussions in which she was a part?

22 Campaign Manager: I was not.

23 Scott Gast: Okay.

24 Helen Eisner: How often did you interact with Spouse?

25 Campaign Manager: When you say ... When I say I wasn't, let's say I don't recall, because I
26 don't recall. If we're talking specifically about the California trip.
27 It varied from daily to weeks without communication.

28 Helen Eisner: When she did interact with you, what was the form of interaction or
29 communication?

30 Campaign Manager: It varied. Like I was saying. Sometimes she phoned me.

1 Helen Eisner: When it was daily, what was the nature of those communications?

2 Campaign Manager: Typically giving me advice on how to do better at my job.

3 Helen Eisner: This was campaign strategy?

4 Campaign Manager: Sure.

5 Helen Eisner: Did any of those conversations ever involve funding issues or financing
6 issues for the campaign?

7 Campaign Manager: Like did she and I ever talk about fundraising?

8 Helen Eisner: Let me clarify, not fundraising -- spending or budgeting related to the
9 campaign and the campaign's funds.

10 Campaign Manager: What did we talk about? There were cases in which she would have an
11 idea and I would say that I did not think it was a good idea based on the
12 costs associated with it.

13 Scott Gast: These conversations that you had with yourself, Chief of Staff, Mr.
14 Kochvar - if I'm saying that correctly - with Marlin, can you expand upon
15 what was discussed during those conversations?

16 Campaign Manager: I think that once Marlin decided he wanted to do a California trip. Our
17 goal became to make it a useful political trip, in that our goal was to
18 schedule fundraising meetings, fundraisers etc.

19 Scott Gast: When you say that, was the trip intended to be a useful political trip, or
20 was it intended to be something else and you were making it into a useful
21 political trip?

22 Campaign Manager: Marlin made the decision that he wanted to do a political trip to California.

23 Scott Gast: Are you familiar with the itinerary as it was finalized?

24 Campaign Manager: I mean, I've seen it. I did not finalize it, so I don't have it in my head.

25 Scott Gast: To your recollection of the itinerary, what percentage of the time spent in
26 California would you estimate was spent on campaign-related activities?

27 Campaign Manager: I honestly do not remember.

28 Scott Gast: Would you say, half?

29 Campaign Manager: Here's why it's hard for me to speculate - we had folks trying to get
30 meetings up until the last minute and I don't remember whether or not

1 those last meetings happened. I don't remember, there were changes to the
2 schedule. There were a lot of different people involved in working on
3 different aspects of the calendar, or the schedule. I just don't remember
4 what the end result of all of that was.

5 Scott Gast: During these discussions that you had, was there any suggestion of
6 apportioning payment for the trip between campaign funds and personal
7 funds?

8 Campaign Manager: Yes.

9 Scott Gast: And what were those discussions?

10 Campaign Manager: We got to a point where I felt there was not enough political activity to
11 justify this being solely a political trip and so I suggested that if the trip
12 were to go forward, we would need to look at using a combination of both
13 campaign and personal money.

14 Scott Gast: Who did you express this to?

15 Campaign Manager: Brooks, John, and Marlin.

16 Scott Gast: What was the response to your concern that you raised?

17 Campaign Manager: From?

18 Scott Gast: Let's start with Brooks.

19 Campaign Manager: Brooks and I were on the same page.

20 Scott Gast: What about Chief of Staff?

21 Campaign Manager: I don't recall.

22 Scott Gast: What about Mr. Stutzman?

23 Campaign Manager: What was his response. His response was probably to instruct us to get
24 more political activity on the books.

25 Scott Gast: I think it would be useful to walk through the itinerary.

26 Campaign Manager: Sure.

27 Scott Gast: This is copy of the itinerary. I'll give you this as well and refer to both of
28 these. The first document, for the record, is Bates labeled THMS-0394 to -
29 0399: an email from Chief of Staff to Mr. Stutzman, copied to Mr.

1 Stutzman's spouse, Bryan Prisock, Mary Wells, yourself, and Laura Van
2 Hove.

3 Just to get this straight, who is Bryan Prisock?

4 Campaign Manager: He is a staffer for Congressman Stutzman.

5 Scott Gast: Do you know what his title is?

6 Campaign Manager: I don't.

7 Scott Gast: Do you know what his general duties are?

8 Campaign Manager: I don't. I believe he's a field rep.

9 Scott Gast: Okay, and Mary Wells?

10 Campaign Manager: Is the congressman's scheduler.

11 Scott Gast: That's in the congressional office?

12 Campaign Manager: As is Bryan.

13 Scott Gast: As is Bryan. Laura Van Hove, who is she?

14 Campaign Manager: Our national fundraiser.

15 Scott Gast: On the campaign?

16 Campaign Manager: Yes.

17 Scott Gast: Let's walk through this, day-by-day.

18 Campaign Manager: Mm-hmm (affirmative).

19 Scott Gast: The first day he has some interviews and...

20 Campaign Manager: Are we looking at Wednesday?

21 Scott Gast: Yes. I'm sorry. Wednesday August 12th.

22 It looks like that morning he drove to the Detroit airport.

23 Campaign Manager: Mm-hmm (affirmative).

24 Scott Gast: Just kind of an initial question, is the Detroit airport the closest airport to
25 his home?

26 Campaign Manager: I don't know the answer to that.

1 Scott Gast: Would he often use the Detroit airport? Just seems geographically...

2 Campaign Manager: So, I will just tell you air travel into Northern Indiana is not easy.

3 Scott Gast: Okay.

4 Campaign Manager: You have to use a variety of airports.

5 Scott Gast: So that wasn't unusual to use the Detroit airport?

6 Campaign Manager: I mean, I didn't think anything of it.

7 Scott Gast: Okay. Do you know how the Stutzman's got to the airport that day?

8 Campaign Manager: They were ... I don't know for sure.

9 Scott Gast: How do you believe they got to the airport?

10 Campaign Manager: I believe Bryan drove them.

11 Scott Gast: Do you know whether he drove them as an employee or volunteer?

12 Campaign Manager: Bryan received a stipend from the campaign.

13 Scott Gast: For services provided to the campaign?

14 Campaign Manager: Yes. This was set up before my time.

15 Scott Gast: What was the amount of this stipend?

16 Campaign Manager: I don't recall specifically. I believe it was \$500 a month.

17 Scott Gast: Do you recall what vehicle he used to take them to the airport?

18 Campaign Manager: I would be speculating.

19 Scott Gast: Okay.

20 Helen Eisner: Can you go ahead and speculate?

21 Jason Torchinsky: Why are you asking him to speculate, if he doesn't know?

22 Helen Eisner: He said, "I would be speculating." If he has an understanding based on his
23 knowledge, if that's something that you know, based on prior times that
24 you've seen him driven to the airport.

25 Campaign Manager: Probably Marlin's vehicle.

26 Helen Eisner: Okay.

1 Scott Gast: Then it looks like that evening they had a dinner with Hallmark at Madeo's
2 in West Hollywood. Are you familiar with that event?

3 Campaign Manager: I know that it happened. Well, I don't know that it happened. I know that
4 ...

5 Jason Torchinsky: You skipped an event.

6 Scott Gast: The drive to the Luntz home -- is that what you're referring to?

7 Jason Torchinsky: Mm-hmm (affirmative).

8 Scott Gast: Since he drove back to the Luntz after the dinner, I was going to start with
9 the dinner and then ask about the Luntz home.

10 So, the dinner with Hallmark at Madeo's, was that an official, campaign or
11 personal event?

12 Campaign Manager: I don't know the answer to that.

13 Scott Gast: Do you know how it got on the schedule?

14 Campaign Manager: Not specifically.

15 Scott Gast: Do you know generally?

16 Campaign Manager: Not via myself or my campaign staff.

17 Scott Gast: Would that include Laura Van Hove?

18 Campaign Manager: No. I consider her a consultant.

19 Scott Gast: Do you know if she was involved in the dinner?

20 Campaign Manager: I don't.

21 Scott Gast: You don't know?

22 Campaign Manager: I don't know.

23 Scott Gast: Okay. Do you know whether this dinner was a fundraising event?

24 Campaign Manager: I don't.

25 Scott Gast: Do you know if they raised any money from the dinner?

26 Campaign Manager: I don't.

27 Scott Gast: Do you know if anybody from LVH Consulting attended the dinner?

1 Campaign Manager: I don't.

2 Scott Gast: Other than from looking at this schedule, did you have any independent
3 knowledge of who was attending the dinner?

4 Campaign Manager: I was told that they were doing a dinner with Hallmark folks.

5 Scott Gast: Who told you that?

6 Campaign Manager: Marlin or John.

7 Scott Gast: Did they say why?

8 Campaign Manager: Negative.

9 Scott Gast: Did they provide any other information about the dinner with the
10 Hallmark folks?

11 Campaign Manager: Not that I recall.

12 Scott Gast: Do you know who paid for the dinner?

13 Campaign Manager: No idea.

14 Scott Gast: Do you recall whether the campaign was asked to reimburse the cost of
15 the dinner, or used the campaign credit card for the dinner?

16 Campaign Manager: I don't.

17 Scott Gast: Then back to Frank Luntz's home.

18 Campaign Manager: Mm-hmm (affirmative).

19 Scott Gast: Are you aware of the lodging situation that the Stutzmans had when they
20 were in California?

21 Campaign Manager: Vaguely.

22 Scott Gast: What's your understanding of that lodging situation?

23 Campaign Manager: That he stayed at the home of Frank Luntz.

24 Scott Gast: Did he do that through the entire stay?

25 Campaign Manager: I don't believe so.

26 Scott Gast: What did he do for the other part of his stay?

27 Campaign Manager: I believe he stayed in a hotel.

1 Scott Gast: Stayed in a hotel. Okay. Do you know why he stayed at Frank Luntz's
2 home this evening?

3 Campaign Manager: Why he chose to stay there?

4 Scott Gast: Yeah.

5 Campaign Manager: I do not.

6 Scott Gast: Were you involved in any discussions about using Frank Luntz's home?

7 Campaign Manager: I advised against staying at Frank Luntz's home.

8 Scott Gast: Why was that?

9 Campaign Manager: Based on my understanding of the rules.

10 Scott Gast: What was your understanding of the rules that would make it problematic?

11 Campaign Manager: Members of Congress have to be careful when they accept things such as
12 accommodations and Frank has corporate clients that employ lobbyists.

13 Scott Gast: Who did you advise against staying? To whom did you express that?

14 Campaign Manager: We did a conference call.

15 Scott Gast: Who was on that call?

16 Campaign Manager: Brooks, Marlin, and John.

17 Scott Gast: What was their reaction when you raised that concern?

18 Campaign Manager: Brooks and I raised that concern together.

19 Scott Gast: What was Chief of Staff's and Mr. Stutzman's response?

20 Campaign Manager: I don't recall.

21 Scott Gast: But you believe that they did go forward and stay at Mr. Luntz's home?

22 Campaign Manager: I believe so.

23 Scott Gast: Okay.

24 Helen Eisner: If I can?

25 Scott Gast: Sure.

26 Helen Eisner: What is the relationship between Mr. Luntz and the congressman?

1 Campaign Manager: It predates my time. I honestly don't know.

2 Helen Eisner: Have you ever met Mr. Luntz?

3 Campaign Manager: I've been in the same room as Mr. Luntz?

4 Helen Eisner: In what context was that? Where was that?

5 Campaign Manager: I was a chief on the Hill, and so he would routinely come and give
6 presentations or briefings.

7 Helen Eisner: Have you ever been in Mr. Luntz's presence when the congressman was
8 there?

9 Campaign Manager: I don't believe so.

10 Helen Eisner: So their relationship, you said, predated your time. Do you have an
11 understanding of the nature of the relationship during the time period that
12 you were involved in the campaign?

13 Campaign Manager: Negative.

14 Helen Eisner: So you don't?

15 Campaign Manager: Correct.

16 Helen Eisner: This decision to stay at Mr. Luntz's house. How did that come about? How
17 did the idea of staying at that house come about?

18 Campaign Manager: I don't know.

19 Helen Eisner: What conversations did schedulers have reaching out to Mr. Luntz related
20 to this trip?

21 Campaign Manager: I don't believe I was on any correspondence with Mr. Luntz at all.

22 Helen Eisner: Do you know if there was an invitation to the congressman from Mr.
23 Luntz to stay at his home?

24 Campaign Manager: No.

25 Helen Eisner: Or a request from the congressman?

26 Campaign Manager: No.

27 Helen Eisner: You don't know.

28 Campaign Manager: No.

1 Helen Eisner: Okay.

2 Campaign Manager: That did not go through the campaign.

3 Scott Gast: All right, let's move on to Thursday, August 13th on the schedule. Starting
4 at 9 AM, the first entry here is CS, who I believe is Spouse. Is that your
5 understanding?

6 Campaign Manager: Yes.

7 Scott Gast: And boys travel to Universal Studios.

8 Campaign Manager: Mm-hmm (affirmative).

9 Scott Gast: Are you familiar with that part of the schedule?

10 Campaign Manager: Just based on reading it on the schedule.

11 Scott Gast: Were you aware that they were going go to Universal Studios?

12 Campaign Manager: I probably read it on the calendar at the time.

13 Scott Gast: Was this purely a personal thing? Did it have some relation to the
14 campaign?

15 Campaign Manager: I would assume it's personal.

16 Scott Gast: Now it says on here that the Abbotts, and the Stutzmans, and the Krevoys
17 meet at the front gate. It looks like the Abbotts and the Krevoys were
18 affiliated with Hallmark based on their attendance at the dinner the night
19 before. In fact, I can tell you, Bill Abbott was, at the time, I don't know if
20 he currently is, the CEO of the Hallmark Channel. Which is Universal ...

21 Campaign Manager: That sounds familiar.

22 Scott Gast: And the Krevoys, Mr. Krevoy was a producer of one of the shows on the
23 Hallmark Channel.

24 Campaign Manager: That sounds familiar.

25 Scott Gast: In hearing that, does that refresh your recollection about the dinner the
26 night before at all?

27 Campaign Manager: No.

28 Scott Gast: Its purpose or ...

1 Campaign Manager: Now that you say that, I know that I was told that those positions were
2 there. I did not know who those individuals were.

3 Scott Gast: Does that refresh your recollection about why this dinner was scheduled?

4 Campaign Manager: Not necessarily. I don't ... I don't remember.

5 Scott Gast: Okay. Do you have an understanding of why the Stutzmans were meeting
6 the CEO of the Hallmark Channel and a producer for the Hallmark
7 Channel at Universal Studios that next morning?

8 Campaign Manager: I don't.

9 Scott Gast: Okay. It looks like they spent most of the day there until travelling back to
10 Mr. Luntz's home.

11 Campaign Manager: Yeah. They went back to Frank Luntz's home. Yep.

12 Scott Gast: And then you'll see where it says "MS Schedule"?

13 Campaign Manager: Mm-hmm (affirmative).

14 Scott Gast: Switch to his side of the day.

15 Campaign Manager: Mm-hmm (affirmative).

16 Scott Gast: It looks like he left to pick up National Fundraising Consultant Employee
17 ("FR Consultant") of LVH Consulting.

18 Campaign Manager: Yep.

19 Scott Gast: Who is your national fundraiser on the campaign. Is that correct?

20 Campaign Manager: Laura Van Hove is our national fundraiser. She employs a number of more
21 junior people.

22 Scott Gast: Of which FR Consultant is one?

23 Campaign Manager: Yes.

24 Scott Gast: Okay. Are you familiar with the meetings scheduled that day for Mr.
25 Stutzman with Joe Crail and then a lunch with Brad Jones?

26 Campaign Manager: Just based off it being on the schedule.

27 Scott Gast: Did you have any discussions with Mr. Stutzman about those meetings?

28 Campaign Manager: No.

1 Scott Gast: With Chief of Staff?

2 Campaign Manager: I don't know that I necessarily would have discussed any of it. If these
3 were set up by Laura Van Hove, Laura had the ability to, within the
4 parameters of his availability, schedule meetings and she didn't have to
5 consult me on scheduling those meetings.

6 Scott Gast: So that would have been something that Laura would have worked
7 directly with Mr. Stutzman?

8 Campaign Manager: In communicating the fact that the meetings were scheduled, she would
9 have probably sent an email to either John Hammond; John Hammond and
10 myself; John and Marlin; John, Marlin and myself to say, hey this meeting
11 has been scheduled.

12 Scott Gast: And other than seeing these on the calendar, do you have any other
13 information about these meetings?

14 Campaign Manager: No.

15 Scott Gast: Do you know why they were scheduled?

16 Campaign Manager: Were they scheduled by Laura Van Hove?

17 Scott Gast: Appears to be. I mean certainly FR Consultant of LVH Consulting
18 attended. But you didn't have any independent discussions with anybody
19 about what was hoped to be accomplished during the meetings or things of
20 that nature?

21 Campaign Manager: Laura would schedule meetings with the purpose of fundraising.

22 Scott Gast: Okay. Then it looks like after those two meetings, after the lunch, Mr.
23 Stutzman returned to Frank Luntz's home.

24 Campaign Manager: Where are you seeing this?

25 Scott Gast: The very bottom of that page.

26 Campaign Manager: Oh, yep.

27 Scott Gast: If you flip to the next page, evening, dinner is open. Are you aware of
28 what the Stutzman's did for dinner that evening?

29 Campaign Manager: I'm not.

30 Scott Gast: Do you know who paid for dinner?

1 Campaign Manager: That I don't.

2 Scott Gast: Do you recall if the campaign was asked to pay for dinner?

3 Campaign Manager: I don't.

4 Scott Gast: Is it your understanding that they also spent the night at Mr. Luntz's home
5 that evening?

6 Campaign Manager: That's what the schedule says.

7 Scott Gast: You don't have any independent knowledge of where ...

8 Campaign Manager: I don't.

9 Scott Gast: Moving then to Friday, August 14th, that schedule begins with Spouse and
10 the boys having an open day.

11 Campaign Manager: Oh, yes, right here. Yes, I see that.

12 Scott Gast: Do you know what they did that day?

13 Campaign Manager: I don't.

14 Scott Gast: Then you go on to MAS Schedule, Mr. Stutzman's schedule. It looks like
15 again, he picked up FR Consultant.

16 Campaign Manager: Mm-hmm (affirmative).

17 Scott Gast: Then had scheduled a meeting with former governor Pete Wilson and Mr.
18 Dale Dykema.

19 Campaign Manager: Okay, yep.

20 Scott Gast: Other than seeing these on the schedule here, do you have any knowledge
21 of what these meetings were for? What they entailed?

22 Campaign Manager: Yeah, I mean Laura's job was to schedule meetings for fundraising
23 purposes.

24 Scott Gast: Were you told ahead of time for all of the fundraising meetings in the last
25 two days that Mr. Stutzman attended? Did you get any briefing ahead of
26 time at what was hoped to be accomplished, what he was doing?

27 Campaign Manager: I don't recall.

1 Scott Gast: Did you get any briefing afterwards? How the meetings went? Were they
2 able to secure any contributions or commitments?

3 Campaign Manager: I'm sure I asked the question of Laura. I don't remember what she said.

4 Helen Eisner: You had raised some concerns previously about potentially there not being
5 enough political activity scheduled as a part of this trip.

6 Campaign Manager: Mm-hmm (affirmative).

7 Helen Eisner: These activities that we're talking about, some of the fundraising meetings
8 that might have been scheduled independently of you. Do you know if
9 they had been scheduled when you raised those concerns previously?

10 Campaign Manager: No, but there were meetings that... the calendar is an evolving document
11 and so there could have been a different meeting in its place, so I can't tell
12 you if there were more or less meetings on the calendar when I made that
13 statement.

14 Helen Eisner: Okay.

15 Scott Gast: The schedule then indicates, at the bottom of that page, that Mr. Stutzman
16 was to drive to the Hilton Garden Inn in El Segundo, California and
17 overnight there. Do you know what the Stutzman's actually did for lodging
18 that evening?

19 Campaign Manager: I assume they stayed at the Hilton Garden Inn.

20 Scott Gast: Do you know who paid for the hotel stay?

21 Campaign Manager: I remember there being a conversation about him paying for it personally
22 but I don't know how he ultimately ended up paying for it.

23 Scott Gast: Do you know whether the campaign paid for the hotel?

24 Campaign Manager: I just answered ...

25 Scott Gast: You said you didn't know whether he paid for it personally.

26 Campaign Manager: Correct.

27 Scott Gast: Do you know whether the campaign paid for it?

28 Campaign Manager: Oh, no. Because I don't know which one.

29 Scott Gast: You don't know who paid for it?

1 Campaign Manager: Yeah, yeah, yeah.

2 Scott Gast: Okay.

3 Campaign Manager: But I know there was a conversation had.

4 Scott Gast: You don't know the resolution of that issue, who pays for the hotel?

5 Campaign Manager: Correct, because I said, hey, based on this, here's my recommendation, but
6 he's in California. I'm in Indiana. I don't know what actually happens.

7 Scott Gast: Okay.

8 Helen Eisner: That was based on what? "Here's my recommendation."

9 Campaign Manager: Based on my understanding of FEC rules and conversations that I had with
10 other folks.

11 Helen Eisner: Okay. The conversations were about FEC rules?

12 Campaign Manager: Sure.

13 Helen Eisner: If you could speak to some of the details that were concerning to you.
14 Conversations you had about FEC rules, your understanding of how
15 payment should be made. What was it that formed your understanding of
16 how payment should be made?

17 Campaign Manager: A combination of discussing with other political folks and expertise of
18 having been involved in multiple campaigns.

19 Helen Eisner: Okay. About this particular trip, you had those conversations, you have
20 this expertise based on ...

21 Campaign Manager: I'm not saying I'm an expert.

22 Helen Eisner: Sure. Based on the conversations you had, some knowledge you had from
23 working other campaigns, what was it about this trip that motivated you to
24 have those conversations and recommend that this particular hotel stay or
25 other hotel stays during the trip be placed on a personal card.

26 Campaign Manager: Based on, was there, so it's a Friday, so was there a political purpose for
27 him being and using campaign money for a Saturday and Sunday night,
28 based on then also what was going to be happening the following week.

29 Helen Eisner: Okay.

1 Scott Gast: Given that, let me just go back through what we talked about so far. Do
2 you understand there to have been a political purpose for the dinner with
3 the Hallmark folks?

4 Campaign Manager: I don't know.

5 Scott Gast: You don't know?

6 Campaign Manager: No.

7 Scott Gast: Do you understand there to have been a political purpose for the
8 fundraising meetings that Mr. Stutzman had Thursday and Friday?

9 Campaign Manager: Yes, there is a political purpose to fundraising meetings.

10 Scott Gast: Okay. On the Pete Wilson meeting, do you know whether that meeting
11 actually occurred? There are some suggestions that it may have been
12 canceled?

13 Campaign Manager: I don't know.

14 Scott Gast: You don't know. Okay. Again, on Friday, August 14th, the very last entry
15 on that page dinner is once again open. Do you have ...

16 Campaign Manager: Where at?

17 Scott Gast: The bottom of page ...

18 Helen Eisner: It's THMS-0397.

19 Scott Gast: Do you know what the Stutzmans did for dinner that evening?

20 Campaign Manager: I don't.

21 Scott Gast: Do you know who paid for the dinner?

22 Campaign Manager: I don't.

23 Scott Gast: Okay. Moving forward to Saturday, August 15th. Scheduled for that day
24 in the morning was a tour of Capitol Records. Are you familiar with that
25 event?

