

## FEDERAL ELECTION COMMISSION

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COMMISSION

2011 NOV -8 PM 2:35

OFFICE OF GENERAL  
COUNSEL\_\_\_\_\_  
IN THE MATTER OF: )

FRIENDS OF CHRISTINE O'DONNELL )

CHRISTINE O'DONNELL )  
\_\_\_\_\_) MUR No. 6380**AFFIDAVIT OF JONATHON MOSELEY, ESQ. CONCERNING  
INTERVIEW WITH MARIE REDFIELD**

I, the undersigned, do solemnly swear under oath and make this affidavit testifying that:

1. I am competent to make this affidavit as an adult over the age of 18 years old.
2. In 2008, Marie Redfield functioned in the role of Assistant Treasurer of Friends of Christine O'Donnell, Christine O'Donnell's election campaign for the United States Senate in the 2008 elections. I don't know if she formally carried that title, but served in that position.
3. I was the initial Treasurer for Friends of Christine O'Donnell for Christine O'Donnell's 2008 campaign for United States Senator, as well as her campaign manager for her primary (convention contest) in which she won the Republican nomination for U.S. Senate.
4. On Saturday, April 16, 2011, I interviewed Marie Redfield for about two hours.
5. Marie Redfield knows, stated, and explicitly told me that Brent Vasher was legitimately owed expense reimbursements from Christine O'Donnell's 2008 campaign, in the range of thousands of dollars. Her knowledge is focused on that issue, and also the fact that David Keegan was not a Finance Consultant for Friends of Christine O'Donnell in 2008.
6. This creates the inevitable conclusion that two campaign checks written by Christine O'Donnell on official Friends of Christine O'Donnell campaign checks to Brent Vasher in the amount of \$750 in March 2009 and April 2009 were in fact valid, legal, legitimate, and proper reimbursements of campaign expenses from Friends of Christine O'Donnell to Brent Vasher.
7. To me, Marie Redfield volunteered to prepare a sworn affidavit to clear Christine O'Donnell of charges brought against O'Donnell by Citizens for Responsibility and Ethics in Washington.
8. However, subsequently after consulting a lawyer who is a family friend of hers, Ms. Redfield decided to wait to see if she really needed to get involved. In emails to me, Marie Redfield indicated that she would testify consistently with her statements to me if necessary but

sought to avoid involvement if it could be avoided. However, even though it is her desire to remain uninvolved, I feel obligated to document this information.

9. Marie Redfield's cell phone number is: where I reached her.

10. Based on Marie Redfield's statements to me, I learned the following, and paragraphs 11 through 21 are based on what Marie Redfield told me rather than my personal knowledge:

11. As Assistant Treasurer, Marie Redfield coordinated all aspects of the finances of Christine O'Donnell's 2008 campaign finances during the time when Redfield was with the campaign. Redfield performed the basic bookkeeping, and was the point of contact and interface with the official campaign Treasurer, professional accountant Timothy Koch, in Virginia.

12. As Assistant Treasurer, Marie Redfield performed the role that David Keegan falsely portrays himself as performing, and David Keegan did not perform any such role. David Keegan was not the Finance Consultant for Christine O'Donnell's campaign.

13. Marie Redfield told me that Brent Vasher repeatedly admitted to Marie Redfield or in Marie Redfield's presence that the 2008 Friends of Christine O'Donnell campaign owed Brent Vasher "thousands" of dollars, which Marie Redfield remembers as being in the range of \$3,000 to \$5,000. Although Ms. Redfield did not remember what caused her to place the amount owed by the campaign to Brent Vasher between \$3,000 and \$5,000, she strongly recalls that the amount of expenses owed by the campaign to Brent Vasher as falling in that range.

14. This money owed to Brent Vasher (\$3,000 to \$5,000) is for expenses only. It does not include any compensations, fees, or salaries due for Brent's (additional) work.

15. Brent Vasher's statements that he was owed expense reimbursement money, roughly in the range of \$3,000 to \$5,000, were made in Marie Redfield's presence long after the June 4, 2008, expense reimbursement check written already to Brent Vasher in 2008 for \$3,000.

