EXHIBIT 1

TRANSCRIPT OF INTERVIEW OF REPRESENTATIVE BROUN
MR. MORGAN: Speaking is Bryson Morgan, Investigative Counsel with the Office of Congressional Ethics. I'm here with Paul Solis and Ryan Cortazar with the Office of Congressional Ethics as well, and we are joined by Representative Paul Broun on June 25th, 2014.

BY MR. MORGAN:

Q. And Congressman, we just went over the application of the False Statements Act to the interview, so I think we'll go ahead and get started with our questions.

A. Sure.

Q. Sir, first want to ask you how it was that you became acquainted with Brett O'Donnell and how it was that he came to be retained by the Congressional Office?

A. I was very eager to have somebody help me with our electronic media communications in our staff. Doing a lot of TV interviews and we actually had talked to several people prior to hiring Mr. O'Donnell.

In fact, I had a conversation with -- with -- what's the guy's name that's on TV all the time with on Fox News that -- raising issues all the
time and is around here? Forgetting his name but he came here a day. We didn't hire him. I just talked to him about I wanted to communicate better --

Q. Um-hmm.

A. -- as a member of Congress with all these TV interviews and he came in, spent an hour or so just talking about words that work and things like that.

Q. Is that Frank Luntz?

A. Frank Luntz, Frank Luntz. I talked to Frank Luntz, wanted to hire him to be part of our communications staff to help me be able to communicate as a Congressman with the -- particularly with TV interviews --

Q. Um-hmm.

A. -- and Frank was -- I got to know him just through my contact here as a member. He did not want to come on board.

So then we hired a lady that I had hoped -- I don't remember her name either, but I had hoped to have an ongoing process of helping me to be a bit better communicator.

So we had a lady come in that my
communications director had searched out an individual. She spent a couple of hours with me and the communications director and gave us some suggestions.

I thought it was a bare -- beginning in the process but I still wanted somebody on an ongoing basis to help us with our electronic communications, with our radio interviews as well as our TV interviews.

So when the lady was -- if I remember correctly, is from out of town somewhere. That was not going to be an ongoing process. So I charged my staff to try to find somebody who can help me on an ongoing press -- on an ongoing basis to help with our communications here and our communications office. Principally, with -- from the electronic side, doing radio interviews as well as TV interviews and to help me learn how to communicate better.

As a medical doctor, my propensity is to overexplain things and to try to help my patients understand what's going on and so, I realized that I needed somebody to help me be a better interviewee for radio and TV and I wanted somebody
as part of our communications team to do so.

We -- we got some applications. We
interviewed actually three individuals, and one
took himself out of the consideration and the other
two -- it was just a decision we made to hire Brett
O'Donnell to -- to be that individual and either
one of them I thought could do a good job and
that's what he came on board for.

Q. I'm going to show you this document which
is PBTN5 and this is a calendar item on a calendar
managed by Teddie Norton. The subject is, "Meeting
with Brett O'Donnell, Bachmann's debate coach at
the NRCC." Date is May 31st, 2012. Do you recall
was this, you know, end of May about the first time
that you met with Brett O'Donnell?

A. I don't remember when we met him, and I've
never seen this document as far as I know.

Q. Okay. You --

A. I don't -- I don't remember when we hired
him. I know we hired him in 2012 --

Q. Okay.

A. -- but I don't remember. We started the
process. As I said, we did several interviews, the
three people that they brought to me as potential
-- as potential media advisors and part of our communications team. They -- I don't remember how many interviews. I think we did two interviews with Brett before we hired him. I don't know that for certain --

Q. Okay.
A. -- but we -- I know I interviewed him one time and I think a second time.

Q. Do you recall where those interviews took place?
A. No, I don't. Most of them were over across the street at NRCC --

Q. Okay.
A. -- just out of convenience.

Q. Out of convenience. Okay. Show you this -- well, this is PBDB120 through 130. This is an email from Brett O'Donnell on Friday, June 1st, 2012 to you. That email address appears to be an email account belonging to you. Is that -- that right? This drpbroun?

A. Yes, that's my personal email address.

Q. All right. CC-ing David Bowser and Meredith Griffanti. You know, says, "Thank you for meeting with me yesterday." Skipping a sentence
there. He says, "Attached is my proposal to assist you," and then there's a proposal attached. Do you recall seeing this proposal?

A. I did not look at the proposal. I do recall getting this email but --

Q. Okay.

A. -- what -- what I basically have counted my chief of staff on doing is -- is wean out any kind of staff hires to -- what I've told my chief is that what I'd for him to do is to sort all of those details out, just bring the bottom line to me, whether he things that we ought to hire this person or not and that's for all staff, not only with --

Q. Okay.

A. -- Mr. Mr. O'Donnell but all our staff and so what -- since he is the manager, what I've said to him is that "Whoever we're going to hire -- staff, unless I have a check -- in my spirit about hiring them, if this is a person that you think -- I'm going to rely you." I'm not a micro manager. Maybe I ought to be. My wife thinks I ought to be more but anyway --

Q. Okay --

A. -- so I -- I didn't go through this
proposal at all.

Q. Okay.

A. So I let -- I just depended upon him to do so.

Q. Going back to those you said one or two meetings with Brett O'Donnell when you were interviewing him, what was discussed regarding what his role with the Congressional Office would be?

A. I made it very clear to Mr. O'Donnell all along that he was being hired to be part of our communications team. Actually, with anybody I talk to that -- being hired as part of our communications team here to help me with my radio and TV interviews and that's solely the purpose of -- of our interviews. That's the purpose of our looking to hire them.

Q. Okay. Did you discuss with him your campaign or your political activities during those interviews?

A. I don't remember doing so, no.

Q. Was there --

A. 'Cause it was -- this was all on an official basis. I've -- all along, not only with Mr. O'Donnell but anybody else. I don't -- I've --
I tried not to even get near the line, so that you
guys don't have to come talk to me, so and I've --
I've always just been very clear to everybody no
matter what we do that there is a division between
the official side as well as campaign side.

So Mr. O'Donnell was hired strictly for the
purpose of being part of our communications team to
help us develop our messaging, to help me to
understand how I can communicate better in my radio
and TV interviews.

Q. Want to show you now the -- the consulting
agreement that was entered into between your office
and Mr. O'Donnell. This is PBDB114. So that this
first page is an email from Brett O'Donnell to
David Bowser attaching the consulting agreement.
Attached to it is a consulting agreement, and one
of the things mentioned in the consulting agreement
in a couple of locations, more specifically under
engagement on the first page there, it says,
"Client hereby engages consultant to render as an
independent contractor the consulting services
associated with media interview, public speaking
message, debate preparation for Representative
Broun, such other services as maybe agreed to in
writing." Was campaign debate preparation discussed --
A. Never.
Q. -- in the process of entering into this agreement?
A. I haven't gone through this. I didn't see this document either.
Q. Okay.
A. Just like I did -- the other. It's -- I don't -- I can't make a comment about that 'cause we never talked about campaign function during this whole negotiation period of time. The -- everything I had contact with Mr. O'Donnell about was just about being part of communications team on the official side.

BY MR. SOLIS:
Q. We had a chance to speak with David yesterday and he had mentioned to us that -- that there was some discussion that Brett had offered during that negotiation phase to do some volunteering for the campaign. So to what extent, you know, do you recall those -- those conversations?
A. Well, I wasn't involved in those
conversations at all, so I can't comment about those.

BY MR. MORGAN:

Q. You know, in this -- this email where the consulting agreement was attached, Brett writes, "I wasn't sure that you settled on how I would be paid, so I left the address blank." Were you involved in any discussions about how he would be paid?

A. Negative.

Q. What was your understanding at the time about how he would be paid?

A. My understanding was that he would be a part time independent contractor for us for our communications team.

Q. Be paid by the -- out of the --

A. Out of "MRA," right.

Q. Okay. So I mean, looking at this consulting agreement right now, this is the first time you've seen it or should I say --

A. I don't recall ever seeing that before.

Q. Okay. And wonder if you -- tell us the timeline a little bit? It appears like this consulting agreement was in place for a couple of
months and then it was renewed on a couple of occasions. Do you recall that?

A. No.

Q. Those conversations with Brett O'Donnell who would've had those with him --

A. Assume David --

Q. Okay.

A. -- David Bowser 'cause like I say, I count on him being my chief and helping to -- to do whatever needs to be done as far as trying to hire staff and manage our staff.

Q. Okay. Show you this document here. This is PBDB86, and you -- you're on the first email here at the -- at the very bottom. This is an email from David Bowser on June 14, 2012 to Brett O'Donnell and to Broun, all staff, you know, the Congressional staff, CC-ing you and a few other individuals and he -- he -- he says, "We are pleased to announce the addition of Brett O'Donnell to Team Broun as a communications and messaging consultant to our official office." There's a response to that email from Jordan Chinouth --

A. Um-hmm.

Q. He says, "Had no idea we are close to
making a decision," and then David Bowser responds saying, "This is not a media consultant for the campaign. That part is dragging." Now, I don't -- I don't know if you had seen those two emails before but was there some discussion around that same time that you were bringing Brett O'Donnell on about hiring a media consultant on the campaign side?

A. No.

Q. Okay.

A. Never. In fact, we weren't going to hire a media consultant --

Q. So was there a discussion in which you decided that you wouldn't hire a media consultant --

A. No. There was no consideration of a media consultant at that time. We didn't have the money from the campaign respective -- to hire a media consultant. In 2012, the -- this -- I don't remember June 14th. It's probably just very shortly before the -- the primary which was -- I didn't have a -- a -- didn't have a general election opponent, so --

Q. But it was Mr. Simpson, I think for the
primary?

A. That's right. And we -- I'm not sure at what point but we -- we had decided that we weren't going to -- really going to engage in -- in any kind of a forum or debate or anything else. So there was just no consideration of having a media consultant. We weren't doing TV. We weren't doing radio. We weren't doing any of those types of normal things -- didn't feel like we needed to --

Q. Was that -- was that a competitive primary?

A. Not really.

Q. Not really.

A. Got 69 percent of the vote in the -- in the primary. Simpson didn't have any money and just didn't see any need of having anybody on board at that time.

Q. Okay. When --

A. It seems like he and I had one forum together and that was all.

Q. I do have a couple of questions about that. We'll get to that in a little bit, but do you recall when -- when it was that the consultant agreement with Brett O'Donnell ended?

A. I don't remember. The --
Q. He's not -- is he still a consultant for
the --
A. No, no, no.
Q. When did that relationship end?
A. Well, it ended when he thought that his
being part of our team because of -- of -- I guess
y'all looking into him and what he was doing for
other members -- he thought it might be
advantageous for us -- for him to -- for us to
cease that agreement. So he ceased being part of
-- of our communications team at that time.
Q. Do you recall when about that was?
A. I do not remember.
Q. Would that have been, you know, shortly
after the WSB-TV story and the initiation of our
review --
A. I don't remember --
Q. Okay.
A. -- I really don't remember.
Q. Okay. So want to ask you some questions
about the work that Brett O'Donnell did on the
official side --
A. Um-hmm.
Q. -- for the office. How would you -- you
know, he was introduced here by David Bowser as a communications and messaging consultant. The consulting agreement lays out some of his duties, but how would you, you know, looking back on what he did for the office, how would you describe his role?

A. Well, he helped us on an ongoing basis. It was -- I had phone conversations with him at times about how to deal with a radio interview or a TV interview. He would -- I think my staff talked to him on a routine basis about what was coming up, about what our messaging was going to be, how to deal with that messaging, what our -- whenever I was requested to do a TV interview or radio interview, it's my understanding that my communications director would contact him about what our message was, what our bottom line --

Q. Um-hmm.

A. -- statement would be and I would talk to him about how to approach the interview and what to do with it and that's the way we operated.

Q. Who, who in the Congressional staff did he -- he being Brett O'Donnell, interact with the most frequently?
A. Mostly with the -- with communications
director who is Meredith Griffanti --
Q. And is now Christine Hardman?
A. She's not a communications director. She's
a press secretary --
Q. Okay.
A. So a little different function.
Q. Okay.
A. But Christine replaced Meredith.
Q. Who else would he interact with? Would he
interact with chief of staff quite a bit --
A. I don't know.
Q. Okay.
A. I don't know. I'm sure he interacted some --
or had some action with our scheduler just to
schedule calls and sometimes he'd come here in the
office and we'd sit down and talk about issues.
That happened not infrequently, so.
Q. All right.
A. He'd come here and we'd talk about the
interview or we'd consult by phone. He was -- he
always told me that he was available anytime that I
needed to call and I -- I did try to touch base
with him before every interview that we did -- most
every interview unless I already had it -- and
about what we were doing.

Q. Would you communicate with Brett
independently of your staff? Would you reach out
to him on your own or would that usually go through
your staff?

A. Sometimes I would. Not on an ongoing basis,
but he had my cell phone. I had his.

Q. Okay.

A. Rarely would he call me. Rarely would I
call him. Most times, it was what -- we knew we
had an interview scheduled and so, we'd schedule
sometime for us to either talk in person. He'd
come here, or we'd talk by phone.

Q. Okay. We've seen quite a bit of reference
to weekly sessions that Brett would do with you --

A. Yeah.

Q. Does that -- describe those too...

A. Well, he would come in here and we'd just
talk about how I needed to approach a TV interview.
At the time, I was -- not done a lot and I'd get
kind of uptight on the TV interview, particularly
these national interviews -- national TV and
sometimes my brain would freeze up and I couldn't
think about what I wanted to say and -- and he
would just help me in that process of trying to get
through it, so that I could do these interviews and
so it was an ongoing process os just basically
trying to teach me about how to organize my
thoughts, how to express what I wanted to have the
audience to hear with whatever interview I did
about whatever the topic was.

Q. Did those sessions occur on about a weekly
basis?

A. Pretty much, yeah. It was three or four
times. Well, two to three times a month 'cause
we're not here but generally two weeks and then off
week, so -- or home a week. So he would come in
here not every week that we were here but he would
come frequently most weeks.

Q. Where were those -- where were those
typically held?

A. Right here --

Q. Were they sometimes held over the NRCC as
well?

A. I don't recall doing any over there. Most
of them were right here --

Q. Okay.
A. -- there may have been -- I can't remember any over there --

Q. Okay.

A. -- at all.

Q. And so I want -- take me through what a typical session would entail? You said prep for interviews --

A. We just sat down and talk about the -- what the interview was. If -- if we had an interview upcoming --

Q. Um-hmm.

A. -- what he and I would work through is try to -- as well as the communications director would try to determine what our -- my first sentence was going to be which was the bottom line of the interview.

Q. Okay.

A. The point we wanted to make and then we would -- from that point we wanted to make, we'd develop how I thought about the process, so that I could go through a three minute or five minute interview with --

Q. Okay.

A. -- with the TV personality, whether it was
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
were just not even discussed or even part of anything --

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 BODO0193 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?
Not very frequently. I can't give you --

Be --

-- data --

-- weekly basis --

Oh, no, no, no --

-- or monthly --

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

Okay. But you recall --

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.

I will try to be as quick as possible here.

Okay.

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

Oh, sure --

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

Sure --

-- your side of the story --

-- 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 calendar 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 referencing?

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 --
PBD25 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 calender 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 maybe I'd alter it a little bit depending upon 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, [redacted]@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 2

TRANSCRIPT OF INTERVIEW OF REPRESENTATIVE BROUN'S CHIEF OF STAFF
MR. MORGAN: All right.

Speaking is Bryson Morgan, investigative counsel with the Office of Congressional Ethics, joined by Paul Solis, investigative counsel with the OCE, and Ryan Cortazar, a legal clerk with the OCE, and we are here on June 24, 2014 with [redacted]?