26 Campaign Manager: No.

27 Scott Gast: Was that a political event?

28 Campaign Manager: I don't know.

1 Scott Gast: Was it a personal event?

2 Campaign Manager: I don't know.

3 Scott Gast: Do you know what the purpose of the tour was?

4 Campaign Manager: I do not.

5 Scott Gast: Did you have any discussions with anyone prior to the trip about a tour of
6 Capitol Records?

7 Campaign Manager: No. Actually I don't even remember seeing this so I don't.

8 Scott Gast: Okay. You don't know who attended the tour?

9 Campaign Manager: Mm-hmm (negative).

10 Scott Gast: Okay. At twelve thirty that day, scheduled is lunch with Michael Landon,
11 Jr. and colleagues at Vine Street near Capitol Records. Are you familiar
12 with that?

13 Campaign Manager: I am not.

14 Scott Gast: Do you know whether that was a personal or a campaign, political event?

15 Campaign Manager: I do not.

16 Scott Gast: Did you have any discussions with anybody prior to the trip about a lunch
17 with Michael Landon, Jr. and colleagues?

18 Campaign Manager: Not to my recollection.

19 Scott Gast: Okay. Any idea who attended?

20 Campaign Manager: No.

21 Scott Gast: Paid for the lunch?

22 Campaign Manager: No.

23 Scott Gast: Okay. Later that night, seven thirty PM, it's dinner at the Promenade Café
24 on the Queen Mary. Were you familiar with that dinner?

25 Campaign Manager: Vaguely.

26 Scott Gast: Do you know whether that was a personal dinner? Whether that was a
27 political dinner?

1 Campaign Manager: I believe that I deemed it to be a personal dinner.

2 Scott Gast: What was the basis for you deeming it a political ... Excuse me, a personal
3 dinner?

4 Campaign Manager: Just my understanding of the nature of the dinner.

5 Scott Gast: What was that understanding?

6 Campaign Manager: That it was not political.

7 Scott Gast: Did you have an understanding what he was going to do there? Why he
8 was doing that?

9 Campaign Manager: I mean, I deemed this, in my opinion, this was a personal expense, after
10 the trip. I did not have any input on this dinner prior or during the trip. I
11 received an email with an invoice for this trip either weeks or several
12 weeks after the trip. I said the campaign should not pay for this with
13 campaign money and I enlisted Chris Marston's guidance. He concurred
14 and we told Marlin to pay for this personally.

15 Scott Gast: I want to talk to you about that email. I have a copy of it to look at. But it
16 also included the tour of the Reagan Library the next day so I can just ...

17 Campaign Manager: Sure.

18 Scott Gast: Just go through the rest of the schedule and then come back to that. Were
19 you aware that this dinner on the Queen Mary was an event, part of the
20 tour put together by Pat Miller, the radio talk show host?

21 Campaign Manager: I don't think I knew that at the time. I may have heard that after. I was told
22 Pat Miller was there. I believe Pat Miller was there. I believe that I knew
23 that there was a group activity.

24 Scott Gast: Do you know whether Representative Stutzman had a formal role at the
25 dinner?

26 Campaign Manager: I don't.

27 Helen Eisner: Do you know who attended the dinner?

28 Campaign Manager: No. Not off the top of my head.

29 Scott Gast: Are you familiar with where the Stutzmans stayed that evening?

30 Campaign Manager: No.

1 Scott Gast: Okay. The next day on the schedule, Sunday, August 16th, a tour of the
2 Reagan Library with Pat Miller's group, lunch under the wing of Air Force
3 One. Are you familiar with that event on the schedule?

4 Campaign Manager: Vaguely.

5 Scott Gast: What was your understanding of the purpose of that tour?

6 Campaign Manager: My understanding or my understanding of Marlin's understandings?

7 Scott Gast: Well let's start with your understanding.

8 Campaign Manager: I assumed it was a personal.

9 Scott Gast: What was your understanding of Marlin's understanding?

10 Campaign Manager: Confused.

11 Scott Gast: That Mr. Stutzman was confused?

12 Campaign Manager: I was confused as to his understanding.

13 Scott Gast: Can you talk a little bit more about that? What raised that confusion?

14 Campaign Manager: Different opinions on the interpretation of political versus personal.

15 Scott Gast: What was Mr. Stutzman's interpretation?

16 Campaign Manager: I don't know specifically what his interpretation was. I just think- I can't
17 speculate.

18 Scott Gast: Did he express to you that he believed this to have a political purpose?

19 Campaign Manager: Possibly.

20 Scott Gast: Do you recall whether he did or not?

21 Campaign Manager: I believe he may have.

22 Scott Gast: Was that the source of the confusion?

23 Campaign Manager: Can you just elaborate with that?

24 Scott Gast: Was the differing interpretation that you believed this to be personal, and
25 that he believed this to be something other than personal? Was that the
26 source of the confusion that you referenced?

1 Campaign Manager: I think that the definition and the distinction between personal and
2 political can be very difficult to interpret sometimes, and I think that led to
3 it. I think it's very easy for different people to have different opinions.

4 Scott Gast: Sure. Did he express to you his rationale as to why he thought this was
5 political, if that's what he expressed?

6 Campaign Manager: I don't recall.

7 Scott Gast: Okay.

8 Helen Eisner: Who else was present for that conversation?

9 Campaign Manager: I don't recall.

10 Helen Eisner: When did it take place?

11 Campaign Manager: When did this conversation take place?

12 Scott Gast: It may be helpful to look at this email, and see if that refreshes any
13 recollection. I want to take a minute to go through this. For the record, this
14 is Bates label THMS-0441 to -0443.

15 Campaign Manager: This is what I was referencing earlier.

16 Scott Gast: Right.

17 Campaign Manager: Yes.

18 Scott Gast: So it looks like it starts at the top and works its way down.

19 Campaign Manager: Sure.

20 Scott Gast: That Chief of Staff sent to Chris Marston, with a copy to you-

21 Campaign Manager: Mm-hmm (affirmative).

22 Scott Gast: -an invoice. He writes, "Chris, Marlin asked me to ask if the campaign
23 could reimburse this invoice. This was a boat dinner he enjoyed with
24 fellow Hoosiers while he was in California, on a political trip. Please
25 advise, thank you."

26 Then it looks like you respond, just to Chief of Staff, "How is this at all a
27 campaign expense? Taking the family to the Reagan library." To which
28 Chief of Staff responds, "He had me ask, I didn't know anything about it
29 until I received the invoice in the mail. If Chris says we cannot do it, he

1 will pay. If we can pay it, we should pay after this month anyway. Just the
2 messenger."

3 To which you reply, "My anger is not directed at you. This is ridiculous
4 though." Chief of Staff says, "We have a spending and revenue problem."
5 Then you say, "Still need the money from the flight for the boys."

6 Campaign Manager: Mm-hmm (affirmative).

7 Scott Gast: It's at that point that it looks like Mr. Marston jumps in with an opinion on
8 whether that constitutes personal use or not.

9 Campaign Manager: Mm-hmm (affirmative).

10 Scott Gast: Do you recall this email exchange?

11 Campaign Manager: Yes.

12 Scott Gast: Was this the first time you heard -- this email from Chief of Staff to Chris
13 and you, -- was the first time you heard about a request to have the
14 campaign pay for these expenses?

15 Campaign Manager: This is the first time that I knew definitively that he wanted the campaign
16 to pay for those expenses, yes.

17 Scott Gast: What did you know prior to that?

18 Campaign Manager: I believe it was a question about whether or not the campaign could pay
19 for those.

20 Scott Gast: Did that come from Mr. Stutzman directly to you?

21 Campaign Manager: I don't remember.

22 Scott Gast: Did it come from Chief of Staff?

23 Campaign Manager: Possibly.

24 Scott Gast: Okay. Do you recall those initial conversations prior to the email? What
25 your reaction, what your response was?

26 Campaign Manager: I would just kind of reference the initial email. There were Hoosiers on the
27 trip. You can define whether or not that makes it political activity.

28 Scott Gast: Then your response seems to take the position that it is not. Is that fair to
29 say?

1 Campaign Manager: That is fair to say.

2 Scott Gast: Okay. Does this refresh your recollection at all about a conversation with
3 Mr. Stutzman about this expense?

4 Jason Torchinsky: Can we just get on record, the dates of the emails you're asking him about
5 now are from September 16, 2015? And the schedule that you're asking
6 him about is a document from an email dated August 11th, 2015.

7 Scott Gast: Yes.

8 Jason Torchinsky: So we're talking about documents with a 40-day gap.

9 Scott Gast: Yes.

10 Campaign Manager: No. If this came from John, then I probably- it includes the entire
11 conversation.

12 Scott Gast: Do you recall having conversations outside of this exchange with Mr.
13 Stutzman?

14 Campaign Manager: Not with Mr. Stutzman.

15 Scott Gast: With Chief of Staff?

16 Campaign Manager: Possibly.

17 Scott Gast: Do you recall what the gist of that conversation would have been?

18 Campaign Manager: That we can't pay for this with campaign dollars.

19 Scott Gast: What was Chief of Staff 's response?

20 Campaign Manager: I think he kind of sums it up on the bottom of the first page. "If Chris says
21 we can pay it, pay it. If Chris says we can't, let's not."

22 Scott Gast: Obviously, Chris then came back and said, "Can't pay it." Is that correct?

23 Campaign Manager: Correct.

24 Scott Gast: How was this question of who would pay ultimately resolved?

25 Campaign Manager: I had a conversation with Chris, I assumed that this was then
26 communicated to Marlin.

27 Scott Gast: Do you know if he ultimately paid for this with personal funds?

28 Campaign Manager: No.

1 Scott Gast: You don't know? Or he did not?

2 Campaign Manager: You can reference the last page, that shows Marlin was forwarded this
3 email by John Hammond.

4 Scott Gast: Okay, and when you said no- I'm just trying to make sure I understand-
5 no, you don't know whether Mr. Stutzman paid, or no, he did not pay
6 personally?

7 Campaign Manager: I don't know.

8 Helen Eisner: Besides this email chain conversation, did you have any other
9 conversations with Mr. Marston?

10 Campaign Manager: Yes.

11 Helen Eisner: What were those conversations?

12 Campaign Manager: About the legality?

13 Helen Eisner: About this trip and any type of legality.

14 Campaign Manager: Yeah, my question related to the passage that he cited. I said "Please,
15 please send it in the exact language that we discussed, so that that can be
16 related to Marlin. It's easier for him to read the language himself, than
17 have to rely on my words."

18 Helen Eisner: Okay. Besides following up on this particular email chain, and making
19 sure that the explanation was in place, clarified for the congressman, what
20 other conversations did you have with Mr. Marston?

21 Campaign Manager: About this?

22 Helen Eisner: About this trip, or about the regulations and the personal use issues that
23 we've been discussing.

24 Campaign Manager: Chris Marston was my FEC compliance guy, so I talked to him fairly
25 regularly.

26 Helen Eisner: But specifically, about the trip, or about these regulations?

27 Campaign Manager: I don't recall the conversations that we had.

28 Helen Eisner: Did you have other conversations with him about this topic?

29 Campaign Manager: About this topic?

1 Helen Eisner: Yes, this topic.

2 Campaign Manager: Probably not.

3 Helen Eisner: Probably not.

4 Campaign Manager: I feel like it's summed up pretty tightly in this email exchange.

5 Helen Eisner: Beyond the California trip, any other conversations with him about
6 personal use issues?

7 Campaign Manager: Sure.

8 Helen Eisner: Okay, and when would those conversations have occurred?

9 Campaign Manager: I like to be safe, not sorry, so anytime I had a question, he was a phone
10 call away.

11 Helen Eisner: Okay. Any other conversations or questions that raised this level of
12 concern, that you would have forwarded an explanation or provided an
13 explanation to the Congressman?

14 Campaign Manager: I don't recall. I don't ... I don't recall.

15 Scott Gast: Do you recall any instances where you had conversations with Mr.
16 Marston, Chief of Staff, that rose to this level, of a request that came in
17 that you believed to be inappropriate, and pushed back a little?

18 Campaign Manager: I think it's fairly common for the question to be asked, "Is this
19 permissible?" And I would try to find out the answer, and then make a
20 recommendation based on that answer.

21 Scott Gast: Were there any instances in which the campaign paid for an expense that
22 you believed to have been inappropriate?

23 Campaign Manager: Yes.

24 Scott Gast: What are those instances?

25 Campaign Manager: Related to the conversation that we've been having.

26 Scott Gast: Related to this California trip?

27 Campaign Manager: Correct.

1 Scott Gast: Aside from the California trip, were there instances where the campaign
2 made an expenditure that you believed to have been for an inappropriate
3 reason?

4 Campaign Manager: Possibly the trip for the birthday event. I'd also note that there are cases in
5 which I can flag a possible problem with the expenditure without having
6 the knowledge of how that is resolved.

7 Scott Gast: Sure. Aside from those two instances though, are you aware of any others?

8 Campaign Manager: No. I don't believe so.

9 Scott Gast: Okay, I'm going to ask you about a couple of other lines in this chain.

10 Jason Torchinsky: We've been going for about an hour and a half now, I'd like to take a
11 break.

12 Scott Gast: We don't have much more. Maybe another half hour.

13 Jason Torchinsky: Can we take a break?

14 Scott Gast: Sure.

15 Jason Torchinsky: All right, let's take a break.

16 Scott Gast: If I could just ask these two questions, about these two lines, then we'll be
17 done with this document. Then we would like to stop.

18 Chief of Staff said you "have a spending and a revenue problem" in this
19 chain. What was your understanding about what he meant when he said
20 "We have a spending problem"?

21 Campaign Manager: I thought it was just an off-handed remark about expenditures versus
22 outflow versus inflow.

23 Scott Gast: Was it your understanding that he had any inappropriate spending in
24 mind?

25 Campaign Manager: I don't think so.

26 Scott Gast: It was more kind of the levels coming in, versus the levels going out?

27 Campaign Manager: Fundraising is always a concern.

28 Scott Gast: Okay. Then where you say that you still need the money from the flight
29 for the boys, what did you mean by that?

1 Campaign Manager: Marlin had agreed to reimburse the campaign for the two boys' flights for
2 the California trip.

3 Scott Gast: This was back in September of 2015?

4 Campaign Manager: Is that the date on the email?

5 Scott Gast: Yes, September 16th, 2015.

6 Campaign Manager: So that means he would have agreed to it before that, if I used the term "I
7 still need them."

8 Scott Gast: Did he agree to reimburse any other expenses at this time?

9 Campaign Manager: I believe at the time that was- I don't remember. I remember, obviously,
10 this was about the flight for the California trip.

11 Scott Gast: Did he reimburse, or decide to reimburse his wife's airfare?

12 Campaign Manager: I don't believe so.

13 Scott Gast: Okay, hotel or transportation or meal expenses?

14 Campaign Manager: I don't know how all those were paid for, to be honest.

15 Scott Gast: Okay. That's a good point to stop and take a break.

16 Campaign Manager: Okay.

17 [BREAK]

18 Campaign Manager: One thing I just want to clarify-

19 Scott Gast: Sure, let me just say for the record: Scott Gast, Helen Eisner, Konstantine
20 Kastens, with Campaign Manager and Mr. Torchinsky. You have
21 something for the-

22 Campaign Manager: You asked about any other campaign expenses I potentially questioned.
23 Prior to my time with the campaign, Marlin or the campaign purchased a
24 vehicle, and I had questions about that, and so Brooks and I advised that
25 the campaign no longer have a vehicle, so Marlin agreed to sell the
26 vehicle.

27 Scott Gast: Why did you come to that recommendation to have Mr. Stutzman sell the
28 vehicle?

29 Campaign Manager: The politics.

1 Scott Gast: Can you expand on that a little, what the politics problem was?

2 Campaign Manager: Yeah, I think that ... I mean I think the optics of a campaign having the
3 type of vehicle that he had was a questionable one. I just ... Again, it was
4 all before my time so I honestly know very few details of it. We had a
5 conversation. He agreed to get rid of the campaign vehicle.

6 Scott Gast: What type of vehicle was it?

7 Campaign Manager: An SUV.

8 Scott Gast: Do you know what brand?

9 Campaign Manager: It was ... I don't know for sure. I believe it was a ... It was American made.
10 I don't remember specifically.

11 Helen Eisner: Was it an SUV or-

12 Campaign Manager: Correct.

13 Helen Eisner: It was an SUV.

14 Campaign Manager: Correct.

15 Scott Gast: When you say that the optics of the campaign owning the type of vehicle,
16 was it a high-end SUV?

17 Campaign Manager: I mean, it was a ... Yeah, it was a big SUV.

18 Scott Gast: Okay.

19 Campaign Manager: The likeness of a Yukon or something around there.

20 Scott Gast: Okay.

21 Campaign Manager: Type of vehicle.

22 Scott Gast: As part of your concern, in making the recommendation to sell it, was
23 there any concern over the use of the vehicle?

24 Campaign Manager: Potentially. It was more a concern about the potential.

25 Scott Gast: Potential for inappropriate use?

26 Campaign Manager: Mm-hmm (affirmative).

27 Scott Gast: What did you see as possible inappropriate use of this?

1 Campaign Manager: I just think there's ... I think it's just easy to get in trouble with having a
2 vehicle under the campaign and then dictate how that vehicle was used
3 and then ... I just think it's easier for the campaign to not have the
4 headache of having a campaign vehicle.

5 Scott Gast: Were you aware of any instances of use that you believed to be improper?

6 Campaign Manager: No.

7 Scott Gast: Okay.

8 Helen Eisner: How was the vehicle used?

9 Campaign Manager: I don't know. They had it before my time.

10 Helen Eisner: When was it purchased?

11 Campaign Manager: I don't know.

12 Helen Eisner: Was it still owned by the campaign when you started in 2015?

13 Campaign Manager: Yes. Yes.

14 Helen Eisner: When was it sold?

15 Campaign Manager: Shortly after I joined the campaign.

16 Helen Eisner: Okay, so mid-2015? Approximately?

17 Campaign Manager: I guess it depends on how you define "mid", but shortly after I joined.

18 Helen Eisner: Shortly after you joined. Okay.

19 Scott Gast: I just want to go back to the schedule and wrap up the last day. Before we
20 leave Sunday, August 16th, the last item, again, is an open dinner.

21 Campaign Manager: Where are we at? Page -6040?

22 Scott Gast: -0398.

23 Campaign Manager: -0398. Roger.

24 Scott Gast: The last item on Sunday, August 16th, is an open dinner.

25 Campaign Manager: Yep.

26 Scott Gast: Any idea of what the Stutzmans did for dinner that day?

27 Campaign Manager: Nope.

1 Scott Gast: Do you know if the campaign paid for any dinner?

2 Campaign Manager: I do not.

3 Scott Gast: Okay. Then the final day of the trip was Monday, August 17th.

4 Campaign Manager: Mm-hmm (affirmative).

5 Scott Gast: That day was, according to the schedule, taken up by an afternoon tour of
6 the Reagan Ranch.

7 Campaign Manager: Mm-hmm (affirmative).

8 Scott Gast: Was that an official, a campaign, a personal event?

9 Campaign Manager: I believe it to be a personal event, I believe.

10 Scott Gast: Was there any political aspect to it of which you are aware?

11 Campaign Manager: Based on the itinerary, I believe that there were fellow Hoosiers on the
12 trip, or based on the email.

13 Scott Gast: How would that make that a political trip?

14 Campaign Manager: I guess they're voters.

15 Scott Gast: Okay. Are you aware of any expenses associated with the tour?

16 Campaign Manager: I believe the expenses are related to the dinner, right?

17 Scott Gast: The email that we looked at, that was for the Reagan Library tour and that
18 dinner.

19 Campaign Manager: Oh, this is for both?

20 Scott Gast: Yes.

21 Campaign Manager: Okay.

22 Scott Gast: This is the Reagan Ranch.

23 Campaign Manager: Oh, got you.

24 Scott Gast: Third entity.

25 Campaign Manager: Third entity, okay.

26 Scott Gast: Does that change your answers for anything so far?

1 Campaign Manager: It just means I don't remember the difference between the two.

2 Scott Gast: Okay. But as far as you know, the tour of the Reagan Ranch, as opposed to
3 the Library, had ... You believe that to be a personal event?

4 Campaign Manager: I guess I'm speculating since I thought they were one and the same.

5 Scott Gast: Okay. Do you know whether ... Did you have any political purpose to it?

6 Campaign Manager: I did not.

7 Scott Gast: The Reagan Ranch, as campaign manager?

8 Campaign Manager: No.

9 Scott Gast: Okay.

10 Helen Eisner: Do you know who attended that event at the Reagan Ranch? Who from
11 the campaign would have attended?

12 Campaign Manager: I didn't have any campaign staff on the California trip.

13 Helen Eisner: On any of the California trip?

14 Campaign Manager: My campaign staff.

15 Helen Eisner: Your campaign staff. What about with the Congressman, who would have
16 been with the Congressman?

17 Campaign Manager: I mean I think it's obvious from the email that Laura Van Hove had a
18 representative out there for meetings that she set up. Aside from that, he
19 would have been unstaffed.

20 Helen Eisner: What about Congressional staff? Were there any Congressional staffers?

21 Campaign Manager: I don't believe so.

22 Helen Eisner: Okay.

23 Scott Gast: Having gone through the schedule for the trip, are there any events or
24 activities that you're aware of that aren't reflected on this?

25 Campaign Manager: Not that I'm aware of.

26 Scott Gast: Okay. To summarize the events that we've gone over, it is your
27 understanding, based on your understanding of events, that it was just the
28 four, potentially four, fundraising meetings that Mr. Stutzman had on the

1 Thursday, August 13th, Friday, August 14th, those are the only meetings
2 that you are aware of with kind of with a political aspect to them, a
3 campaign aspect to them.

4 Campaign Manager: I vaguely remember another fundraiser at some point, but it might have
5 gotten cancelled.

6 Scott Gast: Okay. What's your recollection of that?

7 Campaign Manager: That there was one, I thought. Or ...

8 Scott Gast: Could that have been this Hallmark or Michael Landon events that we've
9 talked about?

10 Campaign Manager: No ... Like I said, the schedule changes a lot, but I thought that there was
11 one other, but again, it could have gotten cancelled.

12 Scott Gast: Aside from that event that may or may not have taken place, was that a
13 correct characterization, that those four events were the only ones that
14 you're aware of with a political purpose?

15 Campaign Manager: That I am aware of?

16 Scott Gast: Yes. Is that a correct statement?

17 Campaign Manager: Correct. Brendon is aware of. That doesn't mean there wasn't a political
18 purpose to other events.

19 Scott Gast: Okay. I want to ask you about the role that Spouse had at the events. Did
20 she have any role in any campaign-related activity or event, things like
21 that?

22 Campaign Manager: Occasionally, sure.

23 Scott Gast: During this trip.

24 Campaign Manager: Not that I am aware of.

25 Scott Gast: Do you know why she went along on the trip with Mr. Stutzman?

26 Campaign Manager: I do not. I think that was something they probably discussed.

27 Scott Gast: Was that part of any of the discussions that you had prior to the trip, of
28 whether the campaign would pay for her?

29 Campaign Manager: Marlin communicated that, and this was Marlin's stance for just about
30 everything, that he was going to spend as much time with his family as he

1 could. Period. He preferred to be with his family than away from his
2 family. Which I think most fathers and husbands would agree with.

3 Scott Gast: Sure. Based on your understanding of the trip and Spouse 's role, was it
4 your belief that it was appropriate for the campaign to pay for her
5 expenses or not?

6 Campaign Manager: I believe it was questionable.

7 Scott Gast: It looks like there was some discussion about whether the campaign could
8 pay for the costs of Spouse 's minor children to accompany them, is that
9 correct?

10 Campaign Manager: That's correct.

11 Scott Gast: Do you recall those discussions?

12 Campaign Manager: I believe that the campaign should not pay for them.

13 Scott Gast: Who did you express that to?

14 Campaign Manager: Brooks. Marlin. Hammond.

15 Scott Gast: Okay. What was your basis for reaching that conclusion?

16 Campaign Manager: My understanding as it was communicated to me of FEC rules.

17 Scott Gast: What specifically was the issue there?

18 Campaign Manager: I think ... What is their ... I think one of the questions is, what is their
19 purpose or role in the political events that are taking place?