16. Marie Redfield has stated very clearly to me that when she left in mid-August 2008, Brent Vasher was owed \$3,000 to \$5,000 in expenses (expenses only, not counting work).

17. However, public FEC campaign finance reports show that the campaign did not cut any checks to Brent from June 4, 2008, to March 2009.

18. Therefore, when Christine O'Donnell wrote Brent Vasher a campaign check for \$750 in March 2009 and another campaign check for \$750 in April 2009, Friends of Christine O'Donnell still at that time owed Brent Vasher between \$3,000 and \$5,000 at the time

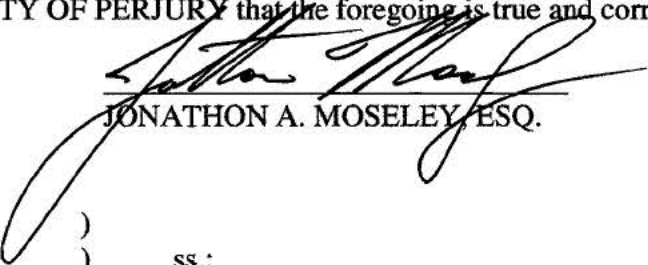
19. Marie Redfield describes these statements by Brent Vasher as conversations with Christine O'Donnell present.

20. Thus, Marie Redfield's account indicates that Christine O'Donnell must have honestly believed in March 2009 and April 2009, when she wrote two Friends of Christine

O'Donnell checks of \$750 each to Brent Vasher, that Friends of Christine O'Donnell legitimately and actually owed Brent Vasher between \$3,000 and \$5,000 in expense reimbursements for the campaign as of those dates.

21. Whether or not Brent's statements are accurate, Marie Redfield's account indicates that Christine O'Donnell believed – because Brent Vasher told her so in Marie Redfield's presence and Christine O'Donnell seemed to agree – that the campaign owed Brent Vasher thousands of dollars for reimbursement of campaign expenditures.

I DECLARE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

  
JONATHON A. MOSELEY, ESQ.

COMMONWEALTH OF VIRGINIA )

) ss.:

COUNTY OF FAIRFAX )

Before me, the undersigned Notary Public, in and for the above-mentioned jurisdiction, appeared this day Jonathon A. Moseley whose name is signed to the foregoing document, and acknowledged her signature thereto.

Subscribed and sworn to before me this \_\_\_\_ day of June, 2011.

\_\_\_\_\_  
Notary Public

My Commission Expires: \_\_\_\_\_

**People of the State of Delaware**

**Christine O'Donnell,  
Complainant,**

**v.**

**David Charles Keegan, Jr.**

**Defendant.**

**Docket #** \_\_\_\_\_

**AFFIDAVIT OF STATEMENTS BY DAVID CHARLES KEEGAN, JR.  
POSTED ON FACEBOOK ABOUT CHRISTINE O'DONNELL**

I, the undersigned, do solemnly swear under oath and make this affidavit testifying that:

1. I am competent to make this affidavit as an adult over the age of 18 years old.
2. I am an attorney in good standing licensed in the Commonwealth of Virginia.
3. I was the initial Treasurer for Friends of Christine O'Donnell in 2008.
4. David Charles Keegan, Jr. falsely claims to have been a campaign insider of Christine O'Donnell's 2008 campaign for U.S. Senate, working for and supporting her election to become a United States Senator.
5. David Keegan claims that he knows information about Christine O'Donnell's personal and campaign finances as a consequence of his insider status.
6. However, in fact, David Keegan's own pornographic, depraved, rude, and insulting statements about the Republican nominee for U.S. Senate in both 2008 and 2010 reveal that David Keegan was obviously never an insider supportive of Christine O'Donnell's election to the United States Senate, including in 2008, and does not know what he claims to know.
7. In fact, because David Keegan's only proper role in the 2008 campaign was to raise campaigns funds for the campaign – a task at which David Keegan failed at spectacularly – the

inference becomes clear that David Keegan may have actually sabotaged Christine O'Donnell's 2008 campaign either by neglect or action.

