a friendly one or sometimes an unfriendly 'cause I
did some of those too and of course, more stressful
to do those when you're dealing with somebody like
Megyn Kelly, she can be a little bit forceful --

Q. Um-hmm.

A. -- if you ever watched -- so --

Q. Dick Cheney discovered that recently.

A. What's that?

Q. I think Dick Cheney discovered that recently as well from what I read but --

A. Anyway, so what -- what Brett was trying to
help me do is to be able to -- to keep everything
together, keep my mind functioning properly, so
that when I made my first statement, I was making
my point and then I would build the -- the case for
that point and then end up basically restating that
point. So --

Q. Um-hmm.

A. -- we would -- we would talk about what
that interview was all about. Sometimes he would
help me as far as if it was an issue that -- that
he needed to help research a little bit to give me
some more background. He would do that for me --

Q. Okay.
A. -- on the outside. So he was -- we were
talking about issues and a whole raft of issues.
In fact, he even prepared an issue book for me to
-- to look at various issues, so that I would have

it available to study as -- as we went along and we

Q. Where was -- would David Bowser typically
participate in those sessions?

A. Sometimes he would. Sometimes he wouldn't.

Q. And Meredith and Christine, would they --

would they sit it on those as well?

A. The -- I'm not sure where Meredith came. I
guess she followed --

Q. It appears to us from the -- that she

overlapped with Brett O'Donnell's role with the

office for about a year --

A. And then --

Q. -- and then it was I think June or July of

2013 when Christine came on.

A. Yeah.

Q. But do you recall Meredith, Christine or

whoever was in that --

A. Whoever was in on communications job 'cause

there were -- he was helping to develop my
messaging too that we would do when we would put
out press releases and things like that --

Q. Okay.

A. And so he was -- he just part of our
communications team.

Q. Okay. As you were preparing for the
upcoming interviews and these sessions, would some
of those interviews or some of the things you were
preparing for be campaign related --

A. No.

Q. -- as opposed to official?

A. No.

Q. No?

A. Un-uh.

Q. If you had an upcoming campaign related
speech or appearance or something like that, would
it just not be addressed at all in the session?

A. Well, we didn't -- like I said, when he was
hired, it was toward the tail end of the -- of the
primary process --

Q. Um-hmm.

A. -- we didn't have an opponent that I was
concerned about too much. Did not have a general
election opponent. So there's -- campaign issues
Q. We're going into --
A. -- so --
Q. -- you know, 2013 --
A. Okay.
Q. -- and then into, you know, 2014 --
A. Right.
Q. -- when you were having these weekly sessions and there was -- was more campaign related things happening in your life. Would you discuss campaign media appearances or campaign speeches or -- or debates in this weekly sessions?
A. Not much if any. It was -- he and I had more of those discussions by phone than anything else --
Q. Okay.
A. We -- I wrote my own campaign speeches. He helped tweak them a little bit but actually, my wife was more my campaign media consultant than -- until we hired a media person --

BY MR. SOLIS:
Q. Would you review videos of your past campaign appearances either on, you know,
interview, on TV? Would you sometimes review those
here during --

A. Oh, we did that, yes.

Q. Um-hmm.

MR. MORGAN: I want to --

MR. BROUN: In fact, it wasn't every time
but I tried to look at those TV interviews and --
and critique it myself and listen to his critique
and we would try -- again, it was -- the purpose
for having him was to help me be a better
communicator and so we -- we would -- you know, we
did that.

BY. MORGAN:

Q. You said he -- Brett O'Donnell prepared an
issue book for you to study. Do you recall him
briefing you or providing you with talking points
or research on any -- any specific issues?

A. No. I asked him to help put the issue book
together, just so that when we ever had an
interview, that I would have it available to -- to
look at -- at -- at the issues that were in the
current news cycle and so --

Q. We --

A. -- there are a lot of issues that of course
all of us have to deal with and -- and so --

Q. We didn't see a copy of that issue book in
the documents provided to us --

A. I don't have a copy.

Q. But --

A. I don't know if there is another copy --

Q. Okay. I want to just show you this

PBDB151. This -- this was not sent to you but this
is from Brett O'Donnell to David Bowser. Subject
if "FAA material." So it was on April 29, 2013,
and my question is just if this was typical of the
type of an issue briefing or issue research that
Brett O'Donnell would do? Appears to be you know,
what four, five pages of material on FAA and then
how it was perhaps impacted by the sequester.

A. Without studying this, I can't make a
comment about the content --

Q. Right --

A. -- but this is the kind of thing that yes,
that he prepared, so that I would know background
history and -- and the -- the -- any issue that we
may deal with. I didn't -- I've never seen that --

Q. Okay.

A. -- that I know of.
Q. But that's typical of the type of issue research he would provide --
A. Yeah.
Q. Okay. Did he have any role in drafting speeches on the official side? I think you said you wrote of your own speeches. He would maybe edit them. Floor speeches --
A. Most of those, I -- I do those myself or I did it along with my communications director or press secretary. We -- a lot of times those things occurred very rapidly. So we didn't have a lot of time to -- to really tweak them or edit them or anything else.
Q. Okay.
A. So it was -- it as more a spontaneous type of -- of situation.
Q. One of the -- you know, of the newspaper articles this spring mentioned -- I think it attributed to you a comment that Brett had helped you prepare a floor speech about the VA after visiting a VA hospital down in Georgia. Does that ring a bell?
A. No.
Q. Do you recall making that statement?
A. No.

Q. It was a statement that was not in quotation marks but it was nevertheless attributed to you but you don't recall Brett working on a VA speech?

A. I do not, no.

BY MR. SOLIS:

Q. What about your Patient Option Act, did he draft any speeches, any floor speeches?

A. No. We talked about it. Just the same way we talked about any issue but no. Most of my speeches, the -- the one that I can remember that we talked about more than anything else, I did a special order on the Commerce Clause, and we had some conversation about that. He really didn't do a lot for that either, but we did talk about that one and that's the only one I can remember off the top of my head that -- that he actually -- he and I had any discussions about, so. And that was very limited, even at that.

Q. If he had been involved in working on drafts of speeches, would you have known about it?

A. I don't know. I don't know about any. Again, what -- normally what I do is I do my own
speeches --

Q. Um-hmm.

A. -- or I'll tell my press secretary, communications director, whatever, of what I want to say --

Q. Um-hmm.

A. And ask them to get some bullet points for me and I do more extemporaneously than -- than read a speech. I have a hard time just sitting and reading a speech and doing it effectively. So I feel more comfortable actually just doing it out of my head.

Q. Yeah.

A. And so that's generally the way we do it. Now, they have prepared some speeches that I have read and I've tried to learn to do that better by doing some one minute speeches. Most of those are prepared very quickly. We'll just talk when I come up. For our first day, we'll have a staff meeting, say, "Well, maybe tomorrow we're going to do a speech," or I'll tell my communications staff, "I want to do a one minute on this and this is what I want to say," and they'll put some talking points for me -- page and I'll go down the floor and give
Q. Okay. Do you recall Brett O'Donnell ever providing you or your staff with any training?

A. This was an ongoing process.

Q. Um-hmm.

A. So I considered it all training 'cause that's what I hired him to do, help train me to be a better communicator. That's the purpose of him coming on board.

Q. We -- we talked to -- to Brett and he -- he mentioned that he does it like a -- at least when he's brought on by somebody during those first initial sessions, he has a little training thing that he does on more -- you know, talking about communication skills in -- in general. Do you recall anything like that, like an initial round of training that he did or --

MR. CORTAZAR: Video.

