

# **EXHIBIT 22**

**Bowser, David**

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**From:** Brett ODonnell [REDACTED]@odacomunications.com]  
**Sent:** Wednesday, December 19, 2012 10:59 AM  
**To:** Bowser, David  
**Cc:** Griffanti, Meredith; GovBob  
**Subject:** Re: CNN Video

**Importance:** High

I agree.

On Dec 19, 2012, at 10:06 AM, Bowser, David wrote:

> I talked to him about this just now, my primary focus was he did not need to explain the foundations of his belief (evidence), we have all already discussed it with him and know it, let's focus our time on messaging strategy.

>

> In my opinion it is ALL about messaging on jobs/economy, taxes/spending, and health care. Anything else is counter-productive to messaging efforts. My goal is to get him to adhere to the idea that anything we discuss in a media setting should only be about these three things, nothing else.

>

> Do not discuss evolution or young earth with the media - he agreed he wasn't going to convince them anyway.

>

> Do not discuss gun control with the media - we will be able to micro-target these people anyway.

>

> Do not discuss Socialism with the media - it seriously damages the credibility of any message.

>

> Etc etc.

>

>

> -----Original Message-----

> From: Griffanti, Meredith

> Sent: Wednesday, December 19, 2012 7:11 AM

> To: 'Brett ODonnell'

> Cc: Bowser, David

> Subject: RE: CNN Video

>

> I'm going to try to bring the CNN video, the CNBC hit, and our CNN hit from this morning. We have A LOT to discuss. FYI - be prepared for a spiel on how he wants to defend the evolution stuff again. Please don't let him waste the whole hour giving you his theories about a young earth again either... I know you've already heard it and we've got limited time together. Anyways, the evolution stuff came up this morning briefly at the very end of our interview on the fiscal cliff. He did an okay job of sidestepping it and said "I came on your show today to talk about the fiscal cliff and spending and that's what I'm focused on." BUT afterward he told me that the Lord is up to something else here and 4 months later this is still coming up so he wants to confront it head on. We actually just got through a twenty minute prayer on how I should best communicate God's feelings on evolution (don't worry Brett he specifically prayed for you too in guiding us in spreading the message). Big big big trouble. Between this and what he wants to say on guns... I am really scared.

>

> -----Original Message-----

> From: Brett ODonnell [REDACTED]@odacomunications.com]

> Sent: Tuesday, December 18, 2012 4:22 PM  
> To: Griffanti, Meredith  
> Subject: CNN Video  
>  
> Do you have the video from last week's CNN appearance?  
>  
> Thanks  
>  
> Brett

# **EXHIBIT 23**

**From:** Hardman, Christine [REDACTED]@mail.house.gov  
**Subject:** Re: Call tomorrow  
**Date:** August 11, 2013 at 4:26 PM  
**To:** [REDACTED]@odacomunications.com

Hi Brett,

Tom morning we have a radio town hall w/ Tim Bryant and Martha Zoeller at 8am.

At 11am tom, he is speaking on changes in federal benefits as related to Obamacare.

At 6pm, he has a Town Hall with the Oglethorpe Farm Bureau.

We can discuss the 6pm town hall on our call tomorrow.

Tues:

He has a Gwinnett Constituent Coffee scheduled at 8am.

At 6pm he has the Dekalb Citizens Forum (town hall).

Wed:

Wilkes Constituent Coffee @ 8am.

Radio with Robbie Ross, WLOV @ 930am.

Visit with Thomson/McDuffie Chamber @ 10:15

Radio WTHO w/ Donna Branch @ 11am.

Tony Powers Radio Town Hall @ 5pm.

Thurs:

Jasper Constituent Coffee @ 8am.

Coffee/Conversation w/ the Alzheimer's Asoc @ 10am.

Washington County Town Hall @ 6pm.

[http://m.timesenterprise.com/limesenterpris/pm\\_113433/contentdetail.htm?contentguid=E0b7pJ6Z](http://m.timesenterprise.com/limesenterpris/pm_113433/contentdetail.htm?contentguid=E0b7pJ6Z)

<http://www.newsmax.com/Newsfront/broun-immigration-amnesty/2013/08/07/id/519271>

The other stations were planning on holding the interviews until they needed them, so we're still waiting on the others. I'll send you links to anymore that do come up.

