

EXHIBIT YY



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Transcript of Sharon Strine

Date: January 26, 2017

Case: Benisek, et al. -v- Lamone, et al.

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MARYLAND

-----:

O. JOHN BENISEK, et al., :

Plaintiffs :

v. : Case No.

LINDA H. LAMONE, et al., : 13-cv-3233

Defendants :

-----:

Deposition of SHARON STRINE

Baltimore, Maryland

Thursday, January 26, 2017

9:05 a.m.

Job No.: 133651

Pages 1 - 66

Reported by: Carla M. Sinclair, RPR, CRR

Conducted on January 26, 2017

<p style="text-align: center;">1</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE DISTRICT OF MARYLAND</p> <p>3 -----:</p> <p>4 O. JOHN BENISEK, et al., :</p> <p>5 Plaintiffs :</p> <p>6 v. : Case No.</p> <p>7 LINDA H. LAMONE, et al., : 13-cv-3233</p> <p>8 Defendants :</p> <p>9 -----:</p> <p>10</p> <p>11</p> <p>12 Deposition of SHARON STRINE</p> <p>13 Baltimore, Maryland</p> <p>14 Thursday, January 26, 2017</p> <p>15 9:05 a.m.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 Job No.: 133651</p> <p>21 Pages 1 - 66</p> <p>22 Reported by: Carla M. Sinclair, RPR, CRR</p>	<p style="text-align: center;">3</p> <p style="text-align: center;">A P P E A R A N C E S</p> <p>1</p> <p>2</p> <p>3 ON BEHALF OF PLAINTIFFS BENISEK, ET AL.:</p> <p>4 E. BRANTLEY WEBB, ESQUIRE</p> <p>5 MICAH D. STEIN, ESQUIRE</p> <p>6 MAYER BROWN, LLP</p> <p>7 1999 K Street, N.W.</p> <p>8 Washington, DC 20006-1101</p> <p>9 202-263-3188</p> <p>10</p> <p>11</p> <p>12</p> <p>13 ON BEHALF OF DEFENDANTS LAMONE, ET AL.:</p> <p>14 SARAH W. RICE, ASSISTANT ATTORNEY GENERAL</p> <p>15 JENNIFER L. KATZ, ASSISTANT ATTORNEY</p> <p>16 GENERAL</p> <p>17 OFFICE OF THE ATTORNEY GENERAL</p> <p>18 200 St. Paul Place</p> <p>19 Baltimore, Maryland 21202</p> <p>20 410-576-7847</p> <p>21</p> <p>22</p>																																														
<p style="text-align: center;">2</p> <p>1 Deposition of SHARON STRINE, held at the:</p> <p>2</p> <p>3 OFFICE OF THE ATTORNEY GENERAL</p> <p>4 200 St. Paul Place</p> <p>5 Baltimore, Maryland 21202</p> <p>6</p> <p>7</p> <p>8</p> <p>9 Pursuant to agreement, before Carla M.</p> <p>10 Sinclair, Registered Professional Reporter,</p> <p>11 Certified Realtime Reporter, and Notary Public of</p> <p>12 the State of Maryland.</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p style="text-align: center;">4</p> <p style="text-align: center;">C O N T E N T S</p> <table border="0"> <tr> <td>2 EXAMINATION OF SHARON STRINE</td> <td style="text-align: right;">PAGE</td> </tr> <tr> <td>3 By Ms. Rice</td> <td style="text-align: right;">5</td> </tr> <tr> <td>4 By Ms. Webb</td> <td style="text-align: right;">59</td> </tr> <tr> <td>5 By Ms. Rice</td> <td style="text-align: right;">65</td> </tr> <tr> <td>6</td> <td></td> </tr> <tr> <td>7</td> <td></td> </tr> <tr> <td>8</td> <td></td> </tr> <tr> <td>9</td> <td></td> </tr> <tr> <td colspan="2" style="text-align: center;">E X H I B I T S</td> </tr> <tr> <td colspan="2" style="text-align: center;">(Attached to the transcript)</td> </tr> <tr> <td>10 STRINE DEPOSITION EXHIBIT</td> <td style="text-align: right;">PAGE</td> </tr> <tr> <td>11 2 e-mails</td> <td style="text-align: right;">6</td> </tr> <tr> <td>12 3 campaign information e-mail</td> <td style="text-align: right;">21</td> </tr> <tr> <td>13 4 e-mails</td> <td style="text-align: right;">23</td> </tr> <tr> <td>14 5 e-mail</td> <td style="text-align: right;">28</td> </tr> <tr> <td>15 6 e-mails</td> <td style="text-align: right;">29</td> </tr> <tr> <td>16 7 e-mails</td> <td style="text-align: right;">31</td> </tr> <tr> <td>17 8 e-mail</td> <td style="text-align: right;">32</td> </tr> <tr> <td>18 9 e-mails</td> <td style="text-align: right;">37</td> </tr> <tr> <td>19 10 e-mail</td> <td style="text-align: right;">38</td> </tr> <tr> <td>20 11 e-mail</td> <td style="text-align: right;">40</td> </tr> <tr> <td>21</td> <td></td> </tr> <tr> <td>22</td> <td></td> </tr> </table>	2 EXAMINATION OF SHARON STRINE	PAGE	3 By Ms. Rice	5	4 By Ms. Webb	59	5 By Ms. Rice	65	6		7		8		9		E X H I B I T S		(Attached to the transcript)		10 STRINE DEPOSITION EXHIBIT	PAGE	11 2 e-mails	6	12 3 campaign information e-mail	21	13 4 e-mails	23	14 5 e-mail	28	15 6 e-mails	29	16 7 e-mails	31	17 8 e-mail	32	18 9 e-mails	37	19 10 e-mail	38	20 11 e-mail	40	21		22	
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<p style="text-align: right;">5</p> <p>1 PROCEEDINGS</p> <p>2 SHARON STRINE,</p> <p>3 having first been duly sworn, testified as</p> <p>4 follows:</p> <p>5 EXAMINATION BY MS. RICE:</p> <p>6 Q Okay. Good morning. I am Sarah Rice.</p> <p>7 I'm an Assistant Attorney General, and I</p> <p>8 represent the defendants in this matter.</p> <p>9 MS. KATZ: Jennifer Katz, also</p> <p>10 representing the defendants.</p> <p>11 MS. RICE: And if we could do</p> <p>12 introductions.</p> <p>13 MS. WEBB: Okay. Brantley Webb from</p> <p>14 Mayer Brown on behalf of the plaintiffs.</p> <p>15 MR. STEIN: Micah Stein on behalf of the</p> <p>16 plaintiffs.</p> <p>17 THE WITNESS: Sharon Strine. That's</p> <p>18 S-T-R-I-N-E.</p> <p>19 MS. RICE: And yesterday Mr. Medlock</p> <p>20 asked that we number exhibits sequentially. We</p> <p>21 will mark this 2.</p> <p>22 (Whereupon, Strine Deposition Exhibit No.</p>	<p style="text-align: right;">7</p> <p>1 verbal for the benefit of the court reporter.</p> <p>2 And, also, for the benefit of the court reporter,</p> <p>3 let's both do our best not to talk over each</p> <p>4 other. And we will all try to do that as well.</p> <p>5 Have you taken any medication today?</p> <p>6 A No.</p> <p>7 Q Is there any other reason why you might</p> <p>8 not be able to testify this morning?</p> <p>9 A No.</p> <p>10 Q Ms. Strine, what do you do for work?</p> <p>11 A Mostly I take care of our family farm,</p> <p>12 and then I also do campaign management, and I</p> <p>13 have a small consulting business, political</p> <p>14 consulting business.</p> <p>15 Q What kind of farm do you have?</p> <p>16 A It's poultry, and vegetables, and hay,</p> <p>17 yes.</p> <p>18 Q And does your consulting business have a</p> <p>19 name?</p> <p>20 A Amethyst Strategies.</p> <p>21 Q And do --</p> <p>22 A LLC. Sorry.</p>
<p style="text-align: right;">6</p> <p>1 2, e-mails, marked.)</p> <p>2 BY MS. RICE:</p> <p>3 Q Ms. Strine, I noticed, and I apologized</p> <p>4 this morning, there was an error in the</p> <p>5 deposition notice that we sent to you. So I've</p> <p>6 given you the original there and the correction</p> <p>7 with your name spelled correctly on it.</p> <p>8 Have you seen this document before?</p> <p>9 A Yes, I did. Not the corrected one. This</p> <p>10 is the first time.</p> <p>11 Q Okay. Great.</p> <p>12 And you are Sharon Strine?</p> <p>13 A Yes.</p> <p>14 Q So today we are not anticipating that we</p> <p>15 will be here that long, so we are going to try to</p> <p>16 make it through without a break, but if you need</p> <p>17 one, just let me know, and we will find an</p> <p>18 appropriate place to stop.</p> <p>19 If you don't understand a question that I</p> <p>20 ask you, please tell me, and I will rephrase it</p> <p>21 so that it's something that you do understand.</p> <p>22 Please make sure that your answers are</p>	<p style="text-align: right;">8</p> <p>1 Q Are you doing any current work?</p> <p>2 A No. This is in between season, so, no.</p> <p>3 Q And what was the last campaign that you</p> <p>4 worked on?</p> <p>5 A I helped with Frank Howard's campaign.</p> <p>6 He ran for Congressional CD 6 in the primary, but</p> <p>7 he did not make it through the primary.</p> <p>8 Q And what was the campaign previous to</p> <p>9 that one that you worked on?</p> <p>10 A I worked on Dan Bongino's congressional</p> <p>11 campaign for CD 6, Maryland Congressional</p> <p>12 District CD 6.</p> <p>13 Q And what was the prior campaign?</p> <p>14 A I worked on Dan Bongino's U.S. Senate</p> <p>15 campaign in 2012, for Maryland U.S. Senate.</p> <p>16 Q And was that the first campaign that you</p> <p>17 worked on?</p> <p>18 A No, the first campaign was Kathy Afzali</p> <p>19 for State Delegate, District 4A.</p> <p>20 Q And what year was that?</p> <p>21 A That was 2010.</p> <p>22 Q And did you work on Mr. Bongino's</p>