BY MR. SOLIS:

Q. -- video that he may have showed you?

A. We looked at some videos. He -- most of the videos we looked at were just a critique of what I've done on TV interview or floor speech but I don't recall a training video as such.
Q. Okay. I do -- I want to ask you some questions now about the work that Brett O'Donnell did on your campaigns, both in 2012 --
A. Um-hmm.
Q. -- Congressional campaign and then the 2014 Senate campaign. So how -- how would you describe Brett's role with -- with your campaigns?
A. He was always in a volunteer status. I made that crystal clear to him and to my staff that anything that he helped us with -- I don't recall him being engaged in the 2012 election at all --
Q. I do have -- I do have some documents I'll show you along those lines but you said you made it clear to your -- to him, to your staff?
A. Like I said, I don't recall -- I don't recall him being involved in that at all --
Q. Okay.
A. -- and then I made it crystal clear to Brett as I do my staff when they volunteer for our campaign to do -- campaign type functions that --
Q. Do you recall when that was that you made it clear to Brett?
A. I had all along.
Q. All along?
A. Yeah.

Q. Recall any specific conversation?

A. No, because I do this quite frequently. Whenever I asked him to do something, I'd say to him, "I can't require you to do this. If you -- if you'd like to, I'd like for you to do this for me," and it's something that I've been very diligent about telling all my staff, no matter they do is that it's all -- whatever they do on the campaign side, it has to be on a volunteer basis --

BY MR. CORTAZAR:

Q. And do --

MR. BROUN: -- and that they're not required...

BY MR. CORTAZAR:

Q. Excuse me. And do you think that when he first began volunteering, would have come up through his -- his coming to you or was that something that you would normally do -- propose to him?

A. I don't remember --

Q. The first instance?

A. No.

BY MR. MORGAN:
Q. Do you recall if you ever had a discussion with Brett about how if your senate campaign fundraising started kicking up or if you made it through the primary that you would then pay him out of the campaign?

A. Never.

Q. Do you recall if he ever was paid out of the campaign --

A. Never --

Q. -- for any services?

A. As -- never as far as I now. We paid a -- the campaign paid for him to come to Georgia --

Q. Okay.

A. -- to -- we had a staff retreat down there and the -- we just felt --

Q. Is that a congressional -- congressional...

A. Yeah. We had the staff in Georgia as well as the whole Washington staff came down. We -- we've tried to -- I've tried to do that on a yearly basis to just kind of lay out the plan for the full year. We -- Dave and I talked about it. We felt that it was best to -- to -- since he was an official employee, that he ought to be there because we were talking about what we're going to
be dealing with but we paid for his expenses down there out of the campaign just to -- that was what David thought was the best and clearest way to keep from having any kind of a -- of a problem from an ethics perspective.

Q. I want to -- I want to discuss with you in some level of detail the different types of work that -- that Brett O'Donnell did for the campaign and first being you know, campaign speeches, campaign media appearances. I think you -- you mentioned that in these weekly sessions, did you review past campaign speeches or campaign media appearances with Brett in those weekly sessions?

A. I don't recall doing so. It --

BY MR. SOLIS:

Q. Congressman, I just want to be clear. You know, I had asked -- I had asked that same question about 10 minutes ago and you said you recall that you had reviewed and the whole package of things that Brett -- services Brett provided --

A. Right.

Q. -- you know, media appearances, even if it's on your campaign, I asked you if you reviewed those here on video or something and you -- you
said that you had. So I just want to be clear.

A. Well, let me make that clear. My answer was that we have looked at things not from a campaign perspective but from the official side. So I apologize for the confusion --

Q. Okay.

A. -- there but I thought you were talking about all inclusive, "Has he done any of those?"

And -- and so we -- we looked at --

BY MR. MORGAN:

Q. So let me make sure --

A. Okay.

Q. Let me make sure we're clear. When you say from an official perspective --

A. Right.

Q. -- were there instances in which you know, in those weekly sessions the videos or the appearances that you reviewed were campaign interviews or appearances?

A. I don't remember doing any campaign appearances during those weekly sessions, no.

Q. Reviewing those? Okay.

A. Yeah.

BY MR. SOLIS:
Q. You know, David had recalled that -- that you had done that a couple of times and I think Christine had recalled that that occurred a couple a couple of times.

A. I'd defer to them. I don't remember it.

Q. Okay.

MR. SOLIS: Okay.

MR. BROUN: So.

MR. MORGAN: Okay.

MR. BROUN: What I do remember is those times that we've looked at -- at TV interviews and those types of -- of reviewing --

MR. SOLIS: Um-hmm.

MR. BROUN: -- the -- the appearance on one of the TV networks and I don't recall the campaign.

BY MR. MORGAN:

Q. Show you -- show you a document here. This is BOD00193 and this is -- now want to ask you some questions about Brett's involvement in campaign speeches. This document is an email from Brett O'Donnell to -- well, to himself but CC-ing David Bowser, Brian Tringali, Bob Bibee, Meredith Griffanti where he says, "Attached is the 10 minute stump that Dr. Broun asked me to write. Wanted to
sent it around to your edits -- approve before
sending it to Dr. Broun." Do you recall asking
Brett to prepare a 10 minute stump speech for you?

A. What -- as I mentioned earlier, I basically
write all my speeches and have the ideas of what I
want to do --

Q. Um-hmm.

A. -- I talk to him about what should be
included or not included. So it's -- basically, my
speeches were my speeches --

Q. Um-hmm.

A. -- and he did help tweak them some and that
sort of thing. So we were --

Q. So would you -- would you tell him in
person or over the phone the types of things you
wanted to talk about and then would he then
actually put it to paper? Is that --

A. No.

Q. No?

A. What -- what I -- what I did is talk to him
about taking my whole 20 minute stump speech --

Q. Okay.

A. -- and helping me to pare it down to 10
minute or 3 minute speech, what he thought was most
important to help me in that. This was all done on a volunteer basis.

Q. Okay.

A. Was not done out of what we were doing from the "MRA."

Q. Okay. Do you recall if he had any role in -- in your 2013 Georgia GOP convention speech?

A. He -- yes, he did and again, it was to help me basically put -- he made some suggestions about what -- what I needed to say and that sort of thing. So he did help in that process, yes.

Q. Did you rehearse that speech with him?

A. No.

Q. No. Do you recall if -- if that speech was filmed and he provided you feedback on that delivery?

A. I don't know. I don't remember him doing so.

Q. Okay. What about your -- your speech when you announced your candidacy for the Senate? Do you recall if he had any role in that speech?

A. I don't remember that.

Q. Show you one email here. This is BOD01551. I'll sort of point out the part I want to ask you
about. Take your time to review that. It's an email from David Bowser to -- to Brett O'Donnell, CC-ing Bob Bibee, yourself, Meredith Griffanti and Jordan Chinouth on February 5th, 2013. David writes, "For the sake of brevity, I will get to the point. There are two -- two things only that we care about with this announcement. One, it is delivered well and looks like it. Two, what is the story and main theme we want printed?" And then he says, "The first is Brett and Meredith's job." So referring to it being Brett and Meredith's job to make sure the speech is delivered well and looks like it. Was -- was Brett involved in preparing you for that announcement speech?

A. Only the point that -- just talked to him about trying to -- to make a very short speech and have some -- some sound bites in it.

