

Exhibit 1

CONSULTING AGREEMENT

THIS AGREEMENT is effective as of June 16, 2012, by and between "Representative Paul Broun" (the "Client"), located at _____, and O'Donnell and Associates, Ltd. (the "Consultant"), located at 3101 N Hampton Drive, #1517, Alexandria, VA 22302.

RECITALS

1. Consultant has expertise in the area of public speaking/debate and message/media strategy and media interview preparation for individuals/organizations and is willing to provide consulting services to Representative Paul Broun.
2. The Client is willing to engage Consultant as an independent contractor, and not as an employee, on the terms and conditions set forth herein.

AGREEMENT

In consideration of the foregoing and of the mutual promises set forth herein, and intending to be legally bound, the parties hereto agree as follows:

1. Engagement:

(a) The Client hereby engages Consultant to render, as an independent contractor, the consulting services associated with media interview/public speaking/message/debate preparation for Representative Paul Broun and such other services as may be agreed to in writing by the Client and Consultant from time to time.

(b) Consultant hereby accepts the engagement to provide consulting services to the Client on the terms and conditions set forth herein.

2. Term.

Client will retain Consultant, and Consultant will accept such retention, commencing as of June 16, 2012 and continuing until August 3, 2012. The contract may be renewed beginning September 1 by the Client and then will be month to month.

3. Compensation.

- (a) Monthly Retainer: Client will pay Consultant as compensation \$3,750.00 for the entire term (June 16-August 3). Renewal will be at the rate of \$2,500.00 per month.

Expenses: Reimbursement for ordinary expenses such as long distance, copies, postage, etc. shall be made paid within thirty (30) days of being incurred by Consultant upon presentation to Client of invoices with original receipts and documentation of costs/expenses incurred. Consultant's expenses under this Contract shall be invoiced without mark-up. Consultant also agrees to obtain prior approval for any travel and/or other incidental expenses. First class travel in any form is not reimbursable and shall be reimbursed only at a coach or other discounted rate.

- (b) Production and out-of-pocket expenses incurred specifically on behalf of Client will be billed monthly as incurred at cost. Consultant agrees to immediately notify Client if the aggregate amount of expenses in any given month exceeds \$500.00.
- (c) Payment: Any payment due Consultant shall be remitted directly to consultant. Consultant shall submit an invoice upon the beginning of each calendar month for work performed and expenses incurred the previous month. Client shall remit payment for such invoices within fifteen days (15) of receipt.

4. Intellectual Property Rights

Client shall own all right, title and interest, including copyrights, in any materials, files and work product developed or acquired by Consultant and/or Client' employees as a result of the consulting services provided to the Client by the Consultant.

5. Outside Employment

- (a) Consultant represents that he is not and will become a party to any agreement which conflicts with his duties under this Agreement.
- (b) Consultant shall devote such time, attention and energy to the business and affairs of the Client as reasonably requested by the Client.

6. Notice.

Any notice to required or permitted by the terms of this Agreement shall be given by registered mail, prepaid and properly addressed as follows:

If to Client:

If to Consultant:

O'Donnell and Associates, Ltd.
Attn: Brett O'Donnell
3101 N Hampton Drive
#1517
Alexandria, VA 22302

Any such notice shall be deemed to have been given when received.

7. Termination.

- (a) This Agreement may be terminated by either party with or without cause upon 30 (30) days written notice, pursuant to Section 6 of this Agreement, to the other party.
- (b) Upon the termination of this Agreement, all outstanding retainers, expenses shall be paid to the Consultant within fifteen (15) days of notice of termination.

8. Confidentiality.

Consultant will not either during the term of this Agreement, or thereafter divulge, furnish, or make available (either directly or indirectly) to any person, firm, corporation or other entity any proprietary or confidential information used by Client or acquired by Consultant pursuant to the terms and conditions of this Agreement. Consultant agrees that all such matters and information shall be kept strictly and absolutely confidential.

9. Not an Employee.

Consultant is an independent contractor and is not an employee or agent of Client. Consultant shall be entitled to no benefits or compensation from Client except as set forth in this Agreement and shall in no event be entitled to any fringe benefits payable to employees of Client. Consultant shall be solely responsible for the payment of all taxes due on the income received for the consulting services provided under this Agreement.

10. Personal Services.

Consultant is being retained for the personal services of O'Donnell and Associates Client consultant. The performance of such services under this Agreement may not be assigned or delegated by Consultant without the written consent of the Client.

11. Liability.

Nothing herein shall be construed to create a personal liability on behalf of Brett O'Donnell, President, O'Donnell and Associates, Ltd or any employee of O'Donnell and Associates, Ltd.

12. Waiver.

Failure by either party to exercise rights contained in this Agreement upon the occurrence of any event or contingency set forth herein will not constitute a waiver of such rights upon the reoccurrence of such event or contingency.

13. Entire Agreement.

This Agreement is the entire agreement of the parties relating to the subject matter hereof, and supersedes all prior and contemporaneous negotiations, correspondence, understandings, and agreements of the parties relating to the subject matter hereof. It may be amended only by an agreement in writing, signed by both parties.

IN WITNESS WHEREOF, the parties have executed this Agreement as of the date first written above.

Brett O'Donnell, President
O'Donnell and Associates, Ltd.

Agent for Representative Paul Broun

Date

Date

Exhibit 2

1 MR. MORGAN: All right.

2 Speaking is Bryson Morgan, investigative
3 counsel with the Office of Congressional Ethics,
4 joined by Paul Solis, investigative counsel with
5 the OCE, and Ryan Cortazar, a legal clerk with the
6 OCE, and we are here on June 24, 2014 with David
7 Bowser?

8 MR. BOWSER: Correct.

9 BY MR. MORGAN:

10 Q. So, Mr. Bowser, we have, already gone over
11 the application of the False Statements Act to this
12 interview and we do emphasize that you answer all
13 of our questions correctly and honestly, and the
14 first we want to just get some basic background
15 information about you --

16 A. Sure.

17 Q. -- and your current position is chief of
18 staff --

19 A. Yes, sir.

20 Q. -- to Representative Paul Broun?

21 A. Yes, sir.

22 Q. And who do you report to in that capacity?

23 A. Congressman Broun.

24 Q. Okay. And what are your duties?

1 A. Oversee the office and management of the
2 team, district offices, as well, of course, the
3 district operation, mainly and most importantly
4 assist Dr. Broun with his legislative duties, his
5 goals, his -- anything that he needs done.

6 Q. Okay. Who do you supervise; who do
7 you -- who directly reports to you?

8 A. For the most part, we have 17 staff
9 members, I want to say.

10 Q. Okay.

11 A. I believe that's the -- that's the full
12 allotment between the district office and the DC
13 office. Obviously there's a lot of fluctuation
14 going on sometimes, with people leaving and people
15 coming, but usually we have -- we have around 17
16 staff members.

17 Q. Okay. Are some of them part-time staff?

18 A. Yes, sir.

19 Q. Which ones are part-time?

20 A. To my knowledge -- I'd have to look at
21 the -- the latest payroll form because it's three
22 positions that we had that are labeled as
23 part-time.

24 Q. Okay.

1 A. I want to say Bob Bibee is a part-time
2 staffer. We had a district staffer whose name
3 totally escapes me right now. He's a recent hire.
4 We run a Milledgeville office that's open three
5 days a week, and he was manning that office for us.
6 The problem is we have a guy named Boston and a guy
7 named Arthur or something like that, and so I
8 confuse the two, and then who would be our third
9 part-time staffer?

10 Quite honestly, I don't -- I can't recall.
11 I can look at the payroll form if you like,
12 though.

13 Q. But Bob Bibee is part-time; he's --

14 A. Yes.

15 Q. Okay. So he's not -- there's not a
16 contractual relationship with him?

17 A. No, sir. He's a staff member.

18 Q. Part-times staffer, okay.

19 How often do you interact with
20 Representative Broun?

21 A. Daily.

22 Q. Daily; and when he's in the District, same
23 thing or --

24 A. When he's in the District, it depends on

1 what kind of week we're having. I mean, I -- the
2 last week, he was off for most of it, so I think I
3 talked to him -- I'm sorry, not the last week, the
4 last work period, he was off for most of it so I
5 think I only talked to him like twice during the
6 course of the week.

7 Q. Okay.

8 A. A lot more by e-mail and text if he's in
9 the District than when he's here.

10 Q. Okay. What did you do prior to being Chief
11 of Staff?

12 A. I was a Chief of Staff for a member from
13 California named John Campbell.

14 Q. Okay. And prior to that?

15 A. I owned a firm, a fundraising consulting
16 firm.

17 Q. What was the name of that firm?

18 A. Increased Strategies.

19 Q. Okay.

20 MR. SOLIS: Yeah, we just spoke to
21 Christine, and Christine -- when we asked her about
22 Bob's role with the office, she -- I believe she
23 mentioned that she thought Bob was a consultant,
24 that maybe he had some sort of agreement with

1 Representative Broun's office to provide services.

2 Do you know why she would have thought
3 that?

4 A. I have no idea.

5 MR. SOLIS: Okay.

6 A. I mean Bob's been on staff longer than
7 Christine's been on staff, so --

8 MR. SOLIS: Okay.

9 A. -- that might explain it, and also
10 obviously, Bob did not work out of the DC office.

11 So I'm not sure she's actually physically
12 met Bob or not.

13 MR. SOLIS: Okay.

14 BY MR. MORGAN:

15 Q. Where does Bob work you out of?

16 A. He lives in Tennessee.

17 Q. Tennessee?

18 A. He commutes to our Athens office pretty
19 frequently, meets with the Congressman a lot when
20 he's down in the District, but for the most part,
21 we handle everything by e-mail or by phone.

22 Q. Okay.

23 MR. SOLIS: Does he was a title?

24 A. He is a communications consultant,

1 strategist type of position. He's been with
2 Dr. Broun actually longer than I have, so I'm not
3 sure how long they have been together.