20 Scott Gast: You believe that that role did not justify, in this particular circumstance,
21 that role did not justify the campaign paying their expenses?

22 Campaign Manager: Correct.

23 Scott Gast: Okay. I want to talk to you generally about the expenses and what you're
24 aware the campaign paid for.

25 Campaign Manager: Sure.

26 Scott Gast: The campaign paid for the airfare for all four family members of the
27 Stutzmans?

28 Campaign Manager: Correct.

1 Scott Gast: Did the campaign pay for the airfare of anyone else?

2 Campaign Manager: Not that I'm aware of.

3 Scott Gast: Any family friends?

4 Helen Eisner: The witness is consulting with counsel.

5 Campaign Manager: We probably reimbursed ... We reimbursed Laura Van Hove for the cost...
6 The campaign probably reimbursed Laura Van Hove Consulting for the
7 cost of her staffer's flight.

8 Scott Gast: Okay. Fair enough. Do you know whether the campaign paid for the
9 Stutzman's family friends to attend?

10 Campaign Manager: I don't know.

11 Scott Gast: What about their transportation? I understand they rented a Ford
12 Expedition while you were out there.

13 Campaign Manager: Sure, I thought it was a minivan, but they rented a vehicle.

14 Scott Gast: A vehicle. Did the campaign pay for that vehicle that time?

15 Campaign Manager: I believe there was a conversation about whether or not it needed to be
16 split between the campaign and the personal.

17 Scott Gast: Do you know what the result of that discussion was?

18 Campaign Manager: I don't.

19 Helen Eisner: Who had that conversation?

20 Campaign Manager: Probably discussed it with Brooks, but I probably had that conversation
21 with John Hammond.

22 Helen Eisner: Who raised the concern during the conversation?

23 Campaign Manager: I did.

24 Helen Eisner: You did.

25 Campaign Manager: He may have shared the concern. I just ... I don't know. Was probably ...

26 Scott Gast: I want to show you this email and I have a quick question on it.

27 Campaign Manager: Yep.

1 Scott Gast: For the record, this is THMS-0437 to -0438.

2 Campaign Manager: Mm-hmm (affirmative).

3 Scott Gast: It's an email from Mary Wells to you and to Chief of Staff with some
4 options for renting a car for the California trip.

5 Campaign Manager: Mm-hmm (affirmative).

6 Scott Gast: Are you familiar with this email?

7 Campaign Manager: Mm-hmm (affirmative).

8 Scott Gast: One of the things I wanted to ask is, it looks like she was looking for a
9 rental car that holds at least six people. The Stutzmans, I understand, are a
10 family of four. Do you know who these six people that they are going to
11 have in the car were?

12 Campaign Manager: No, but if they needed room for suitcases.

13 Scott Gast: Okay. It looks like a couple of their family friends, the Davidsons, are you
14 familiar with them?

15 Campaign Manager: No.

16 Scott Gast: Traveled with them.

17 Campaign Manager: Oh, in the rental car?

18 Scott Gast: Traveled with them in California.

19 Campaign Manager: Oh.

20 Scott Gast: I don't know whether they used the car or not. Did you have any
21 discussions about the Davidsons?

22 Campaign Manager: Uhn-uh (negative).

23 Scott Gast: In this context of this trip?

24 Campaign Manager: No. Are they from Indiana?

25 Scott Gast: I don't know. Does seeing this email-

26 Campaign Manager: Mm-hmm (affirmative). I remember the email. Yep.

1 Scott Gast: -refresh your recollection at all about conversations you may have had
2 about who should pay, additional information about what those
3 conversations entailed?

4 Campaign Manager: Yeah, so to me it looks like I got this email. I probably called John when I
5 saw this email. I said "Hey, what do we got going on here?" Then it looks
6 like Mary went ahead and booked it regardless, based on John 's
7 instructions to figure out payment later.

8 Scott Gast: Then figuring out payment later ultimately led to conversations about the
9 appropriate source to pay for this? Whether that was personal funds,
10 campaign funds?

11 Campaign Manager: Well I flagged it as an issue. I don't remember the follow up. I said, based
12 on this, to my recollection I called John, flagged the issue from my
13 perspective. Subsequently Mary Wells sent this email.

14 Scott Gast: Okay. The lodging question I believe we've covered -- you're unaware of
15 the campaign paying for any lodging expenses?

16 Campaign Manager: No. I just remember there being a conversation.

17 Scott Gast: Okay.

18 Campaign Manager: Well I'm not saying that I'm aware or unaware, I just remember there was
19 a conversation. I don't know how it was ultimately paid for.

20 Scott Gast: Okay. You were not aware of some of the meal expenses? The Hallmark
21 meal?

22 Campaign Manager: Yeah, I have no idea.

23 Helen Eisner: What about any other meals?

24 Campaign Manager: No, I'm afraid not. I mean, I'm not ... I don't sit there and micromanage
25 how Marlin pays for meals. He's an adult man.

26 Scott Gast: You're not aware of any instances where there was a request to have the
27 campaign reimburse for meals or food? Any such discussions?

28 Campaign Manager: No.

29 Scott Gast: What about, other than the Reagan Library tour, which we saw in that
30 email, any other tour expenses that were discussed? Capitol Records or the
31 Reagan Ranch?

1 Campaign Manager: I know that there was an invoice for a tour that... I can't tell you if that's
2 the invoice that we discussed here, or if it's a separate invoice that Marlin
3 ended up paying for personally.

4 Scott Gast: Okay.

5 Campaign Manager: I don't remember.

6 Scott Gast: I believe we've seen documents... that likely was that meal, Reagan
7 Library tour.

8 Campaign Manager: Okay.

9 Scott Gast: Now sometime later Mr. Stutzman made the decision to reimburse the
10 campaign for certain expenses.

11 Campaign Manager: Later?

12 Scott Gast: I was going to ask you ... Previously we had discussed a decision that Mr.
13 Stutzman had made to reimburse the campaign for the price of the airfare
14 for the children.

15 Campaign Manager: Yes.

16 Scott Gast: That was made while you were still with the campaign?

17 Campaign Manager: Yes.

18 Scott Gast: You weren't sure about the wife, is that correct?

19 Campaign Manager: Correct. Marlin made a commitment to pay back the cost for the boys'
20 flights.

21 Scott Gast: You were not aware of any other expenses that he made a commitment to
22 pay back?

23 Campaign Manager: Correct.

24 Scott Gast: Do you know if that actually happened while you were still with the
25 campaign?

26 Campaign Manager: I don't know.

27 Scott Gast: Okay. Then after you left the campaign there was some press reporting
28 about the trip, and the press reported that Mr. Stutzman was going to
29 reimburse the airfare for his family. The children and wife.

1 Campaign Manager: That's how I read it.

2 Scott Gast: Did you have any discussions with anyone either at the campaign,
3 formerly with the campaign, Mr. Stutzman, Chief of Staff, Mr. Kochvar,
4 Mr. Marston, at the time of this news reporting about the reimbursement?

5 Campaign Manager: Sure, when I read the news article. Yeah, sure.

6 Scott Gast: Who did you have conversations with?

7 Campaign Manager: I don't recall the specifics, but I think it's fairly common to talk about a
8 story like that when it's –

9 Scott Gast: Did you have a discussion with Chief of Staff?

10 Campaign Manager: Possibly. I mean we had one ... I've seen him since I left the campaign.
11 Whether or not that was discussed I don't remember.

12 Scott Gast: You don't remember. It was about two months ago, I believe, that this
13 came out in April. You don't have a recollection of discussing this?

14 Campaign Manager: With John?

15 Scott Gast: Yeah.

16 Campaign Manager: I mean, it wouldn't surprise me if we did. Do you remember every
17 conversation you had?

18 Helen Eisner: When was the last time you saw Chief of Staff?

19 Campaign Manager: I don't know. It's been a couple of weeks.

20 Helen Eisner: How frequently do you see him?

21 Campaign Manager: Once every month or two. I mean I don't...

22 Helen Eisner: So you have seen him since April?

23 Campaign Manager: April? Sure. So, yes I have. I've seen him since Marlin lost the primary.

24 Helen Eisner: Who else are you in touch with from the campaign or the congressional
25 office?

26 Campaign Manager: From the campaign, I talk to Brooks Kochvar and I've talked to Chris
27 Marston and I've talked to Joe Knepper, and I talked to Welsey Scott, and
28 I talked to Nick Lauritsen.

1 Scott Gast: Just for the record, who's Mr. Knepper?

2 Campaign Manager: Political director -former director.

3 Scott Gast: The last name you said, I'm sorry?

4 Campaign Manager: Nick Lauritsen.

5 Scott Gast: What was his position?

6 Campaign Manager: Field rep. They're all employed now for other organizations.

7 Scott Gast: Did you have any conversation with Mr. Stutzman about the
8 reimbursement?

9 Campaign Manager: I have not talked to Marlin since I left the campaign.

10 Scott Gast: Okay. Unless you have anything more I want to move on to a different
11 topic. It should be brief.

12 Helen Eisner: You talked a little bit about your knowledge, or what you remember about
13 whether or not the expenses for the flights were paid back. I think you said
14 that you didn't remember whether or not they were paid back during your
15 time as part of the campaign.

16 Campaign Manager: I don't think that's what I said.

17 Helen Eisner: Can you then clarify?

18 Campaign Manager: Yeah, I read in the paper that they were paid back.

19 Helen Eisner: During your time with the campaign? Do you have knowledge of whether
20 or not they were paid back during your time with the campaign?

21 Campaign Manager: I mean I knew exactly when they paid back when I read it in the
22 newspaper.

23 Helen Eisner: Okay, so this discussion of expenses being paid back and the suggestion of
24 whether or not any type of expenses should be reimbursed to the
25 campaign, besides the flights that we've been talking about, are there any
26 other instances when you've had conversations about reimbursing the
27 campaign for expenses? That would be from the congressman to the
28 campaign.

29 Campaign Manager: The congressman reimbursing the campaign?

30 Helen Eisner: Yes.

1 Campaign Manager: I don't remember. I don't think so. I don't remember.

2 Helen Eisner: Okay, so you don't remember. We'll move on to the next.

3 Scott Gast: I want to move on to talk briefly about mileage reimbursement during the
4 campaign. When Mr. Stutzman would travel for the campaign, would he
5 drive himself or did he have a driver?

6 Campaign Manager: He typically had a driver.

7 Scott Gast: What vehicle would they use?

8 Campaign Manager: After they sold the vehicle, they used Marlin's personal vehicle.

9 Scott Gast: Marlin's personal vehicle. Okay. Did the campaign have a designated... go
10 ahead.

11 Campaign Manager: Most of the time.

12 Scott Gast: Other times?

13 Campaign Manager: I'm sure there's other vehicles. Bryan has a vehicle.

14 Scott Gast: For the most part, used the campaign owned vehicle until that was sold
15 and then used Marlin's personal vehicle?

16 Campaign Manager: Correct.

17 Scott Gast: Okay. When he was traveling for the campaign, would that be Bryan who
18 was his driver, or was there another person?

19 Campaign Manager: Yeah, typically Bryan.

20 Scott Gast: Did Bryan drive for both official and campaign; was he kind of the
21 designated driver?

22 Campaign Manager: I believe so. I have no knowledge of the official side.

23 Scott Gast: How many vehicles do the Stutzmans own?

24 Campaign Manager: I don't know the answer to that.

25 Scott Gast: Did they use different cars when travelling for campaign events versus
26 official, or did they use the same car?

27 Campaign Manager: I don't know the answer. Well, did ... explain?

1 Scott Gast: I guess my question is when he had the campaign car, was that used for all
2 travel or just campaign travel, or how was that?

3 Campaign Manager: I don't know, that was before my time.

4 Scott Gast: Okay. There's been some reporting in the press that Mr. Stutzman may
5 have received an unusually high level of reimbursement for mileage from
6 both his official office and campaign.

7 Campaign Manager: I'm aware of that.

8 Scott Gast: During your time with the campaign, were there any questions or concerns
9 that you had with requests for reimbursement for mileage that he
10 submitted?

11 Campaign Manager: I mean I did not ... When the miles were submitted to me, I would briefly
12 look over them but typically I took his word or Bryan's word that the miles
13 were accurate. I didn't operate from a place that there was something
14 wrong with the miles.

15 Scott Gast: At any point did something seem off or seem odd or seem excessive or
16 unusual?

17 Campaign Manager: About the campaign miles?

18 Scott Gast: That Mr. Stutzman asked for reimbursement.

19 Campaign Manager: At any point. No, I don't think while I was there.

20 Scott Gast: Were you aware of instances when you were not there?

21 Campaign Manager: No.

22 Scott Gast: Did you ever have to go back to him for clarification on a reimbursement
23 request?

24 Campaign Manager: I remember us having conversations, I think the conversations were more
25 about the delay and the payment being processed more so than it was an
26 issue of what we were reimbursing. If I remember correctly.

27 Scott Gast: Were any mileage requests, reimbursement requests, withdrawn or
28 dropped?

29 Campaign Manager: I don't remember, I don't think so.

1 Scott Gast: Did you have any knowledge of reimbursement requests through the
2 official office, through the MRA? Members' Representational Allowance?

3 Campaign Manager: I believe I was shown a reimbursement request once or twice but I don't ...
4 I didn't pay very close attention.

5 Scott Gast: Why was that shown to you?

6 Campaign Manager: I think we were just trying to make sure we weren't double charging miles.

7 Scott Gast: Were you aware of any instances where that may have happened?

8 Campaign Manager: No.

9 Scott Gast: Okay.

10 Helen Eisner: The SUV that we've discussed that was owned by the campaign, until
11 shortly into your time working for the campaign, where was it stored?

12 Campaign Manager: I don't know.

13 Helen Eisner: Was it in Indiana or was it in Washington, DC?

14 Campaign Manager: I believe it was in Indiana.

15 Helen Eisner: It was in Indiana. If the campaign had headquarters, is there a place where
16 you would have been able to keep a car?

17 Campaign Manager: We didn't have a headquarters until I got on the ground.

18 Helen Eisner: Okay. Have you seen this car during your brief time?

19 Campaign Manager: Actually, I don't think I ever did. I mean I might have but, Marlin was in
20 Howe, which was in the Northwestern part of the state. I and the campaign
21 was basically in Indianapolis. Well, yes, Indianapolis, we were a little
22 North of the city. So there's obviously a 90 to 120 minute drive into it.

23 Helen Eisner: So this SUV still ... When did you, or did you hear about it being used for
24 any official events or congressional purposes?

25 Campaign Manager: I don't know that I ever heard that.

26 Helen Eisner: You don't know that you ever heard that?

27 Campaign Manager: Yeah. You said, when did I hear, I don't think that I ever heard that.

1 Helen Eisner: Do you know of any instances when it would have been used for a
2 congressional event?

3 Campaign Manager: No.

4 Helen Eisner: What about its use by individuals that were not connected to the
5 campaign? When was it used by anyone who wasn't associated with the
6 campaign?

7 Campaign Manager: I don't know that it was.

8 Helen Eisner: Was it ever used by the congressman's family?

9 Campaign Manager: I don't know.

10 Helen Eisner: Did you ever have any conversations about it being used by the
11 congressman's family?

12 Campaign Manager: Not to my recollection.

13 Helen Eisner: The concerns that you talked about, causing it to be sold, were there any
14 issues related to mileage reimbursements for that particular vehicle?

15 Campaign Manager: You can't reimburse mileage if the campaign owns the vehicle.

16 Helen Eisner: So were there ever any mileage reimbursements submitted, related to that
17 vehicle?

18 Campaign Manager: I don't know.

19 Helen Eisner: To the campaign?

20 Campaign Manager: I don't know.

21 Helen Eisner: What about for the MRA? The Members Representational Allowance?

22 Campaign Manager: I don't know.

23 Helen Eisner: Okay.

24 Scott Gast: I want to ask you briefly, during your time with the campaign, did you
25 ever make use of privately owned aircraft?

26 Campaign Manager: No. Who me?

27 Scott Gast: The campaign, I'm sorry.

28 Campaign Manager: I don't think so.

1 Scott Gast: Mr. Stutzman?

2 Campaign Manager: Not to my knowledge. I know I didn't at all. I barely fly in coach.

3 Scott Gast: I believe those are all the questions we had for you. Unless anybody has
4 anything additional?

5 Helen Eisner: I think you talked about being in touch to a certain extent with some of
6 your former colleagues or people who worked in the congressional office.
7 What conversations have you had with any of those individuals about the
8 Office of Congressional Ethics and our review?

9 Campaign Manager: I've had nothing with any of them except Brooks.

10 Helen Eisner: With Brooks, can you explain that a little bit? Did you have a
11 conversation?

12 Campaign Manager: A brief conversation.

13 Helen Eisner: What was the nature of that conversation?

14 Campaign Manager: When I initially was told that you guys wanted to talk to me, since I've
15 never talked to you guys before. Brooks is someone I trust in politics so I
16 called him for advice.

17 Helen Eisner: Did you discuss any of the facts that you've shared with us today?

18 Campaign Manager: Discuss any of the facts? Maybe generally. Just in the fact that we both
19 lived through this at the same time.

20 Helen Eisner: At any point in time, in that conversation or with any of the individuals
21 that you still keep in touch with, including the congressman, although I
22 know you said that your communication with him has been limited or not
23 at all.

24 Campaign Manager: I was CC'd on an email with him, I just remembered.

25 Helen Eisner: Okay.

26 Campaign Manager: I did not communicate with him.

27 Helen Eisner: Has anyone included on that list, or anyone at all, offered you a narrative
28 for how to answer our questions here today?

29 Campaign Manager: No.

30 Scott Gast: Is there anything else that you think would be helpful for us to know?

- 1 Campaign Manager: Nope.
- 2 Jason Torchinsky: I just want to clarify one thing for the record.
- 3 Scott Gast: Sure.
- 4 Jason Torchinsky: You put out on the table documents labeled THMS-0230 through -0235.
5 You didn't ask about these documents right, so they will not be included in
6 the transcript?
- 7 Scott Gast: That's correct, yes. Thank you for your time.

Exhibit 6

Representative Stutzman's Spouse
Transcript of Interview
June 22, 2016

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33

Scott Gast: For the record, my name is Scott Gast. I'm with my colleagues Helen Eisner and Konstantine Kastens. We are with the Office of Congressional Ethics. We are joined today by Representative Stutzman's Spouse ("Spouse"), who is accompanied by her counsel Cleta Mitchell. It's June 22nd and we appreciate you sitting down to talk with us.

One of the topics that we'd like to discuss with you is a trip to California back in August of 2015 that you and your family took, just starting out with what was the purpose, what was the primary purpose of the trip?

Spouse: It was a fundraising trip, a campaign fundraising trip that my husband had been planning for a while. He had some connections out there with fundraising and so that's what it was.

Scott Gast: We have seen in some emails that have been provided to our office that the genesis of the trip may have been out of a tour that radio host Pat Miller had been putting together. Does that sound like something familiar to you?

Spouse: I think he had wanted to do that, like in tandem with us or whatever, but when we checked there were some complications as far as legalities and stuff so we didn't do that in tandem with them. It wasn't a trip together or anything.

Scott Gast: I want to start out showing you an email. This is, for the record, THMS-0387, if you want to take a minute to look over that. Do you recall this email?

Spouse: Well, I recall it now that I'm reading it.

Scott Gast: Sure.

Spouse: Yeah. It's been a long time, but yeah. Mm-hmm (affirmative).

Scott Gast: Is this kind of the first time that this idea for a California trip came up?

Spouse: I'm not sure. I don't know.

Scott Gast: Is this the trip that ultimately materialized in August of 2015? Is the trip discussed in this email the same trip?

1 Spouse: No, not really. It kind of changed over time just because the more we
2 talked about it the more I had connections with folks out there as well.
3 That came more into play as far as fundraising, on the fundraising side. It
4 leaned more that way and our initial idea wasn't what it ended up being.

5 Scott Gast: What did it end up being?

6 Spouse: A fundraising trip for a campaign.

7 Scott Gast: Now, it looks like while you were in California, Pat Miller's tour group
8 was there at the same time.

9 Spouse: Right.

10 Scott Gast: I assume that wasn't a coincidence -- that the trip was scheduled at the
11 same time that the Pat Miller tour group was going to be out there.

12 Spouse: Actually it kind of overlapped, and it just happened that way. He really
13 wanted to do one. He wanted to take a group out to see the Reagan Library
14 and just kind of follow in some footsteps there. That was what he had
15 always wanted to do with his listeners and he felt like there were enough
16 people that were interested to do it. We were glad it overlapped. We had to
17 go a little bit out of our way to be able to see them because they weren't in
18 the same area we were, but he wanted to take a trip out there and show
19 people the Reagan Library.

20 Scott Gast: If this Pat Miller tour group was not the genesis for this trip, that it was
21 this fundraising idea, when did the idea for a fundraising trip come up?

22 Spouse: I mean, it has always been a ... Okay, so Pat Miller wanted to do this co-
23 trip and we checked it out. It wasn't allowed, but Marlin had been talking
24 about a California trip for fundraising all along. That's always kind of part
25 of your fundraising trajectory because there's a lot of money to be raised
26 there and several other places around the country. That's always something
27 on your radar.

28 Scott Gast: Was the idea for a California fundraising trip around prior to the Senate
29 campaign?

30 Spouse: I don't know. You're always talking about where do you have the most
31 network. Is it Texas? Is it California? Is it New York? Is it Florida? You're
32 just trying to look for a hub where you can go and raise as much money as
33 possible. Is it closer to home? That's always something that we're talking
34 about. Where do we have connections and a network?

1 Scott Gast: Did the campaign do any California fundraising trips prior to the one in
2 August of 2015?

3 Spouse: I don't remember. I don't know.

4 Scott Gast: Okay.

5 Helen Eisner: What was your role in the campaign?

6 Spouse: The wife. Just do whatever is required. I've always been very involved. I
7 kind of jokingly say out of self-defense because if I'm not involved I don't
8 really see him very often, and we're a very tight family. When he was in
9 the State Legislature I moved down to Indianapolis because it was three
10 hours away and we had a one year old. So I didn't have to take him to
11 school, I had a business where I could travel. I was doing it from home,
12 and so we moved down to Indianapolis for the first three years for three to
13 four months out of the year when he was serving in the State House. Why?
14 Because we're trying to keep our family together. He's a hands-on dad and
15 I wanted to see what he's doing. I'm an artist, so I've got a little bit of
16 flexibility there. Same thing with the way we campaign. We're always
17 trying to find as much family time as possible. I mean, I joke about a
18 Lincoln Day Dinner -- I consider it a date anymore. Why? Because that's
19 the time that I see him, and I get to ride in the car with him.

20 Helen Eisner: You said something about ... Forgive me if I'm phrasing this incorrectly,
21 but it was something like, you're always having conversations or we're
22 always having conversations, and you were talking about fundraising.
23 Who is the, "we" or the "you" in that context? Who were you referring to?

24 Spouse: My husband and I and the campaign team. I'm always part of the
25 campaign discussions. He wants me part of it.

26 Scott Gast: Can you tell us who was part of that campaign team?

27 Spouse: Well, it changed for the Senate race. It was different for the Congressional
28 race. For the Senate race it was, Brendon Del Toro was the ... I don't know
29 his title, the Campaign Manager. Then Brooks Kochvar was the General
30 Consultant at that time.

31 Scott Gast: Who did it change to after that?

32 Spouse: It changed to ... It's called ... I forgot their name. Mike Gentry was the
33 General Consultant, and the Campaign Manager was ... I should know

1 this. They were with ... It's their consulting firm. What's it called? I can't
2 remember, sorry.

