

STATE OF NEW HAMPSHIRE

* * * * *
*
IN RE: *
ANDREW SANBORN *
*
* * * * *

ORIGINAL

INTERVIEW OF ROBERT CLEGG - 1/18/18
TRANSCRIBED FROM AUDIO

Prepared for: Geoffrey W. Ward, Esquire
Senior Assistant Attorney General
Criminal Justice Bureau
Attorney General's Office
33 Capitol Street
Concord, NH 03301-6397

AVICORE Reporting

The Beacon Building
814 Elm Street - Suite 400
Manchester, NH 03101

Licensed Court Reporters
Certified Videographers
Videoconferencing

(603) 666-4100
Toll Free (888) 212-2072
Fax (603) 666-4145

1 INVESTIGATOR SCOTT GILBERT: Today's date is
2 January 19, 2018. The time is approximately 9:30. I
3 am Scott Gilbert, investigator with the New Hampshire
4 Attorney General's Office. I am at the Attorney
5 General's Office. We're in the first floor
6 conference room, room 107. I am with Robert Clegg
7 and Geoffrey Ward. We spoke just briefly before I
8 turned the tape recorder on, and you've given me
9 permission to record this already.

10 ROBERT CLEGG: Sure, yeah.

11 ATTORNEY GEOFFREY WARD: And it's the 18th,
12 Scott.

13 INVESTIGATOR SCOTT GILBERT: I said the 19th?

14 ATTORNEY GEOFFREY WARD: You said the 19th.
15 It's all right.

16 ROBERT CLEGG: You had me going.

17 INVESTIGATOR SCOTT GILBERT: My mistake.

18 Sorry. There won't be any more mistakes. We
19 discussed briefly what this was about yesterday when
20 I talked to you on the phone.

21 ROBERT CLEGG: Right.

22 INVESTIGATOR SCOTT GILBERT: So you're aware
23 of why you're here, and you have some knowledge of

1 this. Just a little background. Can you tell us a
2 little bit about what you do now and what you've done
3 in the past?

4 ROBERT CLEGG: Well, I spent eight years in
5 the New Hampshire House and I spent six years in the
6 New Hampshire Senate. I own a firm that rehabs old
7 buildings. We like to restore the historic
8 buildings. And I also own a lobbying firm. I ran
9 for Congress when I left the Senate. I lost, or I
10 won, depends on how you look at it. I think I won
11 because I didn't have to go down. And since then,
12 I've stayed active in politics in the state of New
13 Hampshire. We take on a lot of pro se -- or I should
14 say pro bono issues but we do stay -- we stay intact.
15 So how I got involved in the Sanborn issue was
16 because I've been there so long. To a lot of the
17 people that are over there, I'm the big brother or
18 the father.

19 INVESTIGATOR SCOTT GILBERT: Sure.

20 ROBERT CLEGG: So a lot of people tell me
21 things that they probably shouldn't. Most things
22 don't go anywhere, but this one happened to be a
23 situation that I had gotten tired of because this

1 guy's just a -- it's a common practice for him to
2 sexually harass people or harass people, and this one
3 went too far. The way I found out about it was when
4 Peter Bragdon was being pushed out politically for
5 taking a job as -- with the Municipal Association
6 while also being the President of the Senate and
7 while the State of New Hampshire had a lawsuit with
8 the Municipal Association -- I know all the names.
9 So [No. 1] was working in the Clerk's Office.

10 INVESTIGATOR SCOTT GILBERT: So he would be
11 the intern --

12 ROBERT CLEGG: He was the intern, the New
13 Hampshire intern of the University. And he had asked
14 the Clerk, Tammy [No. 1] -- no, what's Tammy's last
15 name -- Tammy Wright -- sorry -- if his deal was
16 going to be gone. Tammy called me. [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 she didn't want to get a lot of information out there
20 but she told me what the situation was, how he had
21 gotten some money and the job in return for basically
22 clamming up, I guess, on the situation. So I went
23 out and found out from a number of people by asking

1 just the right questions that if, in fact, a case
2 such as this existed, that the money in the envelope
3 was a small part that the real -- the real payoff was
4 a job. Because unless he had done something that
5 would be considered an offense, he had a lifetime
6 job, so he could have 20 years in the Clerk's Office
7 with a pension. And I passed that along. So as it
8 progressed, more and more information came out about
9 it. We started asking for, myself and others, under
10 the Right to Know, for the whole thing, because we
11 thought it was time for him to leave. And while
12 leadership kept saying we could have it, legal
13 counsel, Rick Lehmann, kept saying that we missed
14 something, we didn't put the right word in. There
15 was always a reason why we couldn't have it. At one
16 point, he called it -- said it was an employee
17 situation and I argued that Senator Sanborn's not an
18 employee. I had been through that whole thing
19 before. And as far as we were concerned, we didn't
20 care who the intern was. Although we knew, we didn't
21 care who the intern was -- redact his name. We need
22 the information because this guy needs to leave. I
23 still believe in the institution. It means a lot to

1 me. And I think what he does is a black eye upon the
2 institution. So we have tried ever since we found
3 out about it to get him out.

4 This kid's not the only one that he's harassed.
5 I know of others. I know that No.2 who now works for
6 [REDACTED] And there's --

7 INVESTIGATOR SCOTT GILBERT: Can I -- do you
8 know -- do you have any contact with her now?

9 ROBERT CLEGG: I don't, because she was a --
10 she was -- she worked -- [REDACTED]

11 [REDACTED] I gave her a glowing

12 recommendation [REDACTED]

13 [REDACTED]
14 Are you saying she won't return calls?