4 MR. SOLIS: But he's an official House
5 employee?

6 A. Yes.

7 MR. SOLIS: Okay.

8 BY MR. MORGAN:

9 Q. Have you --

10 A. And that's all he is, by the way, I think.

11 Q. Have you ever held any positions with
12 Representative Broun's political campaigns?

13 A. Have I held any positions?

14 Q. Yeah.

15 A. No. I mean, I've advised the Congressman.

16 Q. Okay.

17 A. The last -- the -- this most recent
18 campaign, I was a consultant to it, yes, now that
19 I --

20 Q. A paid consultant?

21 A. Yes, sir.

22 Q. Okay. And you're referring to the 2014
23 Senate campaign?

24 A. Yes, sir.

1 Q. Okay. For the 2012 campaign, were you a
2 paid --

3 A. No.

4 Q. -- consultant?

5 A. Not that I'm aware of.

6 Q. Okay. But you --

7 A. I may have gotten expenses reimbursed, paid
8 for my cell phone, a Capital Club membership,
9 things like that.

10 Q. Okay.

11 MR. SOLIS: Would you have volunteered
12 then?

13 A. Uh-huh, yes, sir.

14 I mean, he really hasn't had any campaigns
15 until 2014, for the most part.

16 MR. SOLIS: Okay.

17 BY MR. MORGAN:

18 Q. When did you first become acquainted with
19 Brett O'Donnell?

20 A. I want to say April or May of 2012.

21 Q. Okay. I do have some documents to show you
22 that may refresh your recollection here. This is
23 PBTN 5.

24 A. So May.

1 Q. And PBDB 120.

2 So the first one, PBTN 5, again, was a
3 calendar item, "Meeting with Brett O'Donnell,
4 Bachmann's debate coach, location NRCC, May 31,
5 2012."

6 Were you in that meeting?

7 A. I'm sure I was. We had four different
8 interviews --

9 Q. Okay.

10 A. -- four different type of people,
11 consultants of the same nature.

12 Q. You -- you said you interviewed four
13 different --

14 A. Uh-huh.

15 Q. -- potential consultants?

16 A. I think four.

17 Q. Okay. Who -- do you recall any of the
18 other people you interviewed?

19 A. A guy named Steve, he was from -- I'd say
20 Massachusetts; who was that other guy -- I
21 apologize, my memory is very bad, but I -- I
22 remember meeting at least three, if not four, Brett
23 being the fourth.

24 Q. Okay.

1 A. I would say --

2 Q. What kicked --

3 A. -- Brett was the most recent.

4 Q. -- off that process of doing those
5 interviews?

6 A. You know, for years, Dr. Broun has always
7 been focused on messaging.

8 Q. Uh-huh.

9 A. He believes that's one of his primary
10 responsibilities. Being in Congress, it's sort of
11 educate America on getting back to our
12 Constitutional founding moorings, as he calls them,
13 and he's gone through several different efforts to
14 try to improve his public speaking.

15 That's always been his weakest link, his
16 ability to -- to convey a message in a shorter,
17 more concise way. It's not his strong suit,
18 especially being a physician. You know, I mean,
19 physicians tend to explain things in excruciating
20 detail, and on top of that, you know, a Southern
21 country doctor, he's got a slow drawl and he wasn't
22 a very powerful speaker.

23 So it's always been one of his main
24 focuses, is improving his public speaking and his

1 ability to get his message across.

2 We've had several sessions over the years
3 with Frank Luntz.

4 You're familiar with Frank Luntz, I assume?

5 Q. Uh-huh, generally.

6 A. We hired a woman named Merrie Spaeth, I
7 want to say is her name, out of Texas for a day.
8 She came in and did this whole workshop, she filmed
9 him and went over his interviewing techniques and
10 he bought a few books, based -- I can't remember
11 the author's name, but it was based on the guy who
12 did communications for Winston Churchill.

13 So he went through these several different
14 iterations of trying to improve his ability to give
15 public speaking and messaging. He decided that he
16 needed more consistent help.

17 I mean, he would improve after taking a
18 class or -- or doing a seminar or a book or
19 whatever, but it would only last like a week or so,
20 and then he would slip back into his previous ways.

21 So he started asking around. He asked
22 several different members. We came up with three
23 or four people that we interviewed. Brett
24 O'Donnell, I think he got from Ms. Bachmann. He

1 was talking to Ms. Bachmann about her public
2 speaking and she recommended that we talk to Brett.

3 Before we had a chance to reach out to
4 Brent, I think he actually contacted us.

5 Q. Okay.

6 A. And so we sat down and -- and met with him.
7 I honestly can't remember whether it was here or at
8 the NRCC. We had set up like three or four of them
9 in a row and, you know, it's -- it's funny because
10 I thought I knew all of these people's names, but
11 now I can't seem to remember them all, but he
12 seemed to hit it off with Brett. So they seemed to
13 have a natural ability to work together.

14 The other guy, Steve -- I can't believe I
15 can't remember his last name for the life of me
16 because we met with him twice actually -- he was a
17 close second.

18 Q. Was it one meeting with Brett before he was
19 brought on or were there multiple?

20 A. I honestly can't recall. I mean, I know we
21 met with him at least once and then we did a trial
22 period when he first came on.

23 We were getting ready to enter the summer
24 break, obviously August recess. So we went through

1 probably June and July and August. We did like a
2 three-month block for one set price, I believe, and
3 the idea being if it worked out and Dr. Broun, you
4 know, appreciated how it was progressing -- he
5 actually went to Afghanistan over the month of
6 August, if I remember correctly.

7 So when he got back, we sat down and
8 revisited Brett again, and he thought that there
9 was a lot of positive benefits of the work he was
10 doing with him.

11 Q. Okay.

12 A. So they decided to continue forward and
13 that would be obviously September, I think is
14 when -- is when we did a more permanent sit down
15 relationship type deal.

16 Q. So this -- you know, on PBTN 5, the
17 location is listed as the NRCC.

18 You don't recall where -- where the meeting
19 did take place, though?

20 A. I don't. I mean, it's funny because I can
21 remember the meeting with Steve and I can remember
22 the meeting with the other guy who's name totally
23 escapes me because we were sitting in that -- in
24 that back conference room. I just honestly can't

1 remember meeting Brett the first time.

2 Q. Okay. What was discussed in that meeting
3 with Brett?

4 I mean, you can't remember the location but
5 do you remember the -- what was discussed?

6 A. We discussed what Dr. Broun was looking
7 for, quite frankly. I mean, the -- again, the idea
8 being that, you know, when he gave floor
9 statements, when he did press interviews,
10 especially media interviews tended to go not as
11 well as he liked them to go --

12 Q. Okay.

13 A. -- and the whole idea was improving on his
14 message delivery, and that's -- you know, that's
15 what he talked to Ms. Bachmann about and, you know,
16 Michelle does a good job at doing interviews.

17 Q. Was campaign speeches, campaign debates --

18 A. No.

19 Q. -- were those discussed?

20 A. No.

21 Q. Not at all in that meeting?

22 A. Not that I recall.

23 Q. Okay. I mean --

24 A. I mean, Brett may have brought it up that

1 that's what he does.

2 Q. The title was listed as Bachmann's debate
3 coach. Is that -- was that just --

4 A. That's, I guess, how he presented himself.

5 Q. Okay. So the -- the second document, PBDB
6 120, it's an e-mail from Brett O'Donnell to you and
7 Meredith Griffanti. The subject is proposal.

8 A. Uh-huh.

9 Q. He says, "Thank you for meeting with me
10 yesterday." You know, "Attached is my proposal,"
11 and if you look at the proposal attached there, you
12 know, it discusses fine tuning communication,
13 public speaking, media interview skills, media
14 prep" --

15 A. Uh-huh.

16 Q. -- "preparing for media speeches, as well
17 as debates. Additionally, this proposal will cover
18 assisting with messaging and other strategic
19 communication, campaign or official activities
20 including specific media interview prep in each
21 appearance."

22 You know, it references debates in a couple
23 of locations on the second page and then, you know,
24 Page 3 and Page 4 includes significant sections on

1 debate preparation.

2 If -- so is it correct that part of Brett's
3 proposal -- the proposal of work he was to do for
4 the office included campaigns activities and
5 campaign debate preparation?

6 A. No. I mean, that's not what we were
7 looking for.

8 Q. That wasn't what you were looking for?

9 Do you have any idea why he included it in
10 his proposal?

11 A. I -- I don't. I mean, honestly, I didn't
12 even -- I don't think I went through the proposal.
13 I mean, my job is to put everybody together. He
14 spent a lot of time with Meredith and Dr. Broun
15 discussing what it is that they needed to do. I
16 was in most of those meeting.

17 Q. Okay. I want to show you now, the -- this
18 document, PBDB 114. It's an e-mail from Brett to
19 you saying, "Attached is my consulting agreement."

20 A. Uh-huh.

21 Q. He asked -- he said, "I wasn't sure that
22 you settled on how I would be paid so I left the
23 address blank."

24 Was there some discussion about how you

1 would pay Brett O'Donnell?

2 A. Probably.

3 Q. Probably?

4 A. I mean, I don't recall the specifics. I
5 mean, at --

6 Q. You don't recall?

7 A. -- at no point did we ever entertain the
8 idea this would be a political adventure. This was
9 purely on the official side. I mean, this was the
10 whole idea, was to help him improve on his ability
11 to communicate his message.

12 Mainly, we are looking at, again, the
13 floor -- floor debate in the House. He was just
14 became a subcommittee chairman, so, you know, he's
15 managing the debate and the committee mark-up, and
16 especially being in Oversight Committee.

17 There's not -- you don't mark-up bills in
18 the Oversight Committee, you do pure hearings in
19 the Oversight Committee --

20 Q. Uh-huh.

21 A. -- as well as media interviews and town
22 halls. I mean, that was the -- the summer of
23 the -- if I recall correctly, that was the summer
24 of the Obamacare heat-up and debate, and the town

1 halls we were at, they were quite large and very
2 well attended.

3 So he was having a hard time trying to
4 communicate his message there, as well.

5 On top of that, he introduced a complete
6 call overhaul of the healthcare financing system,
7 his option --

8 Q. (Inaudible)?

9 A. Yeah, which was a major messaging
10 opportunity for him, and it's a tough, complicated
11 subject to try to get across to people in sound
12 bites. So that's -- I mean, we went into it purely
13 looking for nothing but official help, and we
14 talked to House Admin because Mr. O'Donnell had
15 worked for -- at the time, was working with a
16 couple of other members, from what we understand,
17 in the same capacity. They said that it was
18 allowable.