MR. [redacted]: Correct.

BY MR. MORGAN:

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

A. Sure.

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

A. Yes, sir.

Q. -- to Representative Paul Broun?

A. Yes, sir.

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

A. Congressman Broun.

Q. Okay. And what are your duties?
A. Oversee the office and management of the team, district offices, as well, of course, the district operation, mainly and most importantly assist Dr. Broun with his legislative duties, his goals, his -- anything that he needs done.

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

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

Q. Okay.

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

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

A. Yes, sir.

Q. Which ones are part-time?

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

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

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

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

Q. Okay. So he's not -- there's not a contractual relationship with him?
A. No, sir. He's a staff member.

Q. Part-times staffer, okay.

How often do you interact with Representative Broun?

A. Daily.

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

A. When he's in the District, it depends on
what kind of week we're having. I mean, I -- the
last week, he was off for most of it, so I think I
talked to him -- I'm sorry, not the last week, the
last work period, he was off for most of it so I
think I only talked to him like twice during the
course of the week.

Q. Okay.

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

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

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

Q. Okay. And prior to that?

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

Q. What was the name of that firm?

A. Increased Strategies.

Q. Okay.

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

Do you know why she would have thought that?

A. I have no idea.

MR. SOLIS: Okay.

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

MR. SOLIS: Okay.

A. -- that might explain it, and also obviously, Bob did not work out of the DC office. So I'm not sure she's actually physically met Bob or not.

MR. SOLIS: Okay.

BY MR. MORGAN:

Q. Where does Bob work you out of?

A. He lives in Tennessee.

Q. Tennessee?

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

Q. Okay.

MR. SOLIS: Does he was a title?

A. He is a communications consultant,
strategist type of position. He's been with Dr. Broun actually longer than I have, so I'm not sure how long they have been together.

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

A. Yes.

MR. SOLIS: Okay.

BY MR. MORGAN:

Q. Have you --

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

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

A. Have I held any positions?

Q. Yeah.

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

Q. Okay.

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

Q. A paid consultant?

A. Yes, sir.

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

A. Yes, sir.
Q. Okay. For the 2012 campaign, were you a paid --
A. No.
Q. -- consultant?
A. Not that I'm aware of.
Q. Okay. But you --
A. I may have gotten expenses reimbursed, paid for my cell phone, a Capital Club membership, things like that.
Q. Okay.
MR. SOLIS: Would you have volunteered then?
A. Uh-huh, yes, sir.
I mean, he really hasn't had any campaigns until 2014, for the most part.
MR. SOLIS: Okay.
BY MR. MORGAN:
Q. When did you first become acquainted with Brett O'Donnell?
A. I want to say April or May of 2012.
Q. Okay. I do have some documents to show you that may refresh your recollection here. This is PBTN 5.
A. So May.
Q. And PBDB 120.

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

Were you in that meeting?

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

Q. Okay.

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

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

A. Uh-huh.

Q. -- potential consultants?

A. I think four.

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

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

Q. Okay.
A. I would say --
Q. What kicked --
A. -- Brett was the most recent.
Q. -- off that process of doing those interviews?
A. You know, for years, Dr. Broun has always been focused on messaging.
Q. Uh-huh.
A. He believes that's one of his primary responsibilities. Being in Congress, it's sort of educate America on getting back to our Constitutional founding moorings, as he calls them, and he's gone through several different efforts to try to improve his public speaking.
   That's always been his weakest link, his ability to -- to convey a message in a shorter, more concise way. It's not his strong suit, especially being a physician. You know, I mean, physicians tend to explain things in excruciating detail, and on top of that, you know, a Southern country doctor, he's got a slow drawl and he wasn't a very powerful speaker.
   So it's always been one of his main focuses, is improving his public speaking and his
ability to get his message across.

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

You're familiar with Frank Luntz, I assume?

Q. Uh-huh, generally.

A. We hired a woman named Merrie Spaeth, I want to say is her name, out of Texas for a day. She came in and did this whole workshop, she filmed him and went over his interviewing techniques and he bought a few books, based -- I can't remember the author's name, but it was based on the guy who did communications for Winston Churchill. So he went through these several different iterations of trying to improve his ability to give public speaking and messaging. He decided that he needed more consistent help.

I mean, he would improve after taking a class or -- or doing a seminar or a book or whatever, but it would only last like a week or so, and then he would slip back into his previous ways. So he started asking around. He asked several different members. We came up with three or four people that we interviewed. Brett O'Donnell, I think he got from Ms. Bachmann. He
was talking to Ms. Bachmann about her public speaking and she recommended that we talk to Brett. Before we had a chance to reach out to Brent, I think he actually contacted us.

Q. Okay.

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

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

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

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

We were getting ready to enter the summer break, obviously August recess. So we went through
probably June and July and August. We did like a three-month block for one set price, I believe, and the idea being if it worked out and Dr. Broun, you know, appreciated how it was progressing -- he actually went to Afghanistan over the month of August, if I remember correctly.

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

Q. Okay.

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

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

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

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

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

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

Q. Okay.

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

Q. Was campaign speeches, campaign debates --

A. No.

Q. -- were those discussed?

A. No.

Q. Not at all in that meeting?

A. Not that I recall.

Q. Okay. I mean --

A. I mean, Brett may have brought it up that
that's what he does.

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

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

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

A. Uh-huh.

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

A. Uh-huh.

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

You know, it references debates in a couple of locations on the second page and then, you know, Page 3 and Page 4 includes significant sections on
If -- so is it correct that part of Brett's proposal -- the proposal of work he was to do for the office included campaigns activities and campaign debate preparation?

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

Q. That wasn't what you were looking for? Do you have any idea why he included it in his proposal?

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

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

A. Uh-huh.

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

Was there some discussion about how you
would pay Brett O'Donnell?

A. Probably.

Q. Probably?

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

Q. You don't recall?

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

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

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

Q. Uh-huh.

A. -- as well as media interviews and town halls. I mean, that was the -- the summer of the -- if I recall correctly, that was the summer of the Obamacare heat-up and debate, and the town
halls we were at, they were quite large and very well attended.

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

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

Q. (Inaudible)?

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

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

A. Okay.

Q. -- but I want you to look at this consulting agreement that's attached to that e-mail.
A. This one?

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

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

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

A. Yes, sir.

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

When it refers to debate preparation there --

A. Uh-huh.
Q. -- is that referring to debates in the campaign context?
A. No, sir.
Q. And why is that?
A. And why is that?
Q. Well, common -- in common usage, this is --
Brett O'Donnell is a person who's well known as a campaign debate preparation --
A. Sure.
Q. -- person, it's a consulting agreement here, part of the work product is debate preparation.
A. We didn't need debate preparation.
Q. You didn't need it?
A. Uh-huh.
Q. Okay.
A. No. In 2012, we didn't even have a general election, so --
Q. You had a primary that year?
A. We had a primary that year, I think it was three weeks later, Dr. Broun got like 64, 68 percent of the vote and then he had no idea that he'd be running for the Senate in February, March.
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
to say I talked to -- not the person who answered the phone. I told them what I was looking for and they transferred me to somebody else and it was -- they seemed to indicate there was no problem at -- I mean, my only inquiry was whether an office could enter a contract with an outside consultant, and they indicated that we could, as long as it's for official business.

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

A. I do not, I'm sorry.

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

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

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

A. --

Q. In what form?

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

Q. Is this around July of 2013?
A. Yeah, I guess.

Q. And when you say -- what --

A. That was it.

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

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

Q. Fine with regards to staff training?

A. Allowed to hire outsides consultants, yes.

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

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

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

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

Q. That's news to you?

So your conversation with Admin around May of 2012 --

A. Right.

Q. -- they indicated to you that you could hire a consultant?
A. We were allowed to have consultants -- outside consultants as long as we were doing official business.

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

A. No, sir.

Q. Okay.

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

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

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

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

A. Right.

MR. SOLIS: -- would any of those documents have been forwarded on to the Committee on House
Administration by you?

A. No, they were not.

BY MR. MORGAN:

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

A. No, I called them --

Q. -- to ask them about --

A. -- a second time about that article.

Q. About the July 2013 article?

A. Yes, sir.

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

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

Q. Okay.

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

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

A. That's what was saying.
Q. -- (inaudible)?
A. I think they actually reached out to me.
Q. They reached out to you?
A. To ask if we --
Q. Okay.
A. -- were still involved with Mr. O'Donnell.

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

Q. Did, at any point, you send, you know, the initial consulting agreement or any of the subsequent consulting agreements to Admin or Ethics Committee for them to view?
A. Not that I'm aware of, no.
Q. Okay.
A. Not that I recall.

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

In hindsight, obviously, I probably should've.

Q. Okay. When was the first time that Brett O'Donnell became involved in Representative Broun's
campaign activities?

A. I cannot recall if he did anything for us in 2012. I mean, again, he came on right about the time that we were entering into our primary phrase. I recall a specific time where he indicated to us that he'd be happy to volunteer on the campaign side if we needed him to do anything.

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

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

Q. Okay.

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

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

A. Okay.

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

A. Okay.

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

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

A. Uh-huh.

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

A. Yes.

Q. -- this response from Jordan Chinouth.

A. Yes.

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

A. Yes.

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

A. Uh-huh.

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

A. I don't why he thought he would be a campaign consultant. I'm not sure if Jordan was ever just consulted at all on hiring any messaging consultant on the official side.
Jordan would've been our district director at the time --

Q. Uh-huh.

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

Q. Okay.

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

Q. For the campaign?

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

Q. You ended up not having one?

A. Right, we never --

Q. Why did you --

A. We never ran any ads.

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

A. No.

MR. SOLIS: You mentioned that Jordan, at
this time, was the district director.

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

A. Uh-huh.

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

A. Yes, sir.

MR. SOLIS: -- am I right?

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

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

BY MR. MORGAN:

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

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

MR. SOLIS: Okay.

So again -- so again, you know, bearing in
mind that he was actually working for the campaign during that time --

A. Sorry.

MR. SOLIS: Are we just coming in or -- yeah -- that he was working for the campaign at that time, would that have given him any reason to inquire about a media consultant for the campaign? Would -- would that have -- I mean, he was part of those discussions on bringing somebody on?

A. As a media consultant --

MR. SOLIS: Yeah.

A. -- on the campaign side?

MR. SOLIS: Yeah.

A. Probably.

MR. SOLIS: Okay.

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

I mean, here we are a month out, we really didn't have a serious opponent and this is more about just wrapping up a brand new district. We had just finished -- redistricting -- we were about 60, 65 percent new district, new territory,
so it was just more about getting Dr. Broun known
in the new part of the district.

MR. SOLIS: Okay.

BY MR. MORGAN:

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

A. Uh-huh.

Q. -- did for the Congressional office.

A. Yes, sir.

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

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

Q. Okay.

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

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

A. No, not that I recall. There may have been
an odd one here or there, but for the most part, they were in his office here.

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

A. Uh-huh.

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

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

A. Yeah, this is a long.

Q. -- those e-mails.

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

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

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

So sometimes, he would meet over at the NRCC if that's where Dr. Broun was making his calls from all day.
1 Q. Okay.
2 A. So -- and this is what, 2012, December, yeah. That would December. It was probably a year end push for the NRCC dues.
3 Q. Okay, and she refers to NRCC stuff -- to do NRCC stuff next week --
4 A. Makings calls.
5 Q. -- to have this meeting be official but NRCC stuff --
6 A. "Do NRCC stuff next week," I don't -- I'm not sure what she's referencing there at all.
7 Q. Okay.
8 A. She cc'ed me on it, unless she --
9 Q. Would these weekly sessions, you -- you said you'd review the past week's media --
10 A. Uh-huh.
11 Q. -- talk about the upcoming week's media?
12 A. Yes, sir.
13 Q. Would that include campaign media?
14 A. It would, yes, if they were reviewing an interview he had done -- I mean, for the most part, there was really nothing after July, I guess would be, whenever the primary was of 2012, until February of 2014.
Q. Or 2013?
A. 2013, yes. I'm sorry.
Q. 2013. Okay.
A. So --
Q. Was that about when he announced --
A. Yes, sir.
Q. -- when Representative Broun announced his --
A. He announced some time in February. I can't recall the exact date.
Q. Okay. So the course -- over the course of, you know, approximately this two-year period where Brett O'Donnell was a consultant --
A. Yes, sir.
Q. -- these weekly sessions, sometimes they would cover campaign media appearances?
A. They would review what he had --
Q. What he had done?
A. -- what he had done.
Q. And prepare for campaign media appearances coming up?
A. He would prepare for just any media appearance, yes.
Q. Okay.
A. Yes, sir.

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

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

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

Q. Well --

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

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

A. He would help Dr. Broun sort of solidify his talking points. In other words, Dr. Broun
would say, "This is what I'm trying to get across, or I want to talk about, you know, the Option Act, immigration, taxes, shutdown or whatever it may be, how do I get my point across in 30 seconds," or the main thing he would really work on, especially at the beginning was not being taken off topic.

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

Q. Okay.

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

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

A. I am sure sometimes.

Q. Floor speeches?

A. Floor speeches, appearances -- again, keep in mind we have a huge district so there was a lot -- Dr. Broun loves to be out amongst the district. If we don't schedule him end to end, for the most part, then he's not very happy.
Q. Okay. I will give you an e-mail here, see if this refreshes your recollection, this is PBDB 0151, so this is in your document production.

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

A. Uh-huh.

Q. -- that Brett provided.

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

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

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

A. Sure, sure.

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

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

Q. Okay.

A. And whether it be Meredith and then later
on, Christine, take it down and then would hammer 
out a draft and then the whole team would look at 
it.

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

Q. Okay. Did Brett have any -- any role over 
the legislative strategy or the legislative work of 
the office?
A. As far as producing legislation, not that 
I'm aware of.
Q. Or advising on --
A. Well --
Q. -- votes or the sponsoring or --
A. No. I mean, sometimes he would offer his 
two cents on, you know, what a vote would mean, 
what it could do. How to message it was more what 
we were interested in.
Q. Okay. Would he, for example if
Representative Broun was contemplating voting a
certain way, would he offer his thoughts on how
that would play in the press or how that might --
A. I'm sure he would.
Q. -- effect by other --
A. Sure, absolutely. I'm sure he did.
Q. Did he ever provide any training to the
Congressional staff --
A. Just --
Q. -- Brett?
A. I would assume just Meredith and then
Christine.
Q. Were you ever a part of -- of any, you
know, a series of training or an initial series
that Brett O'Donnell put the Congressman through on
speaking training sessions?
A. I know he would do -- more so obviously
towards the beginning. I knew he would sit down
and review -- it was more of reviewing speeches. I
mean, we filmed all of his public appearances that,
you know, obviously interviews, speeches floor
speeches, town halls, I mean, everything. We
filmed everything --
Q. Debates.

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

Q. Is it a G drive, Google drive?

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

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

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

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

MR. SOLIS: Before we move on --

A. Yes, sir.

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

A. Certainly.

MR. SOLIS: Bryson had asked you just about some of the work on the legislative side, if any, or to the degree that Brett mentioned legislation. Did he have any contact with any staffers who handle legislation? Would he ever e-mail them, have a phone call with them?
A. Not that I'm aware of.

MR. SOLIS: Okay.

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

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

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

A. Uh-huh.

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

A. Who, Christine?

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

A. I'm not sure if I ever directed them do it. I think they would just -- that was part of the process, and it would not be just Brett, either, that I'm aware of. It's -- again, it's the whole
team thing. I mean, if you've noticed on the
e-mails, a lot -- Dr. Broun liked us to include a
wide swath of people in a lot of our e-mails just
as more of a so they know what's going on approach
as opposed to put your hands in there and tinker
with it approach --

MR. SOLIS: Okay.