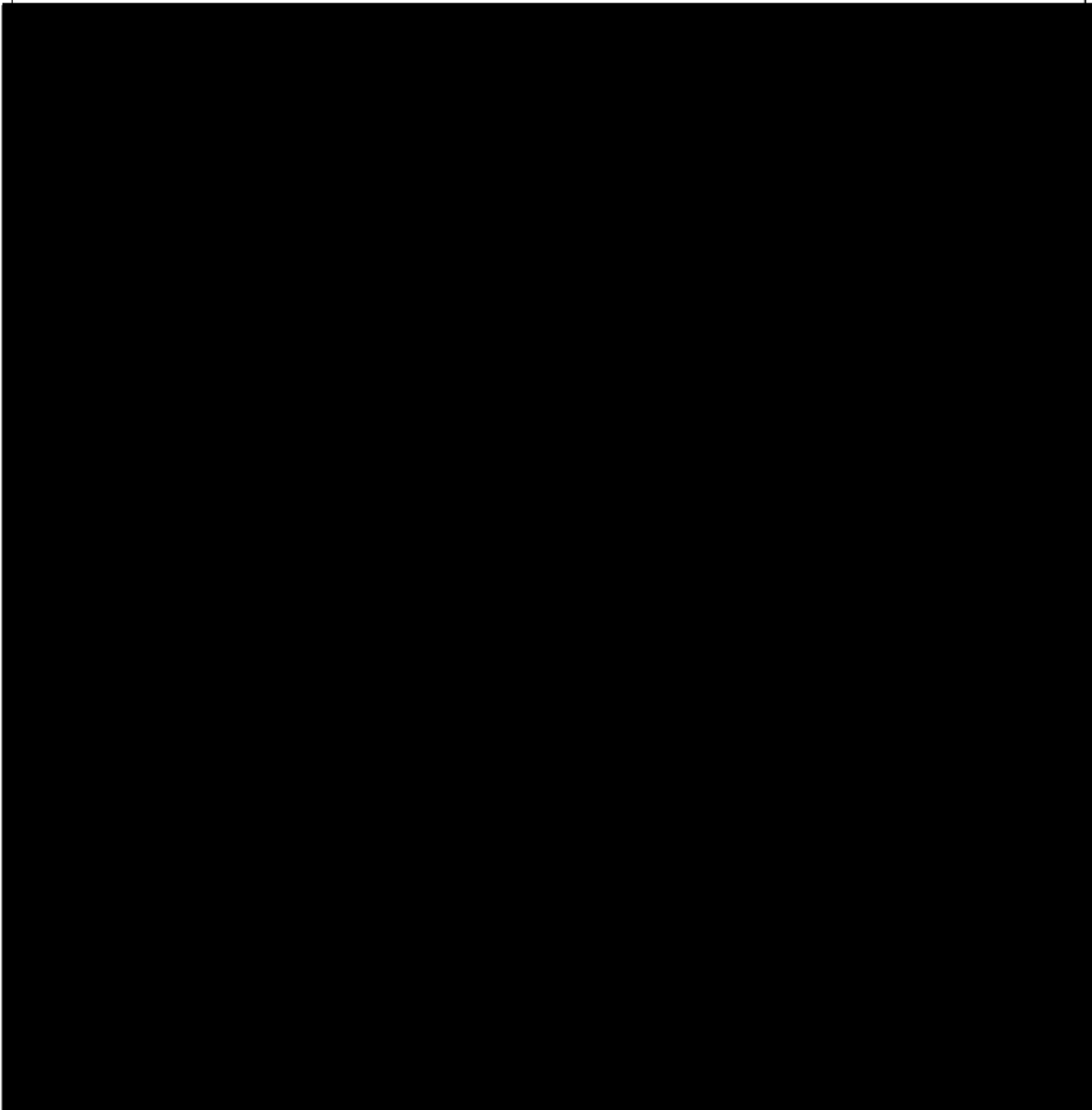
15 INVESTIGATOR SCOTT GILBERT: Yes.

16 ROBERT CLEGG: I can see what I can do but I
17 have a feeling that with [REDACTED]

18 [REDACTED] -- what's happened is a
19 lot of people are fearful that if they come out and
20 say anything, that when they have legislation, it's
21 going to come out. I was told the other day that
22 Andy Sanborn called No.1 [REDACTED] down to his facility
23 after the place was closed, at the draft, and I was

1 told when No. 1 got there, Andy was cooking
2 something. NO. 1 got a little nervous and left.
3 Now, Andy's -- Andy's a big guy and he can be
4 threatening. So to some people, they don't want any
5 part of that. And, you know, it's not unusual -- I

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

INVESTIGATOR SCOTT GILBERT: Have you -- do you know of or have you heard of anything about any possibility of any nondisclosures in this matter?

ROBERT CLEGG: I don't know.

INVESTIGATOR SCOTT GILBERT: No? Okay.

ROBERT CLEGG: I don't.

INVESTIGATOR SCOTT GILBERT: Can I ask you what -- there's three things going on here. There was a, as you referred, that situation where Senator Sanborn said --whether a proposition or whatever you want to refer to it as, to **No. 1** (sic), what you know of or what you've heard that was, what the --

ROBERT CLEGG: Okay.