9

1 campaign in Florida?

2 **A No. I have to stay local. My family's**

3 **too important.**

4 Q And what was the highest level of

5 education that you achieved?

6 **A I finished high school and then I've**

7 **taken tons of classes since then.**

8 Q What kinds of classes?

9 **A I'm not going to be able to name them**

10 **all. Anything that interests me. I've done**

11 **accounting, anatomy, physiology, statistics,**

12 **taxes, web design, photography. And, as I said,**

13 **I'm not going to be able to name them all.**

14 **Probably 20 or 30. Right now I'm taking Thai**

15 **poorly.**

16 Q And is there some place that you take

17 these classes?

18 **A Sometimes I do them on site. FCC, HCT,**

19 **Hood. They are all very good locations, but now**

20 **with on line, possibilities are endless. You can**

21 **take anything.**

22 Q When did you first register to vote?

10

1 **A On my 18th birthday, April 29th, 1982.**

2 Q Where did you live then?

3 **A I lived on Harp Hill Road. It's 11611**

4 **Harp Hill Road, Myersville, Maryland.**

5 Q And what congressional district is that?

6 **A District 6. It was. It's not now.**

7 Q And who was your congressional

8 representative?

9 **A At that time it was Beverly Byron, but I**

10 **moved out of there in '83. She left office a**

11 **couple years after that.**

12 Q So that gets to my next question. Where

13 did you move next?

14 **A To Middletown for one year in an**

15 **apartment, 312 Broad Street, and I was there**

16 **until '84.**

17 **And then I bought my first house on Loy**

18 **Wolfe Road, which was 12610 Loy Wolfe Road,**

19 **Myersville, 21773, until '96. And then we moved**

20 **to the house we are in now, which is 12709 Martin**

21 **Road, Smithsburg, Maryland, 21783.**

22 Q And are all those addresses in

11

1 Congressional District 6?

2 **A They were.**

3 Q And so you said that Beverly Byron left

4 office shortly after you moved. Who was your

5 congressional representative after?

6 **A It was Roscoe Bartlett.**

7 Q And who is your congressional

8 representative now?

9 **A Jamie Raskin.**

10 Q And who was your congressional

11 representative in 2012?

12 **A Van Hollen.**

13 Q In 1982, how often did you vote?

14 **A In 1982?**

15 Q Yeah.

16 **A I voted in every election. There are no**

17 **municipality elections where I live, but any**

18 **primary, presidential, or gubernatorial election.**

19 Q So just so I understand, you voted in

20 every election, every primary in a gubernatorial

21 year and every primary in a presidential year?

22 **A Uh-huh.**

12

1 Q And every general election in a

2 gubernatorial year and every general election in

3 a presidential election?

4 **A Yes. Civics was very important in our**

5 **family.**

6 Q And that's continued to the present day?

7 **A Uh-huh.**

8 Q Have you ever missed an opportunity to

9 vote?

10 **A Not with early election. There's no**

11 **excuse now.**

12 Q Are you registered as a member of a

13 political party?

14 **A Yes. I'm a Republican.**

15 Q And when did you first register as a

16 republican?

17 **A April 29, 1982.**

18 Q And have you ever registered with another

19 party?

20 **A No.**

21 Q Have you ever affiliated with another

22 party in any way?

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1 **A No. Well, what do you mean? Like**
 2 **helping a candidate that's a Democrat? Because**
 3 **otherwise, no.**
 4 Q So by affiliated with a party, I'll
 5 get -- we will talk about different candidates
 6 you may have helped later, but when I'm talking
 7 about affiliating with a party, I would mean
 8 going to a meeting of that party, identifying
 9 yourself as a member of the party.
 10 **A No.**
 11 **May I take my jacket off, just because**
 12 **it's 900 degrees in here?**
 13 Q Of course.
 14 **A Thank you. Sorry about that.**
 15 MS. WEBB: Could you say for me again,
 16 you said, by affiliating, you mean going to a
 17 meeting or --
 18 MS. RICE: If we can read that back. Is
 19 that okay?
 20 (The record was read by the Reporter.)
 21 BY MS. RICE:
 22 Q Have you ever voted for a candidate who

14

1 is not a Republican?
 2 **A Yes.**
 3 Q When?
 4 **A I voted for Beverly Byron. And then I**
 5 **voted for Brad Young, who is the president of**
 6 **Frederick County's Board of Education. They ran**
 7 **two times, two sessions.**
 8 Q Okay. And are those the only times?
 9 **A Yes.**
 10 Q What party was Beverly Byron?
 11 **A She was Democrat. She was a conservative**
 12 **Democrat.**
 13 Q And what party is Mr. Young?
 14 **A You're not supposed to know because it's**
 15 **supposed to be bipartisan, but he's a Democrat.**
 16 Q When Roscoe Bartlett was on the ballot,
 17 did you ever vote for someone other than Roscoe
 18 Bartlett?
 19 **A No.**
 20 Q Did you vote for Chris Van Hollen?
 21 **A No.**
 22 Q Who did you vote for?