Q. Okay.

A. Other than that, I don't recall any -- any other type of function in that.

Q. Okay. Would Brett draft talking points, bullet points or -- or one liners or things like that for you to add your speeches or add to your -- your media appearances? Was he involved in -- in
helping you come up with that type of content?
A. Yes.
Q. Okay. Do you recall any specific issues --
A. Well, you're asking about on the campaign side?
Q. On the campaign side.
A. Oh --
Q. Yeah.
A. He did more of that on trying to get that sound bite -- that first sentence from the official side --
Q. Okay.
A. -- and the -- as far as -- as what he did from the campaign side, most of what -- all of our contact was more -- had to do with TV interview and radio interviews, so --
Q. I want --
A. I don't remember him trying to give me bullet points. He may have helped me look at -- I don't know how to answer your question --
Q. Let me see. This email might --
A. Okay, so.
Q. -- help a little bit --
A. Okay.
Q. -- so. This is PBCH22 --
A. Um-hmm.
Q. You know, this is going to be another one of those instances where I ask you if this was typical of Brett's work for the campaign. He emailed you on August 13, 2013, writing, "Dr. Broun, so we know now that Obamacare is a winning message. Here's the one you need to be a little sharper on, strikes a populist message that will hit the voters we need," and then he provides you with a few lines of -- of you know, text --
A. Um-hmm.
Q. -- on -- on Obamacare.
A. Um-hmm.
Q. Was it typical for -- for Brett to provide you talking points or messaging like this?
A. Well, I did get these kind of things occasionally --
Q. Um-hmm.
A. Would read them and that was the end of that, so again, I can't remember this.
Q. Okay.
A. I can't remember how to do this, and I can't just regurgitate that without sounding as if
I'm just trying to go through the memorization point. That's not the way my brain works. So whenever I would get something like this, I'd read what he has to say and -- and then I'd think about it a bit and that's -- that would be the end of it.

Q. Okay. Well, do you recall -- was in December of 2013. Do you recall there being a "Georgia Public Broadcasting Get to Know the Candidates" piece that you filmed in December of 2013 down in Atlanta?

A. I do.

Q. Do you recall if Brett was involved in -- in helping you with that piece at all?

A. I don't remember him being involved in that, no. Whether he was or not, I don't remember, but I don't recall him being a part of that.

Q. Okay. Was it -- do you recall before you would do a speaking engagement on the campaign trail would you sometimes have a brief messaging call with Brett before -- before a speaking event?

A. I may but that was not a routine --

Q. Wasn't a routine thing. Do you -- how frequently would that happen during the Senate campaign?
A. Not very frequently. I can't give you --

Q. Be --

A. -- data --

Q. -- weekly basis --

A. Oh, no, no, no --

Q. -- or monthly --

A. No. I can't give you a time --

Q. Okay. But you recall --

A. And so it would be occasionally and it was just when I had a question, I'd give him a call.

As I've already mentioned, he told me all along that he was available anytime but I seldom called him and he seldom called me. By the way, got another appointment at 3:00, so.

Q. I will try to be as quick as possible here.

A. Okay.

Q. I do want to give you the opportunity to chime in on some other documents --

A. Oh, sure --

Q. -- and ask you questions. It's important we get your --

A. Sure --

Q. -- your side of the story --

A. -- I'm trying to be helpful --
Q. Do you recall if Brett was involved at all in negotiating campaign debate formats?
A. I don't know.

Q. You don't know. Want to talk to you now about Brett's role in -- in preparing you for campaign debates and reviewing debate performances. Think -- see here. Show you this document which is BOD681. It's the second email there I want to ask you about which is from Brett O'Donnell to David Bowser, CC-ing Bob Bibee, Jordan Chinouth, Meredith Griffanti and yourself on June 22nd, 2012. He writes, "Dr. Broun, below are the reminders from the prep session today." So I'll tell you. It appears from the documents reviewed -- we've reviewed that you had a primary debate on June 22nd, 2012 with Mr. Simpson, and it was the day before that on the 21st that you had a prep session with Brett O'Donnell. Do you recall that prep session?
A. I do not.

Q. Not. There was also a 10th District Debate on Athens radio, WGAU on July 2nd, 2012. Do you recall that debate?
A. No, I don't.
Q. Do you recall --

A. I don't remember doing any debates with Simpson except for seems like we did one forum.

Q. Okay. Do recall if Brett O'Donnell was involved in preparing you for that forum that you do recall?

A. I don't recall.

Q. Do you recall -- show you this -- PBTN10 through 11. It's the -- on the second page is what I wanted to ask you about an email from Teddie Norton to Brett O'Donnell on July 3rd, 2012 --

A. Um-hmm.

Q. She writes, "Hey, Brett. Dr. Broun wants to set up about 90 minutes next week to go over both debates." You know, and then it appears like that was -- that was set up to occur -- Teddie requested a room at the NRCC --

A. Um-hmm.

Q. Do you recall a session with Brett to go over those 2012 primary debates?

A. I don't.

Q. Don't recall that.

A. Like I said, we -- we made a decision that we weren't going to do debates with him and I don't
really remember any -- any forum or debates.

Obviously, there was --

Q. When you say you made a decision not to do debates with him, you mean with Mr. Simpson?

A. Yeah, from the campaign side, we -- we just wanted the -- the radio broadcast. WGAU was very upset with me for a long period of time -- wouldn't even talk to me because we did not do a forum that he wanted us to do -- that he wanted to host.

Q. Okay. I want to move right along --

A. Sure.

Q. -- be respectful of your time. Now, looking at the 2014 senate campaign --

A. Um-hmm.

Q. -- I have a series of calender items and documents I need to go through with you.

A. Sure.

Q. But do you recall the Charge Senate Forum? It appears that it occurred in July of 2013 at Lake Prads Marina -- at Lake --

A. La Prades --

Q. La Prad?

A. La Prades.

Q. Do you recall that --
A. I do --

Q. -- that forum?

A. Yeah.

Q. Do you recall if Brett was involved in preparing you for that?

A. We talked about it. It's -- when -- we never had what I would consider a sit down practice debate or anything like that 'cause these were forums where they ask questions and he and I would talk about questions that might be asked and what my answer would be and that was basically --

Q. And that's what you did leading up to the Charge Forum?

A. Well, I'm just talking about in general.

Q. In general? Okay.

A. Yeah.

Q. I want to --

A. With any -- with any --

Q. -- make sure --

A. -- with -- and I don't remember any specific event. I don't remember talking to him about that particular event or any others but that's how we worked basically.

Q. So there were it appears a number of
debates in that senate campaign.

A.   Right.

Q.   Quite a few actually --

A.   None were true debates. They were all forums.

Q.   Okay.

A.   Just answer questions.

Q.   Okay.

A.   There's was back and forth. There was no -- really no opportunity or very little opportunity for rebuttal or anything else. So they were -- they were not true debates. Just forums. Ask a question about an issue. We'd answer the question and they're basically the same questions of virtually everyone --

Q.   Okay. So we can refer to them as forums.

A.   Okay.

Q.   Would you typically discuss an upcoming forum with Brett? Would you do a preparation session with him for -- for each of the forums or most of those forums?

A.   We would probably talk more by phone than anything else about what went on. We might mention it during a period of time that he would be here
where we're working on the -- the -- I don't recall any specific instance but we may or may not have talked about -- about what might be upcoming when he was here --

Q. Okay.

A. -- to -- to help with the TV interviews and radio interviews I was doing on the official side.

Q. Do you recall Brett O'Donnell preparing for you a debate attack grid? Does that sound familiar at all? This is BOD1956, the second -- the email at the bottom there. On December 26th, 2013, Brett writes, "Attached is the attack grid for Dr. Broun --

A. Yeah.

Q. -- to use against PG and KH in the debates."

A. Um-hmm.

Q. Do you recall him preparing an attack grid for you?

A. He did this. Yeah, I remember that.

Q. Okay. Is that something you requested him to do?

A. No.

Q. I want --
A. In fact, I would not have asked for that 'cause I've always run a positive campaign. In fact, I've told my staff through every campaign, "We will always run a high, high road campaign, and we're not going to be doing any attacking." It was going to be basically about me and my policies and where I stand on issues and that's -- would show maybe a delineation between me and my opponents in that regard and that one opponent would have a position on an issue here. I'd have one there. So comparison I think is fair, but I've never run an attack campaign.

Q. Okay. I do want to give you the opportunity to -- to tell us if you recall any specific prep sessions that are reflected in some of the documents we have.

A. Okay.

Q. This is BOD2268, email from Teddie Norton to Brett O'Donnell saying, "David's" -- on January 8, 2014 saying, "David has arranged for you all to prep for the debate at Jamestown Associates townhouse" --

A. Um-hmm.

Q. Subject of the email is, "This morning."
It appears that this session occurred on January 8, 2014. Do you recall that?

