

VIRGINIA: IN THE CIRCUIT COURT FOR THE COUNTY OF LOUISA

**THOMAS ALEXANDER GARRETT, JR.,
Plaintiff,**

Case No: CL19000417-00

**FLANNA SHERIDAN GARRETT,
Defendant.**

**PLAINTIFF'S ANSWERS TO
DEFENDANT'S FIRST SET OF INTERROGATORIES**

COMES NOW, your Plaintiff, Thomas A. Garrett Jr., by counsel and for his Answers to Defendant's First Interrogatories hereby respectfully states as follows:

GENERAL OBJECTIONS

A. By submitting these answers, Plaintiff does not in any way adopt the suggested definitions and words and phrases contained within Defendant's discovery requests. Plaintiff objects to Defendant's suggested definitions to the extent that those definitions seek to impose an obligation or duty inconsistent with or greater than that contemplated by the Rules of the Supreme Court of Virginia when Plaintiff uses terms or phrases that Defendant has purported to define. Those terms or phrases should be given either the meanings set out by Plaintiff in his answers or in the case of ordinary words that Defendant has attempted to define in a manner inconsistent with their meaning, the ordinary meaning of such words.

B. Plaintiff objects to Defendant's discovery requests to the extent that they seek attorney work product and documents prepared by Plaintiff in anticipation of this litigation and/or work product.

C. Plaintiff objects to Defendant's discovery requests to the extent that they call upon Plaintiff to provide expert opinions. Plaintiff will not be testifying to an expert opinion at

deposition or trial. Plaintiff will identify his experts in accordance with any scheduling order entered by the Court or any agreement entered into by the parties.

Subject to the preceding **GENERAL OBJECTIONS**, and without waving the same, Plaintiff specifically objects or otherwise responds to Defendant's First Interrogatories as follows:

1. Provide the following information as to all bank accounts (checking/savings), savings and loan accounts, credit union accounts, or certificates of deposits, 401 (K) accounts, pension plans, IRA or Keogh accounts, money market accounts, mutual funds, stocks, bonds or other securities and investment accounts established in your name individually or in joint names with any other person(s) or in the named entities in which you have or had an interest in at any time since the date of marriage. For each account, set forth the following:
 - (a) What are the name(s) of the institutions?
 - (b) What type(s) of account(s)?
 - (c) What is the account(s) number?
 - (d) In whose name(s) is it?
 - (e) The balance as of the date of marriage
 - (f) What is the balance(s) as of the date of separation?
 - (g) Are there any liens held by a third party?
 - (h) What is the present balance(s)
 - (i) Marital, Separate or Hybrid? For any property claimed to be separate or hybrid, please provide a written explanation of the basis of your claim.

ANSWER: I have had one personal banking account in my name since the date of marriage.

The account is a checking account at Virginia Community Bank, subsequently purchased by Blue Ridge Bank. The account number is 151103915, routing number 051404037. The current balance of this checking account is approximately \$2500.00. I am attempting to determine the balance on the date of marriage. I previously provided the balance on the date of separation. There is a \$10,000 line of credit associated with this account and at the date of my last responses to discovery, the balance was approximately (negative) -\$9,000.00. There are no third-party liens of which I am or ever have been aware.

I have a trust account associated with my law practice. The current balance is approximately \$320.00.

The Defendant and I opened a joint account at the Congressional Federal Credit Union. I have not removed any money from that account, and I have not used or accessed that account since she left on April 20, 2019. The Defendant has full access to this account and all information relevant to it.

Deferred Compensation (457) Account: \$3,586.48 Marital and separate portions to be determined.

Virginia Retirement System (VRS) Defined Benefit Plan: \$48,756.30 (access to this account not available until age 55 without penalty and elimination of account). Penalty for early withdrawal includes 24% tax, plus up to a 10% penalty. Accessing funds prior to required age will also terminate eligibility going forward. Marital and separate portions to be determined.