3 Cleta Mitchell: It'll come back to you.

4 Scott Gast: Sure.

5 Spouse: I can picture him. Our Campaign Manager was really tall. Mike Gentry
6 and Jason Neiland were the Consultants. Mark It Red, that's what it was.
7 Mark It Red.

8 Scott Gast: Okay. You said that the primary purpose of this trip was a fundraising trip.

9 Spouse: Mm-hmm (affirmative).

10 Scott Gast: Were there other purposes for the trip, other reasons for taking the trip?

11 Spouse: No, not really. We had taken the boys ... My oldest boy Child 1, he was
12 thirteen at the time, hugely into making movies. I'm from a fine arts
13 program background. My dad runs a performing arts center. I studied
14 opera. I'm very into the arts. I'm an advocate for the arts, and so he's kind
15 of been exposed to that and he loves movies. He's got this favorite show
16 on Hallmark Channel and so we took a trip to Vancouver, a little family
17 getaway when he had a little break for school, and he wanted to see the set
18 of this show and see it made. I'm friends with the writer and producer of
19 the show through my fine arts connections, and so he kind of showed us
20 around and things like that. Well, it just so happened that the CEO of
21 Hallmark was there with his daughter. She was taking part in being in one
22 of the episodes or something, and got to know them.

23 We found out he was coming to Washington. Well, when they did, Marlin
24 said, "Hey, I'll give you a tour of the Capitol." He gave him a tour of the
25 Capitol, got to know him and his family. His wife was along as well. Just
26 real sweet people. We found that we had a lot in common with them as far
27 as my advocating for family friendly arts, family friendly entertainment.
28 Just found out a little more insight from them as how legislation affects
29 that sector. That was a real connection there as well. Through him and his
30 producers and my friends there, they were saying, "If you're going to be
31 running for Senate and everything, we'd love to help with fundraising,"
32 and so that was the connection there.

33 Helen Eisner: Can you tell us the names of those individuals? You mentioned a
34 writer/producer who you have a relationship with or had a preexisting
35 relationship with then?

1 Spouse: Well, we didn't meet with him on this trip. He was in Vancouver.

2 Helen Eisner: Okay, so there was an individual in Vancouver and then there was the
3 President of –

4 Spouse: No, Bill Abbott. Yeah, on the set.

5 Helen Eisner: Okay, Bill Abbott is the –

6 Spouse: Yeah.

7 Scott Gast: He's the CEO –

8 Spouse: He's the CEO of Hallmark.

9 Scott Gast: Of the Hallmark Channel.

10 Spouse: Mm-hmm (affirmative).

11 Scott Gast: Okay.

12 Spouse: Yeah.

13 Scott Gast: Okay. Is that fair to say that there was some personal aspect to the tour,
14 given your son's interests?

15 Spouse: A tour of what?

16 Scott Gast: When I asked you about other purposes you had mentioned that your son
17 was really interested in filmmaking and you had gone to Vancouver to see
18 the show.

19 Spouse: Well, the real purpose of taking the boys with us is trying to be together as
20 a family as much as possible. We always do that. When you're looking at a
21 Senate race, and you're not going to be seeing each other very much, and
22 you have one August break, and the kids are on summer vacation, and
23 you're husband's saying, "This is the time I have to go and raise money..."

24 I have connections out there as well, that people are saying, "Hey, we'd
25 like to introduce him to so and so. Heard you're running. Blah-blah-blah."
26 Well, those are people that I have communicated with personally. It was
27 very interesting to me that although I had never seen my aspect of fine arts
28 advocating as being fundraising, it ended up being very helpful as far as
29 helping to connect him with fundraising people as well. You're always
30 networking like that. I've raised funds for non-profits before and you just
31 have to network and meet as many people and raise money where you can.

1 Scott Gast: In trying to figure out the reasons for taking the trip to LA, we talked
2 about fundraising. Was participating in the Pat Miller tour one of the
3 reasons for planning this trip?

4 Spouse: We had hoped it would work out, that it was constituents, but they were
5 going with a travel agency and stuff like that. We hoped it worked out and
6 it did. It was kind of a last minute thing, but it did.

7 Scott Gast: Okay. Then the trying to be together as a family, is it fair to say that was a
8 personal reason for traveling together to California to...

9 Spouse: I would say, when you mix family with one of your spouses running for
10 office, the reasons are mixed. Sure, yeah. We try to keep our family
11 together as much as possible, but there's also political reasons as well. We
12 were going to be meeting with some folks that had their family there as
13 well, and there's a relational thing. It's all kind of mixed together there.

14 Scott Gast: I think it would be useful if we would walk through the itinerary for the
15 California trip and look at each event by each event. To help us do that, I
16 have a couple of documents. One is an email from Representative
17 Stutzman's Chief of Staff ("Chief of Staff"), it looks like the day before
18 the trip, in which he includes a Stutzman day by day agenda. The other, if
19 it's helpful, is a calendar, an excerpt from Mr. Stutzman's calendar, for the
20 days of travel. I'd like to go through these event by event.

21 For the record, the two documents are... The email with the day by day
22 agenda is THMS-0394 and following, and the calendar entries are THMS-
23 0230. If we can start with Wednesday, August 12th; that's the day you
24 traveled to Los Angeles, flying out of the Detroit airport. You arrived,
25 picked up a rental car, drove to Frank Luntz's.

26 I want to ask you a little bit about the Luntz home. How did it come about
27 that you stayed with the Luntz's?

28 Spouse: We had visited there on a trip with Steve Scalise. I think it was a year
29 before, on a congressional trip. He had held a town hall meeting in his
30 home and had the congressmen get up and answer questions and things
31 like that. I had also been in training programs with him, with the
32 Republican spouses' speaker's club. He had come and trained probably
33 eight or nine of us as far as what to be prepared for with media and his
34 stuff and gotten to know him through that as well. We've known him for
35 several years and considered him a personal friend. He's offered his house
36 to us.

1 Helen Eisner: He offered his house to you? How did that offer come about?

2 Spouse: I don't know. That wasn't through me.

3 Helen Eisner: Okay, do you know who received the offer?

4 Spouse: No.

5 Scott Gast: How do you know there was an offer?

6 Spouse: Maybe I misspoke -- I don't know. I don't know how it happened. I wasn't
7 in charge of that part, that was through Marlin.

8 Scott Gast: There was some confusion about lodging during the entire part of the trip.
9 The itinerary, as we'll see, lists a Hilton hotel as lodging for certain nights.
10 Did you end up staying in that Hilton hotel? Did you stay with Mr. Luntz
11 for the entire trip? What was the lodging situation?

12 Spouse: We were going to stay there but ...

13 Scott Gast: Stay at the Hilton?

14 Spouse: Yes.

15 Scott Gast: Okay.

16 Spouse: He insisted that we stay there, he's just being very hospitable and said,
17 "Why? just go ahead and stay here. I'm enjoying having you visit."

18 Scott Gast: For each of the nights of trip you stayed with the Luntz's?

19 Spouse: Mm-hmm (affirmative).

20 Scott Gast: Were there any expenses associated with that?

21 Spouse: Not that I know of. No.

22 Scott Gast: It seems that after you settled in at the Luntz's, there was a dinner that
23 initial night. According to the agenda, it says dinner with Hallmark at
24 Madeo's in West Hollywood, and then lists the attendees there. Can you
25 tell us a little bit about that dinner?

26 Spouse: It was set up basically because my husband and I had gotten to know Bill
27 Abbott and he was eager to introduce us to some of his associates. They
28 set that dinner up once the ball got rolling; we knew what date we would
29 be there and stuff like that. They arranged it.

1 Scott Gast: Who were the folks that were at the dinner? We see the names here; can
2 you give us a sense of who they are?

3 Spouse: They were folks that worked for Hallmark.

4 Helen Eisner: Why was Mr. Abbot interested in introducing you to these individuals?

5 Spouse: First, because I have hugely advocated for family friendlier programming.
6 Second of all, he was interested in talking about Marlin's role as far as a
7 congressman, how he could help with legislation that would encourage
8 family friendly programming. Then he also knew that he was running for
9 Senate and was interested in knowing more about that race and seeing if
10 he could possibly help. That's it.

11 Scott Gast: How would you characterize the purpose for the dinner? Was it a personal
12 dinner? Was it an official dinner? Was it a campaign dinner?

13 Spouse: I would consider it a campaign dinner because Bill was kind of
14 introducing us to some of his associates.

15 Scott Gast: I want to ask you about this email; this, for the record, is THMS-0421, if
16 you want to take a moment to look at this email.

17 Spouse: Mm-hmm (affirmative).

18 Scott Gast: In the first paragraph, I think it's the third sentence, you write, "Marlin
19 said he would count a dinner will Bill Abbot as a FR dinner" -- does "FR"
20 mean fundraising?

21 Spouse: Yeah.

22 Scott Gast: Can you tell us what you meant, by that line of the email?

23 Spouse: Well, I don't know what you mean. What do you mean by the question?

24 Scott Gast: What do you mean when you said that Marlin would count it as a
25 fundraising dinner?

26 Spouse: That's what I meant, that Marlin would count it as a fundraising dinner. It's
27 a fundraising dinner.

28 Scott Gast: Was it a fundraising dinner?

29 Spouse: Yes, it was.

1 Scott Gast: I'm trying to understand the dinner because we had just discussed how it
2 was an opportunity for you to talk about ways that Mr. Abbott could help
3 with legislation, talk about family friendly programming, introduce people
4 from the Hallmark channel, ways that he could help with the Senate
5 campaign –

6 Spouse: I'm talking about what we talk about with these people and then also they
7 know he's running for Senate. Bill is saying, I'd like to introduce you to
8 some of my associates and talk about possibly helping with your
9 campaign. It doesn't mean that you're paying a big check there but it
10 means that you're laying a foundation to be able to raise money. There
11 might be a check given that night. It's all of that conversation happens
12 when you're networking in a dinner. They knew me, I was their personal
13 contact and advocate for what they were doing. That's how they'd gotten to
14 know Marlin. When they got to know Marlin, they knew he understood
15 their issues. Therefore, you're laying the groundwork to say, hey, because
16 I understand your issues, you might want to help me out to run for Senate
17 because I'm going to understand them over there as well. It's like a
18 business networking dinner.

19 Scott Gast: Well, I ask the question because when we went through the discussion of
20 what the dinner involved, you didn't use the term fundraising dinner –

21 Cleta Mitchell: But she did use the term campaign dinner.

22 Scott Gast: Yes.

23 Cleta Mitchell: She did say campaign –

24 Scott Gast: Yes, and here it was referenced as a fundraising dinner.

25 Spouse: In my mind, it's the same thing. I'm not the politician in the family.

26 Scott Gast: Sure, was LVH Consulting involved with the dinner at all?

27 Spouse: What is LVH Consulting?

28 Scott Gast: Laura Van Hove Consulting, the national fundraising ...

29 Spouse: I don't know.

30 Scott Gast: ...consultant for Spouse's campaign.

31 Spouse: I don't know that she was on at that time, I don't know.

32 Scott Gast: Is it your answer that she was not involved?

1 Spouse: My answer is I don't know.

2 Scott Gast: Okay, was there a charge to attend the dinner? Was there a fundraising
3 ticket price?

4 Spouse: No, it wasn't that type of dinner.

5 Scott Gast: Was any money raised at the dinner?

6 Spouse: I don't know.

7 Scott Gast: Was there a solicitation for campaign contributions made at the dinner?

8 Spouse: I wouldn't say he walked up to somebody and said can you give me a
9 check but at the same time there was discussions about how can we help
10 and Brad Krevoy, who was there, ended up donating to the campaign.

11 Scott Gast: When was that?

12 Spouse: During the campaign.

13 Scott Gast: Do you know when his donation came in?

14 Spouse: No, I don't know, I don't do those numbers.

15 Scott Gast: Do you know what the amount of it was?

16 Spouse: No.

17 Scott Gast: Okay, do you know if the other people at the dinner –

18 Spouse: I do not, I don't know.

19 Scott Gast: ...were campaign contributors?
20 Who paid for the dinner?

21 Spouse: I'm not sure; you'll have to our accountant.

22 Scott Gast: Did the Stutzmans pay for the dinner?

23 Spouse: I don't know.

24 Scott Gast: Okay. Why the choice of language here, “Marlin said he would count a
25 dinner with Bill Abbot as fundraising dinner?” What was he counting it
26 towards?

1 Spouse: If you're going to, I mean you're picking apart a sentence here. All it is
2 saying that in my world, I'm from the arts world. I'm not from the lawyer
3 political world, I talked to Marlin and said okay, now that this dinner is
4 coming together, what is it like? What is it going to be? He said, well, it's
5 going to be a fundraising dinner, in other words Bill is inviting people to
6 meet us to talk shop and then to see how they can help us with the race.

7 Scott Gast: I'm trying to understand, which is why I asked the question, when you said
8 "count" versus "Marlin said this is fundraising dinner," I'm curious as to
9 why that choice of language.

10 Spouse: I maybe should've said B.

11 Scott Gast: Why did you say A?

12 Spouse: A?

13 Scott Gast: Why did you say it the way you did say it, why ...

14 Helen Eisner: Why did you say "count"?

15 Cleta Mitchell: Let me ask you this, is there some specific thing you're looking for here
16 because I ...

17 Scott Gast: Yes, her understanding of what she said.

18 Cleta Mitchell: She's answered that question. Are you wondering why she didn't use the
19 word "consider it to be" or I mean it's pretty self-explanatory unless you
20 consider "count" to be some legal term of art.

21 Scott Gast: Trying to get her understanding of what she meant when she used the
22 language she did. I cannot think of a better person to ask than the person
23 who wrote it.

24 Cleta Mitchell: Do you have any explanation for why you would say the word "count"
25 rather than "consider" or something else?

26 Spouse: Because I'm not a lawyer.

27 Scott Gast: Was this an effort to try to ensure that the activities undertaken during the
28 California trip included enough events of a political nature to ensure that
29 the primary purpose of the trip was –

30 Spouse: See, these are my personal connections. I am trying to be helpful to my
31 husband and trying to say, you know what, now that we... Bill was here in
32 Washington and we got to know him. He's really interested in what we're

1 doing and what you stand for but, like we said from the beginning, this
2 was a fluid plan as we went along. When we were setting up things I was
3 just trying to make sure to categorize, because as the wife everything is
4 kind of under one umbrella. It's we're together as a family and blah, blah,
5 blah but then you have to... when you're in Congress you're having to
6 separate into this is official, this is campaign, this is whatever. I don't
7 always use the right terminology but I do the best I can.

8 Scott Gast: When you talk about categorizing the events, is that why you used the
9 word "count" in this email?

10 Spouse: I guess so, I don't know. I was just telling them what Marlin told me.

11 Scott Gast: I want to go back to the itinerary.

12 Spouse: Okay.

13 Scott Gast: Going to the next day, Thursday, August 13th. The initial entry under that
14 day is for CS and boys: "9:00AM - CS and Boys Uber to Universal
15 Studios located at" their address. Can you tell me about your activities at
16 Universal Studios?

17 Spouse: Yes, we purchased our tickets on our own personal money and Bill Abbot
18 and the Krevoys had invited us to see one of their shows on the set
19 because they knew that we were interested in that. We went to visit the set
20 and then we finished the day because the set is inside the park. While
21 Marlin was doing some what I call campaign or fundraising meetings,
22 somewhere, I don't remember where, I went through the park with the
23 boys and we finished the day that way. Marlin ended up meeting us there
24 at the end.

25 Scott Gast: Would you characterize that as a campaign activity, a personal activity, or
26 an official activity?

27 Spouse: I would say that was a personal activity, we were trying to keep the boys
28 occupied while Marlin was doing some fundraising stops.

29 Scott Gast: Okay. Then you mentioned that Mr. Stutzman met you at the end; do you
30 recall what time of the day that was?

31 Spouse: No, I don't. I remember he was texting me and he was in traffic and stuff
32 like that. I don't remember what time he arrived. It was late. It was the end
33 of the day.

34 Scott Gast: Were you aware of what his activities were that day?

1 Spouse: Sure, yeah, I had a calendar.

2 Scott Gast: What did he do?

3 Spouse: He had several meetings around the area with some potential donors.

4 Scott Gast: According to the schedule, the itinerary here, it shows that he met with a
5 gentleman by the name of Joe Crail and then had a lunch with, apparently
6 hosted by, a gentleman named Brad Jones. Do you know if those were the
7 two meetings that he attended?

8 Spouse: If that's what it says, that's what it was, yeah.

9 Scott Gast: Do you know whether those actually occurred?

10 Spouse: I wasn't with him but yeah, I know they occurred. He texted me after each
11 meeting, "I had just got done with this meeting and I'm going to the next
12 one."

13 Scott Gast: Were there any other meetings that he had before meeting you at
14 Universal Studios?

15 Spouse: No. I mean, he did the ones on the calendar.

16 Scott Gast: What time did you leave Universal Studios?

17 Spouse: I don't remember.

18 Scott Gast: What did you do after you left?

19 Spouse: We went to the place where we were staying for the night.

20 Scott Gast: And that was?

21 Spouse: At the Luntz's home.

22 Scott Gast: And did you have dinner at the Luntz's home?

23 Spouse: I don't remember. I think we grabbed something somewhere.

24 Scott Gast: And who paid for dinner?

25 Spouse: We did.

26 Scott Gast: Using personal funds?

27 Spouse: Mm-hmm (affirmative).

1 Scott Gast: You don't recall where that was?

2 Spouse: No. It was a busy day.

3 Scott Gast: All right, we're going to jump to the next day – Friday, August 14th. It
4 begins “CS and Boys - Open.” Can you tell us what you did that day?

5 Spouse: Slept in.

6 Scott Gast: What did you do after you slept in?

7 Spouse: We just relaxed.

8 Scott Gast: Did you go anywhere in the morning?

9 Spouse: Not that I remember, no.

10 Scott Gast: What did you do for lunch?

11 Spouse: I really don't remember, I'm sorry. I don't remember.

12 Scott Gast: Who paid for lunch?

13 Spouse: If we were on our own, it was me. I paid for it.

14 Scott Gast: And that's using personal funds?

15 Spouse: Yes.

16 Scott Gast: Did you do anything that afternoon?

17 Spouse: I'm sorry, I just don't remember. It was just a relax day.

18 Scott Gast: Did there come some point where you met up with Mr. Stutzman?

19 Spouse: I'm sure, yeah, as soon as he was done with his meetings, yeah.

20 Scott Gast: And what time of day would that have been?

21 Spouse: Let's see, it says he was done at 2:30 and so he probably would have
22 gotten back at 3:30 or 4:00.

23 Scott Gast: Where did you meet him?

24 Spouse: At the home. At the Luntz's home.

25 Scott Gast: Did you do anything that evening?

1 Spouse: Yeah, I think we ... There was one night we were able to just go for a
2 walk. Just sightseeing and went for a walk together.

3 Scott Gast: What did you do for dinner that evening?

4 Spouse: I'm trying to remember. It was one of those nights that we were out there. I
5 think it was ... No, it wasn't Saturday, well ... It might have been Saturday
6 night.

7 Cleta Mitchell: That's when you went to the –

8 Spouse: Oh, that might have been that night. I cannot remember. One of the nights
9 at Frank Luntz's home, he was hosting a Medal of Honor award winner
10 dinner and I remember we got to sit in the back and watch their
11 presentation and stuff like that, so that might have been that night. Sorry, I
12 can't remember. Yeah, one of those nights. That was Friday, I don't think it
13 would have been Thursday, because that was a busy day. It was probably
14 Friday night.

15 Scott Gast: Did you eat dinner?

16 Spouse: Yes, they had some food there and we just grabbed some food there.

17 Scott Gast: Was there any payment made for the dinner there or was it just ...

18 Spouse: I don't know. I'm not sure.

19 Helen Eisner: Can I ask a question actually? How many people actually attended that
20 Medal of Honor award dinner?

21 Spouse: I don't ... I mean ...

22 Helen Eisner: Based on your recollection.

23 Spouse: Probably 100 maybe.

24 Helen Eisner: And who were they generally?

25 Spouse: Military and families.

26 Helen Eisner: Was it a ticketed event?

27 Spouse: No.

28 Helen Eisner: So for all 100 attendees they attended for-

29 Spouse: Franks sponsors it. He's a big sponsor of that.

1 Scott Gast: Did either you or Mr. Stutzman have any role at that dinner?

2 Spouse: No, uh-uh (negative).

3 Scott Gast: I want to ask you about Mr. Stutzman's schedule on Friday, August 14th.
4 According to the itinerary, he was scheduled to meet with governor Pete
5 Wilson and a gentleman by the name Dale Dykema. Do you know
6 whether those meetings occurred?

7 Spouse: Yes, he really enjoyed that meeting with the governor, yeah.

8 Scott Gast: And what about the meeting with Mr. Dykema?

9 Spouse: He said that was an interesting one as well. Enjoyed that.

10 Scott Gast: Aside from those two meetings, are you aware of any other meetings he
11 had that day?

12 Spouse: No. His schedule is ... This was on there, I don't know. Maybe Dale
13 introduced him to somebody else and they were talking or whatever. I
14 wasn't there, so.

15 Scott Gast: I want to jump ahead to Saturday, August 15th. This day according to the
16 schedule began with a tour of Capital Records. Can you tell us about that
17 tour?

18 Spouse: Sure, yeah. When we were there the year before with Steve Scalise and the
19 congressional group, they had given us a tour and they had asked for
20 someone to sing in the studio where Frank Sinatra had sung and everyone
21 pointed to me, because they knew that I was a singer. So I went in and
22 recorded a song and it was a lot of fun and they gave me a little recording
23 of it afterwards. We started talking shop again, and I write music and I
24 was asking them about all the new problems with selling music and
25 copyrighting and stuff and how do you do that. I actually had questions for
26 them and how that stuff goes and we were just talking shop from a
27 musician's point of view. They said hey, if you ever come back, we'd love
28 to have you again and talk a little bit more. So I contacted them and said
29 hey, I don't know if you remember me but we're coming out there and
30 we'd love to see it and talk to you some more.

31 Scott Gast: What did the tour involve? What did your time at Capitol Records
32 involve?

33 Spouse: Basically showed us their recording studio. Told the history of it and what
34 happens there and who's recorded there and things like that. Talked about

1 the industry, some of the challenges that they're facing right now, and then
2 that was it.

3 Scott Gast: Who attended the tour?

4 Spouse: It was our family and then family friends the Davidsons.

5 Scott Gast: That was two of the Davidsons -- or more?

6 Spouse: Mm-hmm (affirmative).

7 Scott Gast: Two? Did anybody else join?

8 Spouse: No.

9 Scott Gast: Would you characterize that as a personal activity? A campaign activity?
10 An official activity?

11 Spouse: I think it was a mix of all of the above. We had been there on an official
12 trip the year before. They knew us from that. They knew we understood
13 their sector and so it's hard to ... It's a mix of all of it.

14 Scott Gast: What was the campaign aspect of the tour?

15 Spouse: The campaign aspect of it ... How do I describe that? When you... you're
16 running for office, everything is campaigning. Everything you do relates
17 to some type of campaigning.

18 Cleta Mitchell: That's how you describe it?

19 Spouse: Yeah.

20 Scott Gast: How did this tour, what aspect of the campaign did it relate to?

21 Spouse: Basically, us understanding their sector. Understanding how legislation
22 affects them. And then discussing ... I don't know that we discussed it a
23 whole lot, but Marlin's either running for re-election or for Senate but it's
24 kind of a mix of things. That's the best way I can describe it.