A. I do, yes.

Q. Okay. Do you recall which debate this was --

A. I do not --

Q. -- referencing? Okay --

A. Would've been one shortly after this --

Q. Okay. Would that have perhaps been the Adel debate? 'Cause I'll show you this document, BOD --

A. It's Adel.

Q. Adel -- 638, all right. Says, "Brett," -- on January 9" -- so the following day 2014 emailing David Bowser and CC-ing a number of people saying "Attached is the proposed open for the Adel debate." Do you recall if Brett was involved in putting together your opening statement for -- for that debate?

A. Probably was involved in -- in talking about what I was going to do to -- 'cause opening statements and closing statements were very short --

Q. Um-hmm.
A. It says 1/2 to 2 minutes and just -- we -- I'm sure I talked to him about how do I get the point across? What do I say in that 1 or 2 minutes? 'Cause that's not a long period of time to try to get a point across, and so, we had discussions about what I needed to say during that 1 or 2 minutes.

Q. Okay. It also appears, you know, based on these couple of documents here, PBTN133 and DB -- PBDB25 that there was a debate session on January 10, 2014 at Jamestown Associates conference room.

A. Is this the same one or?

Q. It appears like a separate one and the -- the next page, there's some reference -- there's an email from Brett O'Donnell where he -- he says --

A. This is dated January 9th here, there and this is --

Q. This is the 10th.

A. -- January 10th. So --

Q. Right.

A. -- assume this is the same -- the same event.

Q. You know, you tell me? If you recall it being two separate preps, one on the 8th and then
one on the 10th or if you recall it being the same?
Do you specifically remember there being just one
or two?
A. I don't --
Q. Okay. Appears --
A. -- anyway, I don't remember.
Q. What's referenced in the emails on the 10th
is Brett asking you some tough questions about gay
marriage. I don't know if that jogs your memory of
the debate session in which Brett helped you with
back and forth on -- on some potential questions
about gay marriage. That being a hot button issue
at the time --
A. Um-hmm.
Q. -- given the attorney general's recognition
of the Utah same sex marriage. Do you recall that?
A. Yeah, I do.
Q. Okay.
A. We did have -- he just asked how I would
answer a question and we -- I'd sit there and think
about it and answer it and he'd say, "Well, maybe
you ought to do this?" And that was -- we'd --
we'd go on to the next issue.
Q. Do you recall there being -- I'll show you
these two documents, PBTN134 and PBTN135, couple of
calendar items from Teddie Norton's calendar
listing "Prep for debate with Michael Hall in D.C.
on January 16 and January 17, 2014." Do you recall
one or more prep sessions with Michael Hall?
A. I do.
Q. Okay. Do you recall if it was one session
or if it was two?
A. One.
Q. One session. Who -- Michael Hall --
A. I do remember meeting him --
Q. Yeah.
A. -- and -- and had one session. We had it
again at Jamestown.
Q. Okay. That was at Jamestown?
A. Right.
Q. Who is Michael Hall?
A. He I think works with -- with Brett.
Q. Okay. Had he previously done any work on
your campaign?
A. Negative.
Q. Okay.
A. This was the one and only time I met with
him.
Q. And Brett wasn't there for those?
A. Correct.
Q. For that? Okay. So was Michael Hall
substituting for Brett?
A. Correct.
Q. Okay. Do you recall there being I think
RJC Senator job interview? I think RJC is
Republican Jewish Committee or Coalition or
somewhere along those lines. Do you -- do you
recall there being a forum or --
A. Yes.
Q. -- interview with them? And do you recall
Brett being involved in preparing you for that?
A. I don't recall that either.
Q. Don't recall that?
A. No.
Q. Okay. And what about a Georgia Municipal
Association debate or forum? Do you recall that?
A. I do recall that, yes, and I don't recall
him being involved in that. What I was --
Q. Okay.
A. -- with all these types of events like
that, basically, I was saying the same thing and it
was -- basic stump speech I'd guess you'd say and
-- and -- and maybe I'd alter it a little bit depending upon what -- what the audience was like but I varied it, not much.

Q. Okay. Just want to take you to -- through a few --

A. Sure.

Q. -- calendar items here. This is PBTN137. It's January 29, 2014, listed as "Debate prep with Brett at Jamestown Associates."

A. Um-hmm.

Q. There's also PBTN141. This is January 31st, 2014 --

A. Um-hmm.

Q. -- a couple of -- another instance -- debate prep -- Jordan's office. Do you recall either of these sessions? So the first one would've been it looks like at Jamestown Associates here in D.C. on a Wednesday. Next one would've been on a Friday. Says Jordan's office. We understand that's perhaps J. Russell Associates down in Athens. Is that -- do you recall these -- these prep sessions?

A. No.

Q. Do you recall there being a prep session
down at J. Russell Associates?

A. I don't.

Q. Okay.

BY MR. CORTAZAR:

Q. Is J. Russell Associates the office space -- their headquarters for your campaign?

A. We operate out of there. It's actually the office of Jordan Chinouth who was my district director. He took a leave of absence from being district director. He worked as our grassroots coordinator -- coalition's coordinator for our campaign and he just let us use his office. He has his own office down there. He's gone into political consulting business and so, he -- he has another candidate or two. I don't know. I think -- I know of one. I'm not sure. Know he interviewed others. I'm not sure who all he did 'cause we didn't talk about what he was doing outside the --

BY MR. MORGAN:

Q. So is that space your Georgia campaign headquarters?

A. We really didn't have a Georgia campaign headquarters. You could say that, I guess. We
just used his office whenever I needed to have a place --

Q. Okay.

A. So we didn't -- we had no specific campaign office. It was his office. He very graciously let us use it whenever we needed to have a spot.

Q. Okay. So is that where you store your campaign materials?

A. No.

Q. Is that where your campaign staff had work spaces?

A. We didn't have -- the only campaign staff we had was very limited and they did work out of that office, yes.

Q. Okay.

BY MR. CORTAZAR:

Q. Do you know if your senate campaign paid rent to --

A. I don't know --

BY MR. MORGAN:

Q. Next document is PBTN145, show that. Says, "Call with Brett for debate prep on Tuesday, February 18th." I can -- I can tell you that it appears that on the same day of February 18, there
was an NFIB Senate Candidate Forum. I don't know
if that refreshes your recollection. Do you recall
that forum, NFIB?
A. I remember we had one --
Q. Okay.
A. What we would do with -- I think on a
routine basis, he and I would talk prior to -- to
an event where we had these forums and he'd say,
"Are there any questions? Is there anything I
can?" Just have a very short conversation. It was
not an ongoing discussion for any long period of
time --
Q. Okay.
A. -- usually, it was a very short phone call.
Q. Do you recall if while you were down in
Georgia you ever Skyped or conferenced called Brett
in to those -- those prep session?
A. We did one, yes.
Q. One? Okay.
A. I remember one. Maybe two --
Q. Recall this date here, February 21st, 2014?
It lists, "Debate prep, Skyping with Brett."
A. Um-hmm.
Q. Would that perhaps had been the session in
which Brett Skyped in?

A. Assume.

Q. Okay. Okay. Do you recall the debate in Macon, Georgia?

A. Yes.

UNIDENTIFIED: Your next appointment is here Dr. Broun. About how much longer?

MR. MORGAN: I think three to five minutes.

UNIDENTIFIED: Okay.

MR. MORGAN: Apologize for that.

MR. BROUN: That's okay. Want to answer all of your questions and be as helpful as I can be.