8. Having been Christine O'Donnell's 2008 primary (convention contest) campaign manager and long-time friend, interested in what was being written and reported about her, I witnessed the following statements posted by David Charles Keegan, Jr., of Hockessin, Delaware:

9. Although David Keegan claims that he did not authorize Citizens for Responsibility and Ethics in Washington to use his affidavit in the criminal complaint against Christine O'Donnell, in fact he proudly took credit for his affidavit attached to the criminal complaint. While the criminal complaint was filed by mail on September 20, 2010, David Keegan posted on Facebook on October 13, 2010:



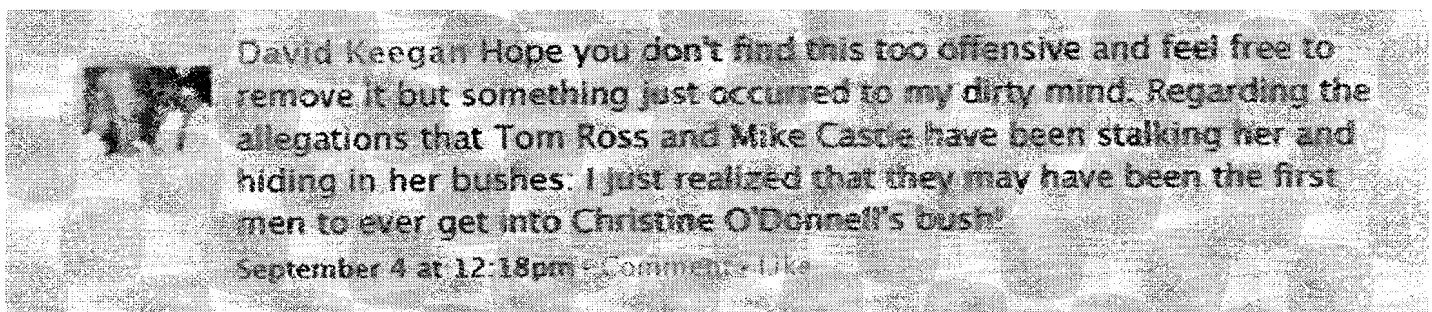
- Mark as Spam
- Report as Abuse

**David Keegan** Exhibit A on the complaint. That's my affidavit.  
October 13, 2010 at 10:47pm



10. Thus, David Keegan proudly bragged that his affidavit was used in the criminal complaint against Christine O'Donnell, belying later attempts to evade responsibility.

11. On September 4, 2010, David Keegan posted on Facebook:



12. On November 3, 2010, David Keegan posted on Facebook:

13. On November 3, 2010, David Keegan posted:

David Keegan She is only the third generation in her family to walk upright. See, apes are still evolving. Also explains that "hairy" thing.

14. In addition to David Keegan – purporting to be a campaign insider supposedly trusted with Christine O'Donnell's finances -- claiming that Christine O'Donnell is only three (3) generations removed from apes, I also witnessed that David Keegan's statement "**Also explains that 'hairy' thing**" was David Keegan referring to Christine O'Donnell's genital area in relation to a depraved and disgusting article posted October 28, 2010 – 6 days earlier – which prominently discussed Christine O'Donnell's allegedly hairy anatomy as the reason why an anonymous writer claims to have refrained from having sexual relations with her, despite having (by his own claim) spent the evening getting drunk on beer. (Bloggers pointed out that attendant photographs show Christine O'Donnell holding a large size glass of cola of the size bartenders serve non-alcoholic sodas in, with the number of straws in the glass that bartenders use to mark a non-alcoholic soda for clarity, rather than the beers claimed in the anonymous article.)

***15. This depraved and pornographic statement by David Keegan severely undercuts his claim to have been a campaign insider trusted with knowledge about Christine O'Donnell's personal and/or campaign finances.***

11/2/10



- Mark as Spam
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**David Keegan** Ding Dong the Witch is DEAD! The Wicked Witch is DEAD!!!!!!  
November 2, 2010 at 8:19pm

- 3 people like this.