19 Q. Well, let's go -- I want to go into that a
20 little bit more in depth in a moment here --

21 A. Okay.

22 Q. -- but I want you to look at this
23 consulting agreement that's attached to that
24 e-mail.

1 A. This one?

2 Q. Yeah, it's attached to the e-mail. It's at
3 PBDB 115 and ask you if this is the -- the first
4 consulting agreement that was entered into between
5 Representative Broun and Brett O'Donnell, if this
6 is the one I think you referred to that covered
7 just a few months?

8 A. Was what, June -- yes, June 16th until
9 August 3rd, right, because that's when
10 doctor -- that when we had recess to, so this would
11 be the --

12 Q. And does this describe Brett O'Donnell's
13 work, his -- the work he was going to do,
14 accurately? Is it accurate to say he was -- he was
15 to be a consultant to the office?

16 A. Yes, sir.

17 Q. It says he has -- well, in the engagement
18 is -- it says, "Engages consultant to render the
19 consulting services associated with media
20 interview, public speaking, message, debate
21 preparation for Representative Paul Broun."

22 When it refers to debate preparation
23 there --

24 A. Uh-huh.

1 Q. -- is that referring to debates in the
2 campaign context?

3 A. No, sir.

4 Q. And why is that?

5 A. And why is that?

6 Q. Well, common -- in common usage, this is --
7 Brett O'Donnell is a person who's well known as a
8 campaign debate preparation --

9 A. Sure.

10 Q. -- person, it's a consulting agreement
11 here, part of the work product is debate
12 preparation.

13 A. We didn't need debate preparation.

14 Q. You didn't need it?

15 A. Uh-huh.

16 Q. Okay.

17 A. No. In 2012, we didn't even have a general
18 election, so --

19 Q. You had a primary that year?

20 A. We had a primary that year, I think it was
21 three weeks later, Dr. Broun got like 64, 68
22 percent of the vote and then he had no idea that
23 he'd be running for the Senate in February, March.

24 MR. SOLIS: Were there debates leading up

1 to that primary?

2 A. I think was one.

3 MR. SOLIS: Okay.

4 A. I would call a debate. I think it was a
5 forum more than anything else but --

6 BY MR. MORGAN:

7 Q. Let me show you this document here.

8 A. Uh-huh.

9 Q. Well, before I do that, you -- you
10 mentioned that you reached out to Admin. Did
11 you --

12 A. Yes.

13 Q. Well, in the process of bringing Brett
14 O'Donnell on --

15 A. Yes, sir.

16 Q. -- did you have any conversations with the
17 Administration Committee or the Ethics Committee
18 about bringing him on?

19 A. Yes, I called House Admin and asked if we
20 were allowed to retain outside consultants, and
21 they indicated that we were.

22 Q. Who did you -- when about was that?

23 A. That would've been May, some time around --
24 I mean, it -- it was just -- I talked to -- I want

1 to say I talked to -- not the person who answered
2 the phone. I told them what I was looking for and
3 they transferred me to somebody else and it
4 was -- they seemed to indicate there was no problem
5 at -- I mean, my only inquiry was whether an office
6 could enter a contract with an outside consultant,
7 and they indicated that we could, as long as it's
8 for official business.

9 Q. Okay. But you don't recall who that person
10 was?

11 A. I do not, I'm sorry.

12 Q. If I were to tell you that -- that Admin
13 has no recollection or record of any communications
14 with this office regarding Brett O'Donnell, would
15 that surprise you?

16 A. It would be inaccurate. It was actually in
17 print.

18 Q. And that -- well, it's in print?

19 A. A --

20 Q. In what form?

21 A. -- newspaper article. The newspaper
22 article came out from USA Today, I want to say his
23 name is Paul Singer. He's --

24 Q. Is this around July of 2013?

1 A. Yeah, I guess.

2 Q. And when you say -- what --

3 A. That was it.

4 Q. -- what's in print in the article that
5 would make that statement accurate?

6 A. Mr. Singer talked to the House Admin
7 Committee and they, in the article, at least,
8 indicated that we were fine.

9 Q. Fine with regards to staff training?

10 A. Allowed to hire outsiders consultants, yes.

11 Q. Okay. Are you aware that the manual on the
12 House Committee Administration specifically
13 outlines that consultants are not allowed to be
14 hired by members offices?

15 A. No, I'm not aware of that.

16 Q. You're not aware of that, that's news to
17 you?

18 A. I'm -- that's news to me, yes.

19 Q. That's news to you?

20 So your conversation with Admin around May
21 of 2012 --

22 A. Right.

23 Q. -- they indicated to you that you could
24 hire a consultant?

1 A. We were allowed to have
2 consultants -- outside consultants as long as we
3 were doing official business.

4 Q. Do you have any -- any record of that
5 conversation occurring, any notes, any e-mails
6 exchanged with them?

7 A. No, sir.

8 Q. Okay.

9 MR. SOLIS: And when you made that inquiry,
10 did you give any specifics on the type of
11 relationship that --

12 A. I may have. I may have said that we were
13 looking to hire a messaging -- someone who could do
14 messaging for us.

15 I mean, obviously, we hired somebody -- we
16 hired Merrie Spaeth in 2000 -- I would have to
17 look, I don't even know what year that was -- and
18 paid her out of the MRA.

19 MR. SOLIS: But the consulting agreement,
20 the proposal from Mr. O'Donnell, those written
21 products that he provided to you --

22 A. Right.

23 MR. SOLIS: -- would any of those documents
24 have been forwarded on to the Committee on House

1 Administration by you?

2 A. No, they were not.

3 BY MR. MORGAN:

4 Q. Was that the only time you reached out to
5 the Admin Committee --

6 A. No, I called them --

7 Q. -- to ask them about --

8 A. -- a second time about that article.

9 Q. About the July 2013 article?

10 A. Yes, sir.

11 Q. And who -- do you recall who you spoke
12 with?

13 A. I do not. I think it was their press
14 office, to be honest thank you.

15 Q. Okay.

16 A. They may have actually reached out to me, I
17 cannot recall totally because there was -- between
18 Ms. Bachmann, Ms. McMorris-Rodgers, House Admin and
19 then us, we were all sort of contacted about that
20 article.

21 Q. Okay. Why did you reach out to their press
22 office and not to somebody who could actually
23 provide you advice on --

24 A. That's what was saying.

1 Q. -- (inaudible)?

2 A. I think they actually reached out to me.

3 Q. They reached out to you?

4 A. To ask if we --

5 Q. Okay.

6 A. -- were still involved with Mr. O'Donnell.

7 Some of this is -- I'm just trying to recall, quite
8 honestly, but some of it was related to the fact of
9 whether or not we were gonna talk to the reporter
10 or not, which we did not.

11 Q. Did, at any point, you send, you know, the
12 initial consulting agreement or any of the
13 subsequent consulting agreements to Admin or Ethics
14 Committee for them to view?

15 A. Not that I'm aware of, no.

16 Q. Okay.

17 A. Not that I recall.

18 I mean, my main thing was they were both --
19 he was already employed by two other offices and I
20 didn't really think about that much about it.

21 In hindsight, obviously, I probably
22 should've.

23 Q. Okay. When was the first time that Brett
24 O'Donnell became involved in Representative Broun's

1 campaign activities?

2 A. I cannot recall if he did anything for us
3 in 2012. I mean, again, he came on right about the
4 time that we were entering into our primary phase.

5 I recall a specific time where he indicated
6 to us that he'd be happy to volunteer on the
7 campaign side if we needed him to do anything.

8 We tied him in a lot on e-mails involving
9 messaging. Sometimes his advice was sought,
10 sometimes it wasn't. Sometimes his advice was
11 taken, sometimes it wasn't.

12 Dr. Broun likes to operate under what he
13 calls under a multitude of counselors --

14 Q. Okay.

15 A. -- but at the end of the day, he makes all
16 his own decisions so --

17 Q. I'm gonna show you some e-mails here.

18 A. Okay.

19 Q. This is PBDB 86. This is from your
20 Document Production.

21 A. Okay.

22 Q. This appears to be -- you know, the bottom
23 here, an e-mail from you to Brett O'Donnell, then
24 Broun Allstaff.

1 A. Okay.

2 Q. You say, "We're pleased to announce the
3 addition of Brett O'Donnell to Team Broun as a
4 communications and messaging consultant to our
5 official office."

6 A. Uh-huh.

7 Q. What I want to ask you about is --

8 A. Yes.

9 Q. -- this response from Jordan Chinouth.

10 A. Yes.

11 Q. He says, "Congrats, had no idea we were
12 close to making a decision."

13 A. Yes.

14 Q. You then respond to him saying, "This is
15 not a media consultant for the campaign. That part
16 is dragging."

17 A. Uh-huh.

18 Q. Was there -- was Jordan confused? Why
19 would he have thought that Brett was a campaign
20 consultant?

21 A. I don't why he thought he would be a
22 campaign consultant. I'm not sure if Jordan was
23 ever just consulted at all on hiring any messaging
24 consultant on the official side.

1 Jordan would've been our district director
2 at the time --

3 Q. Uh-huh.

4 A. -- so obviously, he's down at our district
5 office, but I don't think he's -- he was part of
6 the whole discussion on whether we needed a
7 messaging consultant or not.

8 Q. Okay.

9 A. He -- I'm -- I'm just gonna assume that he
10 thought we had hired somebody on the media side and
11 I had to explain to him that he was not our media
12 consultant. I'm assuming that we also had some
13 discussion about whether we needed a media
14 consultant or not, and --

15 Q. For the campaign?

16 A. Yeah -- and we ended up not having one.

17 Q. You ended up not having one?

18 A. Right, we never --

19 Q. Why did you --

20 A. We never ran any ads.

21 Q. Okay. So you did not hire a media
22 consultant for the campaign?

23 A. No.

24 MR. SOLIS: You mentioned that Jordan, at

1 this time, was the district director.

2 I realize that his title is reflected in
3 that e-mail, but Jordan also took time off at --

4 A. Uh-huh.

5 MR. SOLIS: -- various pointing to go
6 work --

7 A. Yes, sir.

8 MR. SOLIS: -- am I right?

9 Would that have -- you know, keeping in
10 mind that his title is reflected there, would he
11 have been working on the campaign during that time?

12 A. Yes, sir. If that was June of what, 2012,
13 and our -- well, when was our primary, because it
14 just changed this cycle?