BY MR. MORGAN:

Q. Certainly. The Macon debate, March 8, do you recall that debate or forum --

A. Yeah, sure.

Q. Do you recall if Brett was involved in preparing for you for that at all?

A. Again, we would have a conversation by phone about anything -- if I had any questions or anything. So we would have routine phone calls but --

Q. Okay.
A. -- I don't recall anything specifically, you know, recall any type of prolonged conversation --

Q. Okay.

A. -- about any of these forums.

Q. We're almost done here.

A. No problem.

Q. Want to show you this document. This is JC0 --

A. Sorry. Then we have --

Q. -- 190. This is a very long email that Brett O'Donnell wrote on February 24, 2014 to Bob Bibee, CC'ing yourself, David Bowser, Christine Hardman, Jordan Chinouth, @paulbroun who I understand is Josh Findlay --

A. Um-hmm.

Q. -- and then Brian Tringali. I want to -- take your time to review that. I want to ask you about the last couple of -- of lines in this email. So, so let me know when you --

A. Which lines are you talking about?

Q. Near the bottom. So if you go sort of third to last line. Says, "And most of all, we have to stop having campaign panic after every
debate unless he made a significant mistake or
didn't drive the message, then we are on course," and then Brett writes, "You hired me to coach the
candidate. I won't make ads, write mail pieces,
manage the on-line program or the campaign but
let's trust each other to play the roles we were
hired to do."

So my question, why would -- if Brett was volunteering for the campaign, why would he here refer to himself as being hired --

A. Beats me --

Q. -- to coach you as a candidate?

A. 'Cause we never hired him.

Q. Okay. And you said it before but I want to make sure it's absolutely clear for the record.

Your understanding is that all of his work for the campaign was as a volunteer?

A. Absolutely.

Q. Okay. And you recall specific -- having specific discussions with Brett where you discussed that his role with the campaign was as a volunteer?

A. Absolutely.

Q. Is there any specifics or anything else you can tell us about those conversations with Brett,
when they might've occurred, context --

A. Occur periodically through the whole time that he was helping us. I would remind him that this -- that whatever he was doing on the campaign was whether these -- get together's, when we went down to Jamestown or anytime we talked about any campaign issue -- wasn't every single time. I'd say, "I'll remind you, this is -- you're volunteering for this, so."

Q. Okay. Were you involved in putting together the office's statement in response to the newspaper articles this -- this spring questioning Mr. O'Donnell's role with the office? This is an email from Christine Hardman to Brett, subject, "Statement on March 13, 2014," and we, you know, we've confirmed with Christine that this was in fact the statement issued by the office.

A. Yes. And this -- I wasn't involved in this statement at all.

Q. Okay.

A. But this is exactly what he was hired to do. This is exactly what we paid him to do and any other thing outside of this was totally volunteer on his part.
Q. So this statements says at the end -- says, "As stated by the House Administration Committee, O'Donnell's communication training is in compliance with all House rules."

A. Um-hmm.

Q. Were you involved any discussions with the House Administration Committee or with the Ethics Committee about Mr. O'Donnell's role with the office?

A. I was not myself. As I already mentioned earlier on is I wanted to be absolutely clear with everybody that we were absolutely clear with The House Administration and rules of the House. So was very adamant about making sure that we didn't even get to the line -- close to the line.

Q. Okay. And who do you recall telling -- telling that to in your office?

A. Primarily to David Bowser but I would -- I don't remember any specific conversations but it's just something that I've been very adamant about making sure that we delineated the functions of all my staff including Brett.

Q. I'm going to review my notes, see if I have any other questions. I'll let --
BY MR. SOLIS:

Q. Last question for me: Did you talk to Mr. O'Donnell at all about your review?

A. I have not, no.

Q. Okay. Have you talked to David or Christine about over conversations with them?

A. Briefly. Just stated it occurred and we didn't get into -- I don't remember even talking to Christine. Asked David yesterday after y'all talked to him about how did it go and he said it was long and that -- that's about all he said.

BY MR. MORGAN:

Q. Okay. I think you have a good sense of the types of questions we're asking and what we're looking at. Is there anything else you think would be helpful for us to -- to know?

A. The only thing is that I've been adamant all along that any function that Brett had on the campaign side was totally voluntary. He was hired to come and just help me with my communications. He's part of our communications team --

Q. Um-hmm.

A. I considered him as an integral part of what we're doing, trying to communicate to America
about the issues that we were dealing with here in
this office and that's why we hired him and that's
what we paid him to do and that's all we paid him
to do.

MR. MORGAN: Okay. All right. Well, we
appreciate your time.

MR. BROUN: Thank you. I appreciate
y'all's.

(END OF PROCEEDING)
I, Blanca Wier, do hereby certify or affirm that I have impartially transcribed the foregoing from an audiotape record of the above-captioned proceedings to the best of my ability.

__________________________
Blanca Wier
Exhibit 5
MR. MORGAN: Speaking is Bryson Morgan, Investigative Counsel with the Office of Congressional Ethics. I'm joined by Paul Solis, Investigative Counsel with the Office of Congressional Ethics, and we are here with [redacted] on June 23rd, 2014.

BY MR. MORGAN:

Q. And Mr. [redacted], we -- we covered the application of the False Statements Act to this interview. So I think we'll go ahead and begin with our questions. First, we'd like to ask you some general background information, so we'll begin there. How are you currently employed?

A. I'm self employed with O'Donnell and Associates, which is a communications consulting firm.

Q. What types of services does your firm provide?

A. Range of communication services to both corporate, non-profit and political clients.

Q. You said you provide services to political clients?

A. And corporate and non-profit.

Q. And non-profit. On the -- on the political
side, do you provide services to both state and federal political clients?

A. Yes.

Q. When you say political clients --

A. Or elected officials.

Q. -- what do you mean? Elected officials?

A. Elected offices or candidates for public office.

Q. Okay. Approximately how many political clients does your firm have at this time?

A. I'm not going to reveal that --

Q. Okay. Do you have --

A. I've had multiple clients.

Q. Multiple clients?

A. Yes.

Q. Okay. More than one?

A. Yeah.

Q. And you have clients at both the federal and state level --

A. Yes.

Q. -- local -- local level as well?

A. No.

Q. Okay. Do some of your current clients include election campaigns?
Q. Okay. Are some of those election campaigns federal election campaigns?
A. Yes.

Q. Okay. And are you paid for the services you provide to those federal election campaigns?
A. Yes.

Q. Have you ever provided these communication type services or the types of services you provide to federal elections on a volunteer basis?
A. I have.

Q. On how many occasions would you say you've done that?
A. Multiple occasions.

Q. Have you ever provided volunteer -- those types of volunteer services to Representative Paul Broun's political campaigns?
A. I have.

Q. When did you do that?
A. This part year, both in 2014 and some in 2013.

Q. And what about in 2012?
A. Um, you know what? I don't remember. I think we may have talked about he -- his House
debate for like 10 -- you know, off -- out of the context of my work with him but I don't believe I did provide anything in 2012.

Q. When did you first become acquainted with Representative Broun?

A. Okay. You got the email and I should've looked at the date again, but it was in 2012. His chief of staff reached out to me and asked if I would submit a proposal to provide communication services to the Congressman, something that I've done for other members of Congress as well.

Q. I think I do have a few documents I want to show you that may reflect that. Show you this document which is PBTN0005.

A. Yeah, yeah. So it was -- I think we started like in the summer of 2012.

Q. Other document I want to show you is PBT -- DB120 through 130. This first document I showed you number PBTN05 is -- appears to be a calendar item from Thursday, May 31st, 2012. The subject is "Meeting with [REDACTED], Bachmann's debate coach, attending David Bowser, Meredith Griffanti and organized by Paul Broun," and then the second document I showed you, PBDB120 through 130 is an
email from you it appears --

A. Um-hmm.

Q. -- to drpbrown5 and that email address, it appears belong to Representative Broun, CC-ing David Bowser and Meredith Griffanti in which you write, "Thank you for meeting with me yesterday," and then skipping a sentence, "Attached is my proposal to assist you with that goal by helping you sharpen your communication skills," and then there is a proposal attached to that email.