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

MR. SOLIS: Yep.

BY MR. MORGAN:

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

A. Yes, sir.

Q. These are the 00234 --

A. Uh-huh.

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

A. Uh-huh.

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

A. Uh-huh.
Q. -- and you introduce, you know, Hans Keiser
and Guy Short.
At the bottom of this e-mail, you -- you
list Brett O'Donnell.
A. Yes, sir.
Q. You write "Brett O'Donnell is Congressman
Broun's messaging consultant and media prep
advisor."
A. Uh-huh.
Q. Does that accurately describe his role with
the campaign with regards to the Congressman's
political efforts?
A. No. This was about who he was on the
e-mail, about --
Q. Say that again.
A. This was -- I was describing to Hans and
Guy who everybody on the e-mail were.
Q. Uh-huh.
A. I mean obviously, there's a lot of people
on here who are not a part of the campaign but they
may be on e-mails.
Q. Who on here was not part of the campaign?
A. Well, Teddy, of course, being our
scheduler; Meredith, being our communications
director; and Brett, being our media guy -- our messaging guy.

Q. Did --
A. Let me see.

Q. -- Meredith volunteer on the campaign?
A. Yes.

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

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

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

Q. How would you then describe Brett O'Donnell's role with Representative Broun's campaigns?
A. Brett -- again, Brett, volunteered to help out whenever he could and his -- he offered advice sometimes, and it was either listened to or it
wasn't listened to. He helped Dr. Broun try to prepare for any big speeches coming up. Again, this was all on the volunteer side on his own time.

Q. Okay.

A. Yep.

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

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

BY MR. MORGAN:

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

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

Q. Is that -- is that about when you believe
the conversation you had with Brett about volunteering for the campaign would've taken place?

A. Yes, sir.

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

A. Not that I recall, no.

Q. Not that you recall? Okay.

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

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

MR. SOLIS: We just -- we had a chance to speak with -- with Mr. O'Donnell. I mean, he -- he mentioned to us that at some point in the kind of early stages, he had -- he had a conversation with you about engaging the campaign more fully, potentially, with a -- with a more -- with a paid position with the campaign, that the campaign would pay him for sort of more extensive research
services and more extensive services that would go beyond mere volunteering.

Do you recall having a discussion with him about that?

A. I do not. I mean, he may have. You know, the idea being that we weren't quite sure how he would work out. Again, it was sort of a testing phase.

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

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

Q. And --

A. In other words, we actually started moving
more away from anything that he was offering as advice and just focusing mostly on the messaging on the official with him.

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

A. All right.

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

A. Uh-huh.

Q. This is --

A. Document approved, thank you.

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

A. Uh-huh.

Q. You respond, "NRCC, we have a conference room reserved." He responds, "I'm in conversation
A. Uh-huh.

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

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

A. Sure.

Q. Right?

A. That's what it looks like.

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

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

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

Q. But if you look below --
A. Oh, I see, I see.

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

A. Yeah.

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

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

A. Uh-huh.
Q. -- how do you not say then that debate preparation was part of his consulting services?
A. Well, that's -- you know, that was not why we hired him.
Q. But it was one of the first things he did?
A. I'm not sure it was one of the first things he did, but it's apparently something he did do.
Q. But you did not hire him to do campaign debate preparation?
A. No, sir.
Q. And was there any conversation with him about his participation in this debate preparation session being separate from his contract?
A: I'm sure there was. I don't recall.
Q. Yeah.
A. I really don't recall the specifics of this debate preparation session.
MR. SOLIS: Were you there?
A. I don't believe so. I don't remember any of this at all.
BY MR. MORGAN:
Q. Okay. It's just -- it's hard for me -- it's perhaps difficult for us to -- to nail this down, to get a clear understanding.
A. Sure.

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

A. Uh-huh.

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

A. Well.

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

A. Sure.

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

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

A. What he does as a volunteer is separate from what he does on the official side. I mean, who -- what other consultant out there doesn't do 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,
you know, we hired a guy in June, our debates --
our primary is over in July and we have nothing
until he decides to run for the Senate, until
February.

Q. Okay.

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

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

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

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

A. Oh, sure, that was -- I mean, when we hired
him, we were very clear, this is official stuff.
This is what we were doing. We're looking at
messaging and messaging only, and that's the
delivery of the message. It's not about content
and it's not about creating points and creating
issues. This is about Dr. Broun actually delivering the message itself.

Q. Okay.

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

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

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

"This is the guy helps me prepare for my interviews, prepare my floor statement, prepare for 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
4 Q.  Okay.
5
6 A.  I didn't know he did campaign stuff at the
7 very beginning until he sent over his -- or until
8 he sent over his prospectus, I guess, whatever they
9 call that thing.
10
11 Q.  Okay.
12
13 MR. SOLIS:  So the prospectus laid out
14 campaign work?
15
16 A.  Yes, his --
17
18 MR. SOLIS:  The proposal?
19
20 A.  His proposal or whatever it is about him,
21 discussed his debate prep ability, and he pitched it
22 pretty highly as far as maybe I want to say Romney,
23 but I'm not sure if he did Romney or not.
24
25 MR. SOLIS:  Well -- well, Bryson, you know,
26 showed you that earlier and -- and the word debate
27 was used extensively in that proposal and the
28 consulting agreement itself and we asked you what
29 you felt that meant and you said that you felt it
30 meant, you know --
31
32 A.  For us, it would have meant.
33
34 MR. SOLIS:  You know, exclusively floor
debates?

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

MR. SOLIS: Okay.

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

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

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

MR. SOLIS: Okay.

BY MR. MORGAN:

Q. Okay. So you brought on this consultant for the official side. Did you have a conversation with him, asking if he was willing to volunteer on the campaign side, ask him if he was willing to prepare for those --

A. I think he just offered it.

Q. -- 2012 debates; he just offered it?
A. Yeah. He offered it out on his own.

MR. CORTAZAR: Did it come up during the contract negotiations or --

A. No.

MR. CORTAZAR: -- did the volunteering happen at some other point?

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

BY MR. MORGAN:

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

A. Yes, sir.

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

A. Yes, it's --

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

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

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

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

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

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

Q. Okay.

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

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

A. He could have. I mean, I don't think that
it's unlikely that happened.

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

A. Sure.

Q. Was this typical for Brett to do?

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

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

A. It would depend on what these events were. I don't recall this specific event. Obviously, this is over August so this is during recess. Conservative Women of North Atlanta, that may have been an official event or a non-political event, I will
call it, because sometimes they don't like to have campaigning going on at these things, which is strange, obviously. I don't remember what he was in Columbus for.

Q. Okay.

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

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

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

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

A. Sure.

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

A. Uh-huh.
Q. Do you recall -- do you recall --
A. I'm just trying to -- I'm sorry. I'm trying to find the date so I get some idea, oh, December, 2013.
Q. Yeah, that's --
A. Yeah, so it's about six months ago.
Q. Was this also something that was typical for Brett to do to prepare -- well, when you say, "I want heavy Brett time beforehand," what does that -- what does that mean?
A. That means -- let me just see Georgia public broadcast, okay. That means any time he's on TV, I want him to sit down and talk to Brett about how he was to deliver his message.
Q. Okay.
A. I mean, it's about, again, the delivery of the message, not the content of the message.
Q. About the delivery but not the content, okay.
A. Right.
Q. What -- how -- was Brett O'Donnell involved in negotiating debate formats, are you aware?
A. I believe so.
Q. Okay.
A. I believe at one time, he talked to the State party. I want to say the guy's name was Adam, if I remember correctly -- anyway, they were starting to set up -- well, it turned out it might not even be debates or forums more than anything else, but they had never done it before so Brett offered to call out there and tell them how to set them up.

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

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

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

A. Yeah. I remember he sent these one day and he had asked me for information on votes or something, and then he kind of put these things
together and sent them over to us and we never even used them. Dr. Broun didn't like them.

Q. Okay. Did he provide other prep materials for debates similar to the attack grid?
A. Not that I'm aware of. I mean, after these -- again, he did these and Dr. Broun didn't like them and we actually never used them and then I think they reviewed Dr. Broun's opening statements and closing statements, yes.

Q. Okay. Was he involved in putting together Dr. Broun's announcement speech announcing his run for the Senate?
A. I think he helped him with it, yes, sir.

Q. Okay, and do you recall him being involved in -- well, you said he helped -- well, do you recall what his role was in putting that speech together?
A. I don't -- I wasn't in there, no, but I think --

Q. Did he draft it?
A. -- they may have done it on the phone.

I think Dr. Broun, again, told him what he wanted to say and he worked with Dr. Broun on how to deliver it.
Q. Okay. Do you recall Brett O'Donnell being involved in the Congressman's GOP convention speech in 2013?

A. Yes, sir, same thing.

Q. Well, was he --

A. I think it was the same speech.

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

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

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

A. I want to say Meredith.

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

A. I think, yeah, it was sort of like a piece thing. In other words, Dr. Broun would say, okay -- I think they did that a piece at a time.

So Dr. Broun would say okay, here's how I want to say in the opening and so he kind of -- I think he typed it out himself and then we all cleaned it up as far as, you know, because it was this long and we took it down to this long.

So everybody sort of had a hand in it, you
know.

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

A. Uh-huh.

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

A. Uh-huh.

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

A. I could think of two actual sessions.

Q. Which two do you recall?

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

Q. Okay. Is that Jamestown Associates?

A. Yes, sir.

Q. Okay. Who was involved in the sessions?

A. Obviously Dr. Broun, Brett -- was Meredith still there?
I can't remember if Meredith or Christine were the ones that were there at the time. I want to say Christine but it might have been Meredith, forgive me --

Q. Okay.

A. -- and then that's it.

Q. That's it.

At some point was Michael Hall --

A. Yes.

Q. -- involved in debate prep?

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

Q. What -- who is Michael Hall?

A. Somebody that works with Brett.

Q. Somebody that works with Brett?

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

Q. Okay.

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

FEMALE VOICE: Hi, sorry to interrupt.

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

Dr. Broun is back, so --
MR. MORGAN: 10 minutes.

MR. SOLIS: Yeah, 15 minutes.

FEMALE VOICE: 10 minutes, okay. Great.

MR. MORGAN: Thank you.

BY MR. MORGAN:

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

A. I think Brett was out of the country.

Q. Out of the country.

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

MR. SOLIS: Why do you say that?

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

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

A. Yeah. I mean, it was more so that -- I think he was just saying that, you know, what Brett was saying as far as how to deliver the message wasn't working for him -- wasn't working for Dr. Broun, it wasn't his natural style, it wasn't
how he normally did things, and so I think he just
started slipping away from listening to what
Brett's advice was coming up and more so into what
he thought the should be doing.

BY MR. MORGAN:
Q. Okay, but going through some documents here
that reflect some debate preparation sessions, this
is BOD 2268, the first two are debate prep sessions
may have occurred on January 8, 2014 at Jamestown
Associates?
A. Yes, sir.
Q. The next day --
A. I remember the first one.
Q. -- this is BOD 238, Brett O'Donnell
e-mailed an attached proposal for a debate opening
for the Adel debate, so it looked --
A. Right. Well, this is Dr. Broun's speech
that he wrote down.
Q. What -- his speech what --
A. Dr. Broun would write all of his thoughts
down and then we would condense it to the --
Q. To an opening?
A. -- to a minute and a half as opposed to
three minutes or whatever.
Q. So this would have been Brett O'Donnell sending --
A. This is --
Q. -- his proposed open -- opening statement --
A. This is Dr. Broun's proposed.
Q. -- for the debate? Okay.
A. Not Brett's, I'm sorry. I see what you're saying. This is -- in other words, Brett just --
he had the draft and set it up, this is what Dr. Broun --
Q. Okay.
A. -- wants to say.
Q. Okay. The next document here, PBDB 25, it appears that on January 10, there was a debate preparation session and one of the things that was discussed that may jog your memory is talking about responding to questions on gay marriage?
A. I'm sorry, let me just see. We talked about what, oh, other -- same sex marriage.
Okay.
Q. So it appears there was an additional meeting on January 10th. It could have been.
I'm sure if you recall the specific session
in which --

A. I don't recall the specific session. This might have been at a meeting where they were talking about messaging as far as the issue goes.

I think that's what this is.

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

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

Q. Okay.

A. -- prep session.

Q. But this would have been --

A. This is just --

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

A. It could be, yeah.

Q. It could be? Okay.

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

Yeah.

Q. It just -- the -- Christine's response at the top where it says, "Brett was asking the tough questions on this and we discussed answers for a while," made me think this is may have been a debate prep session?
A. No, this was actually --
Q. Other than a typical session?
A. This is a typical session where they were
talking about I think about the news of the day and
how he was gonna respond to it, especially if it's
something he may be likely to be asked about.
Q. So aside from campaign -- specific campaign
debate preparation sessions, sometimes you would
discuss questions and answers back and forth in the
regular weekly sessions?
A. As it related to the media --
Q. As it related --
A. -- not a campaign or anything, but in other
words, all right. So this issue came up today. If
someone sticks a camera in your face and says, you
know, Dr. Broun, what do you think about this
ruling, this is how his messaging should be.
Q. Okay. Next couple of documents PBTN 134
and 135, they're a couple of calendar items that
refer to -- they're both titled, "Prep for debate
with Michael Hall" --
A. Uh-huh.
Q. -- "location DC, January 16th and 17th," do
you recall if there were two sessions with Michael
Hall or was there only one?

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

Q. Okay.

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

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

A. Okay.

Q. I'm sort of jumping through. Here's another session what appears to be taking place on Friday, January 31, 2014.

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

A. Uh-huh.

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

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

Q. Okay. Was, at some point, Brett, would he conference call in or Skype in to the debate prep sessions that happened down in Georgia?
A. I don't know. He may have.
Q. Okay.
A. And sometimes these aren't actual debate preps. I think that's just how Teddy lists them.
It's reviewing the debate that happened already.
Q. Okay.
A. So in other words, it's going over the tape of it and discussing the delivery of the message and how you can do a better job.
Q. Okay. The next one is PBTN 145, "Call with Brett for debate prep." This is February 18th. I can tell you that there was an NFIB Senate candidate forum that day.
I'm not sure if that refreshes your recollection of what this meeting might have been about, if it was preparing for that forum or --
A. It sounds familiar, although I'm not sure if they ended up having it.
Q. Okay.
A. They may have. There were so many different -- in other words, it may have been not like a forum but like just one on one type of thing.
Q. Okay.
A. One candidate in the group.

Q. I see.

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

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

A. Uh-huh.

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

A. Uh-huh.

Q. -- on February 21, 2014.

Do you recall this instance where he was Skyped in?

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

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

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

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

A. Dr. Broun, yes.

Q. Okay. So, I mean, this is -- and previously, you said that Dr. Broun sort of drifted
away from wanting to use Brett's method but it
appears that there's --
A. Well, these were --
Q. -- there was debate prep occurring well
into February and the next document, you know,
well, into the early part of March of this year.
A. They had 11 debates --
Q. Right.
A. -- and I think Brett prepped for two of
them, Michael Hall prepped for one of them and then
we just kind of moved away from prepping for them
at all.
Q. So then but these other -- these other
calendar instances, I mean, there's -- there's -- I
don't know the number, there's at least seven or
eight instances there of calendar items for debate
prep.
A. Right. I think we did more on the first
one, which was the January debate. So we may have
had three or four sessions. Some them may have
been rescheduled because of timing. I'd --
Q. Right.
A. -- have to look at my own schedule to try
to figure that out, maybe --
Q. Okay.