Federal Retirement Savings Account (FERS Account) Federal Employees Retirement System: \$15,312.00 (filed with office of personnel management)

TSP – Thrift Savings Plan: \$37,770.86 (10% early withdrawal penalty for being under the age of 59.5 and 20% federal tax deduction if I were to attempt withdrawal prior to age 59.5)

2. As to any outstanding notes, accounts receivable, or other debts owed to you individually, or to you and any other person(s) jointly, provide the following information:

- (a) Who owes the money to you?
- (b) For what reason do they owe you the money?
- (c) What is the payment schedule?
- (d) What was the original amount(s) due to you?
- (e) What amounts of money were due to you as of the date of marriage and the date of separation?
- (f) What amount of money is due to you presently? To the extent that any notes, accounts receivable, or other debts owed to you as referenced above have been paid, discharged, assigned, forgiven or otherwise satisfied within the past five (5) years, please also provide all of the above information related thereto.

ANSWER: I was not owed money by anyone on the date of marriage nor on the date of separation and I am not owed money by anyone today.

3. Provide the following information as to any life insurance policies owned by you individually or jointly with any other person(s): Insurance Company, Type of policy, Insured, Beneficiary, Policy number, Owner, Face Value and Cash Value.

ANSWER: I have a Whole Life Insurance Policy with New York Life, Policy number 024323450, with myself as the insured. Death benefit: \$89,193.00. The current surrender net cash value of the policy is \$2,663.38. The Agent is Rusty Copeland, 4732 Longhill Road, Suite 3101, Williamsburg, VA 23188.

4. Provide the following information regarding any and all real and personal property, automobiles, boats, airplanes or other vehicles, and any other personal property which are titled in your name individually or which are jointly titled with any other person(s) or entity in which you had any ownership or beneficial interest in at any time since the date of marriage. For each asset produce the property description, Lien Holder, Title information, Estimate value on the date of marriage, estimated value on the date of separation, current value, loan balance as of date of separation, present balance, date sold and amount, class, and basis of class.

In addition, if you have transferred, disposed of or sold any real or personal property, investments, cash, vehicle, boat, airplane or any other item of personal property or cash since the date of separation that would otherwise have been identified in your response to the above, please provide all information requested above. (Please limit your responses to items having a value or \$400 or more.)

ANSWER: My home located at 400 Traveller Street, Mineral VA 23117. Lien holder: Caliber Home Loans. It is titled in the name of Thomas Alexander Garrett, Jr. The property is currently listed for sale for \$619,900.00. The outstanding loan at Caliber Home Loans is approximately \$440,000.00. The County Assessment is \$596,000.00. This property belonged to me prior to the marriage.

2015 Buick Regal (being paid for by my mother)
2017 Chrysler Town and Country
2015 vy SS

5. Provide the following information as to any and all debts such as credit cards, personal charge accounts, credit loans, and loans and notes payable, including those in your name alone or jointly with any person(s) or entity, as follows: Creditor Name and Address, Account number, Reason Incurred, Debtor(s), Monthly Payment, Balance as of Date of Marriage, Balance as of Date of Separation, Who is paying, and the current balance.

ANSWER: See my responses to Interrogatories #1 and #4.

I have an active credit card through Blue Ridge Bank, originally issued by Virginia Community Bank, and it has a zero balance. This was a Mastercard, having been issued by Virginia Community Bank as a Visa, but changed by Virginia Community Bank to a Mastercard, and then, when Virginia Community Bank was procured by Blue Ridge Bank, the only thing that changed was the name on the card. Account #7774 current balance \$4,452.33.

I have a line of credit associated with my checking account at Blue Ridge Bank \$9,901.81. This card was accessed multiple times for withdrawals by Flanna after I told her to stop using the card, in writing.

There was a Capital One Visa card opened in my name, under my social security number, during the marriage but I have never seen, or used, that card. It is my understanding that the Defendant retained the card, used it and maxed it out some months before leaving the marital home, and did so well after I told her in writing that she was not to access my credit and checking accounts as her name was not on them. Upon obtaining knowledge of the account, I used my personal funds to pay off the balance and close it out to avoid it affecting my credit in the future. I have filed a fraud complaint. There is roughly \$5,400.00 owed.