Christine

----- Original Message -----

**From:** Brett O'Donnell [REDACTED]@odacomunications.com]

**Sent:** Sunday, August 11, 2013 02:25 PM

**To:** Hardman, Christine

**Subject:** Call tomorrow

Christine,

please send me media interviews on Dr. Brown's schedule for this week. Also any other events need to discuss on the call tomorrow morning. And also send clips from media done in the past week.

Thanks.

Sent from my iPhone

# **EXHIBIT 24**

**Bowser, David**

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**From:** Brett ODonnell [REDACTED]@odacommunications.com]  
**Sent:** Tuesday, December 03, 2013 10:04 PM  
**To:** Bowser, David  
**Subject:** Re: Dobbs tonight

I thought he did very well. Was proud of him. We'll review next week.

Brett

On Dec 3, 2013, at 7:50 PM, Bowser, David wrote:

> PB did great on Dobbs, lots of Patient Option plugs and took a good swing at Kingston, Dave Bossie thought it went well too.

# **EXHIBIT 25**

**Norton, Teddie**

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**Subject:** Call w/ Brett  
**Start:** Wed 12/11/2013 10:00 AM  
**End:** Wed 12/11/2013 11:00 AM  
**Recurrence:** (none)  
**Meeting Status:** Meeting organizer  
**Organizer:** Broun, Paul  
**Required Attendees:** Hardman, Christine; Bowser, David  
**Categories:** Press

# **EXHIBIT 26**

**Bowser, David**

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**From:** Hardman, Christine  
**Sent:** Wednesday, January 22, 2014 3:19 PM  
**To:** Bowser, David  
**Subject:** FW: Call today

3:30 going to work for you?

**From:** Brett O'Donnell [redacted@odacommunications.com]  
**Sent:** Wednesday, January 22, 2014 1:57 PM  
**To:** Hardman, Christine  
**Cc:** Bowser, David  
**Subject:** Re: Call today

Will 3:30 work. Running into a mtg right now.

Sent from my iPhone

On Jan 22, 2014, at 1:24 PM, "Hardman, Christine" [redacted@mail.house.gov] wrote:

Hi Brett,

Hope you had a nice weekend. Is there any way we could do a phone call today with you before 4pm to discuss some upcoming events? If possible, we'd like to get Dr. Broun on the phone around 5pm to discuss with him as well.

Thanks,  
Christine

**Christine Hardman**  
Press Secretary  
Congressman Paul C. Broun (GA-10)  
2437 Rayburn Building  
202-225-[redacted]  
[Sign up for Dr. Broun's e-newsletters](#)  
<image001.png><image002.png><image003.png><image004.png>

# **EXHIBIT 27**

**Bowser, David**

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**From:** Hardman, Christine  
**Sent:** Monday, August 19, 2013 1:21 PM  
**To:** Hayes, Jessica; Burrell, Jane; Miller, Erika; GovBob  
**Cc:** Bowser, David; 'Brett O'Donnell'  
**Subject:** Communications Plan for Week of Aug 19

**Communications Plan for Week of August 19, 2013**

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**To Do (DC):**

- Sirius XM Radio, Andrew Wilkow, talk Obamacare & Immigration (Wed)
- Messaging calls with Dr. Broun throughout week (Brett)
- Work with Fireside to get website updated. Find way to post E-News on website (start posting on social media).
- Update website survey, post on social media
- Handouts for Patient OPTION Act
- Upload pictures from district, save on S drive

**To Do (GA):**

- Radio Address on Constituent Services (Wed)
- Weekly E-Newsletter, wrap up from events last week (Thurs)
- Upload/update pictures onto website
- Upload pictures of events throughout the week on social media

**On the Radar:**

- Scheduling Dr. Broun on WGAU at end of recess (Jane)
- Op-ed on Patient OPTION Act, finding placement for after recess.
- Radio Town Hall at WDUN (Mon)
- Sept 10<sup>th</sup> Rally on defunding Obamacare