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

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

A. It would have been April.

Q. April of this year?

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

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

A. Yes, sir.

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

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

Q. Okay.

A. He just thought he was becoming too much of
Q. Okay.

A. Some time in mid April.

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

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

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

A. Yes, sir.

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

A. It was probably a couple of weeks earlier.

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

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

Q. Uh-huh.

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

Q. Okay. Who was involved in prepping the
Congressman for those debates?

A. Pretty much, him.

Q. Just him?

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

Q. Okay.

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

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

A. Yes, we did.

Q. -- staff retreat?

A. Yes, sir.

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

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

Q. Was there also as campaign staff meeting?

A. There was, at some point. I honestly
I couldn't recall where we did it. I know it was someplace -- we did the staff retreat at Chateau Alan (phonetic) and there was somewhere right off of Chateau Alan is a little restaurant or something. I think that's where we all met.

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

A. Yes, sir.

Q. -- or reimbursed by the campaign?

A. Yes, sir.

Q. Why was that?

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

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

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

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

A. This wasn't the campaign side.

Q. -- that were not all volunteer?

A. This was on the official side.

MR. SOLIS: He attended that meeting.
BY MR. MORGAN:

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

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

Q. I just want to make sure I'm clear. The reimbursement from the campaign was for his attendance at an official Congressional staff retreat?

A. Yes, sir.

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

A. It was the expenses, right.

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

A. For the Congressional staff retreat.

Q. For the Congressional staff retreat, okay.

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

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

MR. SOLIS: Okay.

A. I know he had not announced yet.

BY MR. MORGAN:

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

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

Q. Go ahead.

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

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

A. I believe I asked my financial counselor, whatever, that we do the weekly MRA reimbursement stuff with. I asked her ahead of time and she said
if he's not a House employee, then you have to reimburse him from the campaign.

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

Q. Okay.
A. Is that not correct or --
Q. Well, we're not --
A. Oh, you don't know.
Q. To be frankly, one of the bright lines we draw in our office, we don't provide advice.
A. Oh, all right.
Q. We don't advise. I mean, we -- that's something that we don't do, so I can't respond one way or another.
A. I always try to be careful, especially when it comes to MRA, so I always ask ahead of time.
Q. After the WSB/TV article broke, did you have any conversations; did you reach out to ethics or Admin? I think you talked about -- we talked about 2 instances in which you had communication with somebody at Admin?
A. Admin, right.
Q. Are there any other instances --
A. Not that I'm aware of, no.
Q. -- communication -- did you have any conversations with Representative Broun about the permissibility of Brett O'Donnell's services?
A. I'm sure we did. I mean, it was more so -- because it was sort of a surprise. The surprise was when the camera showed up at the office.
Q. Uh-huh.
A. At that point, though, we had already had some discussions because Brett had already been in the news for his relationship with Michelle Bachmann and with Cathy Morris-Rogers and --
Q. Yeah.
A. -- Dr. Broun asked me and I said we're really using him on the official side and we're only paying for him on the official side for the official work that he does.
Q. Okay. Going back to, you know, July of 2013 when you said you reached out to Admin, I am going to show you this e-mail PBDB 174 where you e-mailed Brett O'Donnell, "Just talked to Admin? Let me know when you can chat. I have more info." Then Brett O'Donnell responds --
A. (Inaudible).

Q. -- call --

A. I'm assuming that means --

Q. -- he'll call in a bit. I'm assuming that's --

A. Yeah.

Q. Do you recall having a conversation with Brett O'Donnell where you relayed --

A. I think they were asking -- I think this is when I was -- Admin asked me whether we were gonna respond or not, and so Brett wanted to know whether they were gonna respond or not.

Q. And what was the -- was it decided that he would not respond; do you recall how that issue --

A. I think we just never -- we never entertained the idea of responding.

Q. Okay. Were you involved in putting together the office's response to the WSB/TV story?

A. I'm sure I was, yes.

Q. Let's just get it right, here, from Christine. When this says, near the end, "As stated by the House Administration Committee, O'Donnell's communications training is in compliance with all House rules," do you know what
that is referring to, what statement by the Committee?

A. I believe the news article that was in USA Today by Paul Singer --

Q. Okay.

A. -- where they stated that we were in compliance with all House rules.

Q. All right, and so if you will flip the page over, there was an exchange between you and Christine and Brett?

A. And this is on the (inaudible).

Q. Yes. It appears that way.

Did you push to have the article corrected, if you --

A. I wouldn't.

Q. -- viewed that as incorrect?

A. I wouldn't. I would ask Christine to talk to them about it. I know Christine did talk to them. I don't think they were interested in listening to her.

Q. Okay. You know, leading up -- you know, during our office's review process and leading up to these interviews, did you have any conversations with the people we you -- we interviewed?
A. Our staff?
Q. Yes.
A. Yes.
Q. Did you have any conversations about in which you discussed Brett O'Donnell role (inaudible)?
A. Mainly what I was doing was making sure everybody had filled out those forms and turned them in and pitched to the staff members who had no idea what was going on, who Brett was.
I had specifically mentioned to each one of them that I'm not talking to them about what to say about what the whole, you know, relationship or anything was. That's up to them to meet with you or not.
Q. Do you recall telling any of the witnesses that to the extent Brett did campaign work, it was as a volunteer?
A. Sure.
Q. Who do you -- who did you tell that to?
A. I think everybody that asked. They said Brett O'Donnell's is a volunteer, right? I said, yes, I mean, because a lot of people didn't know the -- most people don't know what the specific
details are of everybody else.

Q. Okay.

A. In other words, they don't know who's a volunteer, who's not; who's getting paid, who's not.

MR. SOLIS: So people who didn't know who Brett O'Donnell was said he was a volunteer, right, as a question to you?

A. No, people who -- who -- I'm sorry, didn't know?

MR. SOLIS: Right; you were saying some people in the office didn't even know who Brett O'Donnell was. I'm wondering --

A. No, no. All I'm saying is --

MR. SOLIS: -- why would they ask a question to you about his role in the campaign if they didn't even know who he was?

A. No, the people that he was meeting with.

MR. SOLIS: Okay.

A. Like Jordan and --

MR. SOLIS: Okay.

A. -- and Meredith and -- because they didn't -- I mean, they knew Brett was helping us out and they assumed he was a volunteer but no one
ever asked specifically.

BY MR. MORGAN:

Q. They knew who he was --
A. Right.

Q. -- they just didn't know what his --
A. Right.

Q. -- role was?
A. In fact, I think the only people who knew were myself and Meredith and Dr. Broun.

Q. And Christine?
A. Well, Christine, sorry.

Q. Okay.
A. And my financial guys, of course.

Q. Okay. Have you -- when was the last time you spoke with Brett O'Donnell?
A. He called me yesterday.

Q. And what time yesterday?
A. It would've been late afternoon, mid afternoon. It was before 4 o'clock but after 2 o'clock because I remember having calls on each side of that.

Q. Did you discuss our interview of Brett?
A. I just asked him how -- he's -- I asked him -- because he called me the day before to tell
1. me he was going in. I didn't talk to him at that point.
2. I think he called me, didn't leave a message and
3. then e-mailed me that he was going to meet with you
4. all yesterday, I guess, and then he called me in
5. the afternoon afterwards to tell me he had
6. finished. He said it went about two hours and that
7. he gave them all the e-mails that he had.
8. Q. Okay. Did you discuss -- did he discuss
9. the questions we asked him?
10. A. No.
11. Q. No? Did he --
12. A. I specifically didn't want to ask him about
13. the questions.
14. Q. Did he -- the issue of him volunteering for
15. the campaign come up in your conversation with him
16. yesterday?
17. A. I don't think so, uh-uh.
18. MR. SOLIS: Did the word, "Volunteer," at
19. all enter your discussion with Brett?
20. A. Not yesterday, no.
21. MR. SOLIS: At any other time prior to
22. that?
23. A. It may have prior to that, sure.
24. BY MR. MORGAN:
Q. In the context of our review, did you discuss --
A. Oh, sure. Sure.
Q. When do you recall a specific conversation?
A. No, it was more mostly in the context of, you know, you were just volunteering. I mean, I don't know what the problem is, type of deal.
Q. I want to -- I want to come back to this.
A. Okay.
Q. You know, we showed you those e-mails where in the middle part of June, Brett did a debate preparation sessions.
A. June of last year?
Q. 2012.
A. '12, okay.
Q. So right after the consulting agreement --
A. Sure.
Q. -- is executed, and I believe you said that there was a conversation with him where he volunteered to do campaign debate work?
A. Uh-huh.
Q. Do you recall where that conversation took place; do you recall anything more about it you can
A. I don't. I mean, I remember it was after he was already on the team, and prior to him coming onboard and working for us, we never even talked about campaign stuff. It was always about this is what Dr. Broun is looking for, and this is what we're trying to find, somebody to be able to help him with it.

It would have been right after he came onboard. You know, we -- at some point, we discussed the idea that we're -- you know, we have a debate coming up, and at that point, he volunteered and he said, Look, you know, I do debate coaching -- excuse me -- I do debate coaching -- I do debate coaching. I'm happy to volunteer and help out any time I can.

Q. Was there any expectation or any understanding or even a conversation with Brett that if things went well on the Senate campaign, if the funding was -- was good enough, that he could be paid by the campaign for the debate prep --

A. No.

Q. -- services?
A. I don't think we ever got to that point.
Q. Never a conversation like that --
A. Never got to that point.
Q. -- where if Dr. Broun made it through the primary, he would be hired on officially by the campaign?
A. No, sir.
Q. You don't recall a conversation?
A. I mean, no. We actually never had a conversation about any role that Brett would quite honestly have. It just sort of evolved. In other words, he offered to volunteer, we took him up on his offer at one point and it just sort of came more and more involved and then it wasn't working out so we started pulling back.
Q. Okay. Those are --
MR. CORTAZAR: Do you remember if the offer to volunteer came -- when you said it came after he was onboarded, in terms of onboarding, do you mean when you made an offer to him or when the contract was executed?
A. It would have been after all that. I mean, after at least --
MR. CORTAZAR: (Inaudible).
A. -- a couple of sessions. I think it was after a couple of sessions where they had met --
   MR. CORTAZAR: Okay.
A. -- and they, you know, had a comfortable thing going on.
BY MR. MORGAN:
   Q. Well, I mean, it appears from the e-mail chain we showed you, that --
   MR. SOLIS: The next day.
BY MR. MORGAN:
   Q. -- that the next day or within a couple of days of when --
   A. Well --
   Q. -- he sent the consulting agreement to you, there was that prep session?
   A. That was what, June 21st on that e-mail?
   Q. Yeah, yeah.
   A. And when did he start with us?
   Q. The e-mail from him --
   A. So it would have three weeks?
   Q. -- to you attaching the consulting agreement was like June 19th?
   A. I -- well, he started working for us before we got --
Q. Before the agreement was hammered out?
A. Yeah. Before it was returned and signed.
Q. Okay.
A. A lot of that stuff is done. I mean, I know he started -- I would have to look at the schedule on when the recess was in June. I'm almost sure that we were at least in session the first week of June.
I mean, I know we were at least two sessions in or three sessions in before they even -- the whole idea of the debate even came up and it was sort of a last minute schedule item, anyway --
Q. Yeah.
A. -- the debate.
MR. CORTAZAR: Question: Then, I mean, so then the offer probably came before the execution of the contract, which was two days before the debate prep?
A. I'm sorry?
MR. CORTAZAR: The -- his offer to volunteer then came after you had several meetings when he had been onboard before the contract was actually executed, which would have been two days
before the debate prep?

A. So the contract was executed on --

BY MR. MORGAN:

Q. Executed on June 19th?

A. June 19th, and then we had a debate session on the 21st --

Q. On the 21st?

A. So it may have been, I don't recall.

Q. Okay.

A. I mean, I think we had the contract executed, I mean, it was probably two or three days after we met him, so it would have been -- when did we meet with him, May?

Q. May 31st --

A. 31st --

Q. -- because that was (inaudible)?

A. So I mean, some time around June 3rd, 4th, I mean, whatever the weekend -- after the weekend was, called him up and said I'd like to try it out.

You know, we hammered out the terms, how long it would be, how much it would be, and then we started meeting with him and then -- well, and then he made the offer to do -- to volunteer on the debate side if we ever needed it.
Q. Well, I think you -- I think you have a sense of what we're looking at, what we're interested in.

A. Sure.

Q. Is there anything else that you would like to share with us?

A. I can't recall anything right now, to be honest with you. I mean, I'm just -- there's a lot of stuff but I think it's --

Q. Our review ends tomorrow. If you -- upon reflection, if there's something you want to add to what you told us here today --

A. Uh-huh.

Q. -- whether it be documents, whether it be going through your calendar and trying to get a better sense of the timing of things or whatnot --

A. Uh-huh.

Q. -- let me know.

A. Okay.

Q. I'd be happy to take a supplemental submission from you.

A. No, I mean, I'd like to be able to find out the other -- you know, find the other people that we had met with and -- if that would be helpful at
all, of course, and -- and of course the sessions that we had prior to the search with other -- you know, with the (inaudible) and with Merrie Spaeth and a few others.

I mean, bottom line is this was done because he significantly needed help in his communicating ability and that's the only reason why it was done and, you know, we had no intention at all of doing anything on the political side with this. It just evolved as Brett volunteered and it came along so --

Q. All right. Well, we appreciate your time.

A. Yep.
EXHIBIT 3

TRANSCRIPT OF INTERVIEW
OF REPRESENTATIVE BROUN'S
FORMER COMMUNICATIONS DIRECTOR
MR. MORGAN: All right. Speaking is Bryson Morgan, Investigative Counsel at the Office of Congressional Ethics.

I'm joined here by Paul Solis, who's also Investigative Counsel at the Office of Congressional Ethics.

And we are here with [redacted] on Thursday, June 19, 2014.

So, [redacted], thank you for being here with us.

MS. [redacted]: My pleasure.

BY MR. MORGAN:

Q. And we already covered the False Statements Act and that acknowledgement form, so I think -- first, we'd like to ask you some pretty general questions about your background?

So, what -- what was your first position with Representative Broun's Congressional Office?

A. I was hired as his Press Secretary, originally.

Q. Okay. When, about, was that?

A. That was March, I think. 2010.

Q. 2010. Okay. What did you
A. I think. I'd have to look at my resume.

MR. SOLIS: That's okay. Best of your recollection.

A. I think, I'm sorry.

BY MR. MORGAN:

Q. What did you do before then?

A. I was the -- the Press Secretary, and then formerly Press Assistant for Congressman Phil Gingrey.

Q. Okay.

A. And prior to that I was with Senator Chambliss.

Q. Okay. So, you were hired on as Press Secretary in Representative Broun's office, you think it was March 2010. How long did you hold that position?

A. I was promoted to Communications Director after about six months. You know what, I think it was 2011.


A. I'm sorry.

Q. And then how long were you in -- in that Communications Director position?
A. Two years.
Q. Two years.
A. Approximately.
Q. And what did you do after that?
A. I left to work in the private sector for a company here in Atlanta, where I'm the Senior Director of Public Relations.
Q. Okay. Have you ever had any positions with Representative Broun's campaigns? Either for the House or for the Senate?
A. No.
Q. Did you ever volunteer for the campaigns?
A. Volunteered, yes.
Q. And what -- did you have a title as a volunteer, or what types of things --
A. Um-hmm.
Q. -- did you do as a volunteer?
A. I didn't have any title. I mostly just, kind of, helped him with speeches and talking points. Just sort of the things that were messages for us in the 10th District that sort of resonated with the whole state.
So, I was more of a, kind of, refine and help massage messaging.
Q. Okay. Did you -- so, did you volunteer during the 2010 campaign?