INVESTIGATOR SCOTT GILBERT: -- what you know about the money, and then ultimately what you

1 know about the job.

2 ROBERT CLEGG: Okay. I heard that Andy
3 Sanborn -- I heard that Andy said to his wife that he
4 couldn't go to Florida with her during break and
5 **No. 1** said, geez, I'd love to go to Florida. And I
6 heard that Andy said, well, if you give me a blow
7 job, or oral sex, however he framed it, then you can
8 go with my wife. And I heard that Rick Lehmann was
9 either standing outside the office or walking by the
10 office, heard it and turned it into the Chief of
11 Staff, which was Jay Flanders at the time. Then I
12 heard that Jay took control of it, which is typical
13 for Jay. The kid was offered a job. I heard the
14 money was -- originally the money was so that he
15 could buy some clothes to do the job and he would
16 have gas money. And I heard that the kid agreed to
17 whatever the deal was. But the deal was that he had
18 the job, so.

19 INVESTIGATOR SCOTT GILBERT: Did you hear
20 any reference to the amount of money?

21 ROBERT CLEGG: I've heard 1,200 and I've
22 heard 12,000, but I haven't -- I haven't seen anybody
23 who said they actually counted it.

1 INVESTIGATOR SCOTT GILBERT: Have you ever
2 in your political career ever heard of such a thing,
3 a Chief of Staff giving an intern money?

4 ROBERT CLEGG: Absolutely not. If I were
5 the majority leader at the time, he wouldn't have
6 done it then either.

7 ATTORNEY GEOFFREY WARD: If I could back it
8 up. When you say you heard about the comment that
9 Sanborn makes to **No. 1** how do you hear about that?

10 ROBERT CLEGG: A number of people have told
11 me, and some of them have been senators and some of
12 them have been staff. It's pretty wildly known that
13 that's what it was.

14 ATTORNEY GEOFFREY WARD: Can you tell us who
15 any of those people are that told you that?

16 ROBERT CLEGG: Well, I mean, I heard it from
17 Tammy because she heard it from him.

18 ATTORNEY GEOFFREY WARD: Heard it from
19 **No. 1**

20 ROBERT CLEGG: Yeah. And some of -- some of
21 the senators have not denied it when I've asked them.
22 I've asked Senator Carson, I've asked Senator
23 Bradley. Nobody's denied that that was the comment.

1 Nobody will actually come out and state what he said.
2 A lot of them have said to me, look, we're not
3 supposed to talk about this issue. I respect that.
4 I know what they're doing. Legal counsel has
5 consistently said don't talk. But as I said, both
6 Chuck Morse and Jeb Bradley said that we were
7 entitled to the information. He wasn't protected but
8 every time we tried to get it, to handle it our way,
9 we're stymied by Rick Lehmann, who said no, he's an
10 employee, no, we have the issue. You know, there's
11 been more news organizations who have come out and
12 asked questions, and a lot of them have more
13 information than most people do, so.

14 INVESTIGATOR SCOTT GILBERT: And when you
15 say we have tried to get it through a Right to Know
16 request, who's that we?

17 ROBERT CLEGG: There's a number of people,
18 myself, and the record will show that Susan Olsen has
19 also asked. Susan and I are very close, because of
20 the Second Amendment issues, but actually we've been
21 friends a long time. She was the -- her and her
22 husband were the founder of Rolling Thunder in New
23 Hampshire. So her husband was a pilot, helicopter

1 pilot in Vietnam. So they're good people. I can
2 tell you that we laughed when they came out with the
3 sexual harassment signature pages that they just did.
4 We have the copies of the original ones and Andy
5 Sanborn had never signed it. So when they said that
6 these were missing and everybody had to re-sign, the
7 joke was, sure, because now I bet you Andy will have
8 one that's signed. And sure enough, they show -- he
9 never signed it but -- so we know the games that are
10 being played.

11 INVESTIGATOR SCOTT GILBERT: From your
12 experience over there, what would there be for --
13 there would obviously -- there would be information
14 about the job. You get that information --

15 ROBERT CLEGG: Oh yeah.

16 INVESTIGATOR SCOTT GILBERT: But if they did
17 any sort of investigation, is there the possibility
18 there's no documentation of this whatsoever?

19 ROBERT CLEGG: That's what they're saying
20 now, but that's not what they said before. They said
21 there was a file, they just wouldn't give it to me.
22 And there should be a file. Even if -- even if it
23 was proven false, there should be --

1 INVESTIGATOR SCOTT GILBERT: Something.

2 ROBERT CLEGG: -- some -- some kind of
3 indication. If I'm running for office and somebody
4 brings this up and says, this is what he did, I need
5 a piece of paper to show, or I don't know, a report
6 or anybody, somebody that says, yeah, these
7 complaints were made and they were all proven to be
8 --

9 INVESTIGATOR SCOTT GILBERT: So how would it
10 work? So if Rick Lehmann goes to then Chief of Staff
11 Jay Flanders with this, where would -- would Jay go
12 to Senate President Peter Bragdon? Like --

13 ROBERT CLEGG: Senate President should know
14 but there should have been a written -- a written
15 report from Rick, and Jay Flanders should have also
16 written a report on what his findings were. Rick,
17 because he heard it and turned it in. Jay, because
18 he made the report. And then something should have
19 gone to the President. I don't know that the
20 President would have written his own report. I think
21 he would have relied on that. But those would have
22 been in a file, especially something like that,
23 because you've got -- you've got an intern and it

1 wasn't the first time an intern had been -- I'll go
2 back to Clinton. That was, you know -- so it's not
3 -- it's not something that you would just wash away.
4 You'd have a record of it someplace, just in case.