# **EXHIBIT 28**

## Hardman, Christine

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**From:** Hardman, Christine  
**Sent:** Monday, December 02, 2013 4:41 PM  
**To:** Hayes, Jessica; Burrell, Jane; GovBob; 'Brett O'Donnell'  
**Cc:** Bowser, David; Carson, Austin; Miller, Erika  
**Subject:** Communications Plan for Week of December 2nd

### Communications Plan for Week of December 2<sup>nd</sup>

**Focus: Keeping Obamacare in place is irresponsible: We must Repeal & Replace with the Patient  
OPTION Act**

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#### To Do (DC):

- TV: Lou Dobbs Show (Tues), discuss Citizens United special report
- Radio: Tim Constantine, the Capitol Hill Show (Wed), discuss medical community reaction to Obamacare
- Radio: Monica Crowley Show (Wed), discuss Citizens United special report
- Radio: Martha Zoller & Tim Bryant (Fri), discuss Obamacare
- Radio: Bill Williamson Radio Show (Thurs)

#### To Do (GA):

- E-News highlighting Dr. Broun's efforts to repeal & replace Obamacare (include interviews, news articles from this week).
  - Radio Address: Talk on Dr. Broun's efforts to repeal Obamacare in full and replace it with market-based solutions.

#### On the Radar:

- Obamacare joint roundtable (Date:TBD)
- Potential tour of Jefferson Co. hospital

#### Bills on the Floor:

##### Monday, December 2<sup>nd</sup>:

Suspensions

##### Tuesday, December 3<sup>rd</sup>:

Suspensions

##### Wednesday & Thursday December 5<sup>th</sup> & 6<sup>th</sup>:

**H.R. 1105** - Small Business Capital Access and Job Preservation Act, Rules Committee Print (Subject to a Rule) *(Sponsored by Rep. Robert Hurt / Financial Services Committee)*

**Possible Consideration of H.R. 3309** - Innovation Act, Rules Committee Print (Subject to a Rule) *(Sponsored by Rep. Bob Goodlatte / Judiciary Committee)*

**COMMITTEE ACTIVITY OF THE WEEK**

Small Business Committee hearing on "The Health Care Law: The Effect of the Business Aggregation Rules on Small Employers" (Wednesday, December 4th, at 1:00 p.m.)

# **EXHIBIT 29**

## Hardman, Christine

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**From:** Hardman, Christine  
**Sent:** Monday, January 13, 2014 10:53 AM  
**To:** Hayes, Jessica; Burrell, Jane; GovBob; 'Brett O'Donnell'  
**Cc:** Bowser, David; Miller, Erika; Carson, Austin  
**Subject:** Communications Plan for Week of January 13th

### Communications Plan for Week of January 13<sup>th</sup> Focus: Continue to push messaging on AAPS endorsement

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#### To Do (DC):

- Op-Ed on Unemployment Insurance
- Op-Ed on Charlie Norwood VAMC visit to be placed in Aug. Chronicle on Sunday (1/19)
- 1-Minute Honoring Officer Morgan (will be speaking with Rep. Hank Johnson)
- Submit Congressional Record on Morgan Steward (have printed, framed in district)
- Continue to push messaging on AAPS endorsement (social media posts, E-news, mention in interviews).
- Messaging on spending bill

#### To Do (GA):

- E-News focusing on AAPS endorsement: include floor speech from last week, press release, news articles covering AAPS endorsement, include links to interviews from local interviews last week. (Wed)
  - Radio Address: Talk on AAPS endorsement (Tues)
  - Patriot Award Presentation press release (Mon)
  - Academy nominations press release (TBD, this week)
  - Gwinnett Town Hall, Obamacare themed, press release (Mon)