There was also a Citibank Credit card associated with a Costco Membership opened by the Defendant during the marriage, also using my name and social security number. I have never used this card and it is my understanding it has a zero balance.

The only loan I have is my mortgage, with Caliber Home Loans. \$2,891.81 per month, pay off is approximately \$446,885.32.

IRS Tax Debt: Back taxes including \$9,900.00 due for 2018 because Flanna chose to file separately. Had she NOT done this, we would have received a refund of approximately +/- \$30,000.00.

Louisa County Personal Property Taxes: (2018) =/- \$3,000.00.

6. For any of the above debts, or any other financial loss or expense, that you will ask the Court to order Defendant to be responsible for or otherwise reimburse you, identify the debt and all supporting facts to justify the claim.

ANSWER: Plaintiff reserves the right to seek a credit for Defendant's share of any debt that is marital or part marital.

7. Please state with specificity each and every source of your income from May 28, 2016, to the present, including but not limited to, earnings, retirement benefits, commissions, bonuses, gifts, interest, dividends or other similar investment incomes, and all gross income as defined in Section 20-108.2 (C) of the 1950 Code of Virginia, as amended. Please list each source of income separately and by year received.

ANSWER: For 2020, my net income was \$76,200.00. I received \$18,000 from South Asian Minority Alliance Foundation (no written terms, oral agreement). I received \$1,500.00 per month; \$18,000 from Free Karachi (no written terms, oral agreement). I received \$1,500.00 per month; \$7,500 from criminal and traffic law practice; \$18,000 from New World Strategies for Consulting Services; \$5,000 from Red, White and Blue Inc. for Consulting Services; \$4,000 from Showmasters, Inc. for Consulting Services; \$5,700 from Nick Freitas for Congress for Consulting and Legal Services.

For 2019, my adjusted gross income \$42,750.00. My net income was \$44,000.00. I received \$1500.00 per month from South Asian Minorities Foundation (no written agreement); \$1500.00 per month from Free Karachi (no written agreement). From February to April, I received \$2,000.00 per month from McGuire for House of Delegates (no written terms, oral). Ended April of 2019.

For 2018, my salary was \$174,000.000 from the United States House of Representatives. My healthcare and benefits were paid from my salary with no additional benefits. I received a legal case settlement of \$41,972.22 that commenced in 2016.

For 2017, my salary was \$174,000.00 from the United States House of Representatives. My healthcare and benefits were paid from my salary with no additional benefits.

For 2016, my gross income was \$84,000.00 from my law practice.

I do not have any additional benefits.

8. Identify all businesses, LLCs, partnerships, or other ventures, except for ownership of stock of a publicly traded corporation, that you have had any legal or equitable interest in since May 26, 2016. For each business interest set forth, provide name of business, nature of your legal or equitable interest, present value of your interest, classification of your interest and supporting facts for such classification.

ANSWER: I currently am the sole proprietor in Tom Garrett Law Firm PLC. I also have formed Azadi LLC and Victory Counseling LLC in early of 2019, **however I have not done any business under these names.** I had a 25% interest in the now defunct Virginia Self Defense Law Firm which was totally divested without compensation, and it had zero value when I entered Congress. I also had a P.I.C solo law practice up until I entered Congress which was also closed upon entering Congress. There was zero value to this PLC when it was closed.

9. If you claim that the other party should be barred from receiving spousal support, state in detail all facts and circumstances supporting that claim (including acts, dates of occurrence, person(s) involved and the identities of all witnesses and any communication).

ANSWER: I do not believe Defendant should be barred from receiving spousal support, however, due to the very short duration of our marriage and the fact that I already paid her temporary court-ordered support, she should not be awarded any further support. I reserve the right to claim that the Defendant is either voluntarily unemployed or voluntarily underemployed.