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

1

2 Now, Chuck Morse wasn't aware of it and when he
3 found out, he was not happy. Chuck doesn't get angry
4 very often but in that case he was extremely angry.
5 Jeb Bradley when he found out about it was totally
6 disgusted. So they even kept it from Jeb, and they
7 shouldn't have.

8 Now there's another guy over there too, before I
9 forget, and I don't know what No. 6 last name is
10 but he works

11 ATTORNEY GEOFFREY WARD: No. 6 sound
12 familiar?

13 ROBERT CLEGG: Yeah, that's him. And he
14 supposedly has kept two years of -- it's not a diary
15 but every time Andy Sanborn did something.

16 ATTORNEY GEOFFREY WARD: And you mentioned,
17 Bob, that there were others that have experienced
18 firsthand Senator Sanborn's --

19 ROBERT CLEGG: Sure.

20 ATTORNEY GEOFFREY WARD: -- style. And
21 you've -- No. 2, No. 6

22 ROBERT CLEGG: No. 2 and No. 6

23 ATTORNEY GEOFFREY WARD: No. 1

1 ROBERT CLEGG: No. 1 and --

2 ATTORNEY GEOFFREY WARD: Anyone else we
3 should seek out?

4 ROBERT CLEGG: [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 ATTORNEY GEOFFREY WARD: How does it
11 continue if it's that blatant?

12 ROBERT CLEGG: There's protection, in a
13 sense. You know, you have a tendency to protect your
14 own. I see that. But in his case, the majority for
15 the Republican Party has been so minor and so short,
16 that people felt that well if he gets elected, he
17 gets elected, we're not going to help him, but we're
18 not going to release the information that would stop
19 him from being elected. [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

[REDACTED]

[REDACTED]

ROBERT CLEGG:

ATTORNEY GEOFFREY WARD: Okay.

ROBERT CLEGG:

[REDACTED]

[REDACTED]

ATTORNEY GEOFFREY WARD:

[REDACTED]

INVESTIGATOR SCOTT GILBERT: Who, if anyone, in your experience, Bob, would have some inside or direct knowledge of this issue that would share it with us?

ROBERT CLEGG: On the No. 1 or the everything?

INVESTIGATOR SCOTT GILBERT: Both. If we were looking at the --

ROBERT CLEGG:

[REDACTED]

[REDACTED]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

ATTORNEY GEOFFREY WARD:

ROBERT CLEGG: Okay.

ATTORNEY GEOFFREY WARD: --

ROBERT CLEGG:

ATTORNEY GEOFFREY WARD: Would you suspect that if -- we've obviously spoken to a lot of people. We have not yet spoken to No.1 intentionally, and we're going to everyone else first,

ROBERT CLEGG: He's got a problem. He's got a definite problem. And he's very, very nervous. He knows that there's an investigation, I can tell, because when he's around me, he starts walking in circles. I know he wants to talk to me. I'm not

RTK 001035

1 going to stop the -- it was always our intent, my
2 intent and Susan's intent, to never mention his name.
3 She was the one that was going after a lot of the
4 Right to Know. But his name -- he shouldn't be --
5 well, he was -- he was the victim, so to speak. So
6 we didn't want to -- we didn't want to hurt him. But
7 he definitely knew. He wouldn't have questioned, is
8 my deal still good, when Peter Bragdon was getting
9 pushed out, if he didn't realize that he had signed a
10 deal, or he made a deal.

11 ATTORNEY GEOFFREY WARD: And you hear that
12 from Tammy that he asked that question?

13 ROBERT CLEGG: I heard that from Tammy. And
14 that was the question, is his deal still good. He
15 wants to know is his deal still good. If she hadn't
16 called and asked me, I probably never would have
17 known the whole situation, so.

18 ATTORNEY GEOFFREY WARD: Did she elaborate
19 on that at all in her conversation with him about
20 this deal or what he says about this deal?

21 ROBERT CLEGG: She told me what the deal was
22 supposed to be. I remember when she -- when he was
23 put in her pool, so to speak, that she couldn't

1 understand why. He had no experience. There was no
2 reason for him to be there. He was a good kid but
3 her office is a pretty tough office to be in. He did
4 okay but it wasn't somebody that you would all of a
5 sudden just dump on, especially at the end of the
6 year, because that's the time of the year that you
7 have to do all kinds of stuff. You have to prepare
8 the journals for the constitution and there's a lot
9 of tough work. So she ended up doing a lot of the
10 end of the year things with a newbie. She's good at
11 what she does. She's a little eccentric but she's so
12 dedicated to her job, that perfection becomes a real
13 problem, so.

14 ATTORNEY GEOFFREY WARD: And what did she
15 tell you that the deal was supposed to be?

16 ROBERT CLEGG: She told me that the deal was
17 that -- well, she told me about the money --

18 ATTORNEY GEOFFREY WARD: Um-hmm.

19 ROBERT CLEGG: -- and that he would have a
20 job. So he -- he saw it as a job forever and she had
21 no reason not to believe him.