25 Scott Gast: Was there any fundraising aspect to the tour?

26 Spouse: No.

27 Scott Gast: Where there any voters in attendance?

28 Spouse: No.

1 Scott Gast: What was the official aspect of the tour?

2 Spouse: It wasn't official. I mean, I wouldn't say it's official other than you're a
3 sitting congressman talking about how legislation affects a certain sector.

4 Scott Gast: Was there an official purpose to it? You said it was a mix of all three, but
5 then you said you wouldn't call it official.

6 Clela Mitchell: I think she's answered that. I think she's answered that there's aspects of all
7 three in this meeting with these people.

8 Scott Gast: All right.

9 Clela Mitchell: I think that she's said that repeatedly, Scott.

10 Scott Gast: I think that she's also just said, "I wouldn't call it official." So I'm asking
11 her to clarify.

12 Spouse: Well, solely official.

13 Scott Gast: So let me ask again. What was the official nexus to the trip?

14 Spouse: To the trip?

15 Scott Gast: To the tour?

16 Spouse: The official nexus? I don't even know what that means.

17 Scott Gast: What was the connection between touring the studio and the official
18 duties?

19 Spouse: Well, we had been there on an official trip a year before, so we knew it
20 was in our official capacity, so therefore-

21 Scott Gast: But I'm talking about this trip.

22 Clela Mitchell: I think that she answered that also.

23 Scott Gast: I did not hear that answer, so I'm going to ask if she can answer that
24 question.

25 Clela Mitchell: Well, all right, Christy, tell him again.

26 Spouse: Okay.

27 Clela Mitchell: What you just said about-

1 Spouse: As a sitting congressman, you're talking about their sector and how
2 legislation affects their sector.

3 Cleta Mitchell: And did those subjects come up during the course of your tour?

4 Spouse: Yes, yes.

5 Scott Gast: And what contact did you have with representatives, congressional staff
6 after the tour to discuss those issues?

7 Spouse: That I had?

8 Scott Gast: Yes.

9 Spouse: Well, that wasn't my ... That's not my responsibility. I'm not the
10 congressman.

11 Scott Gast: Did he have any follow up activity relating to the issues associated with
12 this industry after the tour?

13 Spouse: I don't know.

14 Scott Gast: What was the personal aspect of the tour?

15 Spouse: That I had sung the year before in their studio and they remembered me as
16 far as the singing congressman's wife.

17 Scott Gast: Where there any expenses associated with the tour?

18 Spouse: No.

19 Scott Gast: I want to ask you about the "Lunch with Michael Landon Jr. and
20 colleagues on Vine Street near Capitol Records." Can you tell us about
21 that lunch?

22 Spouse: I knew him through my connections with Hallmark. I had gotten to know
23 him through my friend who's a writer/producer and he was interested in
24 sitting down with us and talking again about some issues facing them and
25 what they're trying to do, and if possible helping us with the campaign. I
26 don't know if that ever materialized, but he wanted to do an initial meeting
27 with us.

28 Scott Gast: And when you say, "He wanted to do the initial meeting," was that Mr.
29 Landon?

30 Spouse: Yes.

1 Scott Gast: And what issues did you discuss during the lunch?

2 Spouse: What issues?

3 Scott Gast: You said that he was interested in talking about issues and what you were
4 trying to do.

5 Spouse: We discussed his work, we discussed Marlin's work, we discussed just a
6 variety of things.

7 Scott Gast: Can you give us some examples?

8 Spouse: He is in movies, he makes a TV series and things like that, and he's an
9 advocate for family friendly programming, so he had been very excited to
10 discuss that. How some of the regulations had come down from
11 Washington had affected that, have actually been negative towards the
12 family friendly programming. He wanted to discuss that, and he also
13 wanted to ask Marlin about his Senate race and see what that looked like
14 and where he stood on some issues. It was just an initial meeting.

15 Scott Gast: Was there any solicitation for campaign contributions during the lunch?

16 Spouse: Marlin did not say, "Can you give me a check?" No, he didn't say that.

17 Scott Gast: Did he suggest that financial help would be welcome?

18 Spouse: In every initial meeting you have with someone, when you're laying the
19 groundwork, that's always assumed when you're running for office.

20 Scott Gast: In this meeting, was that conveyed?

21 Spouse: I wouldn't say it was laid out and said, "Hey, and by the way, I want a
22 check from you." No. That wasn't. This was an initial meeting to discuss
23 issues and lay groundwork for possible help in a race or whatever, if he
24 felt so led. If not, that's fine, but you have to lay the groundwork with
25 someone.

26 Scott Gast: Who attended the lunch?

27 Spouse: It was our family and him and an associate.

28 Scott Gast: When you say "our family," was that-

29 Spouse: Marlin, Christy, Child 1, and Child 2.

30 Scott Gast: It was Mr. Landon and one associate?

1 Spouse: Yes.

2 Scott Gast: Who paid for the lunch?

3 Spouse: I'm not sure. I don't remember that.

4 Scott Gast: Okay. The next item on the agenda for Saturday, August 15th was dinner
5 on the Queen Mary. What can you tell us about that dinner?

6 Spouse: Yes. We tried to make it work so that we would drive down and see some
7 constituents on the Queen Mary. Marlin gave some comments to the
8 people there and spent some time talking with them and things like that.

9 Scott Gast: Did Mr. Stutzman have a formal role at the dinner?

10 Spouse: Well, he got up and spoke.

11 Scott Gast: What did he speak about?

12 Spouse: He just welcomed everyone, and he's a congressman, and said, "Glad to
13 see you here." I don't remember everything he said. He said a little speech.

14 Scott Gast: Anybody else speak?

15 Spouse: Pat Miller spoke. He was the leader of it.

16 Scott Gast: Besides the two, Mr. Stutzman and Mr. Miller, anybody else?

17 Spouse: No, it was a very informal dinner.

18 Helen Eisner: How long did the congressman speak for that evening?

19 Spouse: Maybe two minutes, maybe three. I don't remember. It was just a
20 welcome, general speech.

21 Scott Gast: Who attended? Was it the entire family?

22 Spouse: Yes.

23 Scott Gast: Any friends?

24 Spouse: No, it was our family.

25 Scott Gast: The Davidsons, did they join you for that?

26 Spouse: No.

27 Scott Gast: Okay.

1 Helen Eisner: There were constituents present that evening?

2 Spouse: All of them were constituents.

3 Helen Eisner: What conversations did the congressman have with the constituents that
4 evening?

5 Spouse: What conversations? I don't know. I was trying to take care of the boys. It
6 was a very long dinner, and he was walking around talking at tables and
7 stuff.

8 Helen Eisner: How long was he walking around for?

9 Spouse: Probably an hour.

10 Helen Eisner: Were you present for any of the conversations?

11 Spouse: No, I was busy with a 13 year old and a nine year old.

12 Scott Gast: I want to move to Sunday, August 16th. It appears that there was a Reagan
13 Library Tour with Pat Miller's group and lunch under the wing of Air
14 Force One. Can you tell us about that tour?

15 Spouse: Yes. We paid for it out of our own personal money for the tickets, and we
16 were very excited that it worked out. We were going to be there at the
17 same time they were, and we enjoyed talking to them as we walked
18 through the library. It was very inspiring and exciting and we had a really
19 good time. It was the one day when our whole family would be together
20 and Marlin would have no long, boring meetings. We would actually get
21 to walk together, see things together, and be together.

22 Scott Gast: Would you characterize that as an official, campaign, or personal activity?

23 Spouse: I think, again, it was a mix of all of it. I was talking to constituents, he was
24 talking to constituents. At the same time, we were spending time together
25 as a family, so I would say that's a family campaigning together. I don't
26 know what you would categorize that.

27 Scott Gast: Did Mr. Stutzman, other than speaking with constituents throughout the
28 tour, have a formal role at all?

29 Spouse: No. I don't think so, uh-uh (negative).

30 Scott Gast: The schedule notes that that evening, dinner is open. Do you recall what
31 you did for dinner that evening?

1 Spouse: No, I don't. We probably grabbed a pizza somewhere or something.

2 Scott Gast: Do you recall how that was paid for? Personal funds, campaign funds,
3 official funds?

4 Spouse: Personal.

5 Scott Gast: Again, you were overnighting at the Luntz home. Is that correct?

6 Spouse: Mm-hmm (affirmative).

7 Scott Gast: That's a yes, just for the recorder.

8 Spouse: Yes.

9 Scott Gast: Then the final day of the trip, Monday, August 17th, looks as if that was a
10 tour of the Reagan Ranch. Would you characterize that tour as an official,
11 campaign, or personal event?

12 Spouse: I would say that would be more of an official.

13 Scott Gast: What was the connection to the official duties?

14 Spouse: You'd have to ask Marlin on that one. I don't know.

15 Scott Gast: What led you to say that it would be considered an official event?

16 Spouse: I'm just trying to categorize it. I don't know ... I don't know. Because he's a
17 congressman, he is interested in learning more about a former president.
18 How do I describe that?

19 Helen Eisner: There's no right or wrong answer. Just whatever you think.

20 Spouse: Okay. All right, well, I would say it was official, I guess.

21 Scott Gast: Who attended the tour?

22 Spouse: I mean, it was set up, I believe, through the office. I don't know, I'll have
23 to check on that. Who attended the tour?

24 Scott Gast: Yes.

25 Spouse: It was Marlin and Christy, Child 1 and Child 2, and I believe the
26 Davidsons went with us on that one. I'm not sure. I can't remember.

27 Scott Gast: This was not a part of the Pat Miller tour?

28 Spouse: No.

1 Scott Gast: Who paid the expenses associated with the tour?

2 Spouse: I'm not sure. I didn't take care of the finances.

3 Scott Gast: Then, that evening, you flew back to Detroit, flew back home.

4 Spouse: Mm-hmm (affirmative).

5 Scott Gast: What did you do for dinner that evening?

6 Spouse: We probably ate in the airport somewhere.

7 Scott Gast: Who paid?

8 Spouse: Because we landed at 11:10, right? It was a really late flight.

9 Scott Gast: I think you actually departed at 11:10 and arrived at 6:35 in the morning.

10 Spouse: Yeah. We probably ate in the airport or on the plane or something.

11 Scott Gast: Who paid for that meal?

12 Spouse: I'm not sure. I don't know.

13 Scott Gast: All right. Having gone through that schedule, were there any activities that
14 you or other members of the family participated in that are not reflected on
15 this agenda?

16 Spouse: No.

17 Scott Gast: Was there anything on there that we discussed that you did not do?

18 Spouse: That we did not do?

19 Scott Gast: I think we went through everything, but-

20 Spouse: Yeah, it covered everything.

21 Scott Gast: Okay. When this trip became the subject of some press reporting earlier
22 this year, the question was asked about your role and the children's role in
23 some of the political campaign events. The campaign manager at the time,
24 Josh Kelly, told the news media that "Stutzman's wife and sons attended
25 some campaign events with him, and then the whole family attended at
26 least one campaign dinner and Mrs. Stutzman attended other campaign
27 meetings as well."

28 Spouse: Mm-hmm (affirmative).

1 Scott Gast: Can you tell us what campaign events, to start out with, the whole family
2 attended?

3 Cleta Mitchell: I think she's done that, but you want her to go back and do it again?

4 Scott Gast: Yeah. I think if we just go through and highlight which ones, if you want
5 to use the itinerary again.

6 Spouse: We attended the dinner on the first-

7 Scott Gast: This is the whole family?

8 Cleta Mitchell: Tell him which dinner you're looking at, for the record.

9 Spouse: The dinner with Hallmark.

10 Scott Gast: Okay.

11 Spouse: I mean ... It's hard. As I've said before, there is a mix of things that,
12 whether it's official or campaign or whatever. Those things overlap a lot.
13 We attended the Michael Landon, Jr. lunch. We were with him at Capitol
14 Records. We went with him to Pat Miller's group, which was a campaign
15 event, to the Queen Mary, as well as Reagan Library, but out of an
16 abundance of caution, we paid personally for stuff just to be careful. Still,
17 in our minds, that was a campaign stop. We actually got some donations
18 from folks that were on Pat Miller's tour later on because we had met them
19 there. All of that was campaign- and fundraising-related.

20 Scott Gast: Were there any events where it was just you and Mr. Stutzman attending a
21 political campaign event?

22 Spouse: No, the boys were with us.

23 Scott Gast: Okay. Were there any conversations prior to the California trip about
24 whether you and the children would join Mr. Stutzman on the trip?

25 Spouse: Any conversations as to whether we would join him?

26 Scott Gast: Yes.

27 Spouse: Yes, mm-hmm (affirmative).

28 Scott Gast: What were those conversations?

29 Spouse: Well, again, this trip was fluid in its planning, it was changing as we went
30 and could solidify things or whatever. We always are trying to keep our

1 family together, and so that would have been one of the discussions, was,
2 “Okay, do we have to do this trip in August?” That's the one time when
3 Marlin's off. If so, then let's see what we can do to make the most of it as
4 far as what connections I can throw into it. Instead of maybe doing a
5 separate meeting down the road with my connections in California, maybe
6 we can combine them into one trip. That would be the type of
7 conversation that we would have. If we can combine them into one trip,
8 my connections and then his connections, we could, not just that, but if
9 there was a chance we could overlap with the Pat Miller and meet them as
10 well, and have the family there, it would be a lot of things taken care of in
11 one thing. That would have been the conversation.

12 Scott Gast: Were there discussions prior to the trip about who would pay for the
13 expenses of you and the children?

14 Spouse: I'm never really into the financial decisions. That's taken care of with our
15 chief of staff and the campaign team and Marlin.

16 Scott Gast: I want to jump ahead to earlier this year, when there was some press
17 reporting about this trip, and a decision was made to have Representative
18 Stutzman and the Stutzman family reimburse the campaign for certain
19 expenses from the trip.

20 Spouse: Mm-hmm (affirmative).

21 Scott Gast: Were you involved in conversations about the decision to reimburse?

22 Spouse: No. No, I was not.

23 Scott Gast: Did Mr. Stutzman share with you the reasoning for making the
24 reimbursement of some expenses, not others?

25 Spouse: After he had done it, he did, and he said that he felt like it was
26 unnecessary.

27 Scott Gast: That he felt like what was unnecessary?

28 Spouse: The reimbursement.

29 Scott Gast: Did he say why he felt it was unnecessary?

30 Spouse: Because they had checked with Ethics, they had made sure everything was
31 cleared before we did any of this. It was cleared.

1 Scott Gast: Was there any discussion about why certain expenses were reimbursed
2 and other expenses were not?

3 Spouse: Like what?

4 Scott Gast: For example, airfare for I believe it was you and the children was
5 reimbursed, the cost of the rental vehicle was not.

6 Spouse: Well, I would say that he used that rental vehicle the majority of the time.
7 We rode with him when we needed to go someplace, but he was driving a
8 lot more with that rental vehicle.

9 Scott Gast: I believe those are all the questions I have about the California trip, unless
10 ... Do you have any other thing to add?

11 Helen Eisner: I do not.

12 Scott Gast: I want to ask you briefly about birthday events, events coinciding with
13 Representative Stutzman's birthday. Does that sound familiar to you?

14 Spouse: Yeah.

15 Scott Gast: Events held at a farm.

16 Spouse: Mm-hmm (affirmative).

17 Scott Gast: Can you tell us about those events, generally?

18 Spouse: Generally it's a fundraising event centered right around the time when it's
19 Marlin's birthday.

20 Scott Gast: Is that in August?

21 Spouse: Mm-hmm (affirmative).

22 Scott Gast: Okay. Does it have a birthday theme, I assume?

23 Spouse: Yeah. That's the theme of it, and it's usually farming and family friendly
24 and we have lots of games for the kids and stuff like that.

25 Scott Gast: When you say a fundraiser, is there a cost to attend?

26 Spouse: I believe there is, yeah. It's a minimal cost.

27 Scott Gast: All right. I believe that's all I have on that. Just a couple of other areas to
28 touch on that I don't think will be as involved. I want to ask you about
29 Gabe Rivera. Who is Gabe Rivera to you?

1 Spouse: He's my brother-in-law.

2 Scott Gast: He's married to your sister?

3 Spouse: Yes.

4 Scott Gast: Okay. We understand that at some point, he was employed by
5 Representative Stutzman's congressional campaign, is that correct?

6 Spouse: Right.

7 Scott Gast: What was his position at the campaign?

8 Spouse: He was the in-state fundraiser, the Indiana state fundraiser.

9 Scott Gast: When was he employed by the campaign as the in-state fundraiser, the
10 approximate time period?

11 Spouse: It was the summer that Marlin was running for Congress the first time.

12 Scott Gast: Approximately how long was he in that position?

13 Spouse: I think it was two and a half years, three years. I can't remember.

14 Scott Gast: Sure. How was it that Mr. Rivera came to be hired by the campaign in that
15 position?

16 Spouse: Well, we had had a part time fundraiser before that, and hadn't been too
17 happy with the job that was done. There were some issues there. We were
18 looking, Marlin was looking specifically for someone he could trust,
19 someone who had a sales background, someone who was professional,
20 someone who knew how to network and do a good presentation. My
21 brother-in-law is very good at that. He trusted him completely with the
22 money as well, and it's always hard to find people that you can trust with
23 that.

24 Scott Gast: Who came up with the idea to turn to Mr. Rivera as a possibility?

25 Spouse: I don't remember. I don't know. It's probably-

26 Scott Gast: Is that something you may have suggested, or did Mr. Rivera offer to do
27 it?

28 Spouse: No, I think it was Marlin's idea. I think he approached him about it.

29 Scott Gast: Were other folks interviewed or sought after?

1 Spouse: I think there were several other considerations, but again, that was ...
2 Marlin is the hiring guy, so he was looking at all the angles and options
3 and stuff, and really, there's not a whole lot of good fundraisers in Indiana
4 right now, and we've run into that several times.

5 Scott Gast: Had Mr. Rivera had previous experience with campaign fundraising?

6 Spouse: No, not specifically, no.

7 Scott Gast: With other types of fundraising, nonprofit fundraising?

8 Spouse: Yes.

9 Scott Gast: What was that experience?

10 Spouse: Yeah. He was in sales for a while, and then he was working with my dad's
11 fine arts performing arts center. Constantly, when you are in that sector,
12 you are constantly trying to find ways to raise money and network. It's not
13 a sector that is easily funded. It's a challenge to do that, and he was on
14 staff there for I think it was three years or so, and helping with all aspects
15 of it.

16 Scott Gast: He was an employee?

17 Spouse: Yes.

18 Scott Gast: When you say your dad's fine arts center, what is that?

19 Spouse: I don't think that's relevant to this right now. I'd rather keep my parents out
20 of it, if possible.

21 Scott Gast: Generally, is it a nonprofit organization that he owns?

22 Spouse: Yes, it's nonprofit.

23 Scott Gast: Or is he on the board?

24 Spouse: He owns. He founded it.

25 Scott Gast: He owns it. Okay. Is it a venue?

26 Spouse: Yes.

27 Scott Gast: Okay. I think that's sufficient information for what we need. How would
28 you rate his performance over the two and a half, three years that he
29 served as finance director?

1 Spouse: He really did a good job. In fact, a lot of folks, even though he wasn't as
2 familiar with political stuff, were just really impressed with the job he did.
3 Very professional, very easy to talk to. We just got good reviews. Also, he
4 had an uphill battle. We had a very ... I would say our district is harder to
5 raise money, just because it's not a swing district, and so it's always a
6 challenge to say, "Hey, we need money too." You're constantly scrounging
7 to try to find sources for money to say, "We've got to have a campaign.
8 Even though we're not on the top ten watch list or whatever for our swing
9 districts, we're going to need money." That's a difficult thing to jump into,
10 and he did a great job.

11 Scott Gast: Did the campaign or anyone associated with the campaign seek any
12 guidance, whether from the FEC or the Committee on Ethics or anybody
13 prior to hiring Mr. Rivera, given his family relationship?

14 Spouse: I think Marlin is very, very meticulous, and he would have checked on
15 something like that, but you'd have to ask him.

16 Scott Gast: Okay. You're not aware?

17 Spouse: I don't know.

18 Scott Gast: Do you know what his compensation was during his time as finance-

19 Spouse: No. That wasn't- ... I am not a financial person.

20 Scott Gast: Who would have set his compensation?

21 Spouse: Marlin. Marlin would.

22 Scott Gast: He, at some point, departed the campaign, left the campaign.

23 Spouse: Mm-hmm (affirmative).

24 Scott Gast: Do you know why he left the campaign?

25 Spouse: Yeah. He had wanted to finish his degree, and he was going to college in
26 Virginia, in Fredericksburg. That was his hometown. He kind of wanted to
27 move back there and finish up ... I think it was a counseling degree or
28 something he was working on. It would just be easier if he was local,
29 rather than trying to do it long distance, and so he wanted to move back to
30 Fredericksburg. However, it was very difficult then commuting back to
31 Indiana and stuff, so it was one of those things where it just wasn't going
32 to work anymore for what he's wanting to do.

1 Scott Gast: During his time with the campaign, he lived in Indiana?

2 Spouse: Mm-hmm (affirmative).

3 Scott Gast: Then, after leaving the campaign, he moved to Virginia?

4 Spouse: Yeah. No, I think he actually moved to Virginia while he was still working
5 for us, and then we phased him out. Yeah.

6 Scott Gast: Okay. What was that time period where he had moved to Virginia, before
7 he left the campaign?

8 Spouse: It wasn't very long, but I'm not sure if it was months or whatever. We had
9 a time period, we just kind of had to transition.

10 Scott Gast: Were the circumstances amicable?

11 Spouse: Oh, yeah. Yeah.

12 Scott Gast: Who was his successor?

13 Spouse: Oh boy, now you've got me. Let me think here, let me think. The in-state
14 fundraiser would have been ... It was a lady from Indianapolis, I think.
15 Sorry. You'll have to ask Marlin that one.

16 Scott Gast: Sure.

17 Spouse: I worked with her some, but not much.

18 Scott Gast: Had this woman come from other campaigns? Do you know her
19 background?

20 Spouse: Mm-hmm (affirmative), she'd worked with the Todd Young campaign for
21 a while.

22 Scott Gast: Those are all the questions I have on that. I just have one final subject to
23 go over with you briefly. There has been some reporting in the press about
24 the level of reimbursement for mileage that Mr. Stutzman may have had,
25 so we're trying to understand a little bit about that process, that
26 involvement. When Mr. Stutzman is in Indiana, how does he usually travel
27 around the district?

28 Spouse: It used to be ... And, I can't remember when this ... It changed when we
29 started the Senate campaign, because the new consultants encouraged him
30 to change it. We had had a campaign vehicle. I can't remember if it was
31 for PR-related, something that they were saying, "Let's change this." Then,

1 we ... Marlin can tell you all the details about... we sold it or leased it or
2 whatever. I can't remember. We got rid of that one, and we got one that
3 was in our personal name, but then we have a log, a running log, of
4 official ... "This mileage here is official, and then this mileage here is
5 campaign." It's kept in the vehicle.

6 Scott Gast: In the vehicle.

7 Spouse: Mm-hmm (affirmative).

8 Scott Gast: Prior to that, when the campaign had a vehicle, would Mr. Stutzman use
9 different vehicles depending on whether he was traveling to an official
10 event or a campaign event, or was it always the same vehicle?

11 Spouse: It was the same vehicle, and then I think there was reimbursement, but
12 again, I wasn't in on that reimbursement process, so I don't know.

13 Scott Gast: I believe those are all the questions I have on mileage, too. Unless there
14 are other questions, I believe that is all we have for you.