A. Right.

Q. What -- that May 31st, 2012 meeting, do you recall that meeting?

A. I recall we actually had, I think a couple of meetings --

Q. Okay.

A. -- at the NRCC where we just sort of met initially and then I submitted this proposal and then we met again to discuss it. So I believe --

Q. Okay.

A. -- that's correct.

Q. Do you recall who was in that meeting?

A. I think Meredith and David and Dr. Broun.

Q. And what was discussed?
A. Assisting him in doing better with media interviews, speeches, things related to this official duties as a Congressman, floor speeches.

Q. Okay.

A. The proposal I submitted is kind of a boilerplate. You know, it lists all of the range of services and then they can pick what they want. So it's not -- you know, it's not a "Here's everything I will deliver." It's "What I could deliver."

Q. So this proposal was not customized for Representative Broun?

A. Not very much. Un-uh, no. Most of it is standard language that I use in most of my proposals for you know, elected officials or -- or candidates, so.

Q. It's the same proposal you use for both elected officials and candidates?

A. Um-hmm.

Q. During that meeting, that May 31st meeting or the second meeting that you recalled --

A. Yeah.

Q. -- did you discuss Representative Broun's campaign --
A. Not at all --
Q. -- campaigns?
A. I had no idea that he was even considering running for the Senate when I met with him in 2012.
Q. Did you discuss his 2012 congressional campaign?
A. Not at all.
Q. I will note that the proposal does include -- first paragraph of it, "The method of media prep and the materials I provide are essential in preparing for media interviews and speeches as well as debates." Debates are mentioned throughout.
A. Yeah --
Q. On page three, there's a section on media public speaking debate preparation. Page four, several bullet points under debate preparation.
A. Right, right. And I would point out that in their official activities, members of Congress do debate. That's what they do on the floor of the House.
Q. So when you're --
A. The debate bills, things like that.
Q. -- proposal referencing debates here, you're --
A. It can either --
Q. -- referencing it?
A. -- either candidate debates or official debates.
Q. Okay. So on page four, where it says "Debate preparation," this is referring to both candidate debates and --
A. Some of those bullets --
Q. -- floor debates?
A. -- can refer to official debates. Sure, absolutely. Some of them do refer to candidate debates as well -- refers to both.
Q. But in your meetings --
A. It was not discussed in terms --
Q. -- campaign debates were not discussed?
A. Not at all.
Q. You have any idea why the subject of the meeting on the 31st would've been identified as "Meeting with [REDACTED], Bachmann's debate coach"?
A. Um.
Q. That didn't refer to any -- any subject matter to be discussed?
A. Just it was an identifying feature, who I
Q. Okay.

BY MR. SOLIS:

Q. When Representative Broun's chief of staff reached out to you in 2012 to kind of get the discussions started --

A. Um-hmm.

Q. -- about bringing you on, did you talk about debate issues with the campaign or --

A. Not at all.

Q. -- office at all?

A. No. His -- his reach was specifically targeted to Dr. Broun doing better with media interviews, doing better with floor speeches, doing better with his official duties.

BY MR. MORGAN:

Q. Want to show you now document identified as PBDB114. This is an email from you to David Bowser. The subject is, "Consulting agreement," sent on Tuesday, June 19, 2012. You write, "Hi David. Attached is my consulting agreement. I wasn't sure that you settled on how I would be paid, so I left the address blank," and then
attached to that is a consulting agreement. Is --

A. And this is kind of a boilerplate consulting agreement that I use.

Q. This is a boilerplate consulting agreement?

A. Yeah.

Q. What was -- was there a discussion in those meetings of how you would be paid?

A. Not in the first couple of meetings, and David had kind of just left it open. So that's why it's referenced in that email.

Q. Was there a discussion of options for how you would be paid?

A. We had talked about either through the official office or through the campaign, depending on what it was they wanted but it seemed like they wanted, you know, official duty stuff, so.

Q. Okay. So there was a discussion of -- of perhaps paying you from the campaign?

A. I just gave them a range of how people pay me --

Q. Okay.

A. -- so that was where that left and then David was the one who settled on, "This is how we're going to pay you 'cause this is what we
Q.  Is -- is how you are paid something that
you typically have a lot of input --
A.  No.
Q.  -- in?
A.  Un-Uh.  No, no, no.  I just told him.  He
asked me how people pay me, and I asked -- and I
answered that question.
Q.  And the way you answered is...
A.  Some people pay through the campaign, some
people pay through their offices, depending on what
they want done.
Q.  So you said this is boilerplate.  Does this
consulting agreement accurately describe the
services you were to provide Representative Broun?
A.  Yeah, I think it did actually: Public
speaking, debate, message media, strategy, media
interview preparation.
Q.  It appears that a -- this agreement lasted
for a short period --
A.  Yeah.
Q.  -- and then a new agreement was entered
into --
A.  Correct, which is essentially the same --
Q.  -- about September of 2012?
A.  The terms are just changed.
Q.  And then again in believe in January 2013?
A.  Yeah.
Q.  And -- and it appears that the relationship maybe extended month to month thereon?
A.  Right, right, exactly.
Q.  The monthly retainer being $2500 from -- from that point forward I believe --
A.  Correct.
Q.  When did your consulting agreement with Representative Broun end?
A.  Let's see. In March of this year -- March of 2014.
Q.  Why did it end?
A.  We just mutually agreed that he no longer needed my services.
BY MR. SOLIS:
Q.  Why did he no longer need your services?
A.  I mean, what I do is instruction and then you know, I teach them based on specific interviews how to approach things and both of us agreed that he had sort of gotten the max out of what -- what I provide.
BY MORGAN:

Q. I want to ask you some questions about your interactions with and you work for Representative Broun's congressional office.

A. Um-hmm.

Q. How would you describe your role in Representative Broun's congressional office?

A. As a consultant, both as an instructor in terms of teaching him communication skills at a general level in terms of media interview, prep messaging, floor speeches, both delivery and substance and then I'd be consulted on to help write floor speeches or to prep him for specific interviews, or if he was doing a, you know, tell -- town hall that he would do frequently to speak to his district, I'd prep him for those, so.

Q. Okay. How frequently were you in communication with the Congressional Office?

A. I met with him once a week.

Q. Okay. I think we saw some reference to weekly sessions?

A. Yeah. So I met with him once a week, but you know, we didn't have -- his communications person would maybe call me every now and then or
email me or you know, and I've provided most of those emails or all of those emails actually --

Q. Okay.

A. -- and he would -- he would not contact me outside of those meetings.

Q. Okay. Who in the Congressional Office did you interact with?

A. Um, David Bowser, Meredith --

Q. Griffanti?

A. -- and then -- Griffanti and then when his communications director changed, Christine Hardman and then Teddie Norton just to schedule times.

Q. Okay. So I want to break that down a little bit the type -- the types of things --

A. Sure.

Q. -- you did for Representative Broun. These weekly sessions, what -- what was done in the weekly sessions?

A. It would vary. Initially, it was sort of generic, "Here's some communication principles you need to start," based on evaluation of tapes of him, former interviews, things like that. So it would vary from week to week, but most of the time it would be evaluating media that he had done,
talking about how to improve and then if he had
interviews upcoming, prepping him for those or if
he was doing official speeches or floor speeches,
things like that, prepping for that and then giving
advice on -- on how to message on some of his
positions.

For instance, you know, one of his big
pieces of legislation is his Patient Option Act,
talking about how to message around that or
different things, different votes that he was going
to be taking, how to message those.

Q. How to message around those?
A. Yeah. And -- and then on the side, working
with his communications team to help them as they
wrote op-eds or releases from the office, those
things too.

Q. When you say prepping, what -- what is
generally involved in -- in preparing for a speech
or for a media appearance?
A. Well, they're different.

Q. Okay.
A. I mean, the speech, it's writing the speech
and then talking, you know, going back and forth on
what he wants in it, what he doesn't want in it and
Q. Were you involved in -- in writing speeches then?