A. No.

Q. No? So, the 2012?

A. Did I -- yeah, I guess I did volunteer during 2010 campaign. He didn't have a very tough re-elect then, so he didn't need a ton of messaging help. But, mostly, for the Senate.

Q. Mostly for the Senate.

A. Mm-hmm.

Q. So, the -- when -- do you recall when it was that his campaign for the Senate began?

A. It was just after Saxby announced he was retiring, so that was January, maybe?

Q. Of 2013?

A. Yes.

Q. Okay.

A. It was literally like the week after. Or maybe even, like, the day after Saxby announced he was retiring. So --

Q. Okay.

A. -- whenever that timeline was. I should have brushed up on all these before I came in, sorry.
Q. No, it's -- it's fine. All the questions we ask we're just asking that you respond to the best of your recollection.

A. Okay, yeah. Because the dates might be off.

Q. Totally understand. So, when -- let's talk about your time in the Congressional Office.

A. Mm-hmm.

Q. Who did you report to when you were Press Secretary?

A. The chief of staff.

Q. The chief of staff. Is that David Bowser?

A. David Bowser. He was the Chief of Staff the full time I was there.

Q. Okay. And as Communications Director, did you still report to David.

A. Yes. Mm-hmm. It was the same position, it was just a better title and a pay bump.

Q. Okay. Who -- who else was involved in the press or communications side of the Congressional Office during your time?

A. When I first started Austin Carson was the Press Assistant. But he later transferred, kind of, to a legislative role. And then Jane Burrell
was a Press Assistant for a little while, too.

Q. Jane Burrell, okay.
A. Very -- I mean, literally like social media kind of true assistant roles, and then for a while Jessica Morris -- I guess her name is now Jessica Hayes --
Q. Okay.
A. -- she was sort of the District Press Secretary, and handled a lot of the, you know, constituent communications.

But, later, she transferred into a different role and I picked up some of those responsibilities as well.

Q. Okay. And on the -- on the campaign? So -- well -- did you work on the 2012 Congressional Campaign? For Representative Broun? I think he had a primary challenge from --
A. Yeah, he had a --
Q. -- Simpson.
A. Yes. Yeah, I did. But not like a -- like I said, he didn't have a very --
Q. Very strong.
A. -- strong effort there, so. I did very little volunteer work.
Q. Do you recall -- do you recall who else --
I -- I'm trying to get a sense of who are the main players on Representative Broun's campaigns. So, in 2012 do you recall who was the Manager?
A. Bob Bibee.
Q. Bob Bibee. Okay.
A. Mm-hmm. Who was also his Senate Campaign Manager, so.
Q. Okay. Do you recall who else was involved in 2012?
A. Jordan Chinouth.
Q. Jordan Chinouth.
A. Just from a kind of boots-in-the-ground perspective, but --
Q. Okay.
A. -- I really didn't have much of a role in that. Other than, like, prepping for interviews and, you know, a lot of those interviews kind of -- for -- especially for, like, the 10th District, when it's a re-elect campaign and you're already serving -- servicing --
Q. Mm-hmm.
A. -- that district, from a messaging standpoint. Like, we're doing radio interviews,
we're doing anyways. We're not doing anything outside of our district, anyway, so it was a lot of, like, cross-over, I guess.

Q. I see. Yeah, that -- that's understandable. Was Jordan also involved in 2014?
A. Yes. He was involved from a, like, I don't remember what his official title was. He wasn't the Campaign Manager, but, yes, he was involved.

Q. Was Josh Findlay? Does that name ring a bell?
A. Yes. Josh and him are partners.

Q. Oh, okay. I didn't know that. So, I think I've seen some documents where Josh Findlay is identified as the Campaign Manager, but I understand that sometimes titles --
A. Mm-hmm.
Q. -- and roles and duties on campaigns don't necessarily match up.
A. Yeah.

Q. Do you recall who else was -- was really involved in the campaigns? Was David Bowser involved?
A. Most of it, I mean, anyone that volunteered from his Congressional staff was, you know, just a
Q. Just a volunteer.
A. Mm-hmm.
Q. Okay.
A. Not anyone that was paid by the -- I mean, to my knowledge -- paid by the campaign or --
Q. Okay.
A. -- really --
Q. Yeah.
A. -- involved from that standpoint.
Q. I understand that's pretty common. Okay.
A. And, again, I was his Congressional staffer, so my knowledge of, like, everything that went on -- on the campaign is kind of limited.
Q. Okay. So, in the -- in -- during the 2012 campaign, who -- who on the campaign was prepping Representative Broun for media appearances?
A. Just like I said, we didn't really seek out to do a lot of campaign-specific press.
Q. Mm-hmm.
A. So, we were doing radio shows that we were doing weekly anyways, so.
Q. In an unofficial capacity?
A. In unofic- -- yeah -- and, like, we'd be
there for an official interview and a campaign question --

Q. Yeah, of course.

A. -- might pop up that he would have to answer, but, you know, there wasn't a lot of dedicated effort to press.

Like, I don't recall us putting out press releases, like, you know, or anything along those lines for the 2012 --

Q. Okay.

A. -- campaign. We kind of, our strategy was just to ignore that guy.

Q. And in 2014, do you know who was involved in prepping him for -- for media appearances?

A. You know, I -- I did, from a volunteer standpoint, again. But he -- well, he -- I'm trying to -- I mean, again, we didn't really do anything that was -- I -- I think Bob, his campaign manager, maybe sent out the -- a lot of the e-mails and I had access to it from a Gmail account, but...

Q. Well, we have some documents here that might --

A. Yeah, that'd be helpful.

Q. -- refresh your recollection a little, but
we'll get to those in a little bit. But first I want to ask you some questions about Brett O'Donnell.

A. Okay.

Q. And how -- how you first became acquainted -- acquainted with him.

A. Mm-hmm.

Q. Do you recall how that came about?

A. Yes. Dr. Broun had wanted to -- and he had mentioned this, like, literally from the day he hired me, that he wanted to get better at messaging, and he had, you know, just this whole spiel about how messaging was, like, the heart of everything, so.

Q. Mm-hmm.

A. I think his -- he had mentioned multiple times his former Press Secretary had brought in someone to train him a few times, and he was looking for -- instead of just, like, a one time seminar or session, he wanted someone to work with him on an ongoing basis.

So, we first met Brett when we were hiring a consultant.

Q. Okay.
A. A media-coach-consultant sort of thing.

So, we interviewed multiple can- --

Q. Did you review other candidates?

A. Yeah.

Q. You did? Okay.

A. Yup. We interviewed multiple candidates.

Q. Do you recall who any of those other candidates were?

A. I don't. I mean, this was a long time ago.

Q. Yeah. Do you -- do you recall when, about, this was? I think I have -- wait, one document...

A. Mm-hmm.

Q. Here's a -- a little group of documents, so --

A. Sure.

Q. -- to review. And these are some documents that relate, perhaps, to that first interaction you had -- the numbers --

A. Yeah. I guess it would be about this time.

Then -- May? Late May?

Q. Okay. First one is -- I'll read this for the record -- PBDB82. And it looks like it was an e-mail from Brett to David Bowser, introducing himself. And then it -- it -- it looks like there
was an initial meeting -- it says -- it's an e-mail from Brett to David saying, "Just confirming our meeting today" --

A. Mm-hmm.

Q. -- "at 4 p.m. at NRCC."

A. Mm-hmm.

Q. And then if you flip to -- a -- a couple of pages, it looks like there's the calendar appointment from Teddie Norton's account. This is PBTN0005; where the subject line is, "Meeting with Brett O'Donnell --

A. Mm-hmm.

Q. -- about Bachmann's debate coach, and are -- at the NRCC."

A. Yup.

Q. Shows Representative Broun, David Bowser, and you attending.

Was this the -- was this about when you think you first became acquainted with -- with Brett.

A. Yeah. This definitely was, because I was there for the first meeting.

Q. Okay.

A. Where they ever met, so. This was surely
the first time.

Q. Do you -- what do you recall about that meeting? Do you recall why it was held at the -- the NRCC?

A. No. I don't remember if there was a specific reason. I mean, I was just there helping to kind of get a sense of the candidates, so, you know --

Q. Okay.

A. -- I can't really tell you why.

Q. Okay. Do you remember what was discussed or?

A. Yeah. We talked about all the things we were looking for in a, you know, messaging consultant. Dr. Broun frequently had trouble with deliverance in, especially, TV interviews. And sort of just awkward Floor speeches and not pausing in the right places and he just really wanted someone that had a little more expertise, I guess, than me? That could really hone in on deliverance. That was a big part of --

Q. Okay.

A. -- why. And he kind of tended to be all over the place, and then things -- say things that
you'd want to walk back.

So, he was really looking for someone to help with messaging.

Q. Okay.

A. Bottom line.

MR. SOLIS: And when you say, "all the things that you were looking for," is deliverance the only thing, or what -- what are some other things that you were potentially asking Brett about? And so you could --

A. I mean, we just asked him about, you know, how he would handle, I mean, someone who has very go-against the grain beliefs. I mean, obviously, it's a very hard right, tea-party, conservative, likes to vote against things like John Boehner for Speaker, and sometimes those are really tough things to deal with, as far as the press goes.

So, I mean, it's hard to work with anyone on that staff -- I mean, on a staff that doesn't -- doesn't necessarily, like, doesn't agree with what you're doing, or, you know, kind of believe in some of the -- so, we asked him about that and how he would deal with that.

And, you know, Dr. Broun has a very
strong Christian background, and, you know, he always wants to get into --

BY MR. MORGAN:

Q. Excuse me.
A. -- those sort of things when it comes to, like, his speeches, and we needed to make sure that that wasn't something that was going to offend him, or that he would be okay with, so.

Just all sorts of, you know, can you deal with these quirks? What's your experience? Just all of those typical things you would ask.

Q. Did --
A. It was a lot of the -- the interview questions that I got, honestly, when I came on board, so.

Q. Okay. Did -- was there a discussion about what types of service Brett O'Donnell could provide? Did he -- did he mention weekly sessions?
A. I don't remember. I -- actually, I do remember that when we first wanted to hire a communications person we kind of wanted to test it out and see how it went and see if, like, they fit, style wise.

Q. Mm-hmm.
A. And Dr. Broun had been trying to get deployed to Afghanistan at the time, so we said we would revisit it sort of after that. So, I think it was maybe monthly or bi-monthly. I don't quite recall, but...

Q. Okay. Did -- so, what was understood about the services that O'Donnell would provide? Once -- once he was brought on? Was there any discussion of -- of debate preparation?

A. No.

Q. No?

A. Um-hmm.

Q. Okay.

A. No.

Q. Was there any discussion of him helping draft Floor speeches?

A. Yes.

Q. Okay.

A. Yes. Not so much draft, because, I mean, that was primarily my responsibility.

Q. Okay.

A. But more so, like, we would -- Dr. Broun would literally stand up and practice them in front of Brett. Or he would do a Fox interview or a CNN
interview and we would sit back in Dr. Broun's office and go over them afterward and then, like, re-go over them -- of how we can do them better, role-playing, that sort of thing. Just the things he really needed work on.

Q. Okay.

A. -- He was just a true messaging consultant.

Q. Would he -- would he supply you or Dr. Broun with talking points?

A. You know, that -- our talking points in that office really kind of came from the leg staff, because they were very at-one with what Dr. Broun's goals were and what he wanted to get passed on the Floor, what amendments he wanted to offer. And he wanted to kind of hone in on being this, like, deficaut-- -- deficit hawk.

So, I -- it was more like, we would come up with the talking points and maybe Brett would help massage them so that Dr. Broun could deliver them better.

Q. I see.

MR. SOLIS: But the talking points would originate from the legislative staff?

A. Oh, yeah. Or me.
MR. SOLIS: Okay.

A. Mm-hmm.

MR. SOLIS: Do you know how often Brett would maybe meet with those staffers? Those legislative staffers?

A. He didn't really have too much interaction with the legislative staffers. I mean, I think he knew all of them, but it wasn't like he was sitting in on our legislative meetings or going through Bills with us.

I mean, he really just kind of took what we crafted, you know, the Bills that we wanted to pass, or the legislation we wanted to introduce. Like his health care bill for example, his OPTION Act (inaudible).

He would kind of work with -- he in no way shaped policy, but more so, again, just the way we would kind of talk about policy.

BY MR. MORGAN:

Q. I'm going to show you another document here.

A. Sure.

Q. And this -- this may be -- well, I think you were CC'd on this.
A. Okay.

Q. This is PBDB120. This is an email --

A. Do I already have this?

Q. -- from Brett O'Donnell. Yes, you do. An email from Brett O'Donnell to [REDACTED] -- I believe that would Representative Broun's personal email account.

A. Mm-hmm.

Q. And then David Bowser and you, in which he attaches his proposal. And, if you flip over to the next page --

A. Sure.

Q. -- here. This is the proposal attached.

You know, in the first paragraph there, he says -- he writes, you know, halfway down the paragraph:

"The method of media prep and the materials I provide are essential to preparing for media interviews and speeches, as well as debates. Additionally, this proposal will cover assisting with messaging and other strategic communication, campaign or official activities, including specific media interview prep for each appearances that are scheduled."

I can tell you that if -- if you flip
through the proposal he -- he does highlight debate preparation.

A. Mm-hmm.

Q. You know, page 123 of this section is "Media, Public Speaking, Debate Preparation." Page 124, a section on debate preparation. So, I did -- I just want to make, you know --

A. Sure.

Q. -- understand --

A. I mean, I think these are --

Q. -- to what extent debate or campaign preparation may have been discussed as he was coming on board.

A. Yeah. I mean, clearly we knew that he had worked for Michelle Bachmann --

Q. Mm-hmm.

A. -- and what his background and credentials were. But at the time that we were, you know, looking for someone -- I mean, Saxby hadn't even announced he was retiring, so.

I mean, to my knowledge there was no consideration of any campaign. I mean, our -- our campaign was already over. He had already just won our re-elect, so.
Q. There was no discussion of the Senate campaign?
A. I think that this -- this is probably a -- to -- to my knowledge, I mean, I don't know -- this is probably a pretty standard proposal that he gives to --
Q. (Inaudible).
A. I mean, this is what's right off of his website.
Q. Okay.
A. If I remember correctly.
Q. And then the next document I want to show you. I don't think you have this over there yet.
A. See -- I think it'd be -- I mean, if you look his e-mail, like, the things that we were focused on were helping sharpen the communication skills.
Q. Okay.
A. Which is what Dr. Broun would harp on all the time.
Q. Okay. I think that... I think -- I'm not sure you have this one over there.
A. Okay.
Q. It's the consulting agreement. And you'll
notice -- let me just read the bottom number that
ing thing is PBDB115, at the bottom. Yes. Yeah.
Consulting agreement. The e-mail on top of it, so PBDB114 --
A. Uh-huh.
Q. -- where he writes, "I wasn't sure that you settled on how I would be paid, so I left the address blank -- blank."
Do recall if there was a discussion of how -- how Brett O'Donnell would be paid? What the different options for paying him were?
A. I was just in his initial interview.
Q. Okay.
A. On, sort of, his background in candidates. So I, obviously wasn't involved in this conversation at all.
Q. Okay. Do you recall there being any discussion of -- of whether or not Brett should be paid out of the campaign account as opposed to the official account?
A. Not when I was -- we never talked about --
Q. You never --
A. -- I was never involved in conversations about money at all. Kind of over my pay-grade at
MR. SOLIS: Aside from being a part of those conversations, did you know, personally, how he was paid?

A. I did not. I couldn't tell you, till this day.

MR. SOLIS: Okay.

A. Well, aside from what I've read, but.

BY MR. MORGAN:

Q. Okay. Do you recall any -- if you heard of anyone in the Congressional Office touching base with the Committee on House of Administration?