22 ATTORNEY GEOFFREY WARD: And so what happens
23 with that job? Do you know or?

1 ROBERT CLEGG: Yeah. [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 ATTORNEY GEOFFREY WARD: And so it's that

6 No. 1 gets a better offer? Is that -- [REDACTED]

7 [REDACTED] -- as opposed to the job for life

8 thing or what -- can you shed any light on that?

9 ROBERT CLEGG: I'm not -- I'm not sure if

10 No. 1 knew he had a job for life, so, Senate wise,

11 because I informed leadership that that's the deal,
12 whether they knew it or not. They didn't cut it.

13 Bragdon had cut it, but I believe that when you give
14 somebody something in return for shedding up

15 basically is what I saw it as. It's not for a year.

16 [REDACTED] Why would you hire

17 somebody that had no knowledge or experience.

18 ATTORNEY GEOFFREY WARD: Can I put you on
19 the spot again if you don't mind?

20 ROBERT CLEGG: Yeah.

21 ATTORNEY GEOFFREY WARD: Peter Bragdon, if
22 he was one of the only other one that hasn't returned
23 a phone call, would there be a -- do you suspect

1 there's a reason?

2 ROBERT CLEGG: He and Andy Sanborn are very
3 close. So I would suspect that he doesn't want to
4 upset Andy. [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 ATTORNEY GEOFFREY WARD: And so is it your
9 understanding or impression that this job that [REDACTED] No. 1
10 gets in the Clerk's Office is -- I guess, at whose
11 direction? Does it go all the way to Bragdon? Is it
12 Jay Flanders? Is it --

13 ROBERT CLEGG: Bragdon was the only one that
14 could make that happen.

15 ATTORNEY GEOFFREY WARD: Okay. And then to
16 continue to put you on the spot, [REDACTED]
17 is there some connection there in your mind?

18 ROBERT CLEGG: In my mind, there is, but --

19 ATTORNEY GEOFFREY WARD: Okay.

20 ROBERT CLEGG: How better -- if I were
21 sitting up there, I'll admit that I would have looked
22 for a way to get out of a lifetime job and [REDACTED]

23 [REDACTED]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

ATTORNEY GEOFFREY WARD: Did we clarify what the job spec was? What was the job? Was it an aide position?

ROBERT CLEGG: Working -- working in the Clerk's Office could be a number of things. And it could be all things. You could be working on the journal, you --

ATTORNEY GEOFFREY WARD: It's whatever they want it to be.

ROBERT CLEGG: Whatever they want him to do and whatever he's qualified to do, so.

ATTORNEY GEOFFREY WARD: Do you know anything -- talking about No. 6 we know -- No. 6 now, do you know his path? Was he an intern at one point also? Do you know how he came to --

ROBERT CLEGG: He's a [REDACTED] but he was -- he was -- I don't know what they call them anymore, [REDACTED]

ATTORNEY GEOFFREY WARD: Okay.

1 ROBERT CLEGG: And he was always a good one.
2 He had worked for the guy out of [REDACTED]

3 [REDACTED]
4 And then he left and went to work on [REDACTED]
5 [REDACTED] But he was always a very quiet guy, very
6 focused. If you needed something and he was there,
7 you were lucky because he got the job done. So his
8 story is that everybody wanted him but he wasn't out
9 front. He went to [REDACTED]

10 [REDACTED] By going to [REDACTED] he
11 didn't have to worry about losing his job because of
12 Andy. Now if he's really got -- and they keep
13 telling me, he's got two years' worth of journals
14 where he filled them in every single day, so.

15 ATTORNEY GEOFFREY WARD: And who tells you
16 that?

17 ROBERT CLEGG: Different senators.

18 ATTORNEY GEOFFREY WARD: And do they say
19 they've heard this directly from No. 6 [REDACTED] or?

20 ROBERT CLEGG: No. 6 [REDACTED] has told a couple of
21 people, yeah. But No. 6 [REDACTED] wants his 20 and he wants
22 to go home. It's unfortunate that he's [REDACTED]
23 because he was good at what he did, but as a

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

he's a good guy. He was very close with

ATTORNEY GEOFFREY WARD: So far as we've been talking, have I -- have we neglected anyone in particular that we should speak to that you can think of?

ROBERT CLEGG: No, not really.

ATTORNEY GEOFFREY WARD: No?

ROBERT CLEGG:

didn't -- the only person I have talked to actually upfront is Tammy, and I said, did you tell them that you told me. And she said, I did, am I in trouble.

1 I said no, makes it easier now when I go in, because
2 I would have held her confidence, you know.

3 ATTORNEY GEOFFREY WARD: And is that how --
4 excuse me -- how you find out that we're looking at
5 this, is from Tammy or --

6 ROBERT CLEGG: No. I forget who told me but
7 it wasn't -- it wasn't -- oh, it was Tammy. And that
8 was because I know that she went up and talked to
9 Chuck Morse and explained to him. She had called me
10 because when the first report came out that there was
11 nothing to see here, she was very upset, and I said
12 to her, you need to talk to somebody because I can't
13 help you, I can't go to the AG, you need to figure
14 out how to do it. And I suggested she talk to
15 Senator Carson, who said to her, look, you need to
16 talk to the Senate President, which she did. And
17 then I know the reaction of the Senate President, I
18 think from it might have been the majority leader but
19 he was so upset and called the AG and said, you need
20 to look at it again.