15 BY MR. MORGAN:

16 Q. I think it was either late July or August
17 of 2012.

18 A. It may have been in July, the primary,
19 yeah. Jordan had never left full-time. He went
20 either half time or three-quarters time. I'm
21 trying to recall exactly what the number was, but
22 he was either half time or three quarters time.

23 MR. SOLIS: Okay.

24 So again -- so again, you know, bearing in

1 mind that he was actually working for the campaign
2 during that time --

3 A. Sorry.

4 MR. SOLIS: Are we just coming in or --
5 yeah -- that he was working for the campaign at
6 that time, would that have given him any reason to
7 inquire about a media consultant for the campaign?

8 Would -- would that have -- I mean, he was
9 he part of those discussions on bringing somebody
10 on?

11 A. As a media consultant --

12 MR. SOLIS: Yeah.

13 A. -- on the campaign side?

14 MR. SOLIS: Yeah.

15 A. Probably.

16 MR. SOLIS: Okay.

17 A. I don't -- I don't know I'm really sure if
18 I remember discussing media consultant at that
19 point in time.

20 I mean, here we are a month out, we really
21 didn't have a serious opponent and this is more
22 about just wrapping up a brand new district. We
23 had just finished -- redistricting -- we were
24 about 60, 65 percent new district, new territory,

1 so it was just more about getting Dr. Broun known
2 in the new part of the district.

3 MR. SOLIS: Okay.

4 BY MR. MORGAN:

5 Q. Okay. I want to talk to you about the work
6 that Brett O'Donnell --

7 A. Uh-huh.

8 Q. -- did for the Congressional office.

9 A. Yes, sir.

10 Q. How frequently was he in communication with
11 Dr. Broun or with the office?

12 A. The general rule was he would come in about
13 once a week when Dr. Broun was here and we were in
14 session. We would review the week prior and the
15 upcoming week when it came to messaging. He would
16 talk to Dr. Broun by e-mail, I believe, if
17 Dr. Broun was not in town or by phone. We would
18 set up phone conference calls --

19 Q. Okay.

20 A. -- for him. Obviously by e-mail, we
21 communicated depending on the business of the day.

22 Q. Did these weekly sessions sometimes occur
23 at the NRCC?

24 A. No, not that I recall. There may have been

1 an odd one here or there, but for the most part,
2 they were in his office here.

3 Q. I ask you about the document right here.
4 It says PBTN 31.

5 A. Uh-huh.

6 Q. Let's see if this refreshes your
7 recollection.

8 What I want to ask you about the top e-mail
9 from Meredith Griffanti to Teddy Norton cc'ing you,
10 she says, "We could just have it be official today
11 and do NRCC stuff next week," you know, in
12 reference to a couple of meetings with Brett
13 O'Donnell. I -- take your time to review --

14 A. Yeah, this is a long.

15 Q. -- those e-mails.

16 A. -- chain. I got to -- I'm trying to figure
17 out where the beginning is.

18 Q. Yeah, that's always the answer to that.

19 A. So Meredith is was setting up a meeting
20 with Brett, meeting through 6, bell Billy next
21 week, wide open right now, CNBC hit. Okay.

22 So sometimes, he would meet over at the
23 NRCC if that's where Dr. Broun was making his calls
24 from all day.

1 Q. Okay.

2 A. So -- and this is what, 2012, December,
3 yeah. That would December. It was probably a year
4 end push for the NRCC dues.

5 Q. Okay, and she refers to NRCC stuff -- to do
6 NRCC stuff next week --

7 A. Makings calls.

8 Q. -- to have this meeting be official but
9 NRCC stuff --

10 A. "Do NRCC stuff next week," I don't -- I'm
11 not sure what she's referencing there at all.

12 Q. Okay.

13 A. She cc'ed me on it, unless she --

14 Q. Would these weekly sessions, you -- you
15 said you'd review the past week's media --

16 A. Uh-huh.

17 Q. -- talk about the upcoming week's media?

18 A. Yes, sir.

19 Q. Would that include campaign media?

20 A. It would, yes, if they were reviewing an
21 interview he had done -- I mean, for the most part,
22 there was really nothing after July, I guess would
23 be, whenever the primary was of 2012, until
24 February of 2014.

1 Q. Or 2013?

2 A. 2013, yes. I'm sorry.

3 Q. 2013. Okay.

4 A. So --

5 Q. Was that about when he announced --

6 A. Yes, sir.

7 Q. -- when Representative Broun announced
8 his --

9 A. He announced some time in February. I
10 can't recall the exact date.

11 Q. Okay. So the course -- over the course of,
12 you know, approximately this two-year period where
13 Brett O'Donnell was a consultant --

14 A. Yes, sir.

15 Q. -- these weekly sessions, sometimes they
16 would cover campaign media appearances?

17 A. They would review what he had --

18 Q. What he had done?

19 A. -- what he had done.

20 Q. And prepare for campaign media appearances
21 coming up?

22 A. He would prepare for just any media
23 appearance, yes.

24 Q. Okay.

1 A. Yes, sir.

2 Q. And so as his campaign activity picked up,
3 the extent to which those weekly sessions discussed
4 campaign activity would reflect that, as well?

5 A. Well, it would depend on the interview, as
6 well. I mean, keep in mind that sometimes he'd get
7 an interview scheduled and no matter what it would
8 be about, it would be about the Option Act or it
9 would be about immigration or whatever, I mean nine
10 out of the 10 interviewers is gonna bring the
11 Senate campaign.

12 You know, it wasn't booked specifically as
13 a campaign media appearance but they almost would
14 turn into it at some point in time.

15 Q. Well --

16 A. -- but again, keep in mind, Brett
17 O'Donnell's main role and function in these
18 sessions is to review the delivery and the style
19 and -- of the messaging, not the actual content in
20 as much.

21 Q. Would he provide talking points or ways to
22 frame an issue?

23 A. He would help Dr. Broun sort of solidify
24 his talking points. In other words, Dr. Broun

1 would say, "This is what I'm trying to get across,
2 or I want to talk about, you know, the Option Act,
3 immigration, taxes, shutdown or whatever it may be,
4 how do I get my point across in 30 seconds," or the
5 main thing he would really work on, especially at
6 the beginning was not being taken off topic.

7 I mean, Brett's real big focus early on was
8 let's keep you from getting led down -- you know,
9 in other words, an interviewer tries to take you
10 somewhere but you're trying to stay on this path,
11 and so he would work with him on how to stay on
12 that path --

13 Q. Okay.

14 A. -- and not so much run off onto a different
15 path.

16 Q. Would -- would those sessions also cover
17 upcoming speeches?

18 A. I am sure sometimes.

19 Q. Floor speeches?

20 A. Floor speeches, appearances -- again, keep
21 in mind we have a huge district so there was a
22 lot -- Dr. Broun loves to be out amongst the
23 district. If we don't schedule him end to end, for
24 the most part, then he's not very happy.

1 Q. Okay. I will give you an e-mail here, see
2 if this refreshes your recollection, this is PBDB
3 0151, so this is in your document production.

4 This is an e-mail from Brett O'Donnell to
5 you, subject is FAA material. It says, "David,
6 here are some talking points for Dr. Broun and
7 FAA," and then there's -- you know, it looks like
8 about four -- four pages of -- of material that --

9 A. Uh-huh.

10 Q. -- that Brett provided.

11 Was it common for him to provide this type
12 of material to the office?

13 A. Probably. If he had some stuff, he would
14 use, kind of give to us and let us consider whether
15 to use it or not.

16 Q. Do you recall any -- any instances in which
17 Brett O'Donnell drafted speeches for the office?

18 A. Sure, sure.

19 Q. Do you recall any -- any specific speeches?

20 A. Not really; I mean, there is just about
21 every single floor speech and Dr. Broun would sit
22 down and say, "Okay. This is what I want to say."

23 Q. Okay.

24 A. And whether it be Meredith and then later

1 on, Christine, take it down and then would hammer
2 out a draft and then the whole team would look at
3 it.

4 Q. And the whole team would -- would include
5 Brett?

6 A. Yeah, Brett would look at it, Bob, myself,
7 even Dr. Broun, and it really depends on where he
8 was, as well, whether he was at home or up here on
9 the -- on the speed of which we would get a final
10 draft produced. It was all basically taking what
11 he wanted to say and putting it into a 60-second or
12 two-minute format.

13 Q. Okay. Did Brett have any -- any role over
14 the legislative strategy or the legislative work of
15 the office?

16 A. As far as producing legislation, not that
17 I'm aware of.

18 Q. Or advising on --

19 A. Well --

20 Q. -- votes or the sponsoring or --

21 A. No. I mean, sometimes he would offer his
22 two cents on, you know, what a vote would mean,
23 what it could do. How to message it was more what
24 we were interested in.

1 Q. Okay. Would he, for example if
2 Representative Broun was contemplating voting a
3 certain way, would he offer his thoughts on how
4 that would play in the press or how that might --

5 A. I'm sure he would.

6 Q. -- effect by other --

7 A. Sure, absolutely. I'm sure he did.

8 Q. Did he ever provide any training to the
9 Congressional staff --

10 A. Just --

11 Q. -- Brett?

12 A. I would assume just Meredith and then
13 Christine.

14 Q. Were you ever a part of -- of any, you
15 know, a series of training or an initial series
16 that Brett O'Donnell put the Congressman through on
17 speaking training sessions?

18 A. I know he would do -- more so obviously
19 towards the beginning. I knew he would sit down
20 and review -- it was more of reviewing speeches. I
21 mean, we filmed all of his public appearances that,
22 you know, obviously interviews, speeches floor
23 speeches, town halls, I mean, everything. We
24 filmed everything --

1 Q. Debates.

2 A. -- and put it up on onto -- I want to say a
3 YouTube site, but that would --

4 Q. Is it a G drive, Google drive?

5 A. I think it's actually -- I think we have a
6 private YouTube site. I don't know; I just go to
7 the website and it takes me there.

8 Q. Saw some reference in the documents to a G
9 drive and then also to a private YouTube account.

10 A. Yes, we have Broun speeches, something like
11 that. I mean, I rarely looked at it but I knew it
12 was there.

13 Q. Okay. I'm gonna ask you about this e-mail.
14 This is BOD 00234.

15 MR. SOLIS: Before we move on --

16 A. Yes, sir.

17 MR. SOLIS: -- can I just ask one question?

18 A. Certainly.

19 MR. SOLIS: Bryson had asked you just about
20 some of the work on the legislative side, if any,
21 or to the degree that Brett mentioned legislation.