15 Spouse: Okay.

16 Scott Gast: Unless you think there's information that you would like to share with us
17 or that you would like us to know. We're happy to-

18 Spouse: I don't know. I guess that's it. Yeah.

19 Scott Gast: We appreciate you sitting down with us. It's been helpful to flesh this out.

20 Spouse: Okay. Thanks.

21 Scott Gast: Thank you.

22 [BREAK]

23 Scott Gast: Again, Scott Gast, Helen Eisner, Konstantine Kastens with OCE, here
24 with Spouse and her counsel, Clea Mitchell. Spouse is providing the OCE
25 with copies of Facebook posts relating to the California trip. She wanted
26 to explain that.

27 Spouse: Yes. They were personal Facebook posts posted to my friends. They were
28 just three pictures. It was at the Reagan Library. We went to the Reagan
29 Library which we paid for out of our own personal money. We did meet
30 some constituents there and things like that and on the post I mentioned
31 the word "vacation," which is probably a mistake on my part because to
32 me I just try to make the most of everything and have fun.

1 The boys were on summer vacation, so... but the reason I want to mention
2 that is that, and the reason I mention that it was to friends is that in the
3 articles that you're referencing it says that they were taken down and that's
4 not true. They were never taken down and the reason I know who supplied
5 the information on those is that when we started getting word that they
6 were a problem, I realized there was a friend that was listed on my friends
7 list that was part of the Todd Young campaign. I blocked them. When the
8 article came up it said that I had taken them down and I hadn't. It was
9 because they couldn't see them anymore.

10 Scott Gast: Okay. Anything further you want to add about the Facebook posts?

11 Spouse: No.

12 Scott Gast: Okay. Thank you again.

Exhibit 7



Christy Stutzman
August 16, 2015

Great trip to the Reagan Library for our family vacation, teaching these two about the great Ronald Reagan and the Reagan Revolution.

Tag Photo Add Location Edit

Like Comment Share

1 share 9 Comments

View 4 more comments

[Redacted Comment] August 16, 2015 at 9:47pm

[Redacted Comment] August 16, 2015 at 10:21pm

[Redacted Comment] August 16, 2015 at 11:02pm

[Redacted Comment] August 17, 2015 at 2:27pm

Like Reply August 18, 2015 at 8:03am

Write a comment



MS-1.2.CS00020

Exhibit 8



John Hammond <[redacted]>

California Trip 8.12.15 - 8.17.15

7 messages

John Hammond <[redacted]> Tue, Aug 11, 2015 at 6:25 PM
To: Marlin Stutzman <[redacted]>
Cc: Christy Stutzman <[redacted]>, Bryan Prisock <[redacted]>, Mary Wells <[redacted]>, Brendon DelToro <[redacted]>, Laura Van Hove <[redacted]>

Marlin:

Attached to this email is your trip packet for your upcoming political trip to California. Please review carefully. Included in the itinerary is not only the day-by-day schedule pasted below but also the background materials for each political event and the family's tickets to universal studios. Bryan has agreed to print off multiple color copies this evening so both you and Christy can have them in hand at all times during your trip.

You will see that some of the time remains open on the weekend as well as the dinner slots on Thursday and Friday evening. You are free to do what you please during this time. Please also observe the details regarding attire and drive times for each entry. Other than the open times everything is scheduled pretty tight. We are also waiting for the exact location of the political lunch with Michael Landon Jr. and his colleagues which will be provided to Christy very soon.

Lastly, if you can connect with Bruce Bialosky (I believe you left him a VM) and set up a meeting for the morning of August 17th, this could work well on the way up to the Reagan Ranch.

Please let me know if you have any questions.

John

STUTZMAN DAY-BY-DAY AGENDA 8.12.15 - 8.17.15

Wednesday, August 12th

8:08- 8:38 a.m.- WOWO at [redacted] or [redacted]

8:30- 11:15 a.m.- Drive from Howe to Detroit Airport

10:30 a.m. – Call with Nathan at *Roll Call* (Brendon will conference you in)

12:20- 2:10 p.m.- Fly DTW to LAX

Family Confirmation: GNH9UZ

Depart Delta 1719 DTW to LAX (Depart 12:20 p.m.; Arrive 2:10 p.m.)

Seats: 22 A,B,C, D

Pick-up Ford Expedition Rental Car at Economy in LAX Airport

Confirmation: EGDSX197DF

2:30- 3:00 p.m.- Drive from LAX to Frank Luntz's home located at [REDACTED] Los Angeles, CA 90049.

Call Frank's scheduler, Dana Black, when you land at [REDACTED] so she can meet you at Frank's when you arrive. Frank's home is 20 minutes away from airport.

6:30- 7:00 p.m.- 15 minute drive from Frank Luntz's to Madeo's (8897 Beverly Blvd, West Hollywood, CA 90048)

7:00- 8:30 p.m.- Dinner with Hallmark at Madeo's in West Hollywood

Attendees:

Bill Abbott
Paris Abbott
Daniel Lissing
Bailee Madison
Patty Riley
Brad Krevoy
Olivia Krevoy
Congressman Marlin Stutzman
Christy Stutzman
Payton Stutzman
Preston Stutzman
Don Davidson
Audrey Davidson

8:45 p.m - drive back to Frank Luntz's home from Madeo's

Thursday, August 13th

CS and Boys:

9:00 a.m.- CS and Boys Uber to Universal Studios located at 100 Universal City Plaza Universal City, CA 91608 (17 minutes away – expecting you at 9:30am)

The Abbotts, Stutzmans and Krevoy's meet at Front Gate



Universal Studios Hollywood – Global Fountain

9:30am – begin day at Universal Studios (see tickets attached)

11:30am or Noon - Lunch

There are 50+ other restaurants as part of Universal Studios/Universal City Walk

Contacts:

Ron Del Rio, Publicity



Late Afternoon - Uber back to Frank Luntz's home to meet up with MS ([redacted] Los Angeles, CA 90049)

MS Schedule:

7:40 a.m. – Leave to pick up Stefanie Williams of LVH Consulting ([redacted] at Hotel Angeleno (170 N. Church Lane, Los Angeles, CA 90049)

****Note:** Joe Crail Meeting shows an hour drive time away. This is not including traffic**

7:50 a.m.- 9:15 a.m.- MS drives rental car for meeting in Irvine (1 hour drive w/ no traffic)

9:30- 10:30 a.m.- Meeting with Joe Crail at [redacted] Irvine, CA 92612 ****See Attached Briefing Sheet** - *Business Attire***

10:35- 12:15 p.m. - MS drives to Brad Jones lunch (1 hour drive w/ no traffic)

12:30- 2:00 p.m.- Brad Jones lunch at Il Grano Restaurant, 11359 Santa Monica Boulevard, Los Angeles, CA 90025 ****See Attached Briefing Sheet** - *Business Attire***

2:05 p.m. - 2:20 p.m.- Drive from Il Grano to Hotel Angeleno to drop Stephanie off

2:25 p.m. – 2:30 p.m. – drive back to Frank Luntz's home to meet CS & Boys ([redacted] Los Angeles, CA 90049)



Evening – Dinner (open)

Friday, August 14th

CS & Boys:

OPEN

MAS Schedule

9:25 a.m. – 9:30 a.m. – Drive to pick up Stefanie Williams of LVH Consulting ([REDACTED]) at Hotel Angeleno (170 N. Church Lane, Los Angeles, CA 90049)

9:35 a.m. – Meet Stefanie in the lobby of the hotel

9:40 a.m. - 10:20 a.m.- Drive to Governor Pete Wilson meeting

10:30 a.m. - 11:00 a.m.- Meeting with Governor Pete Wilson at Morgan Lewis & Bockius ([REDACTED]) Los Angeles, CA 90071) ****See Attached Briefing Sheet** Business Attire**

11:05 a.m. – 12:10 a.m. – drive to Dale Dykema meeting in Orange, CA. (45 minute drive w/ no traffic)

12:15 p.m. – 12:45p.m. - grab quick lunch in Orange, CA

1:00 p.m.- 2:30 p.m. - Meeting with Dale Dykema at TD Service Company ([REDACTED]) Orange, CA 92868) ****See Attached Briefing Sheet* Business Attire**

2:30 p.m. – 3:15 p.m. – drive back to Hilton Garden INN (2100 East Mariposa, El Segundo, CA 90245).

Hotel Reservation at Hilton Garden Inn LAX/ El Segundo located at 2100 East Mariposa, El Segundo, CA 90245

Confirmation: 3196817288

1 room, 2 queens: \$680.67

1 room, 1 king: \$615.87

Evening – Dinner (open)

Saturday, August 15th

7:45 a.m. –drive from hotel to Capitol Records (1750 Vine Street, Los Angeles, CA 90028). Drive is 30 minutes w/ no traffic.

8:30 a.m. – 11:00 a.m. – Tour at Capitol Records

12:30 p.m. - 2:00 p.m.- Lunch with Michael Landon Jr. and colleagues on Vine Street near Capitol Records (exact location TBD)

7:30 p.m. – dinner in the Promenade Café on the Queen Mary (1126 Queen's Highway, Long Beach, CA 90802)

Late evening - drive from Queen Mary back to hotel

Sunday, August 16th

8:00 a.m. – Depart Hilton Garden INN and drive to Reagan Library (40 Presidential Drive, Simi Valley, CA 93065). ****Drive is one hour w/out traffic****

9:30a.m.- Noon - Reagan Library tour with Pat Miller's group

Noon - 1:00 p.m.- Lunch under the wing of Air Force One

1:15 p.m. – 2:30 p.m. - drive back to hotel from Reagan Library

Evening – Dinner (open)

Monday, August 17th

10:00am – 1:00pm – drive from hotel to Reagan Ranch (217 State Street Santa Barbara, CA 93101) w/ stop for lunch

1:00 pm - Arrive at the Reagan Ranch Center

YAF's state-of-the-art "Schoolhouse for Reaganism" is located in downtown Santa Barbara, just two blocks from Santa Barbara's historic waterfront. (217 State Street Santa Barbara, CA 93101)

1:00-2:00 pm Tour the Exhibit Galleries & watch introductory film on the Ranch

Original artifacts, dynamic multimedia exhibits, and a 30-minute film introducing the Ranch in Ronald Reagan's own words provide the perfect backdrop for your Ranch experience.

2:00-2:45 pm Travel to Rancho del Cielo

The Ranch is located in the mountains above Santa Barbara, about a 45-minute drive from the city. Transportation is provided to and from the Ranch by YAF.

2:45-4:15 pm Tour the Rancho del Cielo

Today the Reagan Ranch is preserved just as it was when Ronald Reagan called it home, down to his books on the shelves, clothes in the closet, and saddles and ranch tools in the garage. Guests will receive an intimate, private tour of the Reagans' home and enjoy some of the spectacular ocean and valley vistas Ronald Reagan so loved.

4:15-5:00 pm Depart Ranch and return to Santa Barbara

A final stop back at the Reagan Ranch Center will conclude the visit. All guests receive several unique mementos as a reminder of their visit to Ronald Reagan's Western White House.

5:15pm – Begin driving to LAX from Santa Barbara to drop off rental car

11:10pm - Family Flies LAX to DTW

Family Confirmation: GNH9UZ

Depart Delta 1406 LAX to DTW (Depart 11:10 p.m.; Arrive 6:35 a.m.)

Seats: 31 A,B,C,D

###

 **StutzmanTripMaterials8.12-8.17.15.pdf**
739K

Exhibit 9

Stutzman 013-0114 CH



WEDNESDAY, AUG 12, 2015 - WEDNESDAY, AUG 12, 2015

Trip Confirmation Number: I551

Washington ✈ LAX, Los Angeles

Depart: Wednesday Aug 12, 2015

Flight	Departure	Arrival	Duration
721	07:15 AM DCA, WASHINGTON REAGAN	09:03 AM DEN, DENVER	3hr 48min NonStop
406	12:25 PM DEN, DENVER	01:48 PM LAX, LOS ANGELES	2hr 21min NonStop

Passenger Name	Sex	Age	Special Services
Janis Williams	F	1	Carry On

Prices

Base Fare	\$172.00
Taxes	\$48.00
Carriage Fees	\$35.51
TOTAL	\$255.51

Cons

Janis Williams	
Car Fee	\$18.00
Car Fee Reg	\$80.00
TOTAL	\$255.50

Purchase Date: 08/10/15

Payment: Visa



our US Airways flight

message

reservations@email-usairways.com <reservations@email-usairways.com>

Tue, Aug 11, 2015 at 12:38 P

US AIRWAYS Your reservation

[Book again](#)

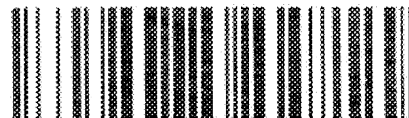
[Travel tools](#)

[Advantage](#)

[US Airways Vacations](#)

You're confirmed

Date issued: Tuesday, August 11, 2015



Scan at any US Airways kiosk to check in



Next stop: the airport. See terminal information and find your way.

Confirmation code:

EJ7TJ9 US Airways

Passenger summary

Passenger name	Frequent flyer # (Airline)	Ticket number	Special needs
Stefanie Williams	[REDACTED]	03724131629072	
Day of departure phone:	[REDACTED]	Email for receipt:	[REDACTED]

Trip details

Download to Outlook



BUR → **BOS** Burbank, CA to Boston, MA
Friday, August 14, 2015

FLIGHT# 5563	Operated by Mesa Airlines dba US Airways Express	AIRCRAFT	CRJ 900
DEPART	07:06 PM BUR	CABIN	Coach
ARRIVE	08:32 PM PHX Terminal 4	MEAL	—
TRAVEL TIME	1h 27m	SEATS	17F

Flight # 5563: Plane change required in PHX

Stop: Change plane in Phoenix, AZ (PHX)

FLIGHT# 560	Operated by US Airways	AIRCRAFT	A321
DEPART	11:59 PM PHX Terminal 4	CABIN	Coach
ARRIVE	07:53 AM BOS Terminal B		

Exhibit 10

Hammond, John

From: Christy Stutzman <[REDACTED]>
Sent: Wednesday, July 08, 2015 4:07 PM
To: Hammond, John
Cc: Wells, Mary
Subject: Re: The Stutzman Family Vacation

John- With everything we have going with both of our houses right now, I'm a bit frazzled. Tons of calls and emails going back and forth. Is there any way you could contact Pam Slay for me and work things out? If dinner the 12th works great! Whatever you work out is fine. Please share with her our thoughts and plans for Thursday- attending taping together- then Marlin going to lunch and meetings while the boys and I do the park- then dinner with Hallmark execs that night? Just needing help and would rather let you handle communications and logistics today. I will contact Capitol again if you could reach out to their lobbyist too, maybe we'll get an answer.

Thanks,
Christy

Sent from my iPhone

On Jul 8, 2015, at 1:54 PM, "Hammond, John" <[REDACTED]> wrote:

Sorry – I meant a set lunch on Thursday and possible meeting requests for Thursday afternoon and Friday.

From: Hammond, John
Sent: Wednesday, July 08, 2015 1:54 PM
To: [christystutzman@\[REDACTED\]](mailto:christystutzman@[REDACTED])
Cc: Wells, Mary
Subject: FW: The Stutzman Family Vacation

Christy-

Before you confirm anything with Pam, would you let me call Laura to see what we have set for those two days? I know for certain we have a lunch on Friday and other possible meeting requests for Thursday afternoon. I'll give you a call in a little bit after I get a better understanding of the schedule. Thanks!

As we discussed briefly yesterday, it might also be worth (if you still want to do it) emailing your contact again at Capitol Records to see if they can still accommodate you on a day of your choosing. At this stage it looks like the weekend might be best if you all have open time as a family. And for your information, the Reagan Library tour is with Pat Miller's group on Sunday. Still trying to get exact times back from Pat. He didn't know them when I called him two days ago.

Thanks,

John

From: Pam Slay [[mailto:\[REDACTED\]](mailto:[REDACTED])]
Sent: Wednesday, July 08, 2015 1:40 PM
To: Christy Stutzman ([REDACTED]); Hammond, John

1

MS-1.2.JRH-CS00007

THMS_0418

16-3645_0226

Cc: Ron Del Rio

Subject: The Stutzman Family Vacation

Hi Christy! I hope this note finds you well. Of course, we are all most excited about your family's vacation here in August. Bill is wondering if we could set up dinner for you all and him on the evening of August 12? Then, you all will start your day on August 13 at Universal Studios Tour and Bill will join you all out at Home & Family at 12:30 that afternoon. You all can finish off a wonderful day in the park following Home & Family and there are many terrific places for family dinner at the end of your day.

Can you kindly confirm at your earliest convenience if this plan will work for all of you? Also, the network will need to know where to deliver your VIP set of tickets for Universal Studios. Thanks so much & hope everyone is well!

Kindest regards,

Exhibit 11



John Hammond <[redacted]>

Need to confirm for CA

2 messages

Christy Stutzman <[redacted]> Wed, Jul 22, 2015 at 1:16 AM
To: John Hammond <[redacted]>, Marlin Stutzman <[redacted]>, John Hammond <[redacted]>

John,
Below is an email I received from Pam Slay today. She copied Ron Del Rio on it as well. Marlin said he would count a dinner with Bill Abbott as a FR dinner. We need to let them know tomorrow so they can plan accordingly.
Thanks,
Christy

From Pam Slay:
I'm so sorry to disturb! Signs of very busy agendas on both sides. Are we able to confirm Aug 12 for dinner? Honestly, if you all cannot, Bill will look forward to another time. I only need to let him know because he is bringing his daughter Paris.

Ron can you please help me track as I will be going on vacation in a week? Thanks all. Take good care!
Pam Slay

Hammond, John <[redacted]> Wed, Jul 22, 2015 at 9:04 AM
To: Christy Stutzman <[redacted]>, John Hammond <[redacted]>, Marlin Stutzman <[redacted]>

Understood. We will coordinate with Pam first thing to lock it in.

Sent with Good (www.good.com)
[Quoted text hidden]

Exhibit 12

1 **Former Fundraising Consultant Employee**
2 **Transcript of Interview**
3 **July 5, 2016**
4

5 Scott Gast: For the record, this is Scott Gast and Paul Solis with the Office of
6 Congressional Ethics. We're here with National Fundraising Consultant
7 Employee ("FR Consultant"), who has agreed to sit down for an interview
8 with us. It's July 5th, 2016. Former Fundraising Consultant Employee has
9 signed the False Statements Act acknowledgement, and we'll dive right in.
10 We'd like to start with a little bit of background information, if you can tell
11 us what you're currently doing employment-wise, how long you've been in
12 that position?

13 FR Consultant: I currently work at the Department of Conservation and Recreation. I've
14 been there since May 31st of 2016.

15 Scott Gast: That's here in the state of Massachusetts, that department?

16 FR Consultant: Yeah, the state of Massachusetts.

17 Scott Gast: What's your position there?

18 FR Consultant: I'm special assistant to the deputy commissioner.

19 Scott Gast: Generally, what are your duties in that position?

20 FR Consultant: I'm an executive assistant.

21 Scott Gast: Prior to joining the Department of Conservation and Recreation, what
22 were you doing?

23 FR Consultant: I was unemployed.

24 Scott Gast: For how long a period?

25 FR Consultant: From December 2015 until I was hired.

26 Scott Gast: Okay. Prior to December of 2015, what were you doing?

27 FR Consultant: I was employed by LVH Consulting.

28 Scott Gast: What was your time period that you were employed by LVH?

29 FR Consultant: April 2015 through December 2015.

30 Scott Gast: A rather short time period?

1 FR Consultant: Yes.

2 Scott Gast: What was your position at LVH?

3 FR Consultant: I was a finance director there.

4 Scott Gast: What duties did that entail?

5 FR Consultant: I would fundraise for clients that were designated to me.

6 Scott Gast: Would that be events, direct mail, telephone?

7 FR Consultant: Primarily events. We would get a host who would say that they would
8 have an event for one of our clients, and then try to get other hosts on
9 board and fundraise through that. Very few people would we call and just
10 get money from individually.

11 Scott Gast: What kind of clients? Were these exclusively political clients, where there
12 corporate clients?

13 FR Consultant: While I was there, exclusively political.

14 Scott Gast: How many clients did you have at a time?

15 FR Consultant: I really can't remember exactly how many were at the firm at that time. I
16 know that I primarily worked on Congressman Ryan Zinke's fundraising,
17 and I would help with other clients as people needed me to.

18 Scott Gast: Before we jump into some of those other clients, before April of 2015,
19 what were you doing?

20 FR Consultant: I was unemployed.

21 Scott Gast: For roughly how long?

22 FR Consultant: From November 2014 through April 2015.

23 Scott Gast: And prior to ...

24 FR Consultant: I worked on Dr. Monica Wehby's US Senate campaign.

25 Scott Gast: Okay. What did you do for that campaign?

26 FR Consultant: I was a finance director.

27 Scott Gast: This is kind of the area that you specialize in?

28 FR Consultant: Yes.

1 Scott Gast: I want to talk specifically about your work for Representative Marlin
2 Stutzman. Was he one of your clients?

3 FR Consultant: He was a client of the firm, and I would just help out whenever I was
4 needed.

5 Scott Gast: Was there one person who was the point person for his ...?

6 FR Consultant: We all shared him.

7 Scott Gast: How many people worked at LVH during the time that you were there?

8 FR Consultant: It was myself, one other finance director, vice president, and then Laura
9 and James, who owned the firm. Five total.

10 Scott Gast: Five principal people, and you would all help out with the Stutzman
11 campaign as needed?

12 FR Consultant: Correct.

13 Scott Gast: Were you hired to fundraise for his Senate campaign specifically?

14 FR Consultant: Yes.

15 Scott Gast: Had you done any work for his congressional campaign? He had been a
16 sitting Member of the House.

17 FR Consultant: I had not.

18 Scott Gast: Your work was exclusively for the Senate campaign?

19 FR Consultant: Correct.

20 Scott Gast: When did you start working on his campaign? Was it right away when you
21 started at the firm?

22 FR Consultant: I can't remember if he was already a client or not when I started.

23 Scott Gast: Do you remember how you came to work on his matters?

24 FR Consultant: I think it was just Laura saying, "Can you help out with this event?" If
25 there was an event that came up that she asked me to help with, then I
26 would.

27 Scott Gast: Did you work on matters prior to this trip to California in August of 2015?

28 FR Consultant: I can't remember, but I believe that was the first one.

1 Scott Gast: The California trip was the first?

2 FR Consultant: Mm-hmm (affirmative).

3 Scott Gast: Specifically if you know, what service did LVH provide to representative
4 Stutzman's campaign?

5 FR Consultant: I believe just fundraising.

6 Scott Gast: That was event fundraising?

7 FR Consultant: Yes.

8 Scott Gast: Were you aware of the fundraising staff on Representative Stutzman's
9 campaign actually employed by the campaign?

10 FR Consultant: No.

11 Scott Gast: Do you know if he had an in-state fundraising team or fundraising person?

12 FR Consultant: I don't know for sure but I would assume he did, since he had a campaign
13 there.

14 Scott Gast: Did you work on matters in Indiana?

15 FR Consultant: No.

16 Scott Gast: Okay.

17 FR Consultant: LVH Consulting would only fundraise outside of the congressman or
18 Senator's state, so we wouldn't fundraise in Indiana for Congressman
19 Stutzman.

20 Scott Gast: Okay. With whom did you work in the Stutzman world?

21 FR Consultant: I was not ever in contact with ... I don't remember being in contact with
22 anyone from the Stutzman campaign or his congressional staff at all.

23 Scott Gast: Who would have been?

24 FR Consultant: Laura.

25 Scott Gast: Laura Van Hove?

26 FR Consultant: Yes.

27 Scott Gast: Would she then relay instructions to you?

1 FR Consultant: Correct.

2 Scott Gast: I want to jump to this California trip in August.

3 FR Consultant: Okay.

4 Scott Gast: How did you first become aware of this trip?

5 FR Consultant: I can't remember. Most of the time if I was going to staff somebody who
6 wasn't Congressman Zinke, Laura would say, "I have this trip put together,
7 will you staff this person?" I'm sure that's how that went down.