A. Um-hmm.

Q. Would you -- what was your role? Would you do a first draft?

A. It depended. Sometimes Meredith or Christine would write the initial draft and then I would look at it and edit it, or sometimes I'd write the initial draft and we'd go back and forth in the session and work on -- work on the final details for it and then media interviews, it's just, you know, thinking through the potential questions he'd get asked in the media interviews and what the message would be for those interviews and how to answer questions.

Q. Show you a document here. This is PBTN...

Take your time to review this series of email exchanges between you and Meredith Griffanti. The question I have is it appears to us that some of these weekly sessions were held in the Congressional Office, and on occasion, they were held at the NRCC. Is that correct?

A. Yeah. And I -- I -- you know, initially, I
think it was just convenience, if he was going to be making calls or stuff like that, so.

Q. Okay.

A. I don't think there was any.

Q. So here, at the top of page one, Meredith Griffanti writes to Teddie Norton and David Bowser, "We could just have it be official today and do NRCC stuff next week." Was there -- if you were discussing official matters, would you meet in the Congressional Office? If you were discussing campaign or political matters, would you meet in the NRCC?

A. Yeah. And we very rarely discussed campaign matters. So we very rarely met at the NRCC. We met there a couple of times in the beginning. I think we met there -- like I said one time we may have talked about debate stuff, and so he wanted to meet there and asked me if I would just give him a few tips about an upcoming debate and then sometimes I -- you know, but I -- very rarely did we meet there. Most of the time, we met in his office.

BY MR. SOLIS:

Q. When you say an upcoming debate, do you
mean?

A. When -- when he was running for Congress. I think he said, "You know, hey, I've got a debate coming up. Will you give me a couple of tips," and I never went to Georgia or anything like that. I went -- I went to Georgia one time. That was last year but --

MR. MORGAN: Think we'll ask you some questions about that.

MR. [REDACTED]: But -- but -- yeah, at any rate, it was just -- you know, "Will you give me a couple of pointers?" So.

BY MR. SOLIS:

Q. And you mentioned it was on convenience, the office you would select at times?

A. I think sometimes. I think it was based on, you know, if he was making calls or whatever -- would I meet him there as opposed to his congressional office.

Q. And by calls, you mean fund raising calls?

A. I think.

BY MR. MORGAN:

Q. Show you an email. This is from your document productions, BOD155. This is an email
from Christine Hardman to you August 11, 2013 in response to an email you sent on August 11. At the bottom of the page there in which you -- you say, "Christine, please send me media interviews on Dr. Broun's schedule for this week, also, any other events -- need to discuss on the call tomorrow morning and also, send clips from media done in the past week," and then her response includes a list of several different events and speeches, town hall. Was this typical --

A. Yeah --

Q. Were you given a list of upcoming appearances --

A. Yeah, absolutely.

Q. -- in your weekly session or it appears sometimes that that session took place over the phone?

A. Yeah. Sometimes, it was via phone.

Q. And then would you also -- so in those sessions, you would discuss the upcoming events and do preparation for those specific events? Is that correct?

A. Yeah. And evaluate past media which is exactly what I asked for.
Q. Okay. You mentioned speeches that Representative Broun gave in his official capacity.
A. Um-hmm.
Q. You sometimes edited those. Sometimes you'd write them. You mentioned Dr. Broun's Option Act. Do you recall if you drafted a speech for Dr. Broun on that?
A. I think I drafted a couple of floor speeches on that and an op-ed actually but I don't remember the -- I mean, he -- that's been his big thing, so there were several things that we -- we did interviews around that, so.
BY MR. SOLIS:
Q. Do you know what op-ed -- what newspaper that appeared in?
A. I don't. I do think it was -- think it might've been Wall Street Journal or something like that but it was -- it was a relatively big placement.
BY MR. MORGAN:
Q. Show you this document here. This is PBDB170.
A. Um-hmm.
Q. Take your time to look at that. What I
want to ask you about is the email, the second half of this first page from David Bowser to Teddie Norton, Gov Bob, you and Christine Hardman in which he -- he asked -- second line of that email, "[redacted], do we have an updated five minute on big government spending?" You, you know, respond 40 minutes later writing, "I'll get something done by late tonight/early in the morning."

A. Yeah.

Q. Do you recall -- is that another speech --

A. It's like a five minute, you know, the one minute, five minute speeches that they give on the floor of the House, absolutely.

Q. Okay. Do you recall drafting a floor speech that Dr. Broun gave shortly after visiting a VA hospital to discuss a speech in which he discussed veterans' issues?

A. No, I do not actually, but that doesn't mean, I didn't. I write a lot of speeches.

Q. Would you draft talking points --

A. Sure.

Q. -- for Representative Broun as well to be

A. Yeah.
Q. -- used either by him or perhaps at press releases?

A. Yep, absolutely.

Q. Do you recall any specific instances of that?

A. Truckload of them. I mean, pretty much if he was doing radio, we would draft talking points. Meredith and I would go back and forth on those. There were many, many times where we drafted talking points for media interviews that he was doing.

BY MR. SOLIS:

Q. Concerning?

A. That was a regular occurrence. What's that?

Q. Concerning his official duties?

A. Sure, yeah.

BY MR. MORGAN:

Q. Do you recall -- let me show you one document. This is PBDB151.

A. Yeah.

Q. This appears to be some talking points you drafted for David Bowser on the FAA?

A. Yeah. This was in the middle of the
sequester and you know, it was stuff that he could
use in media interviews or even on the floor
talking about this issue, absolutely.

Q. So was this -- was this typical for you to
do --

A. Yeah.

Q. -- draft talking points?

A. Absolutely.

Q. How many -- how many times during your
consulting agreement do you believe you did --

A. Oh my gosh --

Q. -- did work like this?

A. It took -- for me to venture a guess, would
be inaccurate because --

Q. Would it be on a weekly basis?

A. Oh, maybe not on a weekly basis but on a
regular basis I would say.

Q. More than once a month?

A. Yeah, absolutely. Sometimes it was more
than once a week if there were big issues going
through Congress that he needed help with.

Q. What -- what big issues do you recall?

A. Well, sequester for sure. We -- we did
several things through the period of sequester,
shut down. I mean, he was out in front talking about that a good bit. Definitely, the healthcare debate and that was ongoing. So, you know, there were multiple things that came up during the healthcare debate that called for different talking points, whether it was when he was re-introducing the Patient Option Act or if there was something happening like the shutdown or some other bill. Congress has taken up -- the House has taken up Obamacare many, many times.

Q. Um-hmm.

A. So through -- and -- and each one of those times, I might've drafted some talking points based on the specific goals -- going to be taken.

Q. Do you recall doing any work on Representative Broun's continuing resolution vote?

A. Not specifically, but I'm sure I did.

Q. What about gun rights issues --

A. Yeah.

Q. -- universal background checks --

A. Yeah.

Q. -- do you recall --

A. Yeah, yeah, absolutely.

Q. -- that being a major issue?
Q. Were you -- I think you may have mentioned this but can you give me a sense of what extent you were involved in discussions of communication strategy, if you were involved in those? Were you involved in those types of discussions?

A. Yeah. I would talk to Meredith and Christine about what media we wanted to do and even helped them from time to time reach out to different folks. Yeah, I was -- and then what we wanted to say in that -- in those interviews. I was reasonably integrated into that process.

Q. Were you involved in legislative strategy, discussions of legislative strategy?

A. Only as it related to the communication side. You know, Dr. Broun worked with his policy -- policy folks and to be honest with you, I have seen them but I couldn't even tell you their names. I remember Austin who was in that office, but you know, I never really did anything with the policy folks. So he would usually meet with them separately and he's -- you know, he's -- he doesn't change his positions based on communications. He wants to develop the communication strategy off of
Q. Did you ever provide any training to the congressional staff?
A. To -- Meredith and Christine went through the training that I gave Dr. Broun initially with me. I have like a message video that I show them and -- and they sort of went through how I approach prepping a candidate for interviews. So both of them were trained, yeah.