22 Did he have any contact with any staffers
23 who handle legislation? Would he ever e-mail them,
24 have a phone call with them?

1 A. Not that I'm aware of.

2 MR. SOLIS: Okay.

3 A. Not that I'm aware of. I'm not sure -- I
4 mean, they knew who he was because he'd come in
5 once a week.

6 Out of our current legislative staff, maybe
7 Tim is the only one who may not have met him but
8 not that I'm aware of. I don't think he's talked
9 to any of the other staffers on the legislative
10 side individually, no.

11 MR. SOLIS: When Meredith or Christine
12 would make a draft of a speech or talking points
13 or --

14 A. Uh-huh.

15 MR. SOLIS: -- anything, would you ever
16 direct them to send their product to Brett for
17 review?

18 A. Who, Christine?

19 MR. SOLIS: Christine or Meredith, would
20 you ever direct them to --

21 A. I'm not sure if I ever directed them do it.
22 I think they would just -- that was part of the
23 process, and it would not be just Brett, either,
24 that I'm aware of. It's -- again, it's the whole

1 team thing. I mean, if you've noticed on the
2 e-mails, a lot -- Dr. Broun liked us to include a
3 wide swath of people in a lot of our e-mails just
4 as more of a so they know what's going on approach
5 as opposed to put your hands in there and tinker
6 with it approach --

7 MR. SOLIS: Okay.

8 A. -- especially on the messaging side. I
9 think we had too many cooks in the kitchen as it
10 was.

11 MR. SOLIS: Yep.

12 BY MR. MORGAN:

13 Q. Yeah, I want to ask you about this e-mail.

14 A. Yes, sir.

15 Q. These are the 00234 --

16 A. Uh-huh.

17 Q. -- e-mail from you to -- well, on December
18 19, 2012 to a number of people, you write, "Good
19 afternoon, Team Broun --

20 A. Uh-huh.

21 Q. -- just wanted to do a quick intro, two new
22 additions brought on today by Dr. Broun to our
23 political efforts" --

24 A. Uh-huh.

1 Q. -- and you introduce, you know, Hans Keiser
2 and Guy Short.

3 At the bottom of this e-mail, you -- you
4 list Brett O'Donnell.

5 A. Yes, sir.

6 Q. You write "Brett O'Donnell is Congressman
7 Broun's messaging consultant and media prep
8 advisor."

9 A. Uh-huh.

10 Q. Does that accurately describe his role with
11 the campaign with regards to the Congressman's
12 political efforts?

13 A. No. This was about who he was on the
14 e-mail, about --

15 Q. Say that again.

16 A. This was -- I was describing to Hans and
17 Guy who everybody on the e-mail were.

18 Q. Uh-huh.

19 A. I mean obviously, there's a lot of people
20 on here who are not a part of the campaign but they
21 may be on e-mails.

22 Q. Who on here was not part of the campaign?

23 A. Well, Teddy, of course, being our
24 scheduler; Meredith, being our communications

1 director; and Brett, being our media guy -- our
2 messaging guy.

3 Q. Did --

4 A. Let me see.

5 Q. -- Meredith volunteer on the campaign?

6 A. Yes.

7 Q. Okay. So this -- this e-mail is describing
8 Brett O'Donnell's role with the Congressional
9 office, not his role with the campaign?

10 A. Correct.

11 I mean, you know, obviously in messaging,
12 they intermix all the time. So if we were doing a
13 messaging e-mail about a -- an interview or an
14 upcoming town hall or whatever it would be, Brett
15 would be on those e-mails.

16 Q. How --

17 A. I mean, he would be on all of the e-mails
18 involving messaging.

19 Q. How would you then describe Brett
20 O'Donnell's role with Representative Broun's
21 campaigns?

22 A. Brett -- again, Brett, volunteered to help
23 out whenever he could and his -- he offered advice
24 sometimes, and it was either listened to or it

1 wasn't listened to. He helped Dr. Broun try to
2 prepare for any big speeches coming up. Again,
3 this was all on the volunteer side on his own time.

4 Q. Okay.

5 A. Yep.

6 MR. SOLIS: Brett affirmatively said to you
7 "I want to volunteer on the campaign"?

8 A. Yes. He said, "If you guys need anything,
9 this is what I do and I have helped other people in
10 this capacity, so let me know."

11 BY MR. MORGAN:

12 Q. When was the first time he -- he did any
13 work for the campaign?

14 A. Again, I can't recall if he did anything at
15 the beginning when he first started in 2012. I
16 mean, it was so near the end and he was so new, I
17 just -- I don't know if he ever talked to Dr. Broun
18 about anything on that side or not, but in February
19 when Dr. Broun told us he was gonna run for the
20 Senate and announced to the staff and team that he
21 was gonna run for the Senate, everybody said they'd be
22 happy to help in any way they could, and that's
23 when Brett O'Donnell did it, I believe.

24 Q. Is that -- is that about when you believe

1 the conversation you had with Brett about
2 volunteering for the campaign would've taken place?

3 A. Yes, sir.

4 Q. Okay. When you were bringing him on
5 the -- that initial time that you brought him on
6 and signed that first consulting agreement, was
7 there any discussion of him volunteering for the
8 campaign at that time?

9 A. Not that I recall, no.

10 Q. Not that you recall? Okay.

11 A. I'm not sure if we ever discussed any of
12 the campaign stuff. It was all just purely
13 messaging. I'm not even sure we discussed what he
14 did for other people.

15 Q. Okay. I want to show you a document -- go
16 ahead.

17 MR. SOLIS: We just -- we had a chance to
18 speak with -- with Mr. O'Donnell. I mean, he -- he
19 mentioned to us that at some point in the kind of
20 early stages, he had -- he had a conversation with
21 you about engaging the campaign more fully,
22 potentially, with a -- with a more -- with a paid
23 position with the campaign, that the campaign would
24 pay him for sort of more extensive research

1 services and more extensive services that would go
2 beyond mere volunteering.

3 Do you recall having a discussion with him
4 about that?

5 A. I do not. I mean, he may have.

6 You know, the idea being that we weren't
7 quite sure how he would work out. Again, it was
8 sort of a testing phase.

9 We had used him obviously on the political
10 side -- on the official side -- on the official
11 side, you know, just pure messaging, and then when
12 the campaign started gearing up and he had a
13 conversation with us, we weren't quite sure if that
14 would work or if he would even be helpful or
15 effective or not.

16 Ultimately, at the end of the day, like
17 everybody else, we were hoping Dr. Broun would win
18 and then we would have our foot in the door, which
19 is why we all volunteered, but I think along the
20 way, as he was providing his thoughts and support
21 and ideas on the campaign side, I don't think
22 Dr. Broun found a lot of value in it.

23 Q. And --

24 A. In other words, we actually started moving

1 more away from anything that he was offering as
2 advice and just focusing mostly on the messaging on
3 the official with him.

4 Q. I am going to show you a couple of -- of
5 documents here. This is BOD 00535. It's a series
6 of an exchange between you and -- and Brett
7 O'Donnell in June of 2012. It starts with the --
8 you know, the last page.

9 A. All right.

10 Q. BOD 540, where Brett O'Donnell writes to
11 you, he says, "Attached is my consulting
12 agreement." Again, this is that e-mail I showed
13 you with his consulting agreement attached.

14 A. Uh-huh.

15 Q. This is --

16 A. Document approved, thank you.

17 Q. You respond two days later, "Brett, I have
18 the contract approved and signed. Make sure you
19 get it this afternoon. Thanks, David." He
20 responds, and then the next e-mail from him is,
21 "Where is prep today?"

22 A. Uh-huh.

23 Q. You respond, "NRCC, we have a conference
24 room reserved." He responds, "I'm in conversation

1 room at NRCC."

2 A. Uh-huh.

3 Q. Early the next morning, this document here
4 BOD 00681, Brett O'Donnell writes to you cc'ing Bob
5 Bibee, Jordan, Meredith and Dr. Broun, "Here" --
6 you know, "Below are the reminders from the prep
7 session today."

8 I -- you want me to -- it appears that this
9 session on June 21, 2012 was a session in which
10 there was a campaign debate preparation?

11 A. Sure.

12 Q. Right?

13 A. That's what it looks like.

14 Q. And what it looks like is that if not the
15 first thing but one of the very first things that
16 is Brett O'Donnell did after the consulting
17 agreement was executed was a debate preparation
18 session.

19 In fact, it's the same -- it's on the same
20 e-mail chain in which the agreement is exchanged
21 and approved, the prep session is discussed?

22 A. I'm sorry. I was just looking at -- oh,
23 this is November 13th. That doesn't make sense.

24 Q. But if you look below --

1 A. Oh, I see, I see.

2 Q. So this is the -- you know, the obvious
3 question and I'll tell you, this is -- this is what
4 our Board is gonna want to know --

5 A. Yeah.

6 Q. -- and they are going to -- to frankly
7 perhaps grill me on, which is how can you say
8 Brett O'Donnell was volunteering for the campaign
9 and how can you say that debate preparation was not
10 part of his consulting agreement when you have an
11 e-mail exchange like this in which debate
12 preparation is discussed in the same e-mail back
13 and forth where the consulting agreement is
14 exchanged and where it appears that the first in
15 June of 2012 and early July of 2012, it appears
16 that what Brett O'Donnell was almost exclusively
17 doing for the office was preparing for two debates
18 for the Republican primary, one held on the 22nd,
19 one on July 2, 2012, and then a session in early
20 July at the NRCC to then review those debate
21 performances.

22 So do you see -- I mean, what my Board is
23 gonna want to know is --

24 A. Uh-huh.

1 Q. -- how do you not say then that debate
2 preparation was part of his consulting services?

3 A. Well, that's -- you know, that was not why
4 we hired him.

5 Q. But it was one of the first things he did?

6 A. I'm not sure it was one of the first things he
7 did, but it's apparently something he did do.

8 Q. But you did not hire him to do campaign
9 debate preparation?

10 A. No, sir.

11 Q. And was there any conversation with him
12 about his participation in this debate preparation
13 session being separate from his contract?