11/2/10



- Mark as Spam
- Report as Abuse

**George Mathews** well, she IS cute. I could overlook her evolution comments **for a quickie**


November 2, 2010 at 5:29pm

•



○

**David Keegan** She is only the third generation in her family to walk upright. See, apes are still evolving. Also explains that "hairy" thing.

November 3, 2010 at 3:31pm · 





11/3/10




- Mark as Spam
- Report as Abuse

**David Keegan** Who created this group? Post a more appropriate picture of the witch.

November 3, 2010 at 3:35pm




## Investigate Christine O'Donnell for Campaign Fraud What would you like to see?

November 3, 2010 at 6:12pm · 



David Keegan I have a collection from when I was with her campaign. I'll see if I can find a good one and post it for you.

November 3, 2010 at 6:56pm · 



Barbei Williams Please stop calling her a witch. I know some very nice caring, honest & compassionate Wiccans... She couldn't hold a candle to them. She owes their community a HUGE apology....

November 4, 2010 at 8:14am ·   



10/23/10



- Mark as Spam
- Report as Abuse

**David Keegan** Over \$3,000,000 in campaign money and she still hasn't reimbursed me the \$138 she owes me and the \$369 debt she owes my son from 2008. Just a dumb b\*tch with a grudge.

October 23, 2010 at 8:41am

- Kevin Fenimore likes this.



11/4/10



- Mark as Spam
- Report as Abuse

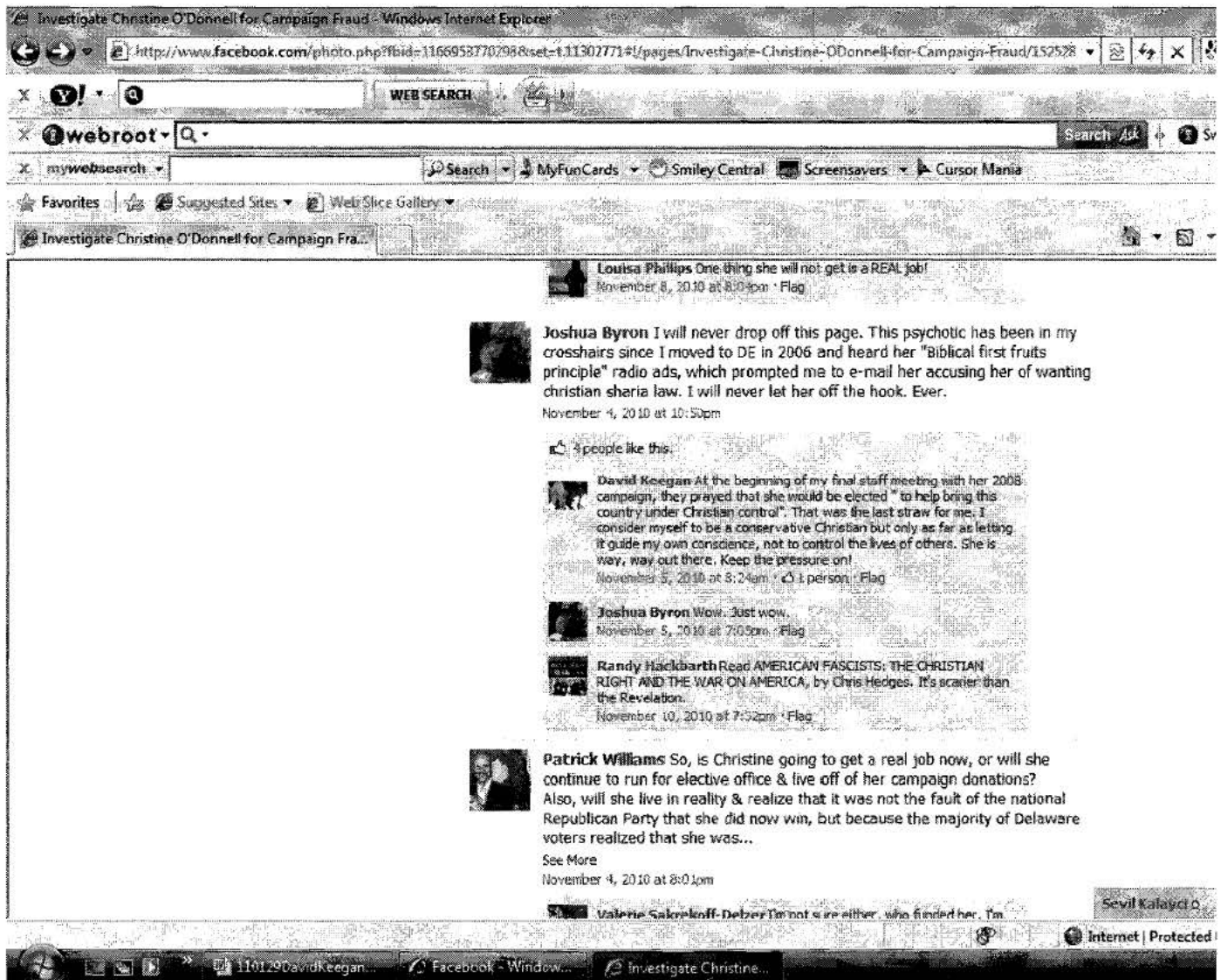
**David Keegan** LOL - Imagine Christine as a candidate for State Treasurer!!!  
LOL again!