10. If you contend that the other party should have income imputed to him or her, state each reason and each fact supporting such claim. In responding to this question, please state the amount to be imputed, the benefit or consideration alleged to have been received by the other party, and identify all witnesses and documents upon which you base your proposed imputation of income.

ANSWER: I do believe that income should be imputed to Defendant. She is highly educated, intelligent and has plenty of time on her hands since she utilizes childcare for our daughter. I intend to hire a vocational expert in order to assess her employability and her earning capacity. In addition, Defendant receives funds from her mother on a regular basis, which should be included in her income. This answer will be supplemented once our vocational expert has been hired and has completed the assessment.

11. If there have been at any time since the date of marriage any safe deposit boxes, vaults, or other places of deposit for safekeeping in which you have had any money, documents, or other items of personal property, please state location and describe all items (tangible or intangible) previously or presently so deposited.

ANSWER: N/A

12. Provide the following information with respect to each expert you expect to call to testify in this case as to any matter at issue in these proceedings. Set forth the subject matter on which the expert is expected to testify, the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion.

ANSWER: No expert witness has been hired at this time, however, there will be a vocational expert. As, if, and when such other experts are identified, this answer will be supplemented.

13. Set forth all times you claim the Defendant has acted, by error, or omission, in any manner that was contrary to the best interests of Sheridan.

ANSWER: Since December 2019, Defendant continues to fail to inform the Plaintiff of the number and nature of all medical visits by the child. The Defendant does not inform the Plaintiff as to the location of the child when the child is sleeping away from the primary residence, whether the Plaintiff is present where the child is sleeping or not, and the frequency that the child is staying overnight away from the primary residence. Defendant does not provide Plaintiff with dates and locations that the child is taken out of the state and with whom.

Plaintiff's mother, the child's paternal grandmother, otherwise known as "Mimi" had a stroke and was hospitalized in August 2020. The Defendant told the parties' minor child that "Mimi" had "gone to be with God" when in fact the child's grandmother is still alive. This is extremely disturbing behavior on behalf of the Defendant and caused undue emotional distress upon the minor child.

Plaintiff and his family reside in Louisa. Defendant told the parties' minor child that "bad people live in Louisa."

Defendant refuses to continue to participate in coparenting counseling with the Plaintiff. The Plaintiff has continually requested that Defendant resume counseling for the past eight months. This is contrary to the current Court order and is not in the minor child's best interests.

Defendant refuses to send copies of medical bills for Plaintiff to pay his share of them. To date, Defendant has not provided any copies of any medical bills despite Plaintiff's repeated requests.

The following is unacceptable behavior of the Defendant:

- a. Watching multiple seasons of 'Orphan Black' television series with the child on her lap. 'Orphan Black' ran on Amazon Prime video and Flanna watched most if not all the episodes with our infant daughter on her lap or in the room. The series is rated as 17+ by Commonsense Media. They suggest that the appropriate score for various areas of the show is 0 of 5 for "positive messages", 0 of 5 for "positive role models and representations", 3 of 5 for vulgar "language", 4 of 5 for graphic "violence", 4 of 5 for explicit "sex", and 4 of 5 for "drinking, drugs, and smoking". I suggested that she not watch this series with the baby present,

but she dismissed this suggestion and continued watching season after season until she had seen all that was available, exclusively with the child present.

b. Bed sharing. Our child in common, Sheridan, has literally never slept outside of the bed with Mother since the child's birth. This is despite the fact that I purchased a bedside sleeper and obtained and assembled or had assembled three different cribs. I also emailed and texted links to studies relating to the dangers of sharing a bed with a child as well as the impacts of bed sharing on relationships. When Flanna travelled away from home, Sheridan stayed with Flanna's mother and her boyfriend as I understand it, where I presume the child also slept with them. I have objected to this as well, but my concerns with bed sharing have been dismissed and ignored despite the overwhelming medical evidence of the risks to the child to include, but not limited to, the risk of death via SIDS, etc.

c. Self-harm. I have witnessed Flanna in acts of rage, literally cut herself to the point of bleeding and needing wound care on these cuts. This behavior is consistent with a temper the likes of which I have never seen in anyone else.

