

**IN THE WEST VIRGINIA SENATE
SECOND EXTRAORDINARY SESSION
2018**

IN RE: The Matter of Impeachment Proceedings
Against Respondent Justice Allen Loughry

**HOUSE OF DELEGATES' RESPONSES TO THE RESPONDENT'S REQUEST FOR
DISCOVERY**

WRITTEN/RECORDED STATEMENTS OF THE RESPONDENT

1. Please see exhibits Exhibit Nos. 23 and 24
2. <https://www.youtube.com/watch?v=hDNxQqtDro0>
3. <https://www.youtube.com/watch?v=ANUUvcueH9Q>
4. "Don't Buy Another Vote. I Won't Pay for A Landslide" – by Allen Loughry
5. Audio Recording of Justice Loughry's testimony before the House Finance Committee
6. Kennie Bass Interview in or about November of 2017
7. Interview with Hoppy Kercheval on November 15, 2017

The Board of Managers reserves the right to amend and/or supplement its response to this request.

EXHIBITS

1. Exhibit Nos. 1-74 which can be found on the West Virginia Legislature's website.
2. Exhibit Nos. 75-97 attached hereto.
3. "Don't Buy Another Vote. I Won't Pay for A Landslide" – by Allen Loughry
4. Youtube videos:
<https://www.youtube.com/watch?v=hDNxQqtDro0>
<https://www.youtube.com/watch?v=ANUUvcueH9Q>
5. Audio recording of Justice Loughry's testimony before the House Finance Committee
6. Kennie Bass interview on November 14, 2017
7. Interview with Hoppy Kercheval on November 15, 2017

The Board of Managers reserves the right to amend and/or supplement its response to this request.

WITNESS LIST

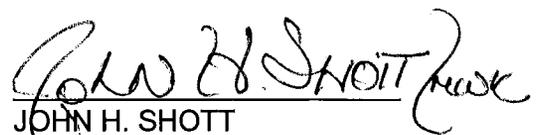
1. Chief Justice Margaret Workman
2. Justice Elizabeth Walker
3. Justice Allen Loughry
4. Retired Justice Robin Davis
5. Former Justice Menis Ketchum
6. Former Justice Brent Benjamin
7. Auditor John B. McCuskey and/or his designee
8. Delegate Eric L. Householder
9. House Clerk Steve Harrison
10. Mrs. Kelly Loughry
11. Arthur Gene Angus
12. Jess Gundy
13. Paul Mendez
14. Jennifer Bundy
15. Paul Fletcher Adkins
16. Scott Young
17. Scott E. Harvey
18. Bill Gallagher
19. Scott Conrad
20. Anthony Hatfield
21. Ryan Arthur
22. Andrew Hinte
23. Steven Dane Canterbury
24. Kim Ellis
25. Sue Racer-Troy
26. Justin Robinson
27. Aaron Allred
28. Melissa Bishop
29. Adam Fridley

30. Michael Proops
31. Chris Workman
32. Kathleen Gross
33. Shannon Green
34. Kennie Bass
35. Michelle Weikle
36. Susan Johnson
37. Kathy Levitan
38. Vici Shafer
39. Ed Weber and/or representatives of Ed Weber Architects
40. CR Neighborgall IV and/or representatives of Neighborgall Construction Company
41. Representatives of Silling Associates, Inc.
42. Representatives of Jeff's Builder Supply
43. Representatives of the Capitol Building Commission

The Board of Managers reserves the right to amend and/or supplement its response to this request. The Board of Managers reserves the right to call any witness who testifies in the criminal trial of United States of America v Allen H. Loughry II.

EXPERT WITNESSES

The Board of Managers reserves the right to disclose expert witnesses.



JOHN H. SHOTT
Board of Managers
WV House of Delegates
1900 Kanawha Boulevard, East
Room M-418
State Capitol Complex
Charleston, WV 25305

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Against Respondent Justice Allen Loughry

CERTIFICATE OF SERVICE

I, JOHN H. SHOTT, on behalf of the Board of Managers, do hereby certify that the foregoing "*House of Delegates' Responses to the Respondent's Request of Discovery*" has been made upon the following individuals this 5th day of September 2018 as follows:

John A. Carr
Attorney at Law, PLLC
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Via electronic mail

Lee Cassis
Clerk of the West Virginia Senate
1900 Kanawha Boulevard, East
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