November 4, 2010 at 8:15am

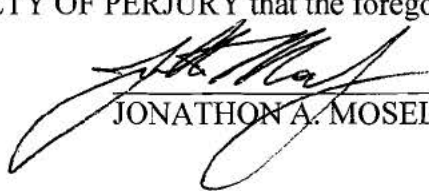


David Keegan At the beginning of my final staff meeting with her 2008 campaign, they prayed that she would be elected "to help bring this country under Christian control". That was the last straw for me. I consider myself to be a conservative Christian but only as far as letting it guide my own conscience, not to control the lives of others. She is way, way out there. Keep the pressure on!

November 5, 2010 at 8:24am · 1 person Jeff Pickens likes this. · Flag



I DECLARE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

  
JONATHON A. MOSELEY, ESQ.

COMMONWEALTH OF VIRGINIA )

COUNTY OF FAIRFAX )

SS.:



Before me, the undersigned Notary Public, in and for the above-mentioned jurisdiction, appeared this day **Jonathon A. Moseley** whose name is signed to the foregoing document, and acknowledged her signature thereto.

Commonwealth of Virginia City/County of  
FAIRFAX acknowledged and sworn  
before me this 25th day of April 2011  
Asim Zubair  
Notary Public  
My Commission Expires 6/30/2013



**FEDERAL ELECTION COMMISSION**

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COMMISSION

2011 NOV 21 AM 11:12

OFFICE OF GENERAL  
COUNSEL

\_\_\_\_\_  
**IN THE MATTER OF:**

**FRIENDS OF CHRISTINE O'DONNELL**

**CHRISTINE O'DONNELL**  
\_\_\_\_\_

**MUR No. 6380**

**AFFIDAVIT OF JONATHON MOSELEY, ESQ.**  
**REGARDING PERSONAL RESIDENCE OF CHRISTINE O'DONNELL**

I, the undersigned, do solemnly swear under oath and make this affidavit testifying that:

1. I have personal knowledge that Christine O'Donnell has never resided at 248 Presidential Drive, Wilmington, Delaware 19807, contradicting a key factual assertion of the Complaint at issue in this "Matter Under Review." *See, Attached.*

2. In its Complaint in this Matter, Citizens for Responsibility and Ethics in Washington (CREW) alleges that Christine O'Donnell lived or lives at 248 Presidential Drive, Wilmington, Delaware 19807. See Complaint, Paragraphs 8 and 21 and 22. CREW alleged:

**Friends of Christine O'Donnell is located at 248  
Presidential Drive, Greenville, Delaware 19807<sup>1</sup>**

*Complaint, Paragraphs 8 (Second Sentence)*

3. Then, in Paragraph 12 of the Complaint, C.R.E.W. alleges that Christine O'Donnell's personal residence was also located at 248 Presidential Drive, Wilmington, Delaware 19807.