14 A. I'm sure there was. I don't recall.

15 Q. Yeah.

16 A. I really don't recall the specifics of this
17 debate preparation session.

18 MR. SOLIS: Were you there?

19 A. I don't believe so. I don't remember any
20 of this at all.

21 BY MR. MORGAN:

22 Q. Okay. It's just -- it's hard for me --
23 it's perhaps difficult for us to -- to nail this
24 down, to get a clear understanding.

1 A. Sure.

2 Q. You have a consulting -- and I'm sure you
3 can relate to this, a consulting agreement that
4 references debate preparation.

5 A. Uh-huh.

6 Q. We -- right after that's executed, we see a
7 lot of debate preparation starting to happen. It
8 happens, Brett O'Donnell is listed as attending,
9 you know, I would say more than a dozen, it's
10 several debate preparation sessions and review
11 sessions and while that consulting agreement refers
12 to debate preparation is in place. So what --

13 A. Well.

14 Q. -- can you help us you understand why --

15 A. Sure.

16 Q. -- it is that that campaign's debate
17 preparation is separate from that consulting
18 agreement?

19 How can you -- can you help us understand
20 that?

21 A. What he does as a volunteer is separate
22 from what he does on the official side. I mean,
23 who -- what other consultant out there doesn't do
24 campaign work, as well. I mean, our franking guy

1 does campaign work. Our townhall guy does campaign
2 works. I don't know who else that doesn't --

3 Q. Do either of them have a contractual
4 arrangement with the office --

5 A. No.

6 Q. -- that specifically mentioned debate
7 preparation?

8 A. No.

9 Q. I mean, that's -- the issue here --

10 A. No, I understand what you're saying. The
11 issue here is at the same time, you're taking one
12 day of debate prep that he does as a volunteer on
13 the outside and you're not looking at the 12 or 14
14 official sessions he did over this, and then you're
15 also talking about --

16 Q. And during that same -- you said he -- that
17 Dr. Broun was in Afghanistan for the month of July?

18 A. No. We're talking about June, July. We
19 had at least -- well, I would say that's an
20 eight-week period and probably about eight to 10
21 different official sessions, yes.

22 Q. In addition to a couple or -- it appears
23 maybe three or so debates?

24 A. I think we only had one debate and again,

1 you know, we hired a guy in June, our debates --
2 our primary is over in July and we have nothing
3 until he decides to run for the Senate, until
4 February.

5 Q. Okay.

6 A. I mean, that, to me, is a pretty clear
7 indication that the guy was brought on in an
8 official capacity. I -- he decided to volunteer
9 and help out on this -- on the campaign side like
10 everybody else does and that's what this is.

11 Q. Was there ever discussion with Brett that
12 he was -- that to the extent he did campaign
13 activity, that was not covered by the consulting
14 agreement?

15 A. I'm sorry, there was a discussion about
16 what?

17 Q. About campaign activity not being covered
18 by the consulting agreement?

19 A. Oh, sure, that was -- I mean, when we hired
20 him, we were very clear, this is official stuff.
21 This is what we were doing. We're looking at
22 messaging and messaging only, and that's the
23 delivery of the message. It's not about content
24 and it's not about creating points and creating

1 issues. This is about Dr. Broun actually
2 delivering the message itself.

3 Q. Okay.

4 MR. SOLIS: So on the outset, you actually
5 had a discussion with Brett, making a clear
6 distinction between the work he would be doing --

7 A. Well, no, we never said anything
8 about -- we were just sitting down talking to him
9 about official stuff. I mean, this is what we were
10 looking for, Obviously by the e-mail. Never -- I
11 don't think it became an issue that we had to talk
12 about, as far as the campaign side.

13 I mean, we didn't have -- you know, our
14 race is almost over, as far as we were concerned,
15 and there was nothing much else going on. I mean,
16 we sat down with him and talked to him plainly and
17 clearly, Dr. Broun needs help with messaging, and
18 at the time, you know, when we talked to him
19 about -- when we talked to Michelle -- when he
20 talked to Michelle Bachmann about it, that's all
21 she talked to him about.

22 "This is the guy helps me prepare for my
23 interviews, prepare my floor statement, prepare for
24 my floor statements, so on and so forth." I don't

1 think they even talked about the campaign stuff.

2 BY MR. MORGAN:

3 Q. Okay.

4 A. I didn't know he did campaign stuff at the
5 very beginning until he sent over his -- or until
6 he sent over his prospectus, I guess, whatever they
7 call that thing.

8 Q. Okay.

9 MR. SOLIS: So the prospectus laid out
10 campaign work?

11 A. Yes, his --

12 MR. SOLIS: The proposal?

13 A. His proposal or whatever it is about him,
14 discussed his debate prep ability, and he pitched it
15 pretty highly as far as maybe I want to say Romney,
16 but I'm not sure if he did Romney or not.

17 MR. SOLIS: Well -- well, Bryson, you know,
18 showed you that earlier and -- and the word debate
19 was used extensively in that proposal and the
20 consulting agreement itself and we asked you what
21 you felt that meant and you said that you felt it
22 meant, you know --

23 A. For us, it would have meant.

24 MR. SOLIS: You know, exclusively floor

1 debates?

2 A. For us, that's what it meant.

3 MR. SOLIS: Okay.

4 A. And that's why -- I mean, floor debate was
5 used extensively through our discussion and we
6 actually, you know, watched videos of Dr. Broun's
7 earlier floor debates to kind of show him what we
8 were talking about.

9 MR. SOLIS: But yet those documents, when
10 they were provided to you, that gave you the
11 awareness that Brett O'Donnell also did campaign
12 work?

13 A. Oh, yes. I mean, we knew -- once I saw
14 him, then I knew what he did.

15 MR. SOLIS: Okay.

16 BY MR. MORGAN:

17 Q. Okay. So you brought on this
18 consultant for the official side.

19 Did you have a conversation with him,
20 asking if he was willing to volunteer on the
21 campaign side, ask him if he was willing to prepare
22 for those --

23 A. I think he just offered it.

24 Q. -- 2012 debates; he just offered it?

1 A. Yeah. He offered it out on his own.

2 MR. CORTAZZAR: Did it come up during the
3 contract negotiations or --

4 A. No.

5 MR. CORTAZZAR: -- did the volunteering
6 happen at some other point?

7 A. It happened in another point. It probably
8 happened in our -- maybe our second session, I
9 guess. I remember was in a session. It was after
10 a session was over and we were leaving and he said
11 something about, you know, I do debate prep on the
12 campaign side. I'm happy to help out with
13 messaging or anything else you need over there, as
14 well. Just let me know and I will volunteer, and I
15 said I will let the Congressman know, and I guess
16 they decided to set up a time to talk about it.

17 BY MR. MORGAN:

18 Q. Okay. I want to ask you some questions
19 about the 2014 Senate campaign.

20 A. Yes, sir.

21 Q. Do you recall the Charge Senate forum; does
22 that ring a bell, on or about July?

23 A. Yes, it's --

24 Q. Okay. I think you have a document I can

1 show you.

2 A. Yes, I recall it. This -- the reason why
3 is because it's not based up there. That was quite
4 strange.

5 Q. Okay. Do you recall if Brett O'Donnell was
6 involved in preparing the Congressman for that?

7 A. I don't know if he was involved in
8 preparing. I do remember watching the video
9 afterwards and discussing the delivery.

10 Q. Watching the video with Brett, and
11 discussing the video?

12 A. No, it wasn't with -- Brett wasn't
13 physically there. I remember watching the video
14 afterwards is what I'm saying.

15 Q. Okay.

16 A. So I don't remember being -- outside of
17 scheduling, I don't remember being involved with it
18 at all.

19 Q. Okay. Do you recall if -- would Brett do
20 brief messaging calls with the Congressman before
21 campaign events, campaign speak -- media
22 appearances or campaign speeches; does that -- that
23 ring a bell to you at all?

24 A. He could have. I mean, I don't think that

1 it's unlikely that happened.

2 Q. Okay. I'm gonna show you a document here,
3 skipping around a little bit. This is PBCH 33
4 through 35. This is an e-mail from you to Brett in
5 which you refer to doing some brief messaging calls
6 in advance of what appear to be some campaign
7 related events. One is a conservative Republican
8 Women of North Atlanta event, other is a Cobb GOP
9 women event, then a Baren BOP barbecue. You
10 write, "All the candidates should be there and they
11 will be speaking in alphabetical order."

12 A. Sure.

13 Q. Was this typical for Brett to do?

14 A. Yeah. I mean, we were mixing in the
15 official interviews and stuff, and they -- I was
16 telling him everything we had coming up.

17 Q. So would this have been something that
18 Brett did in his capacity as a consultant to the
19 office or as a volunteer for the campaign?

20 A. It would depend on what these events were.
21 I don't recall this specific event. Obviously,
22 this is over August so this is during recess.
23 Conservative Women of North Atlanta, that may have been
24 an official event or a non-political event, I will

1 call it, because sometimes they don't like to have
2 campaigning going on at these things, which is
3 strange, obviously. I don't remember what he was
4 in Columbus for.

5 Q. Okay.

6 A. Obviously, Baren GOP barbecue is a campaign
7 event.

8 Q. And Cobb GOP women, would that be a
9 political campaign event, as well?

10 A. It would have to be because Cobb is not in
11 our district.

12 Q. Okay. You can take some time to
13 look at this. This is PBTA 25 through 127B. I'm
14 gonna put a mark next to the relevant part I want
15 to ask you about, but it appears that there was a
16 Georgia public broadcasting get to know the
17 candidate piece that was --

18 A. Sure.

19 Q. -- there was something that was filmed in
20 advance. Then you write here, in response to, you
21 know, being asked in you're okay with scheduling it
22 since the other candidates will be there, you say,
23 "Yes, but I want heavy Brett time beforehand."

24 A. Uh-huh.

1 Q. Do you recall -- do you recall --

2 A. I'm just trying to -- I'm sorry. I'm
3 trying to find the date so I get some idea, oh,
4 December, 2013.

5 Q. Yeah, that's --

6 A. Yeah, so it's about six months ago.

7 Q. Was this is also something that was typical
8 for Brett to do to prepare -- well, when you say,
9 "I want heavy Brett time beforehand," what does
10 that -- what does that mean?

11 A. That means -- let me just see Georgia
12 public broadcast, okay. That means any time he's
13 on TV, I want him to sit down and talk to Brett
14 about how he was to deliver his message.