d. Temper. My older children and I have witnessed Flanna come across the house and kick in a door when during a fit of rage, I removed myself from her attacks and essentially hid in my older children's room. This behavior is indicative of the nature of Flanna's temper and lack of self-control.

e. Obscene Language: My sister and older children have witnessed hours long tirades with the baby present wherein Flanna repeatedly and uncontrollably yelled obscenities to include "fuck" and various uses thereof, and "god dammit", a phrase which I literally never say, but which our child, Sheridan has repeatedly used, even before turning two years old following extended periods with her mother. In one instance, my sister will relate that this behavior

continued for hours and that by her count, the word “fuck” or some variant thereof was used over thirty times while holding the baby.

f. Actions of abuse and mistreatment of Congressional staff which are outlined extensively in the nearly 300 pages, including multiple interviews of the publicly available report of the House Ethics Committee staff. One can reasonably infer from the report and accompanying interviews that Ms. Garrett, not the Respondent was the ‘but for’ cause of these complaints. I will have witnesses who will testify that I repeatedly refused to “throw her under the bus” despite being told by many to do so since it was accurate.

g. The current proceedings. I am previously divorced. In that case, there is no custody or support order and I have never failed to care for my other two children monetarily or otherwise. Flanna knows this. Past behavior is the most reliable indicator of future performance. Despite this, she has refused to communicate, acted in a deceptive and self-serving manner, taken property that did not belong to her. None of this is in the child’s best interests. Additionally, she is on her third attorney, and I have no idea how much money she has spent, but I would contend that it would have been better used to invest towards our daughter’s future education and other foreseeable needs.

h. Theft of funds and assets from father. Including taking a credit card (which was exclusively in my name), which she maxed out AFTER she was told multiple times in writing to cease accessing accounts not in her name and after her abandonment of our home, and pilfered money from a checking account that was held solely in my name, (again, after abandoning our home.) Petitioner has lied regarding the availability of a vehicle which she used during the entire time we knew one another. It is present in the video that shows her peeling out in reverse and attempting to elude the tow truck driver who had come to repossess a vehicle which I’d asked

her to return multiple times in writing. Additionally, when law enforcement who she had called told her to return the vehicle, she intentionally and vindictively removed and withheld floor mats and the spare key, even after law enforcement directed her to surrender the vehicle as it wasn't hers. This cost significant money that could have gone towards our child. Additionally, I offered in writing to allow her to purchase the vehicle from me for only the balance owed, which would have been a great deal... Again, she refused to even respond. This created tension that obviously doesn't lend itself to good outcomes for our child. It is my understanding that she is already in receipt of this video and its accompanying audio.

i. Refusal to keep her word to see a therapist: Upon meeting with marriage counsellor Dr. Ron Nolley, even though she was 25 minutes late to an hour-long appointment that I scheduled, she admitted upon his suggestion that she did indeed need therapy, that she had been in therapy in the past, and that she would seek therapy with the professional that he recommended. She failed to keep her word, even though I immediately did as I said I would and began seeing a therapist. This is clearly not in our child's best interests.

j. Late arrival to husband's marriage counseling and refusal to comply with professional guidance of marriage counselor to save marriage. Despite suggesting as late as the day that she left that she wanted therapy and marriage counseling, she never sought it even after it was recommended above. In fact, she feigned illness the day prior to her well planned abandonment and asked me if I could watch our daughter, which I did all day. When I went into the bedroom where she said she was laying down so I could retrieve a diaper, she was in the closet. When I asked if she was feeling better, she suggested that she felt like cleaning up the closet. I went back to watching our child. I only learned the next day, after I gave her a hug and a kiss and said I wanted to save our marriage (and she did the same) did I learn that she was packing for a

planned departure that occurred immediately after I left for my obligation. This was well planned and executed and was certainly not in our child's best interests.