15

1 **A Whoever the Republican was that was**
 2 **running.**
 3 Q But you don't remember who that was?
 4 **A Dan. Well, Dan ran against Cardin, and**
 5 **there's always somebody who jumps in and runs as**
 6 **the Republican party, but they don't have a**
 7 **chance to win, so.**
 8 Q Did you vote for Jamie Raskin?
 9 **A No.**
 10 Q Who did you vote for instead?
 11 **A I can't remember his last name. His**
 12 **first name is Dan. I'm sorry.**
 13 Q That's okay.
 14 When did you first meet Dan Bongino?
 15 **A It would be the summer of like 2010.**
 16 **Somewhere around there.**
 17 Q And how did you start working for him?
 18 **A I started as his volunteer coordinator,**
 19 **and then from that through the organization moved**
 20 **up and became his political director, and during**
 21 **the last part of the campaign, I was his**
 22 **assistant deputy campaign manager.**

16

1 Q And why did you decide to act as
 2 Mr. Bongino's volunteer coordinator?
 3 **A After I won with Kathy and her election,**
 4 **I met Dan, and he just was a very charismatic**
 5 **candidate. He had all the principles and values**
 6 **that I was looking for in a candidate, and so I**
 7 **got involved.**
 8 Q When you were working for Mr. Bongino,
 9 did you send and receive e-mails as part of your
 10 job?
 11 **A Yes.**
 12 Q And why would you send and receive
 13 e-mails as part of your job?
 14 **A If it was when I doing volunteer**
 15 **coordinating, it was talking to volunteers about**
 16 **events that were coming up. When I moved up to**
 17 **political, I'd -- it was talking to, again, the**
 18 **volunteers, making sure events were taken care**
 19 **of.**
 20 **And then when I was the deputy campaign**
 21 **manager, it was talking to the accountant. It**
 22 **could have been with anything, anything involving**

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17

1 the management of the campaign.
2 Q Would you keep e-mails to keep track of
3 Mr. Bongino's appearances?
4 A I keep everything.
5 Q And would you keep e-mail to keep track
6 of donor information?
7 A Very minimally because you want to really
8 protect your donors.
9 Q But if you did have e-mail about donors,
10 would that e-mail, the reason you had that e-mail
11 be because of your job?
12 A Yes.
13 Q Did you believe Mr. Bongino could win the
14 Maryland Senate seat in 2012?
15 A That was naive, I did. That's before I
16 truly understood Maryland politics.
17 Q Why did you think he could win?
18 A Because I thought if you got a good
19 candidate out there, this is at the time, I'm
20 much more knowledgeable now, if you got a good
21 candidate out there and people got to meet him,
22 they would vote for him, but it's just impossible

18

1 in this political environment.
2 Q What do you mean by "this political
3 environment?"
4 A There are too many Democrats in Maryland
5 for a Republican to win in a statewide race.
6 Q Did Mr. Bongino consider running for
7 Congressional District 6 in 2012?
8 A No.
9 Q And why not?
10 A He left the Secret Service in hopes of
11 winning State Senate or Senate. I mean, it was,
12 again, he didn't understand the environment
13 either. That's just the naiveté of somebody new
14 to the political scene.
15 Q Where did Mr. Bongino live in 2012?
16 A He lived in Severna Park.
17 Q And through his run in 2012 and 2014, did
18 he ever move?
19 A No. You don't have to live in your
20 district to be in federal office.
21 Q Did you follow Roscoe Bartlett's race in
22 Congressional District 6 in 2012?

19

1 A I did because I was friends with his
2 campaign manager. I followed it rather closely.
3 Q Why didn't Mr. Bartlett win?
4 MS. WEBB: Objection. Speculation.
5 THE WITNESS: Sorry.
6 MS. KATZ: You can still answer.
7 Q You can still answer.
8 A Okay. I speculate that it was because of
9 the redistricting. There's just too many, as I
10 know so much about the district now, there's just
11 too many Ds for a Republican to win.
12 Q Is that speculation or is that your
13 belief?
14 MS. WEBB: Objection. I'm not sure what
15 you mean.
16 Q You can go ahead and answer.
17 A Yes. I believe that, yes.
18 Q And what's --
19 A There are four Democrats for every
20 Republican in the district, in District 6.
21 Q So you your belief is based on --
22 A The numbers.

20

1 Q -- the numbers. Okay. And that's your
2 understanding of the numbers. Okay.
3 Do you know why Mr. Bartlett didn't run
4 for Congressional District 6 in 2014?
5 MS. WEBB: Objection.
6 A No, I don't know personally why he didn't
7 run. Sorry.
8 Q Do you have a belief about why he didn't
9 run?
10 A No.
11 Q Why did Mr. Bongino decide to run for
12 Congressional District 6?
13 MS. WEBB: Same objection.
14 Q You may answer.
15 A He knew the people in the district and,
16 you know, he desperately wanted to run for
17 office. So that's why he did it.
18 Q What do you mean by "desperately wanted
19 to run for office?"
20 A He doesn't want to do it now, but he is
21 one of those people that believes that he can do
22 better if he helps and runs for office. He can

<p style="text-align: right;">21</p> <p>1 make a change if he's in office.</p> <p>2 Q Who is Allyson McMahon?</p> <p>3 A She's a friend of mine.</p> <p>4 Q And what was her role in the Bongino</p> <p>5 campaign?</p> <p>6 A She was deputy, well, I guess you call</p> <p>7 her deputy director of operations. That would be</p> <p>8 the best description. She kind of ran the field,</p> <p>9 but she was not an employee. She volunteered her</p> <p>10 time.</p> <p>11 Q But she was the director of operations?</p> <p>12 A Uh-huh.</p> <p>13 (Whereupon, Strine Deposition Exhibit No.</p> <p>14 3, campaign information e-mail, marked.)</p> <p>15 BY MS. RICE:</p> <p>16 Q Do you recognize this document?</p> <p>17 A Uh-huh.</p> <p>18 Q What is it?</p> <p>19 A Yes. I'm sorry.</p> <p>20 It looks like it's one of our campaign</p> <p>21 information documents that we put together.</p> <p>22 Q And who wrote it?</p>	<p style="text-align: right;">23</p> <p>1 let me know when you're done.</p> <p>2 A Okay.</p> <p>3 Q Do you agree with the description of John</p> <p>4 Delaney in this document?</p> <p>5 A Yes.</p> <p>6 Q When he decided to run, did you believe</p> <p>7 that Mr. Bongino could win Congressional District</p> <p>8 6?</p> <p>9 A I believed it was going to be an uphill</p> <p>10 battle.</p> <p>11 Q And why was that?</p> <p>12 A Because of the demographics of his</p> <p>13 district.</p> <p>14 Q And had you looked at the demographics at</p> <p>15 that time?</p> <p>16 A I started to really study it once he</p> <p>17 decided to run.</p> <p>18 Q And what was it about the demographics?</p> <p>19 A It's too many Democrats.</p> <p>20 (Whereupon, Strine Deposition Exhibit No.</p> <p>21 4, e-mails, marked.)</p> <p>22 BY MS. RICE:</p>
<p style="text-align: right;">22</p> <p>1 A It would have either been Ally or it</p> <p>2 would have been Jim Petit. One of the two. It's</p> <p>3 2014, so I'm not a hundred percent sure.</p> <p>4 Q Who is Jim Petit?</p> <p>5 A Jim Petit was our communications</p> <p>6 director.</p> <p>7 Q And why did you have it in your e-mail?</p> <p>8 A Anything regarding the campaign I would</p> <p>9 have had.</p> <p>10 Q Great.</p> <p>11 If you look at the sheet that says 2014</p> <p>12 campaign information, and under the district, I'm</p> <p>13 just going to give you a second to read that and</p> <p>14 I will ask you a question about it.</p> <p>15 A Okay.</p> <p>16 Q Do you agree with the description of</p> <p>17 District 6 in this document?</p> <p>18 A It's not like that now, but, yes.</p> <p>19 Q But at the time in 2014 you agree?</p> <p>20 A Uh-huh.</p> <p>21 Q And moving down to the next section, the</p> <p>22 document, the opponent, take a look at that and</p>	<p style="text-align: right;">24</p> <p>1 Q Who is Maria Pycha?</p> <p>2 A Uh-huh. She was our finance director.</p> <p>3 Q Do you recognize this document?</p> <p>4 A Yes, but just vaguely. It's been so many</p> <p>5 years, but, yes.</p> <p>6 Q Would this document have been received as</p> <p>7 part of your duties as campaign manager?</p> <p>8 A No. She obviously copied me on a</p> <p>9 conversation with Maria, Ally did, so, yeah.</p> <p>10 Everybody liked to copy me because I'm the</p> <p>11 organizer. I keep everything.</p> <p>12 Q Right. Excellent. Okay.</p> <p>13 If we look just in the portion of this</p> <p>14 communication that is from Ally on March 12,</p> <p>15 2014, so kind of the bottom of the first page,</p> <p>16 the first paragraph.</p> <p>17 A The very first paragraph?</p> <p>18 MS. WEBB: The one that begins, "Hey,</p> <p>19 Maria?"</p> <p>20 MS. RICE: Yeah.</p> <p>21 Q If you could look at that and tell me</p> <p>22 when you're done.</p>