15 Q. Okay.

16 A. I mean, it's about, again, the delivery of
17 the message, not the content of the message.

18 Q. About the delivery but not the content,
19 okay.

20 A. Right.

21 Q. What -- how -- was Brett O'Donnell involved
22 in negotiating debate formats, are you aware?

23 A. I believe so.

24 Q. Okay.

1 A. I believe at one time, he talked to the
2 State party. I want to say the guy's name was
3 Adam, if I remember correctly -- anyway, they were
4 starting to set up -- well, it turned out it might
5 not even be debates or forums more than anything
6 else, but they had never done it before so Brett
7 offered to call out there and tell them how to set
8 them up.

9 Q. All right. I am going to show you the next
10 document here. This is BOD 0956 and see if you
11 recall this e-mail at the very bottom from Brett
12 O'Donnell to you and it appears like a couple of
13 people where he says, "Attached is the attack grid
14 for Dr. Broun to use against PG and KH in the
15 debates."

16 Do you recall Brett O'Donnell putting
17 together this attack grid or --

18 A. Yeah, I remember he put this together on
19 his own and we never even used it.

20 Q. When you say, "He put it together on,"
21 Brett O'Donnell put it together on his own?

22 A. Yeah. I remember he sent these one day and
23 he had asked me for information on votes or
24 something, and then he kind of put these things

1 together and sent them over to us and we never
2 even used them. Dr. Broun didn't like them.

3 Q. Okay. Did he provide other prep materials
4 for debates similar to the attack grid?

5 A. Not that I'm aware of. I mean, after
6 these -- again, he did these and Dr. Broun didn't
7 like them and we actually never used them and then
8 I think they reviewed Dr. Broun's opening
9 statements and closing statements, yes.

10 Q. Okay. Was he involved in putting together
11 Dr. Broun's announcement speech announcing his run
12 for the Senate?

13 A. I think he helped him with it, yes, sir.

14 Q. Okay, and do you recall him being involved
15 in -- well, you said he helped -- well, do you
16 recall what his role was in putting that speech
17 together?

18 A. I don't -- I wasn't in there, no, but I
19 think --

20 Q. Did he draft it?

21 A. -- they may have done it on the phone.

22 I think Dr. Broun, again, told him what he
23 wanted to say and he worked with Dr. Broun on how
24 to deliver it.

1 Q. Okay. Do you recall Brett O'Donnell being
2 involved in the Congressman's GOP convention speech
3 in 2013?

4 A. Yes, sir, same thing.

5 Q. Well, was he --

6 A. I think it was the same speech.

7 Q. Oh, his announcement speech and
8 commencement speech were --

9 A. For the most part. I mean, he didn't say
10 I'm announcing today I'm running.

11 Q. Do you know who drafted the main body of
12 that speech?

13 A. I want to say Meredith.

14 Q. Okay, and Brett was involved in putting
15 together maybe the opening and closing; is that --

16 A. I think, yeah, it was sort of like a piece
17 thing. In other words, Dr. Broun would say,
18 okay -- I think they did that a piece at a time.
19 So Dr. Broun would say okay, here's how I want to
20 say in the opening and so he kind of -- I think he
21 typed it out himself and then we all cleaned it up
22 as far as, you know, because it was this long and
23 we took it down to this long.

24 So everybody sort of had a hand in it, you

1 know.

2 Q. Right. I want to -- the campaign
3 debate preparation sessions --

4 A. Uh-huh.

5 Q. -- it appears to us from the documents
6 reviewed that those types of sessions occurred on a
7 number of occasions --

8 A. Uh-huh.

9 Q. -- and it appears that they occurred in
10 various locations?

11 A. I could think of two actual sessions.

12 Q. Which two do you recall?

13 A. There was actually three, but Brett wasn't
14 involved in one of them. It was -- most likely the
15 first two, I want to say Adairsville or something
16 like that, and then I can't remember the second one
17 was, as far as where the debates were, sorry, but
18 we did, at this conference room across the street
19 from the D Triple C, it's a consultant townhouse.

20 Q. Okay. Is that Jamestown Associates?

21 A. Yes, sir.

22 Q. Okay. Who was involved in the sessions?

23 A. Obviously Dr. Broun, Brett -- was Meredith
24 still there?

1 I can't remember if Meredith or Christine
2 were the ones that were there at the time. I want
3 to say Christine but it might have been Meredith,
4 forgive me --

5 Q. Okay.

6 A. -- and then that's it.

7 Q. That's it.

8 At some point was Michael Hall --

9 A. Yes.

10 Q. -- involved in debate prep?

11 A. That's the third guy. That's the third
12 debate.

13 Q. What -- who is Michael Hall?

14 A. Somebody that works with Brett.

15 Q. Somebody that works with Brett?

16 A. I think that's his name. I mean, it sounds
17 familiar.

18 Q. Okay.

19 A. I know there was a guy who worked with
20 Brett and that sounded like what his name was.

21 FEMALE VOICE: Hi, sorry to interrupt.

22 Do you know about how much longer y'all
23 will be?

24 Dr. Broun is back, so --

1 MR. MORGAN: 10 minutes.

2 MR. SOLIS: Yeah, 15 minutes.

3 FEMALE VOICE: 10 minutes, okay. Great.

4 MR. MORGAN: Thank you.

5 BY MR. MORGAN:

6 Q. Why was -- was Michael Hall participating
7 instead of Brett?

8 A. I think Brett was out of the country.

9 Q. Out of the country.

10 A. At this point, Dr. Broun, I don't think
11 felt like Brett was being very helpful and we ended
12 up kind of moving away from Brett as far as debate
13 prep went.

14 MR. SOLIS: Why do you say that?

15 A. I just didn't -- Dr. Broun didn't go with
16 the style that Brett was used to advocating for
17 debates.

18 MR. SOLIS: And he expressed this to you;
19 Dr. Broun expressed this to you?

20 A. Yeah. I mean, it was more so that -- I
21 think he was just saying that, you know, what Brett
22 was saying as far as how to deliver the message
23 wasn't working for him -- wasn't working for
24 Dr. Broun, it wasn't his natural style, it wasn't

1 how he normally did things, and so I think he just
2 started slipping away from listening to what
3 Brett's advice was coming up and more so into what
4 he thought the should be doing.

5 BY MR. MORGAN:

6 Q. Okay, but going through some documents here
7 that reflect some debate preparation sessions, this
8 is BOD 2268, the first two are debate prep sessions
9 may have occurred on January 8, 2014 at Jamestown
10 Associates?

11 A. Yes, sir.

12 Q. The next day --

13 A. I remember the first one.

14 Q. -- this is BOD 238, Brett O'Donnell
15 e-mailed an attached proposal for a debate opening
16 for the Adel debate, so it looked --

17 A. Right. Well, this is Dr. Broun's speech
18 that he wrote down.

19 Q. What -- his speech what --

20 A. Dr. Broun would write all of his thoughts
21 down and then we would condense it to the --

22 Q. To an opening?

23 A. -- to a minute and a half as opposed to
24 three minutes or whatever.

1 Q. So this would have been Brett O'Donnell
2 sending --

3 A. This is --

4 Q. -- his proposed open -- opening
5 statement --

6 A. This is Dr. Broun's proposed.

7 Q. -- for the debate? Okay.

8 A. Not Brett's, I'm sorry. I see what you're
9 saying. This is -- in other words, Brett just --
10 he had the draft and set it up, this is what
11 Dr. Broun --

12 Q. Okay.

13 A. -- wants to say.

14 Q. Okay. The next document here, PBDB 25, it
15 appears that on January 10, there was a debate
16 preparation session and one of the things that was
17 discussed that may jog your memory is talking about
18 responding to questions on gay marriage?

19 A. I'm sorry, let me just see. We talked
20 about what, oh, other -- same sex marriage.

21 Okay.

22 Q. So it appears there was an additional
23 meeting on January 10th. It could have been.

24 I'm sure if you recall the specific session

1 in which --

2 A. I don't recall the specific session. This
3 might have been at a meeting where they were
4 talking about messaging as far as the issue goes.
5 I think that's what this is.

6 Q. Okay. So when Brett says, "We talked about
7 this at today's meeting," that may have been
8 something other than a debate preparation session?

9 A. Yeah, this wasn't a debate --

10 Q. Okay.

11 A. -- prep session.

12 Q. But this would have been --

13 A. This is just --

14 Q. This would have been just one of these
15 weekly sessions?

16 A. It could be, yeah.

17 Q. It could be? Okay.

18 A. I mean, this is just an issue, right?

19 Yeah.

20 Q. It just -- the -- Christine's response at
21 the top where it says, "Brett was asking the tough
22 questions on this and we discussed answers for a
23 while," made me think this is may have been a
24 debate prep session?

1 A. No, this was actually --

2 Q. Other than a typical session?

3 A. This is a typical session where they were
4 talking about I think about the news of the day and
5 how he was gonna respond to it, especially if it's
6 something he may be likely to be asked about.

7 Q. So aside from campaign -- specific campaign
8 debate preparation sessions, sometimes you would
9 discuss questions and answers back and forth in the
10 regular weekly sessions?

11 A. As it related to the media --

12 Q. As it related --

13 A. -- not a campaign or anything, but in other
14 words, all right. So this issue came up today. If
15 someone sticks a camera in your face and says, you
16 know, Dr. Broun, what do you think about this
17 ruling, this is how his messaging should be.

18 Q. Okay. Next couple of documents PBTN 134
19 and 135, they're a couple of calendar items that
20 refer to -- they're both titled, "Prep for debate
21 with Michael Hall" --

22 A. Uh-huh.

23 Q. -- "location DC, January 16th and 17th," do
24 you recall if there were two sessions with Michael

1 Hall or was there only one?

2 A. There was only one. I think it was we had
3 to reschedule it or --

4 Q. Okay.

5 A. -- I remember dropping him off at it but I
6 wasn't at it.

7 Q. Okay, and then here's another -- what
8 appears to be another session, PBTN 147, prep --
9 debate prep with Brett, Jamestown Associates on
10 January 29, 2014.

11 A. Okay.

12 Q. I'm sort of jumping through.

13 Here's another session what appears to be
14 taking place on Friday, January 31, 2014.

15 This says, "Debate prep," and this was
16 Jordan's office --

17 A. Uh-huh.

18 Q. -- is the location? Is that Jordan
19 Chinouth?

20 A. Yes, but that wasn't -- it's not like Brett
21 was there. I don't think Brett was even invited.

22 Q. Okay. Was, at some point, Brett, would he
23 conference call in or Skype in to the debate prep
24 sessions that happened down in Georgia?