4. However, 248 Presidential Drive, Wilmington, Delaware 19807 is the commercial office space of Mid-Atlantic Realty, which I have confirmed from personal eyewitness observation and knowledge of that office location, which has been true for many years.

<sup>1</sup> The residential area is known as Greenville, Delaware, but this is the same as Wilmington, Delaware 19807. Legally and for the purposes of the U.S. Post Office, the address is actually Wilmington, Delaware 19807 though the area is informally known as Greenville, Delaware.

5. No one resides at 248 Presidential Drive, Wilmington, Delaware 19807, because **that is the commercial office space for Mid-Atlantic Realty.**

6. In its Complaint in this Matter, Citizens for Responsibility and Ethics in Washington (CREW) alleges that Friends of Christine O'Donnell as a campaign committee is or was located at 248 Presidential Drive, Wilmington, Delaware 19807.

7. However, Friends of Christine O'Donnell has never been located at 248 Presidential Drive, Wilmington, Delaware 19807, which is the office of Mid-Atlantic Realty.

8. In its Complaint in this Matter, Citizens for Responsibility and Ethics in Washington (CREW) alleges that Friends of Christine O'Donnell paid for Christine O'Donnell's personal residence at **248 Presidential Drive, Wilmington, Delaware 19807** in violation of 2 U.S.C. § 439a(b)(2)(A) and 11 C.F.R. §113.1(g)(1)(i)(E). See Complaint, Paragraphs 8 and 21 and 22.

9. However, Friends of Christine O'Donnell has never paid for any rent for any purpose for the premises at 248 Presidential Drive, Wilmington, Delaware 19807.

10. I have personal knowledge that 'Friends of Christine O'Donnell' had office space in a townhouse at 1242 Presidential Drive, Wilmington, Delaware 19807, having personally myself attended business meetings and performed work in that location.

11. I have personal knowledge that Christine O'Donnell maintained a **different** personal residence in Wilmington, Delaware, that was **NOT** located **either** at 1242 Presidential Drive, Wilmington, Delaware 19807, **nor** at 248 Presidential Drive, Wilmington, Delaware 19807, having personally myself attended group business meetings around Christine O'Donnell's dining room table in that personal residence at a different location.

12. I don't know if perhaps Christine O'Donnell might be said to also have used 1242 Presidential Drive, Wilmington, Delaware 19807 for residential purposes. I don't know if it may



be argued that Christine O'Donnell was legally entitled to also reside there.

13. However, the rule applies to expenses **“that would exist irrespective of the candidate’s election campaign.”** If a candidate also has a different residence, apart from the townhouse used for the campaign, then the townhouse used for the campaign is not an expense **“that would exist irrespective of the candidate’s election campaign.”**

14. If she had not been a candidate in the public spotlight, Christine O'Donnell would not have had a need to safeguard her private, personal residence during the campaign. The arrangement existed only because of the candidate’s election campaign.

15. As a result, the Complaint by Citizens for Responsibility and Ethics in Washington (C.R.E.W.) must fail, because the rule asserted by C.R.E.W. in 2 U.S.C. § 439a(b)(2)(A) and 11 C.F.R. §113.1(g)(1)(i)(E) does not apply factually to the fact pattern at issue.

16. C.R.E.W.’s Executive Director Melanie Sloan swore to the accuracy and truth of the Complaint in the “VERIFICATION” on page 9, in which she swears:

**Citizens for Responsibility and Ethics in Washington and Melanie Sloan hereby verify that the statements made in the attached Complaint are, upon information and belief, true.**

**Sworn Pursuant to 18 U.S.C. § 1001.**

17. C.R.E.W. clearly never bothered to check any of its facts.

18. Specifically, C.R.E.W. alleged:

On March 21, 2010, the *News Journal* in Wilmington, Delaware, reported that Christine O'Donnell was using contributions to Friends of Christine O'Donnell to pay a portion of the rent on her new personal residence at 248 Presidential Drive, Greenville, Delaware.