k. Refusal to allow child to see father. Defendant allowed child less than 24 total hours with father over the course of nearly four months. She asserted that I was unable to care for a child despite the fact that I have far more experience changing diapers, making meals, and being a single parent than she does. She suggested that I couldn't care for the child despite the fact that I did that very thing so that she could surreptitiously pack the day prior. This was clearly malicious and calculated and not in the best interests of our child.

l. Attempting flight from auto repossession with child in the car, spinning tires, driving recklessly, getting car stuck in woods. I intend to introduce the video and comments from the driver. It is noteworthy that this flight was so reckless as to cause or exacerbate damage to the vehicle in which she and the child were in when she attempted flight

m. Refusal to co-parent to include refusal to cooperate to alleviate dangers of co-sleeping, communicate regarding child's dietary issues, health, and living circumstances.

n. Refusal to inform father of child's well-being or physical location, even in defiance of the court order to do so.

o. Misrepresentations on the contents of the court's order in this case. In September, unsolicited, she sent an email suggesting that the Court's order in this case included instructions regarding who was to pick up and be with Sheridan which are not in the court's order at all. This is not in our child's best interest.

14. Set forth the legal custody and parenting plan you will ask the Court to award in this matter in any hearing. Set forth all supporting facts and circumstances that support your position that your proposal is in your child's best interests.

ANSWER: I continue to hold out hope that Flanna will return to co-parenting counseling that she left ages ago, and so if that occurs, I will ask the court for fifty-fifty custody. Obviously with mother having moved into home located approximately two hours from the marital home, there would need to be some party willing to relocate so as to accommodate the needs of Sheridan. I am in the process of trying to find a place closer to Sheridan to affect this outcome.

I incorporate by reference all previous answers to interrogatories and discovery items as well as pleadings to the court in support of this position. I also incorporate my answers to interrogatory 13 above into the aforementioned causes for this shift in the custody arrangement.

If mother continues to refuse to communicate with father about things like taking Sheridan to the doctor nearly a dozen times without informing me why or when or for what, or continues to refuse to inform me where, when, and with whom Sheridan is taken out of state or where, when, with whom, or how often Sheridan spends nights away from her mother's house, then I would ask for full custody for the incorporated and aforementioned reasons. Again, this is not my preference, but there has not been a single phone call regarding Sheridan's best interests (or anything else) since April 20, 2019, and this failure to communicate is horrible for Sheridan and probably not good for mother or father either.

As a frame of reference, tragically, I have been divorced before, and co-parent two children with Dana Scott. We speak on a regular basis and always have, and the children are grateful for it, and I think more well-adjusted because of it. I consider Dana Scott to be not only a co-

parent, but a friend. While mother never needs to be friends with father, things would be better if I wasn't literally afraid to speak to her.

15. Provide the names, addresses and telephone numbers of each person you believe has any personal or direct knowledge of the circumstances relating to the dissolution of the marriage, the facts involved in this case, or the assets or debts of the parties.

ANSWER:

Group 1: All parties who had occasion to witness and interact with Flanna Sheridan during the period of the marriage in a professional and social capacity.

Kevin Reynolds, Jr. 540-672-3700
William R. Janis 804-301-7489
Tanner Hirschfeld 757-289-2849
James Vandenberg 714-955-3782
Zach Werrell 301-481-1500
Matthew Becker 620-290-6088
Steven Harvey 574-210-0621
Elliot Harding 434-962-8465
Hallie Pence 540-908-6980
Mackenzie Morales 615-512-3936
Marissa Mullen 804-892-7916
Tyler Cianciotti 540-407-1373
Paul Hartman 302-584-7519
Andrew Griffin 434-238-0237
Matthew Hanrahan 203-617-9933
Carlyle Gregory 703-532-7660

Group 2: All parties who had occasion to witness and interact with Flanna Sheridan in a family capacity in the period leading up to the dissolution of the marriage.

Paige Delbridge, Dudley Delbridge, and children Rett, Abigail, Emma, Ian 540-872-6445
Carolyn Garrett, Laura Garrett, Dana Scott 804-399-2222
Lois T. Garrett 434-808-4512
Clarke Garrett 256-505-2219

16. Please state or identify, based on a monthly basis, all of your current living expenses. For annual or repeating expenses that are not incurred monthly, please set forth the average monthly amount thereof as you would in an annual budget. Please use the enclosed Income and Expense Sheet.