25

1 **A Okay.**
 2 Q Are you familiar with the poll that Ally
 3 is talking about at that point?
 4 **A A poll?**
 5 Q Yeah.
 6 **A Where is there anything about a poll?**
 7 Q The second to the last sentence.
 8 **A Oh, yes. Sorry. Yes, I know the poll.**
 9 Q And what were the results of the poll?
 10 **A It's about a hundred pages, and it was**
 11 **not -- it was specifically about different**
 12 **issues. I would have to refamiliarize myself**
 13 **with it.**
 14 Q Do you know what Ally is talking about
 15 when she says, "We have a visible path to
 16 victory?"
 17 MS. WEBB: Objection. Calls for
 18 speculation.
 19 Q You can answer and you must.
 20 **A Yeah. If we had, you know, hit on the**
 21 **ground and raise money, we may have a visible**
 22 **path of victory. I understand what she is**

26

1 **talking about, but the poll didn't say that**
 2 **specifically.**
 3 Q Okay. So can you just elaborate a little
 4 bit because I'm not sure that I understand? What
 5 did you think Ally meant when she said a visible
 6 path of victory?
 7 MS. WEBB: I will restate my objection.
 8 **A I really don't know because, as I said,**
 9 **the poll itself, it was about issues, economics**
 10 **and where do people feel about fracking. We**
 11 **didn't actually go into the numbers as to whether**
 12 **he could a hundred percent win or not in the**
 13 **poll.**
 14 Q Okay.
 15 **A Name recognition. So, as I said, it's**
 16 **like 200 pages.**
 17 Q Did you at the time, so in March, 2014,
 18 share Ally's belief that there was a visible path
 19 to victory?
 20 MS. WEBB: Objection. Lacks foundation
 21 and calls for speculation.
 22 MS. KATZ: Can we go off the record for a

27

1 second?
 2 (Discussion off the record.)
 3 MS. WEBB: Go ahead. You can answer.
 4 THE WITNESS: Would you ask the question
 5 again, please?
 6 MS. RICE: Yes.
 7 Q Did you personally share Ally's belief
 8 that there was a visible path, in March of 2014,
 9 that there was a visible path of victory?
 10 MS. WEBB: Objection.
 11 **A I was always a skeptic because I wanted**
 12 **him in office so badly, but it was going to be**
 13 **such a tough road.**
 14 Q Did you share your skepticism with
 15 anyone?
 16 **A My husband. You can't be like that and**
 17 **run a campaign.**
 18 Q And what were the obstacles that you
 19 believed were in place at the time? At the time.
 20 Not now.
 21 **A Trying to get Democrats, enough Democrats**
 22 **to vote for Dan.**

28

1 Q And why did you think that would be a
 2 problem?
 3 **A Because of the type of Democrats that are**
 4 **in our district now, they vote straight,**
 5 **especially in an off-year election. The people**
 6 **who people are people who really want to vote.**
 7 **So they are consistent Democrats that vote**
 8 **democratic consistently. So it just seemed like**
 9 **an uphill battle. I wanted it to happen, but I**
 10 **was afraid we would lose by a point or two, which**
 11 **is exactly what happened.**
 12 Q So we just talked about in March. What
 13 about after the primary in June? Did you believe
 14 that Mr. Bongino could win Congressional District
 15 6?
 16 **A I was always the skeptic.**
 17 MS. RICE: This will be marked as
 18 Exhibit 5.
 19 (Whereupon, Strine Deposition Exhibit No.
 20 5, e-mail, marked.)
 21 BY MS. RICE:
 22 Q Do you recognize this document?

29

1 **A Uh-huh.**
 2 Q What is it?
 3 **A It's an e-mail of Marge Barnard.**
 4 Q And who wrote it?
 5 **A I did.**
 6 Q And in what capacity did you write it?
 7 **A At the time I was the deputy campaign**
 8 **manager.**
 9 MS. RICE: Mark this as Exhibit 6.
 10 (Whereupon, Strine Deposition Exhibit No.
 11 6, e-mails, marked.)
 12 BY MS. RICE:
 13 Q Do you recognize this document?
 14 **A No, but I'll read it. I'm sure I've seen**
 15 **it. Okay.**
 16 Q What is this document?
 17 **A It looks like it's Maria and, excuse me,**
 18 **Mary Jane raised \$2,600 for Dan.**
 19 Q Who is Mary Jane?
 20 **A Mary Jane was a volunteer part of the**
 21 **Finance Committee.**
 22 Q And do you know who Bob Luddy is?

30

1 **A No, I don't know Bob.**
 2 Q And why did you have this e-mail?
 3 **A Because I am the organizer and they send**
 4 **everything to me so I can keep it on file.**
 5 Q Great. Thank you.
 6 How many volunteers did the 2014 Bongino
 7 campaign have?
 8 **A I'm not going to give you an exact number**
 9 **because I don't know what it was now, but we were**
 10 **over 2,000 volunteers.**
 11 Q Did you think that it was an obstacle to
 12 the campaign that Mr. Bongino did not live in
 13 Congressional District 6?
 14 **A To be honest with you, that was a**
 15 **question that was in the poll and no one cared.**
 16 Q As the campaign manager, did you receive
 17 reports from your team that were out in the field
 18 over e-mail?
 19 **A Yes.**
 20 Q What kinds of things would they e-mail
 21 you about?
 22 **A It could be anything about with, you**

31

1 **know, how, where are we going to set the tent up**
 2 **at a festival. It could be how many people are**
 3 **going to show up at a parade, how many doors were**
 4 **knocked on, how many phone calls were made. We**
 5 **need more T-shirts. We're out of bumper**
 6 **stickers. It could be anything involving the**
 7 **communication of the campaign.**
 8 Q Would your field operators tell you if
 9 they heard about a complaint about the campaign?
 10 **A Yes, because, actually, I handled all of**
 11 **the complaints where the campaign was concerned.**
 12 Q And you kept records of those complaints?
 13 **A Uh-huh.**
 14 **Do you think at 10 we could break to use**
 15 **the bathroom?**
 16 Q No problem. It might be a natural time
 17 for a break anyway.
 18 MS. RICE: I'll have marked this as
 19 Exhibit 7.
 20 (Whereupon, Strine Deposition Exhibit No.
 21 7, e-mails, marked.)
 22 BY MS. RICE:

32

1 Q Do you recognize this document?
 2 **A No, but I'll read it. Okay.**
 3 Q And what is this document?
 4 **A It's somebody complaining that Dan**
 5 **doesn't live in the district.**
 6 MS. RICE: Mark this one as Exhibit 8.
 7 (Whereupon, Strine Deposition Exhibit No.
 8 8, e-mail, marked.)
 9 BY MS. RICE:
 10 Q Do you recognize this document?
 11 **A Yes.**
 12 Q What is it?
 13 **A It looks like Ally is trying to figure**
 14 **out where we are going to put signs up. We were**
 15 **discussing the district. It was a learning curve**
 16 **to learn the district.**
 17 Q Do you see the second sentence on the
 18 first paragraph?
 19 **A Yes.**
 20 Q Did you commonly encounter Republicans
 21 who were supporting Delaney on the campaign?
 22 **A Some. Not many.**

Conducted on January 26, 2017

33

1 Q And were there any other common obstacles
2 that you heard from people you thought might be
3 supporters of Mr. Bongino?
4 MS. WEBB: Objection. Foundation.
5 MS. RICE: That's an improper objection.
6 MS. WEBB: No, it's not, and I'm happy to
7 discuss it, if you want her to step out of the
8 room.
9 (The witness left the room.)
10 MS. WEBB: You said were there any other
11 common obstacles that you encountered in your
12 work, and we haven't established any obstacles
13 that were common. I'm not sure what you're
14 referring to.
15 MS. RICE: Foundation, per se, is an
16 improper objection.
17 MS. WEBB: Not in my practice. I don't
18 know if Maryland has a special rule on that,
19 but --
20 MS. RICE: It goes to relevance and
21 admissibility of the evidence, which is not the
22 issue.

34

1 MS. WEBB: I mean, I guess we have to
2 disagree on that. I'm happy to try to tailor my
3 objections, you know.
4 MS. RICE: Yes. Please tailor your
5 objections to curable objections because those
6 are the objections that are allowable in
7 Maryland.
8 So the only times that you can object in
9 Maryland are when it's something that I can cure
10 or it's something that would be about to invade a
11 privilege.
12 MS. WEBB: Okay.
13 MS. RICE: So let's to limit those
14 objections to this.
15 MR. STEIN: Do you have a rule you can
16 show us on this?
17 MS. RICE: Yes. You want to take a
18 break?
19 MR. STEIN: Yes.
20 (Break taken.)
21 (The witness returned to the room.)
22 MS. WEBB: I'm just going to remind you

35

1 that I may make objections from time to time, but
2 you should go ahead and answer the question
3 asked.
4 THE WITNESS: I'm just pausing to make
5 sure that everything is finished before I answer,
6 but I will be glad to answer.
7 MS. RICE: Great. Thank you all.
8 BY MS. RICE:
9 Q So I'm going to get back where we were.
10 And I think when we paused I had a question
11 pending, so I'm going to repeat it for that
12 purpose.
13 Did you know of any other obstacles to
14 Mr. Bongino's campaign, the 2014 campaign, from
15 people who you thought would have been
16 supporters?
17 MS. WEBB: Objection. Foundation.
18 Speculation.
19 **A I don't understand what you are asking.**
20 **I'm sorry. I genuinely don't understand.**
21 Q Let me try again.
22 **A Okay. I'm sorry.**

36

1 Q No. That's great.
2 In your capacity as campaign manager,
3 were you aware of complaints from people that
4 maybe you would have expected to support
5 Mr. Bongino about his campaign?
6 MS. WEBB: Objection. Speculation.
7 **A I'm sorry. I'm just trying to think in**
8 **what direction. You know, going back to the**
9 **poll, I know that I said nobody cares about it,**
10 **but what it was, it's 70 percent of the people**
11 **did not care that he did not live in the**
12 **district, and we polled Democrats, Independents,**
13 **and Republicans. So there were 30 percent, but**
14 **we didn't see the breakdown who it was that**
15 **cared.**
16 **But, other than that, you know, I just am**
17 **not sure who you are talking about, whether you**
18 **are talking about business leaders, politicians.**
19 **Are you talking about voters in particular?**
20 Q Let me try it another way.
21 Putting aside what you already talked
22 about, the number of Democrats in the district,

37

1 were there any other major issues that you
 2 thought that Mr. Bongino needed to overcome?
 3 **A Raising money.**
 4 MS. WEBB: Objection.
 5 **A Seriously, that's the biggy.**
 6 Q And why did you think Mr. Bongino would
 7 have difficulty raising money?
 8 **A Because John Delaney had so much money.**
 9 **You don't have to match your opponent one to one,**
 10 **but you've got to be able to make a dent.**
 11 Q And was Mr. Bongino successful in raising
 12 money?
 13 **A Yes. He raised about \$2 million through**
 14 **the process of the primary and the general.**
 15 (Whereupon, Strine Deposition Exhibit No.
 16 9, e-mails, marked.)
 17 BY MS. RICE:
 18 Q Do you recognize this document?
 19 **A I'm reading it. I mean, I know that I**
 20 **sent it, but I don't remember it.**
 21 **Do you want me to read the whole thing?**
 22 Q I think if you -- read as much as you

38

1 need to familiarize yourself with the document.
 2 Let me know if you recognize it.
 3 **A Okay. I got the gist of what the**
 4 **question is. It's typical of the things that I**
 5 **handled.**
 6 Q So this e-mail would be typical of
 7 something that you handled in your capacity as
 8 campaign manager?
 9 **A Yes.**
 10 Q And who is it from or who is Jeff Miller?
 11 **A I don't recall who he is, but it looks**
 12 **like he is somebody who wanted to attend an**
 13 **event.**
 14 Q Great.
 15 MS. RICE: Mark this one as Exhibit 10.
 16 (Whereupon, Strine Deposition Exhibit No.
 17 10, e-mail, marked.)
 18 BY MS. RICE:
 19 Q Do you recognize this e-mail?
 20 **A No, but I'm reading it. Okay.**
 21 Q What is this document?
 22 **A It looks like it was someone complaining**

39

1 **about getting phone calls from the phone bankers.**
 2 Q And why did you receive this document?
 3 **A Because I handled the complaints of the**
 4 **campaign and then would find who would handle it**
 5 **from there, and I kept it in my files to make**
 6 **sure it was taken care of.**
 7 Q Great. Thank you.
 8 Why do you believe that Mr. Bongino was
 9 not successful in his 2014 race?
 10 **A It wasn't for lack of trying. We knocked**
 11 **on so many doors, made so many phone calls,**
 12 **talked to so many voters. There just aren't**
 13 **enough people to vote Republican in the district.**
 14 Q Did Mr. Bongino get fewer votes than
 15 Governor Hogan in Congressional District 6?
 16 **A To be honest with you, I wouldn't be able**
 17 **to answer that because I just didn't look at**
 18 **Governor Hogan's numbers in District 6. I'm**
 19 **sorry.**
 20 Q Why didn't you look at Governor Hogan's
 21 numbers?
 22 **A Because I wasn't concerned about that. I**

40

1 **was looking at District 6.**
 2 Q Do you know if Mr. Bongino got as many
 3 votes -- oh, never mind. Strike that.
 4 MS. RICE: 11.
 5 (Whereupon, Strine Deposition Exhibit No.
 6 11, e-mail, marked.)
 7 BY MS. RICE:
 8 Q Do you recognize this document?
 9 **A Yes.**
 10 Q What is it?
 11 **A It was communication back and forth with**
 12 **me, Kathy Afzali.**
 13 Q And why do you have, why did you retain
 14 this e-mail?
 15 **A Because I keep all my e-mails, unless**
 16 **they are junk.**
 17 Q Did you receive this e-mail in your
 18 capacity as Mr. Bongino's campaign manager?
 19 **A Yes, after the election.**
 20 Q I think we mentioned Kathy Afzali a few
 21 times. Who is she?
 22 **A She's a delegate in District 4-A. It's**