21 There were a lot of people in the State House who
22 think that you should do everything by the book.
23 Tammy's one of them, and there are others. [REDACTED]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

ATTORNEY GEOFFREY WARD: And I get -- and maybe you can shed some light on it. What is that fear? Is that fear just when it comes to a majority in the Senate or legislation or what's the concern about him?

ROBERT CLEGG: It's legislation. Legislation. It's he'll find a reason to kill anything.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

ATTORNEY GEOFFREY WARD: Um-hmm.

ROBERT CLEGG: I don't need lobbying to live. And I'm not bragging. I'm just saying, I don't need it. But I will tell you that the people that work with me do. That's their livelihood. So even I have to be careful to some degree. But he -- it doesn't take much to shut down a lobbyist or shut down a complaint.

1 ATTORNEY GEOFFREY WARD: So hearing that,
2 you know, the difficult time encouraging [No. 1] to
3 tell this story?

4 ROBERT CLEGG: I believe you are going to
5 have a very difficult time having [No. 1] tell that
6 story. He's -- like I said, he's like a caged
7 rabbit. Somebody told me that [No. 12] -- I can't think
8 of his last name -- [No. 12] [REDACTED]
9 does some fundraisers for the Senate, supposedly has
10 a recording of [No. 1] complaining to [REDACTED]
11 crying, saying, why would you take Andy Sanborn, you
12 know what he's done to me.

13 ATTORNEY GEOFFREY WARD: Who's [REDACTED]

14 ROBERT CLEGG: Ross Berry is a guy that runs
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]

21 [REDACTED] I mean, he's telling people because he's
22 afraid, one, of not -- somebody not knowing that this
23 is happening. I wish he would come to me but, you

1 know, I can understand why he doesn't. I'm sure he's
2 being told not to.

3 ATTORNEY GEOFFREY WARD: Do you have a
4 relationship with No.1 or a friendship or?

5 ROBERT CLEGG: I don't have a real
6 relationship with him. He's a young kid and I was a
7 senator and stuff, I mean, and even afterwards, I see
8 him at things. You know, I've always encouraged him
9 to keep going but other than that, I'm not his big
10 brother,

11

12 ATTORNEY GEOFFREY WARD:

13

14

15

16

17 ROBERT CLEGG: Have you talked to Jessica
18 Eskeland?

19 ATTORNEY GEOFFREY WARD: Yes.

20 ROBERT CLEGG: She's close to him.

21 ATTORNEY GEOFFREY WARD: Okay. Anybody else
22 that comes to mind that somebody he'd confide in?

23 ROBERT CLEGG: Like I said, if he was with

1 [REDACTED] he's got to be [REDACTED] friend, so.

2 ATTORNEY GEOFFREY WARD: And this No. 12 is
3 he friends with?

4 ROBERT CLEGG: He must be.

5 ATTORNEY GEOFFREY WARD: Okay.

6 ROBERT CLEGG: So I would ask [REDACTED] No. 12

7 [REDACTED]
8 ATTORNEY GEOFFREY WARD: [REDACTED] No. 12 is
9 that another [REDACTED] or?

10 ROBERT CLEGG: No. He's [REDACTED]
11 [REDACTED]

12 ATTORNEY GEOFFREY WARD: Okay.

13 ROBERT CLEGG: He's sort of like a [REDACTED]
14 [REDACTED]

15 ATTORNEY GEOFFREY WARD: What about [REDACTED] No. 2

16 [REDACTED] No. 2 Do you know [REDACTED]

17 ROBERT CLEGG: [REDACTED] No. 2 I don't know --
18 I never met him.

19 ATTORNEY GEOFFREY WARD: [REDACTED]
20 [REDACTED] (inaudible)
21 business?

22 ROBERT CLEGG: I honestly don't know. Like
23 I said, [REDACTED] No. 2 worked for me. I think it was her

1 [REDACTED] I've only written I
2 think two in my 20 years glowing recommendations.
3 She was that kind of an employee that when she went
4 over there, I was telling them, grab her, because she
5 was just that efficient. She was a big loss to the
6 Senate [REDACTED]

7 [REDACTED]
8 ATTORNEY GEOFFREY WARD: I know we talked
9 about the job and the cash but do you have
10 information regarding who specifically gave the cash
11 to No. 1 [REDACTED]

12 ROBERT CLEGG: I was told it was Jay
13 Flanders.

14 ATTORNEY GEOFFREY WARD: Okay. And you know
15 that world over there, you know --

16 ROBERT CLEGG: Um-hmm.

17 ATTORNEY GEOFFREY WARD: -- much better than
18 us. Is that the sort of thing that Jay would -- I
19 guess, the question is sort of, where does that money
20 come back to, if you have any information on that,
21 and is that the sort of thing that Jay would do of
22 his own volition or --

23 ROBERT CLEGG: Jay's a smart guy. If he

1 wants something done and you don't want anybody to
2 know about it, you do it yourself. So Jay would have
3 done that. Where the money came from, nobody seems
4 to know. [REDACTED]

5 [REDACTED]
6 [REDACTED] But nobody knows, or nobody seems
7 to know other than Jay. Jay would know where he got
8 it, and it was cash. So, and it's not -- it's not
9 usual to have 1,200 bucks, if that's what it was.
10 It's not usual to have \$1,200 just hanging around.