BY MR. SOLIS:

Q. How many times that occurred, just the one time?
A. No, no. There -- you know, I mean, there were lots of times where I would -- especially at the beginning when I was working with Dr. Broun, pulled Meredith aside and say, "Here's, you know, how I'm thinking through this. Here's how you want him to think through it." So it -- it might not have been like, "Okay, today, we're going to do a training session for Meredith." It may have been -- now, when I first took Dr. Broun through my initial training, she sat in through all of that. So there were probably four or five sessions that she sat in on where it was just sort of generic,
"Here's how you approach media interviews. Here's how you approach speeches."

Q. Did he ask her -- for you to train her?
A. I think so, yeah, yeah.

Well, I volunteered actually. I mean, I think that's healthy, so that the communications staff eventually takes over for doing this. The goal is to do the training, be with them for awhile and -- and then watch them grow and then have a communications staff take over and be able to do it without me.

BY MR. MORGAN:

Q. The training -- this initial training you give you said was four to five sessions?
A. Probably so, yeah.

Q. Were those with Meredith separately or --
A. No, no. Meredith --

Q. -- were you giving it to Dr. Broun --
A. -- would've been --

Q. -- and then she was present?
A. Yeah, she was present. Yeah.

Q. Okay. What about with Christine?
A. Um, well, since they -- you know, they changed in the middle. I kind of talked to
Christine on the side, just told her how I approach media interviews.

Q. Did she go through those four to five sessions?

A. No, no.

Q. All right. Now want to talk a little bit about your role with Representative Broun's congressional campaigns. Show you a document here.

This is BOD00234. This is an email from David Bowser to several individuals including yourself where he writes, "Good afternoon, Team Broun. Just wanted to do a quick intro of two additions brought on today by Dr. Broun to our political efforts."

He introduces those two people and then he says by way of introductions to everyone involved and then lists each person who's involved in the political efforts and -- and a short statement of what they do --

A. Um-hmm.

Q. -- and at the bottom of that page it says, "[illegible] is Congressman's Broun's messaging consultant and media prep advisor."

A. Yeah.

Q. Does that accurately describe your role
with his campaigns?

A. Yeah, I think so. Well, not -- with his campaigns? No, I had no official role with his campaign.

Q. So this is December 19 of 2012.

A. Yeah. I mean, I --

Q. So this is referring to his 2000 -- his senate run, 2013 --

A. Well, I think -- yeah. And I think what he is doing is introducing everyone who's on his team and the way I take this is, you know, I mean, you can't have a guy going out in a campaign and doing exactly opposite of what he's doing on his official side. They're not two people. They're the same person, and so I think he's just introducing everyone who's on Dr. Broun's team, whether it's one side or the other in terms of things that might impact the -- what they're doing politically.

Q. So this reference to you here is -- I want to be clear here -- is a reference to your role in the official capacity --

A. Yeah.

Q. -- or?

A. Official side. I had no -- you know, I had
no official role. I wasn't paid by the campaign.
So I had no official role on his senate campaign.
I did volunteer stuff for him but I had no official
role. I was -- officially, I was his messaging and
media prep advisor --
Q. Um-hmm.
A. -- but I had no official role in his
campaign.

BY MR. MORGAN:
Q. Did you do those same types of duties for
the campaign?
A. Some on a volunteer basis, yeah.

BY MR. MORGAN:
Q. When was the last time you did any
volunteer activity for the campaign?
A. March.
Q. In March?
A. Yeah, of 2014.
Q. Of 2014. Okay. I want to go through the
various types of services you may have provided to
the campaign.
A. Um-hmm.
Q. So, did you discuss campaign speeches,
media appearances, campaign debates, those types of
campaign related media or engagements in your weekly sessions with Dr. Broun?

A. Not in our official weekly sessions, no.

Q. Not in your official...

A. No, no, but we did discuss them, so.

Q. When would you discuss them?

A. On the phone. Occasionally, we met down -- Jamestown Associates. We'd use their conference room to meet.

Q. Okay. Did you draft or provide feedback on campaign speeches?

A. I did, yeah.

Q. Would you also prepare Representative Broun for campaign speeches and events?

A. Yes. Well, yes, yes.

Q. Okay. What was your role in the announcement speech that Representative Broun gave kicking off his senate campaign?

A. I helped draft it.

Q. Help draft it.

BY MR. MORGAN:

Q. Did you help --

A. Think Meredith and --

Q. -- Dr. Broun rehearse for that speech?
A. No. Meredith and I went back and forth via email drafting it, but we did not. He -- I think he -- he did that in Georgia and I wasn't with him.

BY MR. MORGAN:

Q. Want to show you a document here. This is BOD0 -- 0193. This is an email from you to yourself, CC-ing David Bowser, Brian Tringali, Bob Bibee and Meredith Griffanti where you write, "Attached is the 10 minute stump that Dr. Broun asked me to write."

A. Um-hmm.

Q. What -- what can you tell me about the speech?

A. It's a stump speech, and Dr. Broun asked if I -- he respected my writing ability, and he asked me if I would write a stump speech for him to which I said, "Yes."

Q. Campaign speech?

A. Yeah.

Q. What role did you play in -- in preparing Representative Broun for the Georgia Republican Convention that was held in mid-May of 2013?

A. Well, I think he used this speech -- parts of that speech for it, so you know, I helped kind
of craft the final speech for that as well.

Q. Show you the same -- this is PBTN62. Middle of the page, there's an email on May 1st, 2013 from Teddie Norton to you where he writes, "Hi

[Redacted]. We are looking ahead for the next few weeks before convention, and I wanted to know if you could meet with Dr. Broun the following times?"

A. Um-hmm.

Q. "Tuesday, May 7, 2:00 p.m., Thursday, May 16, 3:00 p.m. Just let me know." You responded saying both were fine. Did you meet with Representative Broun leading up to the convention to prepare for his speech?

A. I did.

Q. What -- what occurred in those prep sessions?

A. We went back and forth on what he wanted to do in the speech and say. So we just kind of worked through drafts of the speech.

BY MR. SOLIS:

Q. About how many times would you meet with him about that issue?

A. Oh, not very many.

BY MR. MORGAN:
Q. You think these two meetings occurred?
A. I believe they may have.
Q. And those both would have been to prepare for the convention speech?
A. I think, yeah.
Q. Okay. Show you another document. This is BOD01311.
A. Um-hmm.
Q. This is an email from Christine Hardman to you, subject is "Intro," dated January 29, 2014. She writes, "Hey, [redacted]. Dr. Broun was trying to figure out which flight to take today and was wanting to practice his new intro before leaving. When do you expect to have it done?" What does this email -- what intro is this referring to?
A. It refers to his debate opening statement.
Q. Campaign debate?
A. Um-hmm.
Q. This document is BOD00365. This is an email from you to Representative Broun. You write -- or on February 12, 2014. You write, "Dr. Broun, attached are your announcement, convention speeches. These were two of your best, and as I said yesterday, all you would have to do is
substitute governments for spending announcement, and you have a great speech." Tell me about this email?

A. It was just -- actually, this was meant as an inspirational message. He was lacking confidence in some of the things that he was doing, and so I just sent him an email with some videos to say, "Hey, you gave -- here's a couple of good speeches you gave. You can do it." That's basically it.

Q. Did you work on talking points for the campaign in addition to actually working on speeches? Did you -- did you work on talking points?

A. I may have. I don't remember working on specific talking points with the campaign, but if you have a document?

Q. Show you an email. Yeah...

A. Maybe...

Q. This is BOD00082. These are emails. It appears to be referencing a -- some talking points that you sent to Representative Broun. You write, "Can someone send me a link? I sent him talking points last night." Appears to be in relation to