41

1 **just 4 now. It's not 4-A. I ran her campaign.**
 2 Q Oh. Who is Michael --
 3 **A He's a State Senator. Michael Hough.**
 4 Q Hough.
 5 Go to the second page, the third
 6 paragraph, full paragraph on the top. Did you
 7 write this part of the conversation?
 8 **A Uh-huh.**
 9 Q And what did you mean in that paragraph?
 10 **A Basically what I have been telling you.**
 11 **It was a David and Goliath race. Too many**
 12 **Democrats to win the race.**
 13 Q Who is "you" in that paragraph? I'm well
 14 aware of the games you were playing.
 15 **A Who am I?**
 16 Q No. I'm reading from that paragraph.
 17 **A I'm sorry. Please repeat. I'm sorry.**
 18 Q If you look at that paragraph in the
 19 first sentence, the word you, who does that refer
 20 to?
 21 **A I guess you as in the you, everybody.**
 22 Q Did you write this e-mail in response to

42

1 Kathy Afzali?
 2 **A Yes.**
 3 Q So you are saying that when you said,
 4 "I'm well aware of the games you were playing
 5 behind the scenes during the election cycle, and
 6 to be honest, I'm ashamed," the "you" in that
 7 sentence refers to the general public?
 8 **A Quite honestly -- okay. I don't know**
 9 **where you are going with this, so I'm trying to**
 10 **understand.**
 11 **Even if related, then this amateur hour**
 12 **analysis would lead you to believe, that would be**
 13 **like leave anyone who is looking at it, lead you**
 14 **to believe that Bartlett and Young were the two**
 15 **worst candidates in Frederick County.**
 16 **That's referring to her analysis. And**
 17 **then I asked her to take a few minutes to do a**
 18 **little research.**
 19 **So what is your question? I'm so sorry.**
 20 Q Yes. That's the first --
 21 **A I'm not trying to be combative. I just**
 22 **don't understand.**

43

1 Q No. That's fine. We all want to
 2 understand each other.
 3 That's the first full paragraph. I'm
 4 looking at the third full paragraph.
 5 **A Okay.**
 6 Q I just don't understand it.
 7 **A It's saying that she had said that we**
 8 **recreated the politics in Frederick County, and I**
 9 **said that we didn't. We actually were using**
 10 **common sense. We knocked on doors. We didn't**
 11 **have money. That's why we worked every festival.**
 12 Q What are the games that you are referring
 13 to in this sentence?
 14 **A The games that she was playing? Kathy**
 15 **has turned into your typical politician, and she**
 16 **was behind the scenes because she was jealous**
 17 **that I was working his campaign. She had run**
 18 **against Bartlett and lost in the primary, and so**
 19 **she was telling people not to vote for Dan.**
 20 Q So --
 21 **A And we are friends again. It was just a**
 22 **heated, emotional discussion, and we talk now all**

44

1 **the time.**
 2 Q Who did she tell not to vote for Dan?
 3 **A We would knock on a door and someone**
 4 **would say, hey, I talked to Kathy Afzali and she**
 5 **said we are not supposed to vote for Dan.**
 6 Q Who was she suggesting that they vote
 7 for?
 8 **A Delaney.**
 9 Q So sticking with this argument for just a
 10 second, if you look to the original e-mail from
 11 Michael Hough, it's one, two, it begins on the
 12 bottom of page 3 and goes over to page 4, and,
 13 actually, before we get to that, how often did
 14 you encounter that reaction that somebody had
 15 spoken to Ms. Afzali before you got there?
 16 **A It was only in District 4. So it's a**
 17 **very small district and maybe we encountered it**
 18 **four times. And I can't be a hundred percent**
 19 **accurate on that, but it wasn't that often.**
 20 Q Okay. So on that, I think it's the
 21 fourth page here, Mr. Hough was giving some
 22 comparisons with Governor Hogan's performance in

Conducted on January 26, 2017

45

1 the Frederick City, not district-wide. Is that
 2 correct?
 3 **A I mean, it looks like it, yes. Frederick**
 4 **City is a high Democrat area.**
 5 Q And were you aware that in Frederick
 6 City, Governor Hogan had more votes than
 7 Mr. Bongino?
 8 MS. WEBB: Objection. Foundation.
 9 **A Obviously, when I see this, but there's a**
 10 **reason for it.**
 11 Q What's the reason?
 12 **A Brad Young was running for County Exec in**
 13 **Frederick County, and he is hated by the**
 14 **Democrats in Frederick City. And -- not Brad**
 15 **Young, excuse me, Blaine Young, and Blaine was a**
 16 **supporter of Dan's.**
 17 **So people who wanted to vote against**
 18 **Blaine voted against Dan in Frederick City.**
 19 **And, yes, we did hear that when we talked**
 20 **to Democrats at festivals, especially on**
 21 **July 4th, when we were at the July 4th festival.**
 22 **Politics is an ugly game. I'm sorry.**

46

1 Q I'm sorry for skipping around. I
 2 apologize.
 3 Back to the second page of this document,
 4 the end of the first page, on the top of the
 5 second, you talk about, I'm just going to read
 6 here, "Anyone with a modicum of experience in
 7 politics understands a state race and a federal
 8 race are decided by completely different
 9 criteria."
 10 Can you explain what those criteria are?
 11 **A If you are referring to a delegate, a**
 12 **delegate is only in a small district. I would**
 13 **assume, but I don't remember, I was probably**
 14 **talking about the Hogan race. And people are**
 15 **looking for somebody who is going to work for**
 16 **them at the State House when they are doing a**
 17 **state election. When they are voting for a**
 18 **federal race, they are looking for somebody who**
 19 **is going to go to Capitol hill and fight for you,**
 20 **and they just look at things differently as to**
 21 **who they vote for.**
 22 Q What kinds of things are looked at

47

1 differently?
 2 **A Well, you are not going to -- as far as a**
 3 **state road, you are going to hope that, you are**
 4 **going to reach out to, as a state, to get**
 5 **improvement in a state road. If you are talking**
 6 **about I-70, you are going to go to -- well,**
 7 **actually, they don't do that either.**
 8 **How about anything that is a federal**
 9 **issue. If it has something to do with the**
 10 **constitution, what laws are being passed on**
 11 **Capitol Hill, that kind of stuff, you vote for**
 12 **your congressman and your senator with that in**
 13 **mind. If you are voting for your governor, you**
 14 **are voting for a governor that is going to work**
 15 **with you within the State laws.**
 16 Q And do you think that difference in what
 17 you, what a voter might be looking for creates a
 18 change in their voting behavior?
 19 MS. WEBB: Objection. Calls for
 20 speculation.
 21 **A Yeah. I can only speculate.**
 22 Q What is your belief about it? You can

48

1 answer about your belief.
 2 **A Maryland politics is a rough world. As I**
 3 **said, I had to learn on the fly ten years ago.**
 4 **The Governor has to be able to placate both sides**
 5 **to get in. We don't have Republican governors**
 6 **that get reelected, and I doubt that Hogan will**
 7 **as well just because that's just the way it**
 8 **works. He had a bad candidate that he was up**
 9 **again, I mean, a very bad candidate, and that**
 10 **worked for him as well. Maryland was tired of**
 11 **politics with O'Malley and it was time for a**
 12 **change.**
 13 Q Going back for a second to an answer you
 14 gave previously, why did you vote for Beverly
 15 Byron?
 16 **A Because she was a conservative**
 17 **Democratic.**
 18 Q What do you mean by conservative
 19 Democratic?
 20 **A She was fiscally conservative. That's**
 21 **what I'm looking for.**
 22 Q And you also mentioned the --

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1 **A Brad Young.**
 2 Q Brad Young. Why did you vote for
 3 Mr. Young?
 4 **A Because he is fiscally conservative, and**
 5 **everybody likes him.**
 6 Q Do you consider yourself to be
 7 politically active?
 8 **A Now, yes.**
 9 Q You said now. When do you think you
 10 became politically active?
 11 **A 2010, yes.**
 12 Q And why?
 13 **A Because of the political environment.**
 14 **The census was coming up. I was scared to death**
 15 **what was going to happen, and I just knew I had**
 16 **to step up.**
 17 **Some people go back into their own lives**
 18 **and just ignore what's going on in the world.**
 19 **I'm the type of person that I'm a fixer. If I**
 20 **see there's a problem, I got to get involved, and**
 21 **that's how I got involved.**
 22 Q What were you scared of?