11 ATTORNEY GEOFFREY WARD: I was going to say,
12 are there any -- you know, funds or packs where
13 there's petty cash that would be in, you know, decent
14 amounts?

15 ROBERT CLEGG: There shouldn't be.

16 ATTORNEY GEOFFREY WARD: What's your
17 experience tell you how this is going to go as far as
18 Jay Flanders? He's -- he's not going to say he
19 didn't give him that money, because so many people
20 know that he -- what do you -- how do you foresee it
21 going?

22 ROBERT CLEGG: [REDACTED]
23 [REDACTED]

1

2

3

4

5

6

So --

7

[sneeze]

8

INVESTIGATOR SCOTT GILBERT: Bless you.

9

10

[sneeze]

11

ROBERT CLEGG: [REDACTED]

12

[REDACTED] But the problem is, is Jay again is very smart. He's going to -- he's going to admit to what he did but he may forget where he got it. But then again, if he thinks that he's going to get in trouble for not telling the truth, he'll tell you the truth. When they called and asked him -- when leadership called and asked, did this really happen, Jay quickly said yeah, it did. So he didn't try to hide it from current leadership.

21

ATTORNEY GEOFFREY WARD: And when did they

22

--

23

ROBERT CLEGG: I don't remember when --

1 ATTORNEY GEOFFREY WARD: -- confront him
2 about that, do you --

3 ROBERT CLEGG: I don't know but --

4 ATTORNEY GEOFFREY WARD: Was it at the time
5 or was it more recently, I mean, just sort of a vague
6 timeframe? 13230

7 ROBERT CLEGG: It wasn't at the time. It
8 was probably when we asked for the first Right to
9 Know, when we asked for the information.

10 ATTORNEY GEOFFREY WARD: So under -- sorry
11 -- Chuck Morse's Senate presidency?

12 ROBERT CLEGG: Right.

13 ATTORNEY GEOFFREY WARD: Had that leadership
14 --

15 ROBERT CLEGG: Oh yeah, yeah.

16 ATTORNEY GEOFFREY WARD: Okay.

17 ROBERT CLEGG: And they -- they weren't
18 aware of it. So they called Jay and asked and Jay
19 said yeah.

20 INVESTIGATOR SCOTT GILBERT: Just so we know
21 what we're getting into the best we can, Angela
22 Leach, she was the then Deputy Chief?

23 ROBERT CLEGG: Correct.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

INVESTIGATOR SCOTT GILBERT:

ROBERT CLEGG:

INVESTIGATOR SCOTT GILBERT:

ROBERT CLEGG:

INVESTIGATOR SCOTT GILBERT:

ROBERT CLEGG: --

INVESTIGATOR SCOTT GILBERT: Um-hmm.

ATTORNEY GEOFFREY WARD: And when you say Jay's back in town, what is Jay doing these days?

ROBERT CLEGG:

ATTORNEY GEOFFREY WARD: Okay.

ROBERT CLEGG:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

ATTORNEY GEOFFREY WARD: So does it stand out that Jay is the one who's giving somebody an envelope full of cash or is that sort of his attitude?

ROBERT CLEGG: Yeah. If it was -- that's my understanding is Jay -- Jay gave him the money and Jay would have been the one that would have had to find the money. So if -- he would have been the one that put the entire deal together. But he would not have done it without the President's approval.

ATTORNEY GEOFFREY WARD: And what does Jay do for work now, do you know?

ROBERT CLEGG:

1

2

3

ATTORNEY GEOFFREY WARD:

4

5

ROBERT CLEGG:

6

7

8

9

10

ATTORNEY GEOFFREY WARD:

11

12

ROBERT CLEGG:

13

14

--

15

ATTORNEY GEOFFREY WARD: Would there be any

16

(inaudible) Christy and Jay?

17

ROBERT CLEGG: Any what?

18

ATTORNEY GEOFFREY WARD: Do they -- are they

19

friendly?

20

ROBERT CLEGG: I think Christy is friendly

21

with everybody.

22

ATTORNEY GEOFFREY WARD: But there's not --

23

ROBERT CLEGG: No.

1 ATTORNEY GEOFFREY WARD: -- a major
2 connection between the two. And then Angela and Jay?

3 ROBERT CLEGG: Angela and Jay, they're very
4 close. They were close.

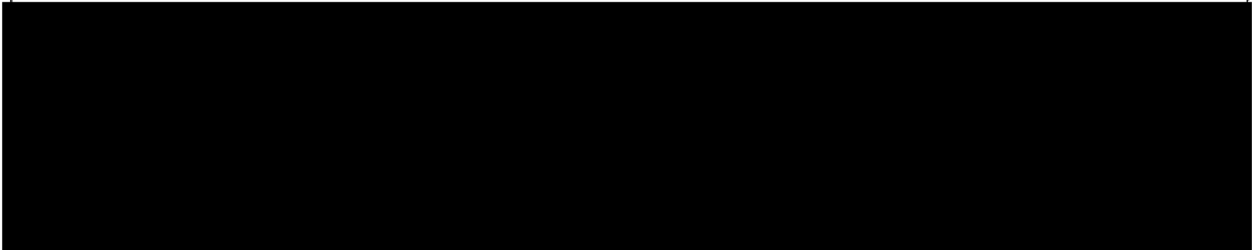
5 INVESTIGATOR SCOTT GILBERT: Okay. I think
6 I'm good.