*Complaint, Paragraph 12.*

19. Yet *the News Journal* never mentioned “248 Presidential Drive” as being

O'Donnell's address.

20. Furthermore, C.R.E.W. fails to disclose that Christine O'Donnell and Friends of Christine O'Donnell have at all times, since March 2010, sharply rejected and disputed the News Journal article as wildly inaccurate.

21. *Indeed, the Christine O'Donnell campaign banned the reporter who wrote that article, Ginger Gibson, from attending any campaign events or talking to anyone with the campaign* on account of (in their view) Ginger Gibson's inability to understand or report accurately information provided to her, starting from that same March 21, 2010, news article.

22. As Ginger Gibson herself admitted about the response of Christine O'Donnell to that news report.

She had stopped speaking to me six months earlier when I authored an article detailing her financial problems, including that she had sold her home to a boyfriend while in foreclosure to avoid a sheriff's sale, her campaign was paying most of her rent and the IRS had filed a lien against her for unpaid income taxes. *Her campaign had made a game out of evicting me from press conferences.*

Ginger Gibson, "Christine O'Donnell: A front row seat to her rise and fall," Statehouse Bureau / New Jersey On Line, August 14, 2011 ("New Jersey Voices" Section) (*Emphasis added*).

23. A news report which a candidate so totally rejected as false – causing Friends of Christine O'Donnell to "evict" the reporter from press conferences – *is not a reliable basis for any factual allegations now before this Commission*. Angering the press is risky, yet Christine O'Donnell so thoroughly rejected the news article as false, that she banned the reporter.

24. Ginger Gibson herself admits that it was the very same news article relied upon by C.R.E.W. in this Complaint, attached to the Complaint, that caused Christine O'Donnell to ban and "evict" Ginger Gibson from further coverage of the Christine O'Donnell campaign.

25. Therefore, Ginger Gibson herself admits that Christine O'Donnell strongly rejected

the news article as being false and inaccurate.

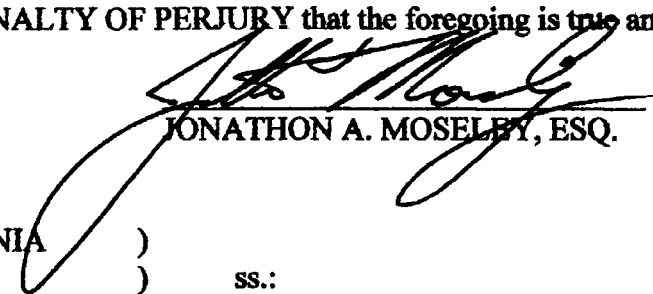
26. Even if this Commission should rely upon the hearsay of news articles, the writer of the news report here admits that the contents of her article are sharply in dispute.

27. I am competent to make this affidavit as an adult over the age of 18 years old.

28. I am a licensed attorney in good standing with the State Bar of Virginia.

29. I was the initial Treasurer for Friends of Christine O'Donnell for Christine O'Donnell's 2008 campaign for United States Senator, as well as her campaign manager for her primary (convention contest) in which she won the Republican nomination for U.S. Senate in 2008, after being friends with Christine O'Donnell since February 1, 2003.

I DECLARE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

  
JONATHON A. MOSELEY, ESQ.

COMMONWEALTH OF VIRGINIA )

ss.:

COUNTY OF FAIRFAX )

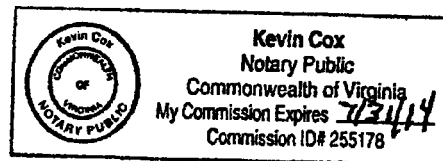
Before me, the undersigned Notary Public, in and for the above-mentioned jurisdiction, appeared this day **Jonathon A. Moseley** whose name is signed to the foregoing document, and acknowledged her signature thereto.

Subscribed and sworn to before me this 14 day of November, 2011.

  
Notary Public

My Commission Expires:

July 31, 2014





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Manager**

**Jenny Lathem, Leasing Consultant** Hours:

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