8 Scott Gast: Do you recall when that would have been?

9 FR Consultant: I'm not sure.

10 Scott Gast: If the trip was August 12th through the 17th, would it have been a couple
11 of days before, a couple of weeks before, a couple of months before?

12 FR Consultant: Just a couple of weeks, most likely.

13 Scott Gast: Couple of weeks. Do you recall what you were asked to do?

14 FR Consultant: I think I just had to go and staff him at events.

15 Scott Gast: Were you involved in setting up any of those events?

16 FR Consultant: I think that I had called to confirm with whoever was hosting that they
17 were still okay to host the event. We didn't want to go if they weren't
18 going to be there.

19 Scott Gast: Right.

20 FR Consultant: But I don't believe I was part of the actual fundraising for the trip.

21 Scott Gast: Who would it have been?

22 FR Consultant: Somebody else, I'm not sure who.

23 Scott Gast: Would that have been somebody within LVH?

24 FR Consultant: Yes.

25 Scott Gast: Okay. Would that have been Laura Van Hove, possibly other folks, a mix?

26 FR Consultant: It could have been a mix, but I'm not sure.

27 Scott Gast: Sure.

1 Paul Solis: Did you ever staff another trip like this in another state? For any candidate
2 you were working with?

3 FR Consultant: Yes.

4 Paul Solis: Who else would you have staffed out of state?

5 FR Consultant: Any of the other clients we had. I remember staffing Senator Toomey, I
6 staffed Senator Sasse, I staffed Senator Rounds, so it was common for me
7 to staff the other clients if somebody else was unable to.

8 Paul Solis: These are fundraising trips outside of their state or district?

9 FR Consultant: Correct.

10 Paul Solis: Would anybody else from LVH have attended those trips with you as
11 well?

12 FR Consultant: No. I would go on my own.

13 Scott Gast: Roughly how many trips would you estimate you staffed prior to the
14 Stutzman trip to California?

15 FR Consultant: I think probably between five and ten?

16 Scott Gast: That was all with LVH?

17 FR Consultant: Yep.

18 Scott Gast: What do you recall of how the event was described to you, how the trip
19 was described to you?

20 FR Consultant: Like how it was set up, or ...

21 Scott Gast: I guess when Laura came to you and said, "I need your help with this,"
22 what did she tell you?

23 FR Consultant: I honestly can't remember. It was a pretty standard, "He's going to Los
24 Angeles, we need somebody to go, it's these dates, these are your flights,
25 this is where you're staying, this is the agenda of what's going on." Then I
26 would just go to the meetings and take any notes that I thought were
27 pertinent or make sure that they had a contribution form. That's pretty
28 much all I had to do. If I wasn't the point person on actually fundraising, I
29 wouldn't speak during the meetings or anything like that.

30 Scott Gast: Was the trip described as anything other than a fundraising trip?

1 FR Consultant: Not to me.

2 Scott Gast: Were you aware of efforts to try to line up a trip with a tour group from
3 Indiana that was travelling to California at the same time?

4 FR Consultant: I don't remember anything about that.

5 Scott Gast: How about recreational, social, family activities?

6 FR Consultant: I don't remember. I stayed at a separate hotel from him. I would just meet
7 him at the meetings, so I didn't know too much about what he did
8 otherwise.

9 Scott Gast: Did you know that his family traveled with him?

10 FR Consultant: I do remember that his family was there.

11 Scott Gast: And that would be the wife and the children?

12 FR Consultant: Yes.

13 Scott Gast: How did you become aware of that?

14 FR Consultant: He told me.

15 Scott Gast: While you were there?

16 FR Consultant: Yeah.

17 Scott Gast: What did he tell you about what they were doing while they were there?

18 FR Consultant: I don't remember, I just know that he and his family went to Los Angeles.
19 I knew he had the meetings, and like I said, I just went to the meetings.

20 Scott Gast: Did Representative Stutzman's Spouse ("Spouse") participate in any of
21 the meetings that you participated in?

22 FR Consultant: No, I never met her.

23 Scott Gast: What about the children? Did they tag along at all?

24 FR Consultant: No, I've never met them.

25 Scott Gast: Do you recall when you actually traveled to California? What the dates
26 were?

27 FR Consultant: No, I don't remember.

1 Scott Gast: If I tell you the trip, the Stutzman's part of the trip, started on a
2 Wednesday, it appears from the schedule, which I want to go over with
3 you, that they had fundraising meetings on Thursday and Friday, and they
4 were there Saturday, Sunday, and returned on Monday. Does that sound
5 familiar?

6 FR Consultant: Yeah, that sounds familiar.

7 Scott Gast: Does that help jog when you might have arrived or left?

8 FR Consultant: I can't remember. I just know that I was there for the meetings. It was a
9 long time ago, so I just can't remember.

10 Scott Gast: Sure.

11 Paul Solis: Did you stay the weekend?

12 FR Consultant: No.

13 Scott Gast: Do you recall if you left right after the meetings that you had, or did you
14 stay overnight that night and fly back the next morning?

15 FR Consultant: We usually ... I can't remember, but the standard protocol was fly in as
16 close to the meetings as possible and fly out as soon as the meetings ended
17 so we could save money on hotels.

18 Scott Gast: Okay. We can only ask what you remember, so if you don't know, you
19 don't know. Do you know who planned the itinerary for the trip?

20 FR Consultant: I can't remember.

21 Scott Gast: You did not work with anybody at the campaign, planning the trip?

22 FR Consultant: I can't remember speaking with anyone from the campaign.

23 Scott Gast: What about anybody in Representative Stutzman's official office?

24 FR Consultant: I can't remember that either.

25 Scott Gast: You never worked with Spouse on any-

26 FR Consultant: No.

27 Scott Gast: -part of the trip? Okay. Were there at any time... Anybody raise any
28 concerns about ethics rules involving the trip?

29 FR Consultant: No, I can't remember anything like that.

1 Scott Gast: Did anybody say, "Let's check with the Ethics Committee," or, "Let's
2 check with the Federal Elections Commission"?

3 FR Consultant: No.

4 Scott Gast: Let me then jump to the schedule itself. This document that I want to show
5 you, there's two actually. The first is an email from with Representative
6 Stutzman's Chief of Staff ("Chief of Staff") to Marlin Stutzman, and it's
7 copied to Spouse, Bryan Prisock, Mary Wells, Representative Stutzman's
8 Former Campaign Manager ("Campaign Manager"), and Laura Van Hove.
9 For the record, I'm just going to note this is THMS-0394 through -0399.
10 Take a minute to look that over.

11 FR Consultant: Okay.

12 Scott Gast: I think it would be helpful to kind of walk through day-by-day and see
13 what you recall.

14 FR Consultant: Whenever you want to go through it.

15 Scott Gast: Do you recall seeing this email, this itinerary prior to today?

16 FR Consultant: I would have only seen Thursday and Friday's schedule.

17 Scott Gast: Okay.

18 FR Consultant: Because those were the only days that I was there.

19 Paul Solis: Did you- you affirmatively saw the schedule for Thursday and Friday, you
20 recall that? Do you think you may have?

21 FR Consultant: I know that I had my own schedule of when each meeting was and how I
22 would be getting there, and how the congressman would have been getting
23 to each of our meetings, but I didn't know anything about, like 9 a.m., or
24 anything like that.

25 Scott Gast: How did you get the schedule that you had? Did you prepare it, did
26 someone give it to you?

27 FR Consultant: I can't remember.

28 Scott Gast: Okay. The other document I just want to share with you to reference if
29 needed. This is the excerpt from Congressman Stutzman's schedule for
30 August 12th through the 17th; if we want to refer to this we can. For the
31 record, I'm just going to note this is THMS-0230 to -0235.

1 FR Consultant: Mm-hmm (affirmative).

2 Scott Gast: We'll go through that first document.

3 FR Consultant: Okay.

4 Scott Gast: Starting with Wednesday, August 12. It appears that aside from some
5 press calls that morning, Representative Stutzman and his family flew
6 from Detroit to LA that afternoon, arriving approximately 2:30 in the
7 afternoon that Wednesday, August 12.

8 FR Consultant: Mm-hmm (affirmative).

9 Scott Gast: Did you travel with the Stutzmans?

10 FR Consultant: No.

11 Scott Gast: Were you aware of their arrangements for getting to LA?

12 FR Consultant: No.

13 Scott Gast: Do you recall if you traveled on that Wednesday, August 12?

14 FR Consultant: I don't remember traveling on Wednesday, I think I traveled on Thursday.

15 Scott Gast: Okay. Just jumping ahead, the Thursday schedule that we have here notes
16 that Representative Stutzman was going to pick you up at approximately
17 7:50 in the morning that morning.

18 FR Consultant: Was that on Thursday, or was that on Friday? Oh, I guess that was on
19 Thursday, so then I guess I would have had to have flown in Wednesday,
20 unless I flew in that morning, but I can't remember when my flight was.

21 Scott Gast: Do you remember having any contact with the Stutzmans prior to meeting
22 Representative Stutzman Thursday morning?

23 FR Consultant: No, I do remember just meeting him out in the parking lot of my hotel and
24 driving to the meeting.

25 Scott Gast: Going back to Wednesday, were you aware of where the Stutzmans were
26 staying while they were in Los Angeles?

27 FR Consultant: I think I do remember him saying that he was staying at Frank Luntz's,
28 but, I mean it says it here that he did stay there.

29 Scott Gast: What did he tell you about that?

1 FR Consultant: Not much. I mean, I know who Frank Luntz is just from being in the
2 political world, but I didn't really ask him any questions about it.

3 Scott Gast: Did that strike you as unusual that they weren't staying in a hotel? That
4 they were staying in a home?

5 FR Consultant: No, not really. I think that he's friends with Frank, so I didn't think that
6 was that weird.

7 Scott Gast: How do you know they were friends? Did he talk-

8 FR Consultant: He told me that.

9 Scott Gast: Okay. That evening, on that Wednesday, the schedule says that
10 Representative Stutzman and his family drove from the Luntz residence to
11 a restaurant called Madeo's in West Hollywood, and according to the
12 schedule, had dinner with Hallmark at Madeo's in West Hollywood. What
13 do you know about that dinner?

14 FR Consultant: I don't know anything about that dinner.

15 Scott Gast: Just to confirm, you did not attend that dinner?

16 FR Consultant: No, I did not.

17 Scott Gast: Did you talk to Representative Stutzman about that dinner?

18 FR Consultant: I can't remember talking to him about that.

19 Scott Gast: Would it surprise you if Representative Stutzman described this as a
20 fundraising dinner, but you were not involved? That you were not aware?

21 FR Consultant: I mean, sort of? Because it's out of state, so that's something that would
22 have most likely gone through LVH, but I know sometimes in-state people
23 have a connection and they want to set up the meeting on their own, and
24 we're not going to- you know, it's a very delicate balance of who's going to
25 get credit for what meetings and everything, so if somebody else set it up
26 it wasn't really my place to speak about it.

27 Scott Gast: Do you know if anyone else at LVH was involved in setting up or
28 planning that dinner?

29 FR Consultant: I can't remember.

30 Scott Gast: You were not.

1 FR Consultant: I don't remember.

2 Scott Gast: Okay. Did Representative Stutzman report to you on the dinner the next
3 morning when he met you?

4 FR Consultant: I can't remember.

5 Scott Gast: Was there any follow-up by you or by anyone at LVH-

6 FR Consultant: I can't remember about that.

7 Scott Gast: Any follow up with the attendees regarding pledged contributions, or you
8 know, kind of take a look at those folks?

9 FR Consultant: I can't remember. Like I said, it was one of those trips where I was just-
10 you know, here's your plane ticket, here's your hotel reservation. Show up.

11 Scott Gast: Okay. So you wouldn't know who paid for that dinner?

12 FR Consultant: No.

13 Scott Gast: Let's go on to Thursday, then. It starts on the schedule with CS and boys,
14 which is Spouse and the Stutzman children. It states that they went to
15 Universal Studios that day. Were you aware of what Spouse and the
16 children were doing that day?

17 FR Consultant: I think he did mention that they were going to do some sight-seeing.

18 Scott Gast: Did he say anything more?

19 FR Consultant: I can't remember, I mean, like I said, this was all the way back in August.

20 Scott Gast: Sure, sure. Then let's jump to the middle of that page where it says "MS
21 Schedule."

22 FR Consultant: Mm-hmm (affirmative).

23 Scott Gast: As we noted before, it appears that early that morning, 7:40, 7:50,
24 Representative Stutzman is shown picking you up at your hotel. Is that
25 correct? Did he pick you up at the hotel?

26 FR Consultant: Yes.

27 Scott Gast: Do you recall what he was driving?

28 FR Consultant: I think it was an SUV.

1 Scott Gast: Did you have any discussion about the arrangements of who rented the
2 SUV, who paid for it?

3 FR Consultant: No.

4 Scott Gast: Then it says the first meeting you attended was a meeting with Joe Crail,
5 in Irvine, California. What was that meeting?

6 FR Consultant: That was a fundraising meeting.

7 Scott Gast: How did that get put on the schedule?

8 FR Consultant: Somebody at LVH would have called him. If I remember correctly, Joe
9 had already contributed to the congressman's campaign, and we were
10 asking if his wife would contribute, or his son. I think his son was also at
11 the meeting.

12 Scott Gast: Then, moving on, it appears that you drove to a lunch with Brad Jones at Il
13 Grano Restaurant on Santa Monica Boulevard.

14 FR Consultant: Yes.

15 Scott Gast: What was that meeting about?

16 FR Consultant: That was also a fundraising meeting.

17 Scott Gast: Do you recall about how many people were at the lunch?

18 FR Consultant: I think there was about 6 or 7 of us.

19 Scott Gast: Do you recall who came and how the guest list was put together?

20 FR Consultant: Brad invited everyone.

21 Scott Gast: Did LVH set up this meeting? Was that something the campaign had set
22 up?

23 FR Consultant: That was something that LVH Consulting would have set up.

24 Scott Gast: Then what did you do after the lunch with Brad Jones?

25 FR Consultant: He dropped me off at my hotel.

26 Scott Gast: Do you recall roughly what time that was?

27 FR Consultant: I mean, I think the lunch lasted about the time frame that it was on here, so
28 the schedule probably would reflect-

1 Scott Gast: So about 2:30?

2 FR Consultant: Yes, I think so.

3 Scott Gast: Do you know what Representative Stutzman did after dropping you off?

4 FR Consultant: No.

5 Scott Gast: Did you have a conversation about it, like, "Hey, I'm going to go do this?"

6 FR Consultant: I think he just told me he was going to go meet up with his family.

7 Scott Gast: Did they say where?

8 FR Consultant: No. I can't remember.

9 Scott Gast: Any other contact that evening with Mr. Stutzman, or with his family?

10 FR Consultant: No.

11 Scott Gast: Do you know what the Stutzmans did for dinner that evening?

12 FR Consultant: I don't.

13 Scott Gast: You were not involved in dinner?

14 FR Consultant: No.

15 Scott Gast: Jumping to Friday. The schedule here notes "CS and boys," Spouse and
16 the children, had an open day. Any idea what they did that day?

17 FR Consultant: I don't know.

18 Scott Gast: Then "MAS schedule," Mr. Stutzman's schedule, looks like he picked you
19 up about 9:35 that morning.

20 FR Consultant: I actually took an Uber to that meeting, he met me there.

21 Scott Gast: Okay. This is the Governor Pete Wilson meeting?

22 FR Consultant: Yes.

23 Scott Gast: What was that meeting?

24 FR Consultant: A fundraising meeting.

25 Scott Gast: There was some suggestion that that one may have been canceled last-
26 minute? That Mr. Stutzman may have done something by phone instead of
27 actually meeting?

1 FR Consultant: Yes, I think I remember that, actually. Yes. He did talk to him on the
2 phone instead, but I- Whatever meeting we went to that day, I did take an
3 Uber to it.

4 Scott Gast: Okay. Could that have been this 1:00 meeting with Dale Dykema?

5 FR Consultant: Yes, but I think that was probably moved to earlier in the day if he spoke
6 with the governor in the morning. We would have tried to move it earlier.

7 Scott Gast: Okay. Do you know if any other meetings or activities were scheduled in
8 place of that canceled meeting, or-

9 FR Consultant: I can't remember.

10 Scott Gast: Do you recall doing any other meetings besides the two on Thursday,
11 perhaps a phone call with Governor Wilson on Thursday- I mean, excuse
12 me, on Friday, and the meeting with Dale Dykema?

13 FR Consultant: No, that's- I really can only remember a few things, and yes, I think there
14 was only- I just remember taking an Uber to this meeting because I had a
15 really nice conversation with my Uber driver, so that's pretty much it.

16 Scott Gast: Do you recall what you did after that meeting?

17 FR Consultant: I think that I had a flight later that afternoon.

18 Scott Gast: Friday evening, afternoon/evening, you-

19 FR Consultant: Mm-hmm (affirmative), yes. It was a real rigmarole to get out of there, but
20 yes, that's all I can remember.

21 Scott Gast: Okay. Then this Dale Dykema meeting. What was that meeting about?

22 FR Consultant: That would have been a fundraising meeting.

23 Scott Gast: Was that something set up by LVH, by the campaign?

24 FR Consultant: It would have been set up by LVH.

25 Scott Gast: Do you know what Mr. Stutzman did after the meeting with Mr. Dykema?

26 FR Consultant: No, because I took an Uber back to my hotel to get my stuff before going
27 to the airport, so he just headed off in another direction.

28 Scott Gast: That was the last that you saw him during the California trip?

29 FR Consultant: Correct.

1 Scott Gast: Any conversation about what he was doing that evening, whether he was
2 staying the weekend, what they were doing?

3 FR Consultant: I can't remember. I know before I went there was talk of trying to get a
4 meeting set up on Monday, but it didn't work out, that's why I flew out on
5 Friday. I don't remember what he did the rest of the weekend.

6 Scott Gast: Did you know that he was staying in California beyond Friday? Were you
7 aware of that?

8 FR Consultant: I can't remember.

9 Scott Gast: Did you try to get any meetings scheduled for the weekend?

10 FR Consultant: I can't remember, but I doubt it. Most people don't want to talk to a
11 fundraiser on the weekend.

12 Scott Gast: Sure. Do they ever want to talk to a fundraiser?

13 FR Consultant: No.

14 Scott Gast: You don't know what Mr. Stutzman or his family did for dinner Friday
15 night?

16 FR Consultant: No.

17 Scott Gast: Do you know where they stayed that evening?

18 FR Consultant: No.

19 Scott Gast: Realizing you left Friday night, I want to go quickly through the rest of the
20 schedule.

21 FR Consultant: Okay.

22 Scott Gast: Just to see if you had any conversations -- during the trip, before the trip,
23 after the trip. On Saturday, the Stutzman family did a tour at Capitol
24 Records in the morning.

25 FR Consultant: Okay.

26 Scott Gast: Do you know anything about that tour?

27 FR Consultant: I can't remember.

28 Scott Gast: Was Capitol Records, or individuals employed by, associated with Capitol
29 Records, was that ever a fundraising target?

1 FR Consultant: I honestly can't remember. I'm going to just be honest with you, my
2 priority was not what the congressman's personal life was, my father had
3 cancer and I only was there to do that. Remembering what he did for the
4 rest of the weekend was not really my priority.

5 Scott Gast: Absolutely. Was there any effort after the fact, a follow-up with people
6 with Capitol Records?

7 FR Consultant: I can't remember. If there was any follow-up for these meetings, it would
8 have just been whatever LVH had set up.

9 Scott Gast: You were not aware that LVH had any involvement in setting up a tour of
10 Capitol Records?

11 FR Consultant: I was not aware of that.

12 Scott Gast: What about lunch with Michael Landon, Jr. and colleagues that day,
13 Saturday, at lunch?

14 FR Consultant: I can't remember. If it was something that LVH had set up, I would have
15 been staying the weekend. I wouldn't have been going home.

16 Scott Gast: Okay. You had nothing to do with setting up or attending the Landon
17 lunch, just to be clear?

18 FR Consultant: No.

19 Paul Solis: Just- I think that had something to do with your prior experience, going on
20 some of these trips as well. As you just mentioned, if there would have
21 been something that LVH had a connection to over the weekend, in your
22 past, you would have definitely stayed?

23 FR Consultant: Correct.

24 Paul Solis: So even when there was a client maybe that wasn't your specific client but
25 you were pitching in, like in this instance, you still would be directed to
26 stay for the weekend and-

27 FR Consultant: Correct.

28 Paul Solis: -assist? Okay.

29 Scott Gast: Do you recall any follow-up with Mr. Landon or any colleagues of his on
30 fundraising?

31 FR Consultant: I don't think so.

1 Paul Solis: Have you ever heard his name before?

2 FR Consultant: I can't remember.

3 Scott Gast: What about dinner on the café promenade on the Queen Mary? Are you
4 aware of that dinner?

5 FR Consultant: No.

6 Scott Gast: Jumping to Sunday, August 16, it appears that the Stutzmans -- Mr.
7 Stutzman, his wife, and his children -- did a tour of the Reagan Library
8 and lunch under Air Force One at the library. Was that something that
9 LVH had any involvement with?

10 FR Consultant: I don't think so.

11 Scott Gast: Then, jumping to Monday, it appears that the family did a tour of the
12 Reagan Ranch, as opposed to the library. Was that something that LVH
13 had any involvement with?

14 FR Consultant: I don't think so.

15 Scott Gast: Then they flew back to Indiana, through Detroit, that evening.

16 Paul Solis: There was a little bit of press on Representative Stutzman and his family
17 going to the Reagan Library and Ranch. Did you recall- and that happened
18 earlier this year. Did you happen to see that at all?

19 FR Consultant: No.

20 Paul Solis: Did anybody mention to you, in your past work, that there was press on
21 that, at his attendance at the ranch?

22 FR Consultant: No. I don't remember.

23 Scott Gast: Aside from what we've gone through now with this itinerary, are you
24 aware of any other meetings or events that aren't reflected on this?

25 FR Consultant: Not that I can remember.

26 Scott Gast: There was some indication that Mr. Stutzman may have attended a dinner
27 for Medal of Honor recipients that Mr. Luntz had at his home one evening.

28 FR Consultant: I honestly cannot remember anything about that.

29 Scott Gast: Okay.

1 Paul Solis: Scott's going through the itinerary and there was only I'd say maybe 2 or 3
2 instances you recall attending, lunches and fundraising events, and you
3 were there for 2 days. Do you think that was a typical amount of events to
4 fly all the way out to California for?

5 FR Consultant: Well, I think that originally there had been more meetings and events
6 planned, but it was August, it's a very slow month for fundraising
7 anyways. People, especially on a Thursday/Friday, as the week goes on
8 people would cancel. Like the Governor Wilson meeting, him doing a
9 phone call instead, that would have made it four meetings, that would have
10 been a pretty good schedule. I was only there for one night, so the flight
11 and everything, that made sense.

12 Paul Solis: Okay. Bearing in mind that there was one cancellation but you had that
13 other schedule, on your way out there, seeing the itinerary, do you recall
14 thinking to yourself "this is a very light schedule to fly all the way to
15 California for," or "this is typical."

16 FR Consultant: No, I've flown to Texas, to Dallas, for one meeting and back in a day, so
17 that wasn't really an issue for me.

18 Scott Gast: Along those same lines, how did this schedule compare to the 5 or 10
19 other trips that you may have been on while-

20 FR Consultant: It seemed pretty standard to me. Yes, you obviously want to put as many
21 meetings as possible on a schedule, but also you can't always do that.

22 Scott Gast: What about the fact that Mr. Stutzman stayed an additional 3 days in
23 California after the last meeting. Was that something that was standard?