7 ATTORNEY GEOFFREY WARD: Anybody else you
8 think that has -- I mean, I know we've already asked
9 you this, but anyone else that comes to mind that
10 would have information that would be important for us
11 to talk to that would help on all these sort of
12 different pieces?

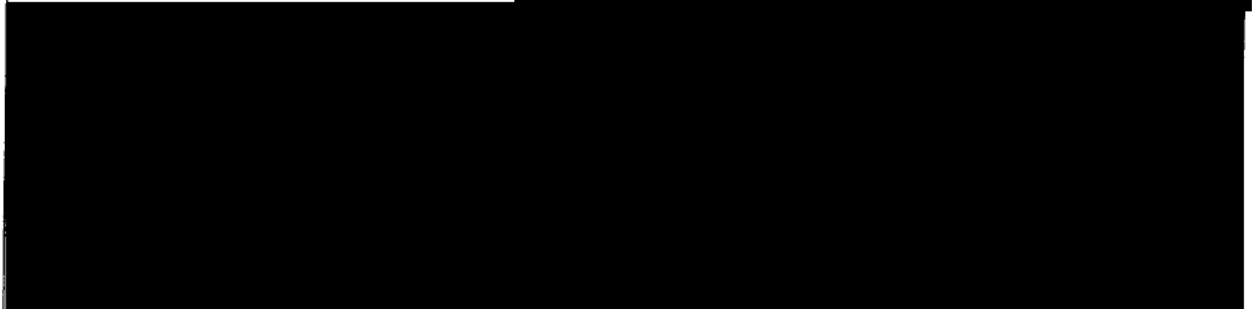
13 ROBERT CLEGG: Other than what happened that
14 day in that office. I mean, Rick's probably your
15 best -- I don't know if he wants to talk but, Rick
16 Lehmann. He's got everything and he's got copies of
17 every single Right to Know that we've ever put in.
18 And when I say we, Susan Olsen's always put them in
19 under her name. So --

20 ATTORNEY GEOFFREY WARD: [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]

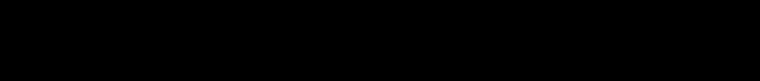
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23



ROBERT CLEGG:



ATTORNEY GEOFFREY WARD:



ROBERT CLEGG:

ATTORNEY GEOFFREY WARD:

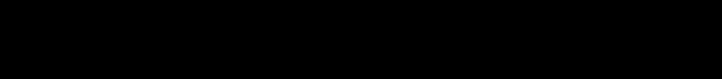


ROBERT CLEGG:



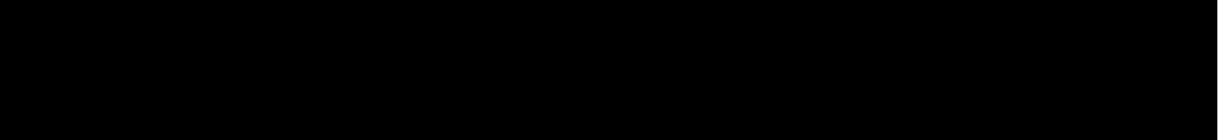
ATTORNEY GEOFFREY WARD:

ROBERT CLEGG:



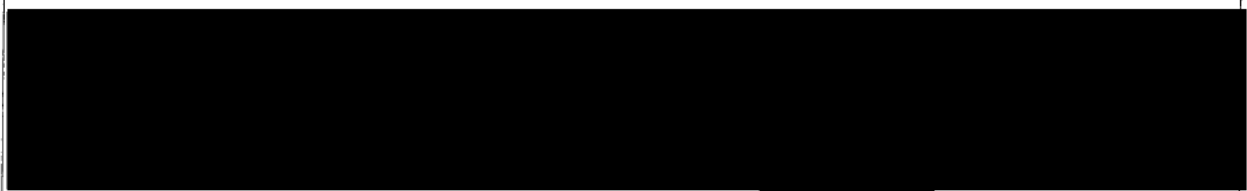
ATTORNEY GEOFFREY WARD:

ROBERT CLEGG:



LASER BOND FORM B PENGAD • 1-800-831-6989 • www.pengad.com

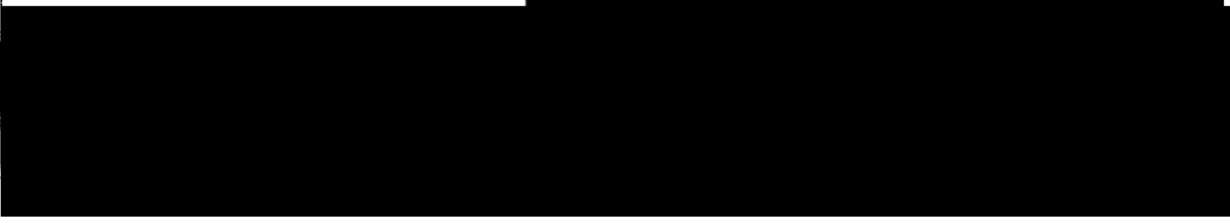
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23



ATTORNEY GEOFFREY WARD:



ROBERT CLEGG:



INVESTIGATOR SCOTT GILBERT: Thank you.

Thank you very much. With that, we'll end the interview. It's 10:15 on the 18th.

(End)