Or the Committee on Ethics, regarding bringing Brett O'Donnell on?

A. Again, it wasn't something I was involved in --

Q. Okay.

A. -- facilitating. So. No, I was just part of the initial interview --

Q. Okay.

A. -- with all of the candidates, sort of, again what we were looking for.

Q. And -- do you recall there being any
discussion of the types of services that Brett O'Donnell could provide to the Congressional Office and types of services he wasn't able to provide? Any sort of boundaries on what he could or couldn't do?

A. No, because, again, at the time, it wasn't something that was up for consideration. So, I -- I mean --

Q. And what -- what do you mean by --

A. -- I think -- I think at that time we had just won -- I mean, if I remember correctly -- we had just won our re-elect.

Q. Mm-hmm.

A. And, I mean, we didn't even know if it was going to work out with him, it was a trial thing. Trial basis with him, so.

Q. Okay.

A. No.

Q. Okay. So, then, now, looking back at your time in the Congressional Office --

A. Mm-hmm.

Q. -- and your interactions with Brett O'Donnell, how would you describe, you know, looking at the totality of what he did, how would
you describe his role with the office?

A. I would say that he was part of the communications team.

Q. Okay.

A. He was part of the -- I'm trying to think of the best way to phrase it. He -- I mean, he was an outside consultant, someone that wasn't, you know, spending time day in and day out with Dr. Broun. He was an extra set of eyes. He was, I mean, he was just a message -- I mean, to me, that's what he -- he was most helpful with me in. Kind of, reining Dr. Broun in and keeping him on point.

Q. Okay. How -- how frequently did you interact with him?

A. I would say weekly.

Q. Okay.

A. I mean, I think at certain, you know, points, like, when he first came on board, that first month maybe bi-weekly? But as we got -- as we got to know --

Q. As in -- as in every other week, or as in twice a week?

A. Every other week, sorry.
Q. Every other week, okay.
A. You know, but as we got to know him and he
got to know Dr. Broun, he just kind of became part
of the, "Hey, what do you think of this Floor
speech? Like, what do you..."

Q. Okay. So, who -- who would he interact
with, on the staff? He being Brett O'Donnell?
A. Me, David --
Q. Okay.
A. -- Dr. Broun, and, I would say, Teddie,
just from a scheduling stand point.

Q. Okay. And you said a few other names of
people who are involved in press? About Jane
Burrell, Jessica Hayes, or Austin Carson?
A. I think by the time Brett came on board,
Austin had already transitioned to Legislative
duties.
Q. Okay.
A. So, not really. And, no, I mean, anything
that got passed down -- because I -- I would say
that all the communications efforts funneled up
through me.

Like, Jessica and Jane, anything that
they did followed up through me, so anything that I
did with Brett got -- vice versa, cascaded down to them.

Q. I see. Okay.

MR. SOLIS: Given that he was basically interacting with Representative Broun --

A. Mm-hmm.

MR. SOLIS: -- once a week, you said about.

A. Probably.

MR. SOLIS: And you were then all the time, obviously --

A. Mm-hmm.

MR. SOLIS: -- how much would you say were your two roles different? You and Brett? I mean, were you basically doing, sort of, the same things from a communications standpoint?

A. Yeah. More or less, I mean, I think he was just a -- someone that would come in and, like, positively reinforce some of the things that, maybe Dr. Broun would second-guess that I would suggest, or that his staff would suggest.

So, you know, it's always good to have those second set of eyes, or someone who's kind of on the outside looking in, saying, "Hey, this is how I would view this if I was watching this on
TV."

And, of course, I mean, that's what his expertise was. Where as I had day in, day out duties with everything under the sun.

MR. SOLIS: Was there every any sort of discussion where it was, "This is only what  
does; Brett, you don't have to do this, this is -- this is only her arena?"

A. No, because it wasn't like he had these, you know, check-boxes to check where he had roles and responsibilities, it was -- again, I have no idea, like, how he was paid or anything like that, but to me it was kind of like he was a as-needed basis sort of thing.

BY MR. MORGAN:

Q. Okay. So, I want to --

A. Big speeches, big TV interviews are coming up, you know, that sort of thing.

Q. Okay. So, he -- from what I understand from the documents we reviewed, it appeared there were almost every week there was about a one hour -- one hour session that Brett O'Donnell did with Representative Broun.

A. Mm-hmm.
Q. Does that sound about right?
A. Yeah, kind of.
Q. I mean, I'm not sure if that occurred every week or?
A. Yeah. Yeah, and I think it -- it was kind of, like, again, as needed.
Q. Right, as needed.
A. Sort of if something big was coming up, maybe we'd spend a little more time. I mean, you know, with votes, sometimes we'd schedule an hour, sometimes we'd get ten minutes. So.
Q. Yeah. What would typically happen in those sessions? Would they be in-person with Brett, or would he call in?
A. No, he would -- a lot of times he would come in to the office -- I -- I can't remember --
Q. To the Congressional office?
A. Yeah. To the -- to the House office, yeah --
Q. Yeah.
A. -- the Congressional office. And if -- I mean, if, for any reason, like, we -- you know, a lot of times, like, the staffers will take meetings in Dr. Broun's office, that sort of thing.
Q. Mm-hmm.

A. So, I -- I -- the only reason I can imagine having gone over the NRCC at this particular time was the office was being used, or something like that.

Q. Mm-hmm.

A. So, yes, for the most part we'd meet in the Congressional office, but I can recall times where we met at the NRCC --

Q. The NRCC?

A. -- as well. But, not abnormal, I would say.

But in the sessions a lot of times we would do kind of like news du jour of the week, sort of, like, if you're getting caught coming off the Floor and you get asked about, you know, what's going on in Syria --

Q. Mm-hmm.

A. -- what are -- how are you going to respond, blah blah blah blah blah.

Because Dr. Broun maybe had a tendency to come up with really news worthy quotes that we would not like for him to come up with, so, it's always good to over-prepare him for anything.
Q. So, would Brett be the one providing those response? Suggesting response?

A. You know, he -- all of our sessions with him were, like, super informal. You know, he never came in with a PowerPoint presentation or --

Q. Okay.

A. -- anything like that. So, a lot of times we would just be talking through those sort of things. Kind of just the three of us, sometimes Bowser would join, sometimes it would just be the three of us.

Q. Okay. Would -- would you review Dr. Broun's past media appearances in those sessions?

A. Yeah, we did that a few times, like where he would have an interview on healthcare, and we would get the clip from the clipping service and sit back in his office and watch it and be, like, okay, well, this is where you really screwed up, this is where you could tell you got nervous, this is where you took too many breaths --

Q. Okay.

A. -- and that sort of thing. But I -- I mean, that was something that I had sort of started
doing with him anyways that we just kind of continued to do.

Q. Okay. Did -- did he have any role -- or Brett O'Donnell have any -- any role -- you said he was acting sort of a consultant, but consulting on a legislative matters?
A. In what sense?
Q. Would he ever suggest voting a certain way or -- or co-sponsoring a Bill, or participating in a committee hearing or anything like that?
A. Not -- No. Not like, "You should do this,"
--
Q. Mm-hmm.
A. -- but maybe, you know, just like any communications staffer would do, like, "This is how it could appear to the media."
Q. Okay.
A. But, you know, not like in any way was he affecting policy.
Q. Okay. And --
A. Because that would be one of Dr. Broun's questions. You know, he'd say, "Well, if I do this, or if I vote against this, clearly it's going to cause a big, you know, hoopla in the press.
Such as if I don't vote for John Boehner for Speaker."

Q. Okay.

A. How, you know, how do we message this? Sort of, you know, that sort of thing.

Q. So, he was providing messaging -- messaging advice?

A. Yeah. That's exactly what I would say.

Q. So, did he -- so, his role with, say, Floor speeches, for example.

A. Mm-hmm.

Q. He would -- would he ever draft those himself?

A. No.

Q. So those would be -- the first draft would be done by?

A. Me.

Q. By you?

A. Always.

Q. Okay. And then --

A. Or maybe like the Press Assistant.

Q. Okay.

A. But very rarely.

Q. And what would his role be? Would he
review the draft?

A. Typically the way I worked with Dr. Broun, like, luckily David was a very kind, hands-off Chief of Staff, but I would write something, I'd go into Dr. Broun, we'd talk about it, he'd edit it. Wake up, come into work the next morning and be on my spee- -- desk all crossed out. And then we'd kind of work on a draft that he felt comfortable with.

And then if it happened to be where Brett was in that week and we were delivering that Floor speech, Dr. Broun would practice it a few times.

I mean, certain words, like, he talked about he was really bad with alliteration. So sometimes, you know, we'd strike words to make it flow better, sound better...

Q. So you would be prep- -- rehearsing in front of Brett?

A. Yes.

Q. And he would --

A. Yep.

Q. -- be providing input, feedback?

A. Yeah. Just, again, delivery was his --
Dr. Broun's really achilles.

Q. Would he also provide comments on the text of the -- of the speech? Offer phrases or suggest taking out phrases. Was he involved in that process?

A. I -- I mean, again, I would say, if it sounded bad, or if Dr. Broun wasn't delivering it well. But it wasn't like he was saying, you know, this word -- I -- maybe he would say, like, this word doesn't resonate well with the media, or this gives off a negative connotation.

But, no, he would not say, you know, "Strike this word and replace it with word. It appeals to voters more," if that's what you're getting at.

MR. SOLIS: Okay. You had mentioned earlier that part of what you were considering with Mr. O'Donnell is that Dr. Broun is a -- I think -- use -- your words were, "a hard-core conservative --

A. Mm-hmm.

MR. SOLIS: -- tea party," and, so when he's developing these floor speeches and he's developing these messages --
A. Mm-hmm.

MR. SOLIS: -- you know, part of what you're assessing Mr. O'Donnell, his hire on, is -- is these types of issues; right? How can you handle going against the grain in these types of things; correct?

A. Sure.

MR. SOLIS: So, if, you know, you're practicing a speech, is Mr. O'Donnell then giving you suggestions on, "Maybe this isn't the right thing to say at this time, we should hold back on this, given that you're hard-core conservative --

A. No.

MR. SOLIS: No?

A. Again, he had no input -- input from, like, a development standpoint. Whatsoever.

BY MR. MORGAN:

Q. Okay. I have a --

A. I mean, he's just not a legislative guy. I mean, he's a messaging guy, so.

Q. I have a few e-mails I want to --

A. Sure.

Q. -- I want to go through to get a sense of, if what we see in the e-mails is typical of -- of
the type of work that -- that Brett did for the
office.

A. Okay.

Q. This is PBDB89. And -- let's see. If you
flip over to the, you know, the third page, which
is actually the first e-mail. It's an e-mail from
you to David Bowser, Jordan Chinouth, Brett
O'Donnell, and GovBob, is Bob Bibee, I believe is
GovBob, is that his e-mail?

A. Yes. Mm-hmm.

Q. And then Jessica Hayes. And in -- here
you're saying, "We absolutely cannot get roped into
commenting on this or dwelling on it." And it's
referring to a CREW report on the most corrupt
members.

A. Mm-hmm.

Q. But if you -- if you notice on the second
page, Brett O'Donnell appears a couple of times in
the e-mail chain.

The e-mail from him to that group on
September 12, 2012, where he -- he basically agrees
with David Bowser, saying, "We should go on the
offense. Offense is the best way to handle this,"
he writes. "Want to talk about corruption? Let's
You respond, I think, somewhat opposing the offensive strategy.

A. Clearly.

Q. He then appears to agree with you, and he says at the top of the page 90 there, "My suggestion is a response if we're asked, I don't think we should (inaudible) or seek press on this."

Here -- it appears in these e-mails that he's -- he's consulting on -- on the messaging strategy, or communications strategy.

A. Mm-hmm.

Q. Like, when to respond, how to respond. Is that -- was that typical for him to do?

A. Not really. I -- I mean, I don't think anyone, to be frank, I don't think anyone really asked him.

Q. Mm-hmm.

A. I think that, you know, he got CC'd on a lot of communications, would-be could-be crises, just to be aware.

But, I don't think that Brett was, you know, had an active role in any decision making.
processes. Whether or not -- I mean, we could've commented on it, or we could've not commented on it. And that would have been our decision --

Q. Mm-hmm.
A. -- and I think he would've --
Q. When you say "our," you mean --
A. Our -- Dr. Broun's -- the -- the staff.
Q. Okay.
A. The official staff. Or the, you know, regular staff. I think we could've made a decision to do either/or in this particular situation. And I think lost this one, I think we ended up commenting, and he would've done, you know, the fallout from either.
Q. Okay. So would it be -- how --
A. (Inaudible).
Q. -- would you describe him as one of -- one of a few people that were providing input into the process, but not with a -- a dispositive role?
A. Sure. I guess. Maybe, you know, I -- I kind of feel like he just chimed in. You know?
Q. Yeah.
A. In the situation. But --
Q. But he was obviously cc'd on the
conversation --

A. Mm-hmm.

Q. -- because...

A. Well, this, I mean, you know as well as I do, these kind of stories always get legs, they always get attention, they always end up, like --

Q. Yeah.

A. -- trickling down to the local press, the AJC, Athens Banner-Herald.

So, I think in this situation we probably wanted to pre-empt any sort of extra media that we would be getting from being the number three most corrupt member of Congress.

Q. Mm-hmm.

A. So, I think he was probably more CC'd for a heads-up situation than a, "Hey, we are going to do whatever you say," type of role.

Q. Okay.

A. David and I always clashed on this stuff.

Q. So, let me show you this e-mail here.

PBDB140. This is an e-mail from you on February 8, 2013. It's not clear exactly who you're sending this to, but based on the response, it looks like you were sending it to Brett and Erica Miller, Dave
Bowser, GovBob, and Jordan Chinouth.

It says, "We need to work on this messaging that he wants to see it go through because it's the first real cut we've seen referring anything to the sequester. It's not getting good reception in Georgia because we're still military-heavy, in just saying that we'll plus it back up after he's cutting it."

Brett O'Donnell then responds, you know, a little over an hour later with suggesting a few lines of -- of -- of language on the sequester. Would that -- would it be common for him to suggest the language that the Congressman used?

A. I mean, I -- I would say that -- again, like, we would kind of come up with positions and the route and direction we wanted to go and if the tone or the, you know, wording need to be -- needed to be massaged or, you know, altered to sound better or come across better in the media, like, that's what he was there for.

Q. Okay. So, I want to show you another -- another e-mail that's -- that's similar.

A. And in this situation, I mean, I was
honestly probably looking for someone else's opinion.

Q. Yeah.
A. Is what it seems like, at least.
Q. And then here is another e-mail and this is PBDB155.
A. Mm-hmm.
Q. It's an e-mail from Brett O'Donnell to Congressman Broun's personal e-mail, CC'ing you and David Bowser. And the subject is "Universal Background Checks Answer," and he writes, "Dr. Broun, below is the answers we discussed."

And it's, you know, five or six lines of language on Dr. Broun's opposition to universal background checks and framing that. Would this also be typical for him to provide --
A. Well, I think in this situation this was right after the Newtown, Connecticut shootings.
Q. Uh-huh.
A. So, it was again, news du jour of the week.
Q. Okay.
A. So, I mean, if I remember correctly, in this situation. You know, we didn't want to be caught off-guard and have Dr. Broun seen
insensitive in any way.

MR. SOLIS: All right.

A. To the situation that was going on, so.

MR. SOLIS: Okay.

A. Yeah, I mean, it's probably, I mean I don't have the e-mail trail, or if we talked about this in his office earlier that day or, you know, this could've been part of a media inter- -- like, I have no idea. This, kind of, is --

MR. SOLIS: The context.