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1 **A The political environment, the debt, the**
 2 **national debt that was happening, the raising of**
 3 **minimum wage. I mean, we could talk for the next**
 4 **three hours with my concerns about politics.**
 5 Q Putting your work for Mr. Bongino aside,
 6 have you ever attended an event that was held by
 7 your congressional representative?
 8 **A By my congressional representative? No.**
 9 **He has only been in office for a very brief**
 10 **period of time.**
 11 Q Sorry. Throughout your whole voting
 12 life, have you ever attended an event held by
 13 your then current congressional representative?
 14 **A I did for Roscoe. He always did little**
 15 **town meetings and stuff.**
 16 Q Okay. So you attended town meetings that
 17 you just said --
 18 **A I probably went to two in the time that**
 19 **he was in his 2010, how many terms he had.**
 20 Q Do you remember what topic they were on?
 21 **A No.**
 22 Q Do you remember, were you just a

51

1 participant at the meeting?
 2 **A Actually, the first time I took my son**
 3 **solely so that he could learn about, because he**
 4 **was getting ready to vote, or not vote, excuse**
 5 **me, getting ready to register to vote, my oldest**
 6 **son. I don't remember the topic and I don't**
 7 **remember why I went the second time.**
 8 Q And did you ever attend an event with him
 9 with Beverly Byron?
 10 **A I actually did a parade with her when I**
 11 **was like 15 years old, so, yes. I did hold a**
 12 **sign. They were good people, Beverly and**
 13 **Goodloe.**
 14 Q And what about Chris Van Hollen?
 15 **A No.**
 16 Q Have you ever volunteered on a campaign
 17 for a congressional representative other than
 18 Dan's campaign?
 19 **A Beverly Byron I did a parade. That's it.**
 20 Q And have you ever contacted your, and by
 21 your congressional representative, I mean from
 22 your whole voting life, your representative at

52

1 the time?
 2 **A One time I contacted Roscoe Bartlett. We**
 3 **were attempting to get a travel visa for my now**
 4 **daughter-in-law, then engaged to my son. She's**
 5 **Thai. We were unsuccessful. Then I also reached**
 6 **out to Mikulski and Cardin, but they didn't**
 7 **respond.**
 8 Q But that was the only time you attempted
 9 to contact a congressional representative?
 10 **A Correct.**
 11 Q And so that was related to constituent
 12 services?
 13 **A Uh-huh.**
 14 Q Is the answer the same about an issue?
 15 Have you ever contacted your congressional
 16 representative about an issue?
 17 **A I wrote a letter to Mikulski when they**
 18 **were getting ready to raise the budget in like**
 19 **2011, maybe, something like that, and I hand**
 20 **delivered it to her office.**
 21 Q And is that the only time that you --
 22 **A That I can remember. I'm sorry. I don't**

53

1 **recall reaching out to them.**
 2 Q When was the first time you became
 3 interested in redistricting?
 4 **A As I said, it was 2010 when the census**
 5 **was coming up, and it was just reading an article**
 6 **on the web about the possibility that we could**
 7 **lose District 6, and I was like, I've got to look**
 8 **into it more, and that's when it started.**
 9 Q And was that interest solely confined to
 10 congressional redistricting?
 11 **A Yeah, actually, because I wasn't going to**
 12 **lose my state delegate because that was going**
 13 **change. They were going to put two districts**
 14 **together, which they did, and, you know, our**
 15 **state senator wasn't going to change because that**
 16 **district stayed the same. It was just tweaked a**
 17 **little bit by a road or two.**
 18 Q Have you ever -- when did you first find
 19 out about the 2010 congressional redistricting
 20 cycle? Do you remember what month it was?
 21 **A No.**
 22 Q After you found out about it, did you

54

1 take any action regarding the redistricting?
 2 **A I always do. Argued with my husband, You**
 3 **know, this is what's going to happen. Seriously.**
 4 **He and I talk things through that way, and he**
 5 **actually said, do your thing and get involved,**
 6 **and that's how it happened.**
 7 Q How did you get involved?
 8 **A I first meet Kathy Afzali and decided to**
 9 **help her with her campaign because while we were**
 10 **knocking on doors during that time, we told**
 11 **people to vote for Ehrlich because the census was**
 12 **coming up, and it was going to be a redistricting**
 13 **time, and that's because I was so new at**
 14 **politics, I thought that was the best way I could**
 15 **help.**
 16 Q And did you testify before the Governor's
 17 Redistricting Advisory Committee?
 18 **A No.**
 19 Q Did you submit any public comment on the
 20 plan?
 21 **A No.**
 22 Q Did you write a letter about the

55

1 redistricting?
 2 **A No.**
 3 Q Did you call any of your elected
 4 representatives about the redistricting?
 5 **A Of course I talked to Kathy all the time**
 6 **about it. She actually was fighting it tooth and**
 7 **nailed at the State House. And I attempted, they**
 8 **had redistricting meetings all over the place,**
 9 **and I attempted to attend them, but I could never**
 10 **find out where they were.**
 11 Q And did you -- were you aware of the
 12 referendum on redistricting?
 13 **A Is that like the one that was Question 5**
 14 **about the boundaries according to the census and**
 15 **the constitution? That one?**
 16 Q Yeah.
 17 **A Yeah.**
 18 Q Did you gather any signatures related to
 19 that?
 20 **A No.**
 21 Q Did you -- how did you vote on the
 22 referendum?

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1 **A If that's the correct one, I voted no.**
 2 Q And have you taken any actions about
 3 redistricting after the passage of the 2011 plan?
 4 **A I got involved in this.**
 5 Q So without telling me about any
 6 conversations that you had with your lawyers
 7 after you asked to be represented by them, so
 8 after that, how did you first hear about this
 9 lawsuit?
 10 **A Maria Pycha has become a very good friend**
 11 **of mine, and she heard me do nothing but complain**
 12 **about the redistricting, and she said, hey, you**
 13 **need to get involved in this. That's how it**
 14 **happened.**
 15 Q Okay. And why did you decide to join the
 16 lawsuit?
 17 **A Solely to see if we could fix the mess.**
 18 Q What mess?
 19 **A The redistricting, the gerrymandering of**
 20 **the district.**
 21 Q And what particularly did you want to
 22 fix?