ANSWER: See attached for Plaintiff's Income and Expense Sheet.

17. For any documents required to be produced in discovery that are missing or otherwise unavailable to you, please state or identify all facts or information relating to the unavailability of the documents, and the person or persons holding or storing the documents. In addition, any reference to "records" or "documents" above includes both written and electronic versions thereof.

ANSWER: No additional documents at this time. As, if, and when such documents become available, this Answer will be supplemented.

18. Identify all efforts you have made since you elected not to run for Congress to obtain employment, income, wages or any other sources of income.

ANSWER: See Answer to Interrogatory Nos. 1 and 2.

Matt Whitworth – Currently working with on film project

Dani Hravni – Currently working with on film project

Sheriff-Elect Donnie Lowe – Was a candidate for Chief Deputy Sheriff, starting 2020, Ronnie Robert was hired over me

Commonwealth's Attorney Russell McGuire (I very briefly worked part-time hourly, had sought the Deputy Commonwealth's Attorney position but Robert Tracci was hired over me.)

Puneet Aluwalia – Have worked with Puneet on multiple contracts, income therefrom included as "New World Strategies.

Annette Elliott – Worked for her during the 2020 General Assembly Session (Showmasters, Inc.)

Young Leigh – Worked for him during the 2020 General Assembly Session (Red, White, and Blue, Inc.)

George Caylor – Discussed working with him during the 2020 General Assembly Session, not retained

Abe Loper – Discussed working with him during the 2020 General Assembly Session, not retained

Liberty University - Sought positions from the following, not retained:

Dean Robert Hurt

Dean Dave Brat

University of Richmond – Sought positions from the following, not retained:

Dean Dan Palazollo

Dean David Kitchen

Mike Woods

Meade Spotts

Karin Talbert Addison

William R. Stanley

Brandon Wheeler

Representatives of the Syrian Democratic Counsel

Representatives of Iraqi Kurdistan

Dave Marsden

Matt Robbins – Sought multiple contracts with Matt, he is now deceased

Bob Livingston

Frank Dekker, North Carolina Renewable Energy: Currently doing contract work with NCRE

Tim Barker, North Carolina Renewable Energy: Currently doing contract work with NCRE

Doug Straley: Superintendent of Louisa Public Schools, spoke regarding positions available there.

Sheriff Scott Jenkins, Culpeper: Spoke with him regarding positions available there.

I also do a two-hour weekly radio show where I am not paid, but I am allowed to solicit legal clients during the show. I advertise my law practice on this radio show multiple times per hour every week on one of the two largest talk stations in the Charlottesville region.

19. Identify all times you have made any efforts to surreptitiously acquire any information regarding Flanna Garrett, her home, guests, or activities; this includes but is not limited to the following activities: purchasing a recording device for the purpose of acquiring such information, communicating with any private investigator or other third party to obtain services to surveil Flanna Garrett's home, her person, her vehicle, or any other activity, including the installation of any recording, GPS, or other device.

ANSWER: I requested that a friend place a game camera near the road leading to the address where my child was staying in early 2020 because the Defendant was, and still is, refusing to tell me the location of my child when she is sleeping away from her primary residence, who is present when my child is away, and when and with whom my child is leaving the state with at any time. The batteries to this game camera died in the spring of 2020 and I have not replaced them nor have I obtained any information from this camera since then. I have done nothing else responsive to this question.

20. Identify all reasons you elected not to run for a second term of Congress. Identify all persons who have personal, firsthand knowledge of the facts and circumstances that caused you to elect not to run again.