A. Yeah, I need the context. But, I mean, it could have been something that -- I think, actually, after that happened we scheduled a call, like, immediately to sort of go over his responses. If I have the timing correct.

So, that could've just been, you know, him putting in to -- typing notes up, or anything along those lines.

MR. SOLIS: Okay. And by "after that happened" do you mean after this e-mail was created? Or?

A. No, I mean after that --

MR. SOLIS: (Inaudible).

A. -- that shooting happened.
MR. SOLIS: Okay. Okay.

BY MR. MORGAN:

Q. Okay. So, when you -- when you say the "news du jour," it -- it seems to me -- and I don't want to put words in your mouth --

A. Sure.

Q. -- so, correct me if I'm wrong. But when hot topic issues would come up that you expected Congressman Broun to need to respond on --

A. Mm-hmm.

Q. -- you would, sometimes, involve Brett O'Donnell in helping craft the messaging --

A. Yeah, I mean --

Q. -- for his responses.

A. -- again, he was part of the -- I would say, part of the communications team. I -- I wouldn't say "crafting the messaging."

Q. Mm-hmm.

A. Again, he wasn't part of the development phase, but if it was something such as Newtown or, like -- I'm trying to think of other horribles that happened at that time.

You know, like, some of the things going on overseas. We'd often ask his opinion on
the way things were phrased, or how to best deliver
that so as to not come across as insensitive.
Q. Okay.
A. Or something, you know, something along
those lines.
Q. Yeah.
A. But it wasn't like, "Should Dr. Broun
change his opinion on gun control because of this?"
So, it -- it was much more, "How do I deliver this
so as to not seem insensitive."
Q. Okay.
MR. SOLIS: So, if that's the case, if Mr.
O'Donnell's doing, really, no development
whatsoever --
A. Mm-hmm.
MR. SOLIS: -- I mean, for example, this
155 e-mail, I mean, that then would have to be sort
of the result of the -- of the -- of putting
together notes and putting together other people's
opinions on it; right? This isn't just Brett
O'Donnell's --
A. This is definitely Newtown, because
"Children safe and free."
I mean, I would say, yes, to answer
your question. This is definitely a result of spending a lot of time with Dr. Broun, first of all, because he is the biggest Second Amendment advocate there is. I mean, these are things he says every day.

I mean, the first thing he says to you when you walk into his office, if you haven't seen the huge animals hanging on his wall, is the, you know, "Being a member of the Safari Club got me into Congress." Like, and he could go on about guns all day long.

So, I mean, this is just something that -- I would hope, at this point, was common knowledge to Brett, if, you know, he knew his client.

BY MR. MORGAN:

Q. Okay. Did -- did Brett ever train the staff?

A. No.

Q. No?

A. No.

Q. So, he didn't interact -- well, he interacted with you and David Bowser --

A. Mm-hmm.
Q. -- and the Congressman.
A. Mm-hmm.
Q. Do you know if he ever provided David Bowser any training?
A. No. David didn't do, like -- I mean, he -- David's role, I would say, would be to ultimately approve the line in which we were going as far as commenting on things.

But he was -- he'll tell you, like, firsthand, he's not, like, a communications guy, so --

Q. Okay.
A. -- no.

Q. And did -- did -- and Brett, did he ever train you?
A. No.

Q. Did he ever train anybody else that -- that you're aware of on the staff?
A. What -- what do you mean, "train"? I mean, we spent time kind of -- I mean, I felt like I learned from him --

Q. Mm-hmm.
A. -- and some of the things that he was really good at. But there's -- as far as training
goes, no. I -- I just -- I guess I'm not clear what you mean.

MR. SOLIS: Well, for example, his proposals. We looked at that a little while ago and there's this, you know, step-by-step listing of kind of how Mr. O'Donnell goes about doing what he does for members of Congress; right?

A. Mm-hmm.

MR. SOLIS: But first -- one of the first times you meet him and you sit down, did you have to go through his, "Here -- here -- here's my methods. And, you know, we'd like to see you do more of this type of thing." Was there any of that?

A. No.

BY MR. MORGAN:

Q. There any -- did he ever --

A. I don't remember him having any particular methods, because, again, it was -- I mean, if you want to say, like, having Dr. Broun practice the alphabet backwards and forwards and, you know, read from his Bible every night to get better at, like, pronunciation words.

If -- there just wasn't a lot of, like,
formal -- we just didn't have very many formal
sessions, if you will.

Q. Well, when I think of training I think of
assisting a person developing skills. Did he do
any of that with you?

Were any discussions he had with you
about how to craft messages, how to write speeches,
how to monitor press, or how to respond to
situations?

A. No. Uh-uhh.

Q. Okay.

A. No, I would actually say, I mean I don't
want to say it was quite the opposite, but when he
came on board he didn't know Dr. Broun at all.

And he has a very unique style, and,
you know, he's very quirky, whimsical, so I would
say it was a lot of Brett kind of sitting in and
learning how Dr. Broun currently does things and
what needs to get better for him to be a better
communicator.

Q. Okay. I want to talk now about Brett
O'Donnell's relationship with Representative
Broun's campaigns. Do you -- do you recall if he
ever had any -- if he ever volunteered for
Representative Broun's campaigns?

A. Yeah, I believe he volunteered some of his time.

Q. What do you recall about that?

A. I remember him just helping out with some of the, you know, kick-off speeches. I mean, I don't think he ever came down to Georgia, to my knowledge.

Q. It does appear -- I was going to ask you about that, because it appears that he may have -- in February of 2013, I think, there's some reference of him taking a trip to Georgia. I was going to ask if you recall that.

A. Okay. I don't. I -- if he did I wasn't here for it.

Q. Okay. Do you know -- do you recall how he first became involved in Dr. Broun's campaigns? Or when that was?

A. I don't -- I don't know how it actually transpired. I mean, I would assume he was probably excited like the rest of us and probably wanted to, you know, volunteer to ensure if his career went on he would still have a job.

Q. And you say he was, you know, volunteering.
1 How did you know that he was doing it in a
2 volunteer capacity?
3     A. I -- I mean, I have -- I don't -- I don't
4 know. I just assumed because the rest of us were,
5 so.
6     Q. I see. Okay.
7     A. I -- I have no idea.
8     Q. Okay. Do you recall who was -- who was
9 involved in preparing Representative Broun for
10 campaign debates and major campaign speeches, who
11 else was involved? So, Brett O'Donnell was
12 involved --
13     A. Mm-hmm.
14     Q. -- on occasion.
15     A. Mm-hmm.
16     Q. Who else was sort of on that -- that team
17 that would prep Dr. Broun for -- for big
18 appearances or for debates?
19     A. Mostly Bob and Jordan.
20     Q. Okay.
21     A. And, you know, some of myself here and
22 there.
23     Q. Okay. David Bowser, was he -- he involved?
24     A. Sometimes, yeah. I mean, again, my role
with the campaign was pretty limited. I didn't do a ton.

Q. Okay.

A. So...

Q. And Josh Findlay, was he -- was he involved?

A. I can't remember Josh being there for any messaging things.

Q. Okay.

A. But, I mean, again, he -- I'd have no idea.

Q. Okay. So I want to take you through just a few instances, a few e-mails to see if you remember particular preparation sessions.

A. Sure.

Q. So the first one is PBTN0009.

A. Mm-hmm.

Q. And this -- well, there's an e-mail from David Bowser to Brett O'Donnell on June 14, 2012. So, this would have been, I believe, June -- June 2012 would have been when Dr. Broun was -- I guess, it was Simpson and Broun was the race at the time. I'm not sure when exactly that election was held, but he -- David Bowser says --

A. Oh, this was Simpson?
Q. I think that's the case, maybe -- maybe I'm incorrect on that.

But he says, "Brett, as we discussed last week, there was a potential for a debate, which has now turned into a scheduled event on June 22nd on television from 9:30 to 10:30 a.m. in studio. We are in session next week with last votes no later than Thursday, June 21st at 3.

The Congressman would like to schedule a couple of hours later that afternoon for debate preparations, so we are going to hold 3-6 p.m. on our schedule and secure a conference at the NRCC for this purpose. Please let me know if we can plan on you attending some or all of the prep time."

He responds, you know, 20 minutes later writing, "I can be there for the entire time. Let's talk early in the week about how to structure that session." So, in -- you know, in Brett's response he does CC you there.

A. Mm-hmm.

Q. Do you recall if that debate preparation session took place?

A. I don't. I can't remember -- I thought,
for some reason, we had hired Brett after our primary win against Simpson. So, maybe I have my timelines confused.

Q. Okay. There was a --
A. So, I don't remember this particular one.
Q. This may help you recall.
A. Okay.
Q. There was -- on July 2, 2012 there was a 10th District debate. It was held on WGAU Radio?
A Broun, Simpson debate?
A. Yes.
Q. Does that ring a bell at all?
A. Yes, I do remember that. I was there for that.
Q. You were -- as in, you were in the studio there?
A. No, I was still on staff.
Q. You were still on staff. Okay.
A. I don't remember who was there.
Q. Do you -- do you recall who was involved in prepping the Congressman for that debate?
A. Me. I was there for that one.
Q. Do you recall if Brett O'Donnell was involved in that debate prep? It would have been
A. I can't -- for some reason, I thought we hired Brett after that happened. But I guess that
--
Q. So, it appears that the -- that first meeting --
A. (Inaudible).
Q. -- with Brett was March of 2012. So, this is, you know, now looking, you know, about four months later, after that first meeting. And all that e-mail.
A. Okay. And the election was in 2013 then?
Q. The election -- I think this was a -- I think, if I'm not mistaken, this was a primary election? 2012 Congressional?
A. Yeah, but wasn't the vote for the general election in 2012?
Q. Yeah. In the -- the fall.
A. November 2012?
Q. Yeah. This would have been, I think, a primary that summer.
A. Oh, okay.
Q. If that rings a bell.
A. Hmm.
MR. SOLIS: This is the first meeting, it was the -- it was May 31; right? Of 2012? The initial meeting.

BY MR. MORGAN:

Q. Oh, yeah. So, excuse me. I got March wrong, it was May. So this would have been --

MR. SOLIS: At -- at the NRCC.

A. This is literally, like, a week later.

BY MR. MORGAN:

Q. This is -- this is a few weeks after he was brought on.

A. So, maybe, I mean --

Q. (Inaudible).

A. -- that's probably why I don't remember him being there much for that.

Q. Okay.

A. I don't recall if he or I prepped him or if he was involved. I'm -- I'm sorry, I just don't remember. Clearly, I don't remember that timeline very well.

Q. Okay.

A. I think he was very new to the team at this point. And, it sounds like David said, some of the prep or all of it. So, it certainly wasn't Brett
leading it by any means.

Q. Okay. So -- and, just to be clear, you can't recall if Brett was there or not?

A. I don't even recall if I was there, so no.

MR. SOLIS: Okay.

BY MR. MORGAN:

Q. All right.

A. Sorry.

Q. Next document is PBTN0010.

A. Okay.

Q. Let me show you this. Take your time to take a look at that.

A. Okay. So, this is later in the summer.

Q. This is -- on the second page there of these e-mails it's an e-mail, you know, on the second page --

A. Oh, I have to start from the bottom up, huh?

Q. Yeah.

A. Okay.

Q. E-mail from Teddie Norton to Brett saying, "Hey, Brett, Dr. Broun wants to set up about 90 minutes next week to go over both debates. What days, times are better for you Tuesday to
Thursday?"

He responds saying, "Hi, Teddie. I'm wide open Tuesday, on Wednesday I'm free to 10:30."

So, it looks like he got scheduled.

And then, you know, the last line on this communication was on July 3rd when Teddie e-mails Brett saying, "Okay, great. We'll request a room at NRCC and let you know which one it is --"

A. Mm-hmm.

Q. -- once they assign it."

So, this would appear to suggest that there was, maybe, a session at the NRCC where Brett went over two debates with Dr. Broun. Does that -- do you recall that session?

A. I don't. I don't think I was even involved, so. I can't really tell you.

Q. Okay.

A. I mean, we -- again, like, Brett was -- at -- at this point I don't remember what his role was. I just distinctly remember Brett being more a part of the con- -- the team when Dr. Broun came back from Afghanistan.

Q. Do you recall when about that was?

A. I think it was in August, or August recess,
when Dr. Broun went. So, my interactions with him were, I mean, few and far between until after that.

Q. Until after that time period?
A. Mm-hmm.

Q. Okay. Let's see one more document. This is PBTN14?
A. Okay.

Q. This is a -- a calendar item from Teddie Norton's calendar. Subject is, "Brett O'Donnell," location is, "Finance Conference room, NRCC," date is July 19, 2012.
A. Mm-hmm.

Q. From 3 to 5 p.m. Attendees -- required attendees are Paul Broun, David Bowser, and you. And then it's categorized as political?
A. Okay.

Q. Does this ring a bell? A -- a 2 hour session at NRCC with Brett O'Donnell around that time period? When those debates were taking place?
A. No. I mean, not really. I -- I mean, I know we went over there and met multi- -- I mean, multiple times.

But, I don't know if it was this particular time and, you know, a lot of times we'd
block off time to go meet and have it end up
turning into thirty minutes, forty minutes.

Like, it just, you know, I -- I can't
recall this specific time, I guess is what I'm
getting at, as two years ago, so.

Q. Okay.

A. Kind of hard to remember each and every
meeting.

Q. Okay. Show you another document here, this
is PBTN31.

A. Mm-hmm.

Q. This may jog your memory a little bit.

A. Okay.

Q. This is -- appears to be, you know,
scheduling a session with Brett. The last e-mail
in the chain, you write to Teddie Norton, CC'ing
David Bowser, "We could just have it be official
today and do NRCC stuff next week."

A. December 13th. (Inaudible).

Q. Yes, this is moving forward to -- to
December of 2012.

A. Yeah, I'm like, what time period is this?

So, this is moving backward.

Q. So, this was after the 2012 election.
A. Okay. After the 2012 election, then?

Q. Yes. And my question about this is what did you mean when you said, "NRCC stuff"?

A. (Inaudible). I don't know. I guess, whatever we were planning to meet at the time at -- over at the NRCC about.

I mean, he could have had some sort of fund raising speech in Georgia that we were going over. Or, I mean, if it was after our primary, certainly we didn't have debates, so. Whatever we were meeting about.

I mean, typically there was a -- a purpose, or something we were going over.

Q. Mm-hmm.

A. I guess we were just -- I was saying, "I'd rather focus on whatever was going on with CNBC than the NRCC." Because, clearly, that was more important at the time.

Q. Okay. And then I'll -- I'll show you this. This appears to be the (inaudible) -- appears to be the session you referred to that did occur in the NRCC on December 19, 2012, 2:30 to 3:30.

Do you recall? This would have been, you know, about a week before Christmas 2012. Do
1 you recall what was talked about in that meeting at
2 all?
3 A. I don't.
4 Q. Okay.
5 A. I don't. I can't -- I mean, I can't even
6 tell you, to be honest, like, like whether or not
7 all of these happened. You know? Like, just so --
8 just so many times --
9 Q. Was it common for something to get
10 scheduled and fall through?
11 A. Yes. It would be so common for things to
12 get moved or get rescheduled or, you know, again,
13 like I said, for them to end up being fifteen
14 minutes, and I think, like, a lot of times, maybe
15 we booked the NRCC because we could be talking
16 about some sort of, you know, activity in Georgia
17 that could be considered campaign related.
18 So, we booked time at the NRCC to,
19 like, be on the safe side. You know, if we weren't
20 specifically going over, like, a Floor speech or a
21 TV interview. If it was something that could have,
22 you know, muddled the waters a little bit.
23 Q. Mm-hmm.
24 A. Just to be safe we'd book time at the NRCC,
but, like, the subjects of these particular meetings is just really hard for me to recall, because, again, like, I mean over the -- the two year period I spent so much time with him I can't say, like, on December 19th I met and spoke with him about this.