#### On the Radar:

- Potential farm bill movement this week
- Likely a 3-day Continuing Resolution this week to keep the govt. running through Saturday
- \$1 Trillion Omnibus spending bill to cover the rest of FY14
- Newton Constituent Coffee, honoring Officer Morgan, (Jan 20<sup>th</sup>)
- Lincolnton Constituent Coffee (Jan 21<sup>st</sup>)
- In studio interview with Tony Powers (Jan 21<sup>st</sup>)

- Atlanta March for Life (Jan 22<sup>nd</sup>)

**Bills on the Floor:**

**Monday, January 13<sup>th</sup>:**

Suspensions

**Tuesday, January 14<sup>th</sup>:**

Suspensions

**Wednesday & Thursday December 5<sup>th</sup> & 6<sup>th</sup>:**

Legislation to Fund Government Operations for the Remainder of Fiscal Year 2014

H.R. 3362 - Exchange Information Disclosure Act (Closed Rule, One Hour of Debate)

**COMMITTEE ACTIVITY OF THE WEEK**

Homeland Security Committee hearing on "Threats to Homeland Security"  
(Wednesday, January 15<sup>th</sup>, at 10:00 a.m.)

**Tuesday, January 14<sup>th</sup>:**

No votes

# **EXHIBIT 30**

**Bowser, David**

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**From:** Brett O'Donnell [redacted@odacomunications.com]  
**Sent:** Thursday, August 22, 2013 11:57 AM  
**To:** Bowser, David  
**Cc:** GovBob; Hardman, Christine; Jordan Chinouth  
**Subject:** Re: PB Speaking tonight

Sounds good.

Sent from my iPhone

On Aug 22, 2013, at 11:54 AM, "Bowser, David" <[redacted]@mail.house.gov> wrote:

Apologies if you all already know and have prepped for this, but Christine just clued me into the fact that PB is the keynote speaker tonight at an event where the topic is religious freedom, which is of course potentially tricky.

Brett, you are talking to him this afternoon before the speech...let's make sure he is a good frame of mind and is always reminded that cameras are everywhere.

Christine is going to pull together a few talking points on HHS mandates in Obamacare that affect religious freedom...probably a good idea to focus his speech on hitting Obamacare in general and using the examples Christine is pulling together to make it relevant to the topic. Big government theme overall as well and of course a strong pro-life stance. He will have 30 minutes available to him and Jody Hice is speaking for 10-15 minutes before PB.

# **EXHIBIT 31**

**Bowser, David**

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**From:** Brett O'Donnell [redacted]@odacomunications.com]  
**Sent:** Monday, August 26, 2013 1:54 PM  
**To:** Hardman, Christine  
**Cc:** Miller, Erika; Bowser, David  
**Subject:** Re: FOX Business Interview Request

Yes. We should do a call before the interview.

Sent from my iPhone

On Aug 26, 2013, at 11:47 AM, "Hardman, Christine" <[redacted]@mail.house.gov> wrote:

Fox Business wants bullets on the cost of Obamacare vs. shutting down the govt. I don't know if we should get into the cost of shutting down the govt. b/c those are not in PB's talking points ( we want to say that we want to shut down Obamacare, not the govt). Looking at giving these numbers. All were found on heritage, any thoughts?

- The Congressional Budget Office projects that spending on the subsidies and federal exchanges will grow from \$48 billion in fiscal year 2014 to \$250 billion in 2023—a more than five-fold increase. Source: <http://www.heritage.org/research/reports/2013/07/defunding-obamacare-the-next-best-option>
- Obamacare will increase Federal Health Care Spending to \$1.8 Trillion by 2023 Source: <http://www.heritage.org/multimedia/infographic/2013/08/federalspendingbynumbers2013/page-8-chart-2>
- According to updated numbers from the Congressional Budget Office (CBO), by 2023, Obamacare will still leave 31 million people without insurance. Source: <http://blog.heritage.org/2013/06/10/obamacare-2023-31-million-uninsured-1-8-trillion-taxpayer-dollars-spent/>

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**From:** Chow, Joanna [redacted]@foxbusiness.com]  
**Sent:** Monday, August 26, 2013 11:36 AM  
**To:** Hardman, Christine  
**Subject:** RE: FOX Business Interview Request

Would be great to