ANSWER: Sometime on or about May 23rd of 2018, I fired my Chief of Staff, Jimmy Keady, largely because he hated Flanna and she hated him, and she essentially told me I had a decision to make. When I fired him, he concocted a story which ran in the Politico that Friday, the headline of which was "Congressman, Wife Treat Staff Like Servants." The Majority Leader called me prior to me even knowing about the story to say he could help if any bad things came to pass. This is essentially how I learned of the accusations. Subsequently, the story and the anonymous allegations therein were used as a basis to initiate and conduct an ethics

investigation. This was a real punch in the gut so-to-speak. On the Saturday after the story ran, I was on the phone with Carlyle Gregory who had acted in a professional capacity as an advisor, my cousin Clarke Garrett, and with Flanna in the room. Clarke asked me what I thought my biggest problem was and I responded that it was unscrupulous people who would plant such a story anonymously without facts to get back at having been fired. Clarke suggested that this wasn't my biggest problem. He suggested that the bulk of my problems stemmed from my drinking. Carlyle said that he also felt that addressing this drinking should be my priority. Only Flanna was angry with the decision not to seek reelection, suggesting that I was throwing away "our" work and that I would regret it. Candidly, I didn't like serving in Congress under the circumstances, many but not all of which were demands from Flanna that things be done in accordance with her wishes as it related to the office, how it ran, and who was in it. I also didn't feel like reelection was in any way a foregone conclusion in light of the ethics investigation and allegations, and that it would be much more difficult to stop drinking if I remained in Congress. For background, I have still not had so much as one drink since the night that I fired Jimmy Keady. At that point, despite the fact that none of the allegations against me so much as mentioned drinking (Jimmy Keady drank a lot more than I did), I decided to go to the Barbara Johns Memorial, (as she is a person whom I hold in the highest regard), the following Monday and announce on video that I was an alcoholic and that as that was the case, I would not seek reelection to Congress. I served out my term because I like to honor the commitments that I make but said privately that if I were unable to do so without drinking, I would resign. I am glad that I didn't run so that I could focus on the much more important issue of getting sober and I am glad that, one-day-at-a-time, I have been successful.

21. Identify with specificity all times since the date of the marriage that you have signed, electronically or otherwise, the signature or indicated in writing the consent, of

Flanna Garrett. For each time, provide all supporting facts that this was done with the knowledge and consent of Flanna Garrett.

ANSWER: N/A.

22. Identify 1) all claims for money against you that have been made by any third party since January 1, 2019 (do not include monthly bills or day to day expenses), and 2) all legal actions/litigation pending or resolved, that you have been a party to, excepting for litigation with Flanna Garrett.

ANSWER: The only "claim" against me personally is a 2016 debt to the IRS for back taxes. I pay a monthly payment of approximately \$300.00 and the balance due is approximately \$28,000.00.

23. Identify all your international travel since January 1, 2019. For each trip, set forth:

- (a) The location and dates of the trip.
- (b) The purpose of the trip.
- (c) Who or what group was responsible for the costs of the trip?
- (d) Persons traveling with you.

ANSWER: July 1 to July 10, 2019—Iraq. Purpose of trip was to film pilot footage for a religious freedom documentary series entitled, *Exile*. Matthew Whitworth, Founder of Update Media Group, accompanied the Plaintiff and covered all travel expenses. There was no compensation to the Plaintiff for this trip.

November 22-29, 2019—Budapest, Hungary, with one overnight in Brussels, Belgium.

Purpose of trip was to meet with potential financial bankers of the *Exile* documentary series.

Matthew Whitworth, Founder of Update Media Group, accompanied the Plaintiff and covered all travel expenses. There was no compensation to the Plaintiff for this trip.

RESPECTFULLY SUBMITTED,
THOMAS A. GARRETT JR.
By Counsel

VERIFICATION

The foregoing Answers to Interrogatories are true and correct to the best of my knowledge and belief.

Thomas A. Garrett, Jr.

COMMONWEALTH OF VIRGINIA
[COUNTY] [CITY] OF _____, to-wit:

The foregoing Answers to Interrogatories were subscribed and sworn to before me this _____ day of October, 2021, by Thomas A. Garrett, Jr.

Notary Public

My commission expires: _____
Notary Registration number: _____