Q. Okay. Did -- did the amount of interaction that Brett O'Donnell had with the Congressional office vary quite a bit, week to week or month to month? Or was it pretty -- pretty steady?

A. Like I told you, in the beginning I remember it being more on a trial basis and more of a, kind of, once or twice a month thing. And then I remember when Dr. Broun came back from Afghanistan he was more, like, of a -- because I think he decided he really liked Brett and that we would keep him, permanently, as our consultant. And -- or, media consultant. And I -- it was a pretty, like, week -- average, maybe, an hour a week. Kind of like you said. But, that -- that being said, there were weeks where we just couldn't get it to work out and it got cancelled.

Q. Yeah.

A. Or we'd do two sessions instead of one or
we'd do not any the next week. So, it was just kind of depended.

Q. Okay. Another e-mail I want to show you.

MR. SOLIS: Can I just ask a quick -- quick question?

A. Sure.

MR. MORGAN: Certainly.

MR. SOLIS: You said something about "when you're at the NRCC it's to be on the safe side."

A. Mm-hmm.

MR. SOLIS: And I think you kind of said it was -- if it involved campaign issues. Can you -- just talk to me a little bit more what you meant by "on the safe side by going to the NRCC to possibly meet with Mr. O'Donnell"?

A. Sure. Just, I mean, I can remember Dr. Broun giving, you know, like speeches to certain groups in Georgia or things that maybe could be fundraising related.

And while those speeches often echoed a lot of the messaging we'd be working on on the House side, I think, just to be safe in case we were talking about something that was more fundraising orientated, we would book time there to go over
those speeches or practice or, kind of, hone in on messaging a little more.

MR. SOLIS: And you mentioned earlier that the other times that Mr. O'Donnell would meet with you it would be at the Congressional Office; right?

A. Yeah. I would say the major--like, most part we would meet in the Congressional Office. But those were for, like, the weekly sessions and if there was anything, like, extra we'd go to the NRCC.

MR. SOLIS: Okay. So then -- it sounds like, then, there's a decision based on what you might be talking about in the meeting, whether you're going to go to the NRCC or you're going to stay in the Congressional Office; right?

A. No. I would say it was more of a standing, like, once Brett became part of the team we'd have kind of like a standing weekly meeting at our Congressional Office about, like, news du jour type thing.

But if it was, like, "Hey, we have this event coming up, here's something extra." Sure, yeah, we'd be like, "Okay, we need to go to the NRCC to talk about this."
MR. SOLIS: Okay. So there was a contemplation about campaign-type issues? That would send you to the NRCC?

A. I guess. I mean, sure. I mean, I don't know. I didn't really book these times, I just showed up where I was told.

MR. SOLIS: Right.

A. I can't -- I mean, I can't tell you what the decision was.

BY MR. MORGAN:

Q. Do you know who made that decision? About where you would meet?

A. I -- I mean, David Bowser? I guess?

Q. Okay. And -- on balance, you said, I think, most of the time you met in the Congressional Office?

A. Mm-hmm.

Q. Was it seventy percent of the time Congressional Office, thirty percent NRCC? Do you have a sense of the -- of the breakdown?

A. Yeah. I would say, like -- I would say, like, eighty --

Q. Okay.

A. -- Congressional Office, twenty NRCC. I
mean, again, I think, like, the NRCC stuff that
came up, especially during this time period was
kind of few and far in between. And I think it was
just kind of a precautionary, "Let's go there to
talk about these things."

Q. Okay. I want to -- I want to show you
another e-mail here that says -- PB -- or PBDB163.
This is the -- I think, the last document I want to
show you.

A. Okay.

Q. And this an e-mail from David Bowser
agreeing with you. I think this is in regards to
an interview he did on the Ingraham Show?

A. Mm-hmm.

Q. (Inaudible) --

A. Yes, I remember this interview.

Q. David writes, "We also need a pre-done
answer that is short and concise on why he can win
this race."

A. Mm-hmm.

Q. "It will be the most asked question."

A. Yeah, I remember when we did this
interview. It was the only time he did the Laura
Ingraham Show while I was part of his staff. And
we booked -- I guess it was right after he announced -- I think?

Q. This is March of -- yeah, March of 2013. So.

A. So, was that right after he announced his candidacy? I think it was.

MR. SOLIS: You mentioned that Senator Chambliss had -- in January, you -- you believed --

A. Yeah. Was it January?

MR. SOLIS: -- you believed that he had announced he was retiring.

A. Okay. So, I think what happened in this particular one -- I remember we booked him to discuss a certain subject. And then immigration came up and it was, like, one of those "gotcha" questions about, "How would you deport people," or something like that. And Dr. Broun completely fumbled.

And then at the end of it, after already having fumbled. She was, like, "Okay. So I heard you, also, are running for Senate." And just, kind of, babbled his way through it; was already caught off guard from the other topics.
And it just sounded bad and I think that this was just David's reaction the whole interview.

But, I know that we particular -- I think we booked him on it for his -- something -- he maybe just released his Patient OPTION Act. I booked it for one thing. That was supposed to be good press, and it ended up getting chewed out because it ended up being about immigration.

Q. Hmm.

A. So --

Q. So Brett responds -- Brett O'Donnell --

A. Mm-hmm.

Q. -- responds saying, "On it. I agree, needs to control the ground of interviews. Send the clip and review in the next meeting."

So, this -- this appears like Brett was tasked with coming up with that pre-done answer on why he could win the race. Is that -- is that your recollection of it?

A. I don't think that David's insinuating that Brett needs to do that. I think if he was writing this to all of us, he was probably just saying we need an answer that's short and concise on why he
can win the race.

I mean, that was probably directed to me, Jordan, Bob, Brett.

Q. Mm-hmm. But then Brett responded and said, "On it."

A. Yeah, but I think if you have gotten a sense by now, Brett would often, you know, respond and kind of add his two cents.

But I don't think that it was directed to him to --

Q. Okay.

A. -- come up with the response.

Q. I see.

A. I think -- ultimately that would've been something that Bob -- Bob kind of tended to wade in to the messaging issues, too.

So, I think that would've been something that ultimately Bob would have responsibility for.

Q. Okay. So, you know, I don't have any other documents I want to show you.

A. Okay.

Q. But zooming back a little bit. I want to make sure that we have it absolutely clear -- clear
for the record.

A. Mm-hmm.

Q. His -- Dr. Broun's 2012 election. Do you recall any specific instances in which Brett O'Donnell was involved in preparing Dr. Broun for campaign debates or campaign speeches or events?

A. No. I didn't -- I, for some reason, truly thought we hired Brett after that race.

Q. Okay. But, so you --

A. But, I guess that doesn't make sense.

Q. So you do have a recollection -- you do have a recollection, only you don't know when it was exactly? Do you recall Brett O'Donnell prepping Dr. Broun for debates?

A. No. Not for that race.

Q. No. At no point?

A. Not --

Q. What about for a -- for a different race?

A. For the Senate race?

Q. Yeah.

A. For the Senate race, you know, he definitely volunteered some of his time. And -- or, you know, went over to the NRCC.

Q. Mm-hmm.
A. I keep saying "volunteered" because the rest of us did, and I just --

Q. You just assu- -- so you -- you weren't sure --

A. -- assume. Well, clearly, like, since then I've read media articles, and I know what this is about. So, I guess I would have to say that I know he volunteered his time. But --

MR. SOLIS: So, for example, you know, we showed that -- that one -- bearing in mind that some of these meetings just fall through --

A. Mm-hmm.

MR. SOLIS: -- but it was in December -- I think it was December 12th or something like of 2000 and --

BY MR. MORGAN:

Q. 12.

MR. SOLIS: 12. That would've been about -- if that happened, it would've been about the Senate race; right? Or no?

A. No.

MR. SOLIS: No?

A. Because I don't think he announced -- I don't think Saxby announced before then.
MR. SOLIS: Okay.

BY MR. MORGAN:

Q. Okay.

MR. SOLIS: All right.

A. Actually, I know he didn't because I went to Saxby's Christmas party and he didn't announce then.

MR. SOLIS: Okay. Okay.

BY MR. MORGAN:

Q. Okay. So, from what you recall Brett O'Donnell being involved in debate preparation sessions?

A. Mm-hmm.

Q. Tell us a little bit about those sessions. Do you recall where they took place?

A. Definitely the NRCC. We never did anything campaign related in our House Office.

Q. Okay.

A. What -- do you want me to tell you --

Q. What was the format? What was Brett's role? Would he design the format? Would he do a mock debate and play the role of the opponent? Or -- I mean, just, so, what was it like?

A. No. Because -- I -- I mean -- I left -- I
mean, I left when a lot of them started getting
into the race. So --

Q. When did you leave the Office?
A. I left in May? Early May.
Q. Early May. Okay.
A. Yes. Of 20 -- I've been at Equifax a year,
now, so May 2013.
Q. Okay.
A. Right? Yeah. 2013. So, no, I mean, he --
we certainly weren't at the debate level then.
Q. Okay.
A. Were we? I don't know. He definitely
didn't play, like, the role of the debater. A lot
of Brett's prep was to go over Dr. Broun's
pitfalls. Which, again, like, I say, like, "muddy
the water," but, like, a lot of things that Dr.
Broun struggled with on a Congressional level were
things we worried about from a campaign standpoint
as far as messaging goes.

Like, he had just had a big -- you
know, like Freudian slip. I don't know what you
want to call it. He had a big mess up when he did
the whole evolution comment.
Q. Mm-hmm.
A. So, a lot of prep for -- that I can remember -- Brett doing was, like, walking that back and kind of trying to determine how we would respond if we'd be asked about that. And, you know --

Q. Mm-hmm.

A. -- when that happened, like, obviously, I put forth the crisis communication strategy. But, it was something we were asked about in any interview we did about anything. Whether that was campaign related or about healthcare, or about Syria.

Like, it would somehow come up. So, a lot of the prep work we did were about things like that.

Q. Okay.

A. Again, just kind of "hot-button" issues for us. So, I don't -- I mean, I don't particularly remember him doing any debate coaching, if you will. But, I mean, we had, you know...

Q. Do you recall any -- any sessions where Brett would review campaign speeches? Or campaign media appearances? Provide feedback on those?

A. I know that the initial speech that Dr.
Broun gave at his announcement for Senate?

Q. Mm-hmm.

A. That Brett reviewed that speech. But I would say that speech mostly originated with me and Bob and Bowser. And Brett reviewed it and helped, again, with just things Dr. Broun struggled with or just, kind of making it better.

But not, again, he doesn't know this -- he didn't know the state of Georgia. I mean, he wasn't a -- we -- we used to have to tell Brett things like, "Oh, that doesn't play well in Georgia."

Q. Mm-hmm.

A. You know, like, Georgia, you know, our constituents don't respond -- I mean, he -- we're not from the same place.

Q. Okay.

A. And, so.

Q. Were there -- was there -- were there rehearsals in advance of that speech? Or prep sessions to -- to go over his delivery of the speech?

A. Yeah. That's what I -- I thought we were just talking...
Q. Oh, okay. Yeah, you said he reviewed the speech.
A. Mm-hmm.
Q. When you -- when you say that you mean, not only the text, but also delivery?
A. I mean Dr. Broun would read it and we'd kind of just review the context, and then once he got it perfectly -- you know what, I mean, he didn't really practice it too much. He practiced it the day of up at the podium, but, you know, that was it.
Q. Okay. Okay. Do you recall any other specific instances in which Brett was involved in campaign work during your time?
A. Nothing that jumps out to me.
Q. Okay.
MR. SOLIS: And because that November 2012 election would've been fairly uncontested election for Dr. Broun --
A. Mm-hmm.
MR. SOLIS: -- again, as you stated before, Brett and the team wouldn't have really been doing much work on the campaign front; correct? The November 2012 election.
A. Yeah. I think, you know, I can remember certain things we did for the Simpson part of it. But, like, the election part of it, no.

MR. SOLIS: Okay.

A. Not at all.

BY MR. MORGAN:

Q. Do you remember -- I'm -- I'm trying to -- because it's still a little bit vague in my mind. It seems like at one point you were saying that you remember Brett being involved in debate preparation.

It appears from the -- the records we've seen that -- that there were one or two debates in July of 2012 -- so, shortly after Brett came on --

A. And that had to have been when the primary -- I don't remember Brett being involved with that primary.

Q. Yeah.

A. With that Congressional race, at all.

Q. At all? Okay.

A. I mean, I know that's what the e-mail says and that the calendar says that, but I truly do not remember Brett having a hand in --
Q. Were you involved in those debate preparation sessions?
A. -- anything having to do with that. A little bit here and there, but just, again, from a, like, this is what's going on. I mean, it obviously affects us media-wise, at that time we were running for our District.

Q. Yeah.
A. I mean this was a -- the Tim Bryant show on WGAU, I remember that one that we did regularly, so I had already had relationships with him.

Q. Mm-hmm.
A. So from that standpoint, yes. But that one -- I -- I mean, that primary, I really don't remember Brett being involved at all.

Q. Okay. Do you -- is it possible that Brett was involved and you didn't know about it? Or that he was involved and you didn't notice his involvement because you weren't involved, or?
A. I mean that's like -- how do I answer that? Is it possible that he was involved and I didn't know about it, I mean, sure, I guess.

Q. Well, what I mean by that is how closely
were you involved with the debate preparation?

A. It would be -- I guess I would say that I would probably have known if Brett and Dr. Broun were out meeting on their own. I mean, that's not to say it didn't happen.

Q. Right.

A. But I -- I mean...

Q. But for the most part, to the extent there were debate preparation or review sessions you would've been involved do you think?

A. For the most part, yeah. And if it weren't me, I mean, David certainly. I mean, he -- I don't think that Brett and Dr. Broun were ever alone in any capacity.

Q. Okay. Okay. At -- at any point during your time in the Congressional Office, was there -- was there ever any discussion about the permissibility of Brett's payments?

The permissibility of the scope of his work for the Office or the campaign?

Do you -- do you recall hearing any discussions of reaching out the Ethics Committee, or House Committee on Administration?

A. Again, I -- Brett and payments never came
Q. Okay.

A. So, I mean, that was something that I --

Q. And -- and this may have been after your time, but it does appear that on a couple of occasions reporters reached out to the Office to ask why Brett O'Donnell was being paid by the Office.

Do you recall any of that occurring while you were -- you were there?

A. That was definitely -- I remember that story. I was here at the time. The WSB story.

Q. Okay. So it was after your time. Okay.

A. I remember actually seeing it down here. But, yeah, no, that -- nothing -- no inquiries ever came up about him while I was there. I mean, it wasn't anything that was in question.

Q. As -- as I said in the beginning, our role is just to gather facts.

A.

Q. So, with that in mind, I think you have had a general sense of what -- the scope of what we're looking at it is --

A. Sure.
Q. -- is there anything else that you think we should know and present to our board?

A. No. I'm -- I don't think there's anything that you haven't covered. I mean -- I -- I would just like to reiterate that, from my standpoint, Brett was part of our official communications team. I mean, that's the way I viewed him.

I mean, he was, you know, helpful with my role as his Communications Director. I think that his involvement with the campaign was probably pretty limited and obviously didn't do much for the campaign since it's no longer in existence.

So, that's just, you know, those are my feelings.

Q. All right. We thank you again for being with us.

A. I'm so sorry, again, that I --

(END OF PROCEEDING)
I, Jennifer R. Kessler, 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.

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Jennifer R. Kessler