24 FR Consultant: I mean, I figure if I didn't want to get back home I probably would have
25 gone to see other friends or something, but if I did that I would have just
26 had to pay for my own ticket back home. That's usually how it would
27 work.

28 Scott Gast: During your travel around with Mr. Stutzman, was he making fundraising
29 calls or scheduling calls to try to set up additional meetings while he was
30 out there?

31 FR Consultant: I can't remember. I don't know.

32 Scott Gast: Given that this was a cancellation, was he trying to fill that spot?

33 FR Consultant: Well, we just moved everything forward so then I could leave earlier.

1 Scott Gast: Okay. Were you involved in any discussions about how Mr. Stutzman
2 would pay for the expenses of the trip, for his expenses?

3 FR Consultant: No, I was not involved in anything like that.

4 Scott Gast: Do you know who paid your expenses?

5 FR Consultant: Well, LVH would book all of my travel, so that's how- I didn't ever have
6 to pay for it myself, unless I wanted to do my own thing.

7 Scott Gast: Sure. Do you know if then, the campaign was charged for that, or how-

8 FR Consultant: I'm not sure. I wasn't involved in the breakdown of how things got paid
9 for.

10 Scott Gast: Above all our pay-grades.

11 FR Consultant: Yes.

12 Scott Gast: Paul had mentioned that there was some press later on, where
13 Representative Stutzman made a decision to reimburse his campaign for
14 the cost of the airfare that the campaign had paid for his wife and his two
15 children to come with him.

16 FR Consultant: Okay.

17 Scott Gast: You said you were not aware of that?

18 FR Consultant: No.

19 Scott Gast: Were there any discussions that you were involved with at any time about
20 whether or not the wife or the children should have been on the trip?

21 FR Consultant: No. That wasn't my place to say anything.

22 Scott Gast: Okay.

23 Paul Solis: Or whether- you might have remained silent when hearing someone talk
24 about it, but do you recall anybody from LVH or otherwise discussing
25 that?

26 FR Consultant: No, we didn't really interfere with their personal lives. That would have
27 been unprofessional.

28 Scott Gast: How often would spouses accompany candidates on these fundraising
29 trips?

1 FR Consultant: I don't think it's unusual, so I can't remember.

2 Scott Gast: When spouses did accompany candidates on the fundraising trips, would
3 they participate in some way?

4 FR Consultant: I can't remember. I've seen spouses go into meetings before, but I don't
5 know.

6 Scott Gast: Part of this press that came out was whether or not this trip to California
7 was really a family vacation that Mr. Stutzman may have used campaign
8 money for.

9 FR Consultant: Mm-hmm (affirmative).

10 Scott Gast: Based on everything that you know about the trip, did you think that this
11 was a trip with a high percentage of campaign events, a high percentage of
12 personal events, official events?

13 FR Consultant: I don't know because I don't really know what he did. I mean, he showed
14 me what he did, but I don't know if that actually happened, or whatever.

15 Scott Gast: Sure. Okay.

16 FR Consultant: I just know what I was at.

17 Paul Solis: Scott just mentioned official. We've asked you about the campaign side,
18 the meetings, the fundraising events, you've touched upon some
19 potentially personal nature of the trip, and you told us what you know
20 about that, or that you can't remember. Official side, did he ever mention
21 to you in your time with him any congressionally related events he had to
22 attend, or official meetings he was taking part in?

23 FR Consultant: I can't remember.

24 Scott Gast: One of the things that Mr. Stutzman, someone suggested, was that when
25 he went on this tour of the Reagan Library, he was with some folks from
26 Indiana, as part of the tour. Is that a typical fundraising practice for
27 candidates to go to groups of constituents and have conversations about
28 the campaign and try to make connections, to maybe seek out
29 contributions down the line?

30 FR Consultant: I'm a little confused at how you worded that.

31 Scott Gast: Sure, and I am too. Is it a standard practice for candidates to go to events
32 and kind of formally see the event as a networking opportunity to collect

1 names of people that they may then seek campaign contributions from in
2 some point in the future?

3 FR Consultant: I guess? I don't think you'd be a good campaigner if you weren't trying to
4 make connections with your constituents, so I guess that's the only answer
5 I can provide. You'd be a poor campaigner if you didn't try to connect with
6 your constituents.

7 Scott Gast: Let me ask it this way: is that the kind of event that LVH would try to
8 schedule on a fundraising trip, is a tour where there will be some
9 constituents at?

10 FR Consultant: I've never participated in something like that.

11 Scott Gast: Okay, fair enough. Just have one other topic that I have maybe one or two
12 questions on, unless you have anything further. Do you know a gentleman
13 by the name of Gabe Rivera?

14 FR Consultant: I can't remember that name.

15 Scott Gast: Okay. This would have been somebody who did fundraising work for
16 Representative Stutzman prior to 2013, so well before you would have
17 come on the scene.

18 FR Consultant: Yes.

19 Scott Gast: Never ran into him during your time on the-

20 FR Consultant: Not that I remember.

21 Scott Gast: Okay. He's also Representative Stutzman's brother-in-law. Does that
22 refresh your memory at all?

23 FR Consultant: No, it does not.

24 Scott Gast: Okay. Well, I believe those are all the questions we have for you.

25 FR Consultant: Okay.

26 Scott Gast: So we're going to stop the recording.

27 [BREAK]

28 Scott Gast: Just for the record: Scott Gast, Paul Solis, with FR Consultant.

29 Paul Solis: Okay. Just, real quickly, kind of about the nature of our review here, at
30 any point prior to ... I'll start with prior to Mr. Gast contacting you, Scott

1 reaching out to you, did you hear from Representative Stutzman or
2 anybody associated with him about our review in this matter?

3 FR Consultant: Laura just emailed me and said, "Scott Gast wants to talk to you," and
4 that's it.

5 Paul Solis: Okay. Did she say anything? Did she say why or about what Scott was
6 asking for you?

7 FR Consultant: Yeah. James called me and said the same thing, because Laura ... He
8 emailed me and then James followed up and said, "They want to talk to
9 you about Stutzman. They want to talk to you about the August
10 fundraising trip, whatever you can remember. Just be helpful." That's all.

11 Paul Solis: Who is James?

12 FR Consultant: James Mellinger. He's Laura's-

13 Paul Solis: Partner.

14 FR Consultant: Husband. Partner. Yeah.

15 Paul Solis: Okay, and he was with the firm while you were there, too, right?

16 FR Consultant: Yes.

17 Paul Solis: What about anybody directly associated with Representative Stutzman?
18 Either Representative Stutzman himself or an attorney of his?

19 FR Consultant: No, I've only spoken with Laura or James.

20 Paul Solis: Okay. Got it.

21 Scott Gast: Did they tell you they had any contact with Representative Stutzman or
22 anyone in his network?

23 Paul Solis: No. Like I said, the only thing they told me was that the two of you
24 wanted to talk to me. They told me it was about the trip, and they just said,
25 "Whatever you can remember, tell them."

26 Paul Solis: Okay.

27 Scott Gast: All right.

Exhibit 13



John Hammond <[REDACTED]>

Fwd: Visiting Again

Christy Stutzman <[REDACTED]>
To: John Hammond <[REDACTED]>

Mon, Jun 22, 2015 at 10:52 AM

----- Forwarded message -----

From: **Christy Stutzman** <[REDACTED]>
Date: Friday, June 12, 2015
Subject: Visiting Again
To: "Salvatore, Paula" <[REDACTED]>
Cc: "Moreno, Mark" <[REDACTED]>, "Schultz, Maureen" <[REDACTED]>, "Kuha, Jim" <[REDACTED]>, Joel Flatow <[REDACTED]>

Paula,

We SO enjoyed our tour - it was amazing! Thanks for the reply. August 14th would work for us. We'd also be open to something after hours if it's a busy time for you and that would work better. Just let me know if morning, afternoon or evening would work better and we'll put it down.

Our group will be smaller- 6-8 people. But VERY interested in te music industry and re issues you face.

Thanks so much!

Christy Stutzman

On Tuesday, June 9, 2015, Salvatore, Paula <[REDACTED]> wrote:

Hi Christy,

I totally remember you, the singing Congressman's wife! How fun it was. We would be happy to set up a tour for your group in August.

The 14th would be the best day but I can't commit to the time just yet.

Is anyone contacting Joel Flatow to host the tour as well? He was there last year. (Also on copy)

Also, I am looping in Maureen Schultz and Jim Kuha, as they would be interested in your group coming to visit Capitol again.

We'll update details as we move closer to August.

Thank you,

Paula

Paula Salvatore

Capitol Studios

VP/Studio Manager

Hollywood, CA 90028

From: Christy Stutzman [mailto:]
Sent: Monday, June 08, 2015 3:26 PM
To: Salvatore, Paula
Subject: Visiting Again

Paula,

Hello. You may not remember me, but my husband and I visited Capitol Music last year with a group of other members of Congress (Congressman Scales lead the tour).

We thoroughly enjoyed the tour of the facilities and learning about the modern challenges of the music industry. It helped to see firsthand how you work and to hear about the various laws, regulations, policies, etc... that those in the entertainment industry deal with on a daily basis. I am a classically trained singer and a big fine arts advocate, so we are always looking for information on ways to better help guide policy related the arts.

We are planning another trip to LA this August and would love to visit Capitol Music Group again. We will have about 8-10 people with us, most of whom would love hearing your perspective and understanding the industry better.

The dates we're looking at are August 13 - 16th.

Please let me know if any of those dates would be possibilities for us to visit. We would be so thrilled to visit with you again and possibly find new ways to work together to help ensure that talent and creativity are allowed to flourish.

My cell is

Sincerely,

Christy Stutzman

(wife of US Congressman Marlin Stutzman - Indiana)

Exhibit 14

Michael Landon Jr.
Transcript of Interview
July 11, 2016

1
2
3
4
5 Scott Gast: For the record, this is Scott Gast with my colleagues Helen Eisner and
6 Konstantine Kastens. We are joined on the telephone by Mr. Michael
7 Landon. We appreciate you taking the time to speak with us. As I
8 mentioned, we'd like to ask you about some interactions you had with
9 Congressman Marlin Stutzman back in August of last year. Just to start,
10 how do you know Mr. Stutzman?

11 Michael Landon: I know Congressman Stutzman through his wife, Christy Stutzman, who is
12 a fan of a TV series that I'm Executive Producer on: "When Calls the
13 Heart."

14 Scott Gast: When Calls the Heart?

15 Michael Landon: Yes. It's a TV series for the Hallmark Channel.

16 Scott Gast: How did you get to know Representative Stutzman's Spouse ("Spouse")
17 through that TV show?

18 Michael Landon: Well, there is a fan base called the Hearties and she is one of the
19 administrators, I believe, and they have been championing our series for
20 the past three seasons.

21 Scott Gast: At some point did you meet Mr. Stutzman through Spouse? How did that
22 come about?

23 Michael Landon: Yes, there was an invitation for a screening in DC for When Calls the
24 Heart and Mrs. Stutzman was gracious enough to host the event.

25 Scott Gast: Where was that? Was that on Capitol Hill?

26 Michael Landon: We had a tour ... the actual screening took place in the, is it the
27 Congressional Screening Room?

28 Scott Gast: The Capitol Visitors Center?

29 Michael Landon: I believe so, yes.

30 Scott Gast: Okay.

31 Michael Landon: It was a few of the stars from the show and some of the executives from
32 the network were there. We toured DC and had the screening.

1 Scott Gast: Do you recall when that was?

2 Michael Landon: I would have to look that up. I want to say it was spring of last year.

3 Scott Gast: Okay.

4 Michael Landon: Like April.

5 Scott Gast: And was that the first time you met Congressman Stutzman?

6 Michael Landon: Correct.

7 Scott Gast: Then in August of last year, you had lunch with the Stutzmans in Los
8 Angeles, is that correct?

9 Michael Landon: That is correct.

10 Scott Gast: Between that screening when you first met Mr. Stutzman and that lunch,
11 did you have any other interactions with him?

12 Michael Landon: We did not.

13 Scott Gast: How about with Spouse?

14 Michael Landon: I cannot ... I mean there might have been an email or two exchanged that
15 took place, you know, regarding the TV series or the fact that they were
16 coming to California.

17 Scott Gast: Which leads me to my next question. It sounds like you had some emails
18 with the Stutzmans about their traveling to California. Can you tell me
19 how that came about?

20 Michael Landon: I think it was just a friendly reciprocation, one of those, "If you're ever in
21 California, please let me know. I'd love to take you and your family out to
22 lunch." That was pretty much it.

23 Scott Gast: So was it Spouse who reached out to you to let you know they were going
24 to be in California?

25 Michael Landon: I believe so, yes.

26 Scott Gast: I take it then you arranged to meet for lunch.

27 Michael Landon: Correct.

28 Scott Gast: Where did you end up having lunch, do you recall?

1 Michael Landon: It was, I'm not sure, I believe it would be considered the Grill. It's a chain.
2 The one that we met at was in Hollywood.

3 Scott Gast: Okay.

4 Michael Landon: I believe it's the Grill. There might be another part of the name to that
5 because there are several Grills around the LA area.

6 Scott Gast: Who all was at the lunch?

7 Michael Landon: At the lunch was Congressman Stutzman, Christy Stutzman, their two
8 boys, their pastor and his wife, whose names I cannot recall, and a friend
9 and colleague of mine, Simon Swart, and his wife and my wife Sheree.

10 Scott Gast: I'm sorry, can you give me Mr. Simon's name again?

11 Michael Landon: Swart, S-W-A-R-T.

12 Scott Gast: And his spouse.

13 Michael Landon: Yes.

14 Scott Gast: Was there a particular purpose for the lunch?

15 Michael Landon: Not really, it was just again, I enjoyed my talk with the Congressman and,
16 again, his wife has been wonderful in terms of her support of the show. It
17 was just a very nice casual lunch.

18 Scott Gast: Was there any discussion about Mr. Stutzman's campaigns at all?

19 Michael Landon: I'd say it was definitely mentioned, you know, the fact that he was running
20 and his schedule was busy and crazed as one would anticipate.

21 Scott Gast: Was this a fundraising lunch?

22 Michael Landon: It was just an in-kind contribution I made. I just basically picked up the
23 tab.

24 Scott Gast: That was my next question, who paid for the lunch? Sounds like you paid?

25 Michael Landon: Yes, I did.

26 Scott Gast: What were the discussions... You said that this was an in-kind
27 contribution. Can you tell me those discussions?

28 Michael Landon: Really wasn't discussed. I mean it was just me picking up the tab, which I
29 was more than happy to do.

1 Scott Gast: Why was it an in-kind contribution?

2 Michael Landon: I just basically called it that. I know that he was, I believe he was
3 fundraising at the time, I'm not sure. I'm not familiar with the rules and
4 regulations.

5 Scott Gast: How did you know to call it an in-kind contribution?

6 Michael Landon: That was after the fact.

7 Scott Gast: When was that?

8 Michael Landon: Probably a few weeks ago.

9 Scott Gast: Can you tell me about that conversation?

10 Michael Landon: Yeah, pretty much Congressman Stutzman reached out to me and asked
11 about who paid - he needed to know for his records who paid for the lunch
12 and so I told him I had paid for the lunch and then asked if it was a
13 contribution and I said yes.

14 Helen Eisner: You said, asked if it was a contribution. Who asked if it was a
15 contribution?

16 Michael Landon: Congressman Stutzman.

17 Scott Gast: So at the time of the lunch there were no discussions about whether or not
18 this was a contribution?

19 Michael Landon: That is correct.

20 Scott Gast: So it was just this conversation a few weeks ago.

21 Michael Landon: That is correct.

22 Scott Gast: Okay. Besides that in-kind contribution, have you made any other
23 contributions to Mr. Stutzman's campaigns?

24 Michael Landon: I have not.

25 Scott Gast: Has anybody ever reached out to you to ask you to make contributions?

26 Michael Landon: They have not.

27 Helen Eisner: Did you see, at the time that you picked up the check from that lunch, did
28 you see that payment as furtherance of Mr. Stutzman's campaign or in
29 support of his campaign?

1 Michael Landon: You know, didn't even think about it to be honest.

2 Scott Gast: I'm sorry, just going back to that conversation with Mr. Stutzman a few
3 weeks ago, when he asked if it was a contribution, what was your answer?

4 Michael Landon: It was via email, let me just pull it up.

5 Scott Gast: Sure, and while you're pulling that up, can I ask if you might be able to
6 send us a copy of that email exchange?

7 Michael Landon: I don't see why not, I mean obviously that's something I guess I should ask
8 my attorney about.

9 Scott Gast: Sure.

10 Michael Landon: But I basically told him that, yes, consider it an in-kind contribution.

11 Scott Gast: Let me then just formally request a copy of that exchange. That would be
12 helpful to us. We're happy to put it in writing if that would be helpful or
13 get you anything formally. Feel free to either reach out to me or have your
14 attorney reach out. I think that would be helpful to us in putting this
15 together.

16 Michael Landon: Okay.

17 Scott Gast: Just a couple of other questions, did you know what [Representative
18 Stutzman and Spouse] and their children did the rest of that day?

19 Michael Landon: You know, I can't remember if they were going to an amusement park
20 before or after. I know they had gone somewhere, I just know they were
21 doing some sightseeing with the kids. I can't exactly recall what it was that
22 they did. I know Universal Studios was on the agenda, I want to say the
23 Hollywood Wax Museum, I believe. A couple of things like that.

24 Scott Gast: They may have done a tour of Capitol Records that morning; did you
25 discuss that?

26 Michael Landon: Oh, yes, yes. That's what they did. Capitol Records.

27 Scott Gast: What did they tell you about that tour?

28 Michael Landon: They enjoyed it. I think there was something about Frank Sinatra, some
29 trivia. It's been almost a year ago, so.

30 Scott Gast: Sure. Did it sound like it was a campaign event, the Capitol Records tour?

1 Michael Landon: Not that... I think it was... not that I was aware of.

2 Scott Gast: What about after they left lunch, do you know where they were going after
3 that?

4 Michael Landon: I'd just be guessing.

5 Scott Gast: Sure.

6 Michael Landon: I know that Universal Studio tour was somewhere in there that day or the
7 following day, what have you.

8 Scott Gast: Okay. Have you made campaign contributions generally to other
9 candidates? Is that something that you've done in the past?

10 Michael Landon: No.

11 Scott Gast: Okay.

12 Helen Eisner: And beyond this in-kind contribution that we've discussed, have you made
13 any other contributions related to Mr. Stutzman and any of his campaigns?

14 Michael Landon: I have not.

15 Helen Eisner: For this particular contribution, did you submit any type of paperwork to
16 the campaign, or maybe the FEC, after the conversation that you had with
17 Mr. Stutzman a few weeks ago?

18 Michael Landon: I did not.

19 Scott Gast: I believe those are all the questions we have for you.

20 Michael Landon: All right.

21 Scott Gast: We very much appreciate you talking with us.

Exhibit 15

August 11, 2015

INVOICE

Congressman Marlin Stutzman

August 15, 2015

Six Dinners on the Queen Mary @ \$50.80 x 6 = \$304.80

August 16, 2015

Six Admissions, tours, lunch at the Reagan Library
@ \$67.95 x 6 = \$407.70

Total Amount due Edgerton's Travel Service \$712.50

Please remit to: Edgerton's Travel Service, Inc.

[REDACTED]
Mishawaka, IN 46545
[REDACTED]

Ps w/ck
[REDACTED]

MS-1.2.TOUR00010

THMS_0735

16-3645_0266

Exhibit 16




John Hammond <[redacted]>

see attached

9 messages

Hammond, John <[redacted]>
To: "johnrhammond" <[redacted]>

Wed, Sep 16, 2015 at 2:52 PM

 **Scanned from a Xerox multifunction device001.pdf**
12K

John Hammond <[redacted]>
To: Chris Marston <[redacted]>
Cc: Brendon DelToro <[redacted]>

Wed, Sep 16, 2015 at 2:55 PM

Chris:

Marlin asked me to ask if the campaign could reimburse this invoice. This was a boat dinner he enjoyed with fellow Hoosiers while he was in California on a political trip.

Please advise. Thank you.

John

 **Scanned from a Xerox multifunction device001.pdf**
12K

Brendon DelToro <[redacted]>
To: John Hammond <[redacted]>

Wed, Sep 16, 2015 at 2:58 PM

How is this at all a campaign expense? Taking the family to the Reagan library?

[Quoted text hidden]

--

Brendon DelToro

Campaign Manager
Marlin for Senate
[redacted]

John Hammond <[redacted]>
To: Brendon DelToro <[redacted]>

Wed, Sep 16, 2015 at 2:59 PM

He had me ask. I didn't know anything about it until i received the invoice in the mail. If Chris says we cannot do it he will pay.

If we can pay it we should pay after this month anyway.

Just the messenger...

[Quoted text hidden]

Brendon DelToro <[REDACTED]> Wed, Sep 16, 2015 at 3:00 PM
To: John Hammond <[REDACTED]>

My anger is not directed at you. This is ridiculous though.
[Quoted text hidden]

John Hammond <[REDACTED]> Wed, Sep 16, 2015 at 3:01 PM
To: Brendon DelToro <[REDACTED]>

We have a spending and a revenue problem.
[Quoted text hidden]

Brendon DelToro <[REDACTED]> Wed, Sep 16, 2015 at 3:05 PM
To: John Hammond <[REDACTED]>

I still need the money from the flight for the boys.
[Quoted text hidden]

Chris Marston <[REDACTED]> Wed, Sep 16, 2015 at 3:16 PM
To: John Hammond <[REDACTED]>
Cc: Brendon DelToro <[REDACTED]>

John,

This appears to be me to be a per se personal use and, as such, expressly prohibited.

Normally, you would apply the "irrepective" test--personal use of funds in a campaign account to fulfill a commitment, obligation or expense of any person that would exist irrespective of the candidate's campaign or responsibilities as a federal officeholder.

However, the Commission, by regulation, has found some expenses to be automatically personal use, and thus prohibited. One seems applicable to the Library:

"The campaign may not pay for admission to sporting events, concerts, theater and other forms of entertainment. Campaign funds may be used, however, if the entertainment is part of a specific officeholder or campaign activity. They may not be used for a leisure outing at which the discussion occasionally focuses on the campaign or official functions. 113.1(g)(l)(i)(F)."

So, you can do a fundraiser at a sporting event and pay for tickets, but that's about it.

There's also a specific example relevant to meal expenses which are determined on a case-by-case basis:
"Campaign funds may be used to pay for meals during face-to-face fundraising events. By contrast, a candidate may not use campaign funds to take his or her family out to dinner. 113.1(g)(l)(ii)(B)."

If there are specific details about these events of which I'm unaware, that could change the analysis, but, in such a case, I would be uncomfortable proceeding without express advice from the Ethics Committee.

Hope that's helpful.

Thanks,
Chris

On Wed, Sep 16, 2015 at 2:55 PM, John Hammond <[REDACTED]> wrote:



[Quoted text hidden]

--

Chris Marston



John Hammond <[redacted]>
To: Marlin Stutzman <[redacted]>

Mon, Sep 21, 2015 at 4:01 PM

FYI.

[Quoted text hidden]

Exhibit 17



John Hammond <[redacted]>


Advisory Opinion 2005-09

2 messages

Hammond, John <[redacted]>
To: "johnrhammond" <[redacted]>


Thu, Jul 16, 2015 at 10:27 AM

Here you go.

 **Scanned from a Xerox multifunction device001.pdf**
45K

John Hammond <[redacted]>
To: Brendon DelToro <[redacted]>, Brooks Kochvar <[redacted]>

Thu, Jul 16, 2015 at 10:28 AM

 **Scanned from a Xerox multifunction device001.pdf**
45K