1 A. I don't know. He may have.

2 Q. Okay.

3 A. And sometimes these aren't actual debate
4 preps. I think that's just how Teddy lists them.
5 It's reviewing the debate that happened already.

6 Q. Okay.

7 A. So in other words, it's going over the tape
8 of it and discussing the delivery of the message
9 and how you can do a better job.

10 Q. Okay. The next one is PBTN 145, "Call with
11 Brett for debate prep." This is February 18th. I
12 can tell you that there was an NFIB Senate
13 candidate forum that day.

14 I'm not sure if that refreshes your
15 recollection of what this meeting might have been
16 about, if it was preparing for that forum or --

17 A. It sounds familiar, although I'm not sure
18 if they ended up having it.

19 Q. Okay.

20 A. They may have. There were so many
21 different -- in other words, it may have been not
22 like a forum but like just one on one type of
23 thing.

24 Q. Okay.

1 A. One candidate in the group.

2 Q. I see.

3 A. And they would just march everybody in one
4 at a time.

5 Q. And held separate meetings or run it back
6 to back, yeah.

7 A. Uh-huh.

8 Q. PBTN 146, this one specifically refers to,
9 "Debate prep, Skyping with Brett" --

10 A. Uh-huh.

11 Q. -- on February 21, 2014.

12 Do you recall this instance where he was
13 Skyped in?

14 A. I do not. I wasn't there.

15 Q. Okay. You're listed as a required
16 attendee. Was --

17 A. I don't know why that would be,
18 especially -- I mean, anything he Skyped with Brett
19 means he was in Georgia and I wasn't there.

20 Q. When you say, "He was in Georgia," you mean
21 the Congressman?

22 A. Dr. Broun, yes.

23 Q. Okay. So, I mean, this is -- and
24 previously, you said that Dr. Broun sort of drifted

1 away from wanting to use Brett's method but it
2 appears that there's --

3 A. Well, these were --

4 Q. -- there was debate prep occurring well
5 into February and the next document, you know,
6 well, into the early part of March of this year.

7 A. They had 11 debates --

8 Q. Right.

9 A. -- and I think Brett prepped for two of
10 them, Michael Hall prepped for one of them and then
11 we just kind of moved away from prepping for them
12 at all.

13 Q. So then but these other -- these other
14 calendar instances, I mean, there's -- there's -- I
15 don't know the number, there's at least seven or
16 eight instances there of calendar items for debate
17 prep.

18 A. Right. I think we did more on the first
19 one, which was the January debate. So we may have
20 had three or four sessions. Some them may have
21 been rescheduled because of timing. I'd --

22 Q. Right.

23 A. -- have to look at my own schedule to try
24 to figure that out, maybe --

1 Q. Okay.

2 A. -- but then after the third or even the
3 fourth out of -- I mean, we just realized they
4 weren't even debates, really. They just turned
5 into forums and Dr. Broun was uncomfortable with
6 how he was doing them, so he just wanted to mix it
7 up, change it up and started doing his own thing.

8 Q. When was the last instance in which Brett
9 O'Donnell was involved in the campaign?

10 A. It would have been April.

11 Q. April of this year?

12 A. Yes, sir, and it was mainly around the
13 media, we were getting on his involvement of the
14 campaign.

15 Q. The media, WSB/TV, is that what you're
16 referring to?

17 A. Yes, sir.

18 Q. So at that -- is that about the same time
19 when his consulting agreement with the
20 Congressional office ended?

21 A. He resigned or whatever they call it, but
22 yeah.

23 Q. Okay.

24 A. He just thought he was becoming too much of

1 a distraction.

2 Q. Okay.

3 A. Some time in mid April.

4 Q. Is that -- do you recall how long after the
5 newspaper articles it was that he resigned?

6 A. I don't know when the articles were, but I
7 know that he was mid April.

8 Q. Okay, and that was the last activity he had
9 with the Congressional office was around that
10 period?

11 A. Yes, sir.

12 Q. And, as well, the last activity he had with
13 the campaign was around that same period?

14 A. It was probably a couple of weeks earlier.

15 Q. Well, were there debates, were there Senate
16 debate -- campaign debates occurring in -- in April
17 and May of this year?

18 A. I'm sure there were. I -- I would have to
19 look, again, at the schedule. They went up till --
20 let's see the primary was May 20th.

21 Q. Uh-huh.

22 A. We had our two biggest debates were the
23 weekend before.

24 Q. Okay. Who was involved in prepping the

1 Congressman for those debates?

2 A. Pretty much, him.

3 Q. Just him?

4 A. Yeah. I mean, I would ask him if he needed
5 anything. We'd talk a little bit about messaging,
6 but at this point, you know, he had done enough of
7 them that he felt like he knew sort of what path
8 and direction he wanted to go.

9 Q. Okay.

10 A. The two last ones were the biggest ones. I
11 mean, they were the only televised ones that we
12 had.

13 Q. Okay. Do you recall Brett O'Donnell
14 travelling down to Georgia around February of 2013
15 in connection with a --

16 A. Yes, we did.

17 Q. -- staff retreat?

18 A. Yes, sir.

19 Q. Why -- why did he go down to Georgia?

20 A. We had a staff retreat and we would -- a
21 big part of it was discussing messaging and
22 Dr. Broun efforts on messaging.

23 Q. Was there also as campaign staff meeting?

24 A. There was, at some point. I honestly

1 couldn't recall where we did it. I know it was
2 someplace -- we did the staff retreat at Chateau
3 Alan (phonetic) and there was somewhere right off
4 of Chateau Alan is a little restaurant or
5 something. I think that's where we all met.

6 Q. Okay. It appears that Brett O'Donnell's
7 expenses related to his travel down to Georgia was
8 covered by the campaign --

9 A. Yes, sir.

10 Q. -- or reimbursed by the campaign?

11 A. Yes, sir.

12 Q. Why was that?

13 A. Because he is not a House employee and I
14 could not reimburse out of the MRA.

15 Q. Okay. Why did he volunteer to cover those
16 expenses himself, considering given how --

17 A. I think we asked him to come down to
18 discuss messaging with the staff.

19 Q. But you had asked him to do a lot of things
20 for the campaign --

21 A. This wasn't the campaign side.

22 Q. -- that were not all volunteer?

23 A. This was on the official side.

24 MR. SOLIS: He attended that meeting.

1 BY MR. MORGAN:

2 Q. But then why was it paid for by the
3 campaign?

4 A. Because he was not a staff -- he's not a
5 House employee so you can't reimburse
6 House -- non-House employees with --

7 Q. I just want to make sure I'm clear.

8 The reimbursement from the campaign was for
9 his attendance at an official Congressional staff
10 retreat?

11 A. Yes, sir.

12 Q. Okay. It wasn't so that he could attend
13 the campaign --

14 A. It was the expenses, right.

15 Q. It wasn't -- so -- so were you reimbursing
16 his travel for the Congressional staff retreat or
17 for the campaign meeting?

18 A. For the Congressional staff retreat.

19 Q. For the Congressional staff retreat, okay.

20 MR. SOLIS: He attended that meeting,
21 though, at the restaurant with the campaign there,
22 right?

23 A. I'm sure he did. I mean, I can't recall
24 specifically. I'm sure he did.

1 It was sort of an impromptu meeting because
2 when we went down there, we did not know we were
3 having a campaign. I think Saxby literally
4 renounced his decision like a week and a half
5 prior, and we got down there. We still --
6 Dr. Broun wasn't even sure if he was gonna run or
7 not at that point in time, and I think there was
8 sort of a meeting to discuss -- you know, he wanted
9 to sort of hear whether everybody thought he should
10 run or not and he was gonna contemplate that.

11 MR. SOLIS: Okay.

12 A. I know he had not announced yet.

13 BY MR. MORGAN:

14 Q. So the -- the WSB/TV article, Brett --

15 A. I'm sorry, real quick, if you don't mind me
16 asking a quick question?

17 Q. Go ahead.

18 A. It was my understanding that we could not
19 reimburse his travel out of the MRA.

20 Q. Did you -- is that based on as conversation
21 you had with someone or --

22 A. I believe I asked my financial counselor,
23 whatever, that we do the weekly MRA reimbursement
24 stuff with. I asked her ahead of time and she said

1 if he's not a House employee, then you have to
2 reimburse him from the campaign.

3 It's the same as if, you know, Dr. Broun
4 goes on the members' retreat, we had to pay for his
5 travel out of the campaign. We can't pay for it
6 out of the MRA.

7 Q. Okay.

8 A. Is that not correct or --

9 Q. Well, we're not --

10 A. Oh, you don't know.

11 Q. To be frankly, one of the bright lines we
12 draw in our office, we don't provide advice.

13 A. Oh, all right.

14 Q. We don't advise. I mean, we -- that's
15 something that we don't do, so I can't respond one
16 way or another.

17 A. I always try to be careful, especially when
18 it comes to MRA, so I always ask ahead of time.

19 Q. After the WSB/TV article broke, did you
20 have any conversations; did you reach out to ethics
21 or Admin? I think you talked about -- we talked
22 about 2 instances in which you had communication
23 with somebody at Admin?

24 A. Admin, right.

1 Q. Are there any other instances --

2 A. Not that I'm aware of, no.

3 Q. -- communication -- did you have any
4 conversations with Representative Broun about the
5 permissibility of Brett O'Donnell's services?

6 A. I'm sure we did. I mean, it was more so --
7 because it was sort of a surprise. The surprise
8 was when the camera showed up at the office.

9 Q. Uh-huh.

10 A. At that point, though, we had already had
11 some discussions because Brett had already been in
12 the news for his relationship with Michelle
13 Bachmann and with Cathy Morris-Rogers and --

14 Q. Yeah.

15 A. -- Dr. Broun asked me and I said we're
16 really using him on the official side and we're
17 only paying for him on the official side for the
18 official work that he does.

19 Q. Okay. Going back to, you know, July of
20 2013 when you said you reached out to Admin, I am
21 going to show you this e-mail PBDB 174 where you
22 e-mailed Brett O'Donnell, "Just talked to
23 Admin? Let me know when you can chat. I have
24 more info." Then Brett O'Donnell responds --