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1 **A I would love it to go back to the way it**
 2 **was before it was changed.**
 3 Q And what problem would that solve?
 4 **A It would allow us as a representative**
 5 **republic to have a representative that matches**
 6 **our principles and values in our district.**
 7 Q Who are you talking about when you say
 8 us?
 9 **A I'm talking about the Republicans in the**
 10 **district.**
 11 Q Do you think you were harmed by the 2010/
 12 2011 Congressional redistricting?
 13 **A In the most simplest form, yes, because**
 14 **we do not have somebody that represents us**
 15 **anymore.**
 16 Q And how is that harmful to you?
 17 **A Because we don't have somebody who speaks**
 18 **for us. Our government was formed as a**
 19 **representative government. We were supposed to**
 20 **vote on somebody that represented us and would go**
 21 **down and speak for us at Capitol Hill. But what**
 22 **has happened is, we no longer have that. Then we**

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1 **can go back to our lives and work; trust they**
 2 **will do the work for us.**
 3 Q Who do you mean by us?
 4 **A The Republicans in the district.**
 5 Q In what district?
 6 **A District 6, but I'm no longer in that**
 7 **district. I got taken out and put into District**
 8 **8, and I'm exactly 3.1 miles from the district.**
 9 Q Do you have a congressional
 10 representative?
 11 **A Yes, Jamie Raskin. He just was sworn**
 12 **into office.**
 13 MS. RICE: Let's take a quick break.
 14 (Break taken.)
 15 BY MS. RICE:
 16 Q Two more questions.
 17 If there was somebody on the ballot who
 18 was fiscally conservative, would you vote for
 19 them?
 20 **A Uh-huh.**
 21 Q Regardless of --
 22 **A Yes. I'm sorry. Yes. Sorry.**

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1 Q Regardless of what party they
 2 were affiliated with?
 3 **A Yes.**
 4 MS. RICE: I'm done.
 5 EXAMINATION BY MS. WEBB:
 6 Q Just a few questions.
 7 **A Okay.**
 8 Q So could you describe again just quickly
 9 what jobs you held on the Bongino campaign?
 10 **A The Senate campaign or the Congressional?**
 11 Q The Congressional.
 12 **A I started out as the deputy campaign**
 13 **manager, and then she left to take care of her**
 14 **mom, and I stepped up as campaign manager.**
 15 Q Okay. And what sort of general duties
 16 did you have?
 17 **A Everything. Yeah, I can go into details,**
 18 **but anything that encompasses the campaign, I**
 19 **oversaw.**
 20 Q As part of your job, would you try to get
 21 your colleagues motivated?
 22 **A That's one of your biggest roles.**

60

1 Q Would you try to set the tone?
 2 **A Absolutely. If you have the worst tone,**
 3 **nobody will do anything. You have to be positive**
 4 **and a motivator all the time. And that's with**
 5 **the candidate down to the person who is holding a**
 6 **sign on the corner.**
 7 Q And in your role, did you communicate
 8 with potential voters?
 9 **A Yes.**
 10 Q And what sort of tone would you try to
 11 project to those voters?
 12 **A Always positive. I mean, you have to**
 13 **make sure that they want to vote. So you have to**
 14 **be positive with them all the time.**
 15 Q You testified that you were harmed from
 16 the redistricting of Congressional District 6.
 17 Correct?
 18 **A Yes.**
 19 Q And you felt disenfranchised. Correct?
 20 **A Yes.**
 21 MS. RICE: Objection.
 22 Mischaracterization.

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1 MS. WEBB: Fair enough.

2 Q Just to clear that up, you testified that

3 you felt you didn't have someone who speaks for

4 you.

5 **A Correct.**

6 Q And did you talk with others in the

7 former congressional district whether they felt

8 harmed?

9 **A Yes. Uniquely, I can state that I spoke**

10 **to 60,000 people in the district, and that's**

11 **between festivals, knocking on doors, parades,**

12 **anything you can imagine, and I'm serious.**

13 **60,000 people is not exaggerating. And every**

14 **time we were out, we met somebody who said, it's**

15 **not worth voting anymore, every single time.**

16 Q Over what period of time were you

17 speaking to all these people?

18 **A When I got involved in the campaign until**

19 **the election night in November.**

20 Q And when did you first get involved?

21 **A I think it was in October, I think.**

22 **Honest to God, I don't know the exact date.**

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1 Q October of --

2 **A It would have been 2011.**

3 Q Okay. 2011?

4 **A Yes.**

5 Q So over --

6 **A Not 2011. Excuse me. It was 2014. So**

7 **it would have been 2013. Sorry.**

8 Q 2013?

9 **A Yeah.**

10 Q Until the present?

11 **A Correct.**

12 Q And would you -- you mentioned some ways

13 you were talking to people, parades, festivals.

14 Could you elaborate?

15 **A Myself, I probably made a thousand phone**

16 **calls. The volunteers made way more than that.**

17 **And so I didn't have that much time to make phone**

18 **calls. But every time I got on the phone, I'd**

19 **call like 50 people, and at least one person**

20 **would say, I'm not, I don't know why I should**

21 **vote, and, of course, it was my job to try**

22 **encourage her to vote because, I'm saying she, as**

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1 **in she or he, okay, they just feel**

2 **disenfranchised that they can't, they don't have**

3 **somebody that represents them anymore.**

4 **There was an old guy at a festival in**

5 **Cumberland that came over, and it was so**

6 **disappointing because you could tell he was the**

7 **salt of the earth, that he worked hard every day,**

8 **dirt under his fingernails, in his coveralls, and**

9 **he just stopped there to get a ham sandwich, and**

10 **we talked to him, and he said that there's just**

11 **no point in voting anymore because nobody**

12 **represents us in Cumberland anymore. So, I mean,**

13 **it's a valid point that I heard continuously.**

14 Q Anymore being when?

15 **A After the redistricting. I'm sorry.**

16 Q And do you agree with them? Do you feel

17 that as well?

18 **A Absolutely. I had a rough time this last**

19 **go-around with Amie Hoeber even getting excited**

20 **or even wanting to give my time because I just**

21 **knew it was a losing race. There was no chance**

22 **that Amie was going to win, even though she had**

64

1 **money and he had money. She lost by 14 percent**

2 **or a little over 14 percent.**

3 Q Just one more quick question about

4 Exhibit 11, which you have there in front of you.

5 If you turn to the third page of Exhibit 11, you

6 were asked some questions about an e-mail here

7 from a Michael Hough.

8 **A Hough. That's all right. I called him**

9 **that until he corrected me.**

10 Q Sent November 8th, 2014. And does the

11 e-mail that you see here include some statistics?

12 **A Yeah.**

13 Q Do you know for a fact that these are

14 accurate?

15 **A No.**

16 Q Okay. Thank you.

17 **A As I said, I didn't look at stuff after**

18 **the race. I was in recovery.**

19 MS. WEBB: Thank you.

20 MS. KATZ: We are going to ask a couple.

21 Take a quick break for a second.

22 (Break taken.)

65

1 EXAMINATION BY MS. RICE:
 2 Q One question remaining.
 3 So as I understand what you just said,
 4 that you had encountered many people that told
 5 you that they weren't excited about voting
 6 anymore. Is that correct?
 7 **A Uh-huh.**
 8 Q Do you know anyone who actually did not
 9 vote?
 10 **A No, because I would have no way of**
 11 **knowing that information.**
 12 MS. RICE: Thank you. That's it.
 13 THE REPORTER: Do you want a copy,
 14 Ms. Webb?
 15 MS. WEBB: Yes.
 16 THE REPORTER: Is an E-Tran okay?
 17 MS. WEBB: Yes.
 18 MS. KATZ: They need it in five days. We
 19 don't.
 20 (Off the record at 10:46 a.m.)
 21 -----
 22

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1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC
 2
 3 I, Carla M. Sinclair, the officer before whom
 4 the foregoing deposition was taken, do hereby
 5 certify that the foregoing transcript is a true
 6 and correct record of the testimony given; that
 7 said testimony was taken by me stenographically
 8 and thereafter reduced to typewriting under my
 9 direction; that reading and signing was
 10 not discussed; and that I am neither counsel for,
 11 related to, nor employed by any of the parties to
 12 this case and have no interest, financial or
 13 otherwise, in its outcome.
 14
 15 IN WITNESS WHEREOF, I have hereunto set my
 16 hand and affixed my notarial seal this 30th day
 17 of January, 2017.
 18 *Carla M. Sinclair*
 19
 20 My commission expires:
 21 November 13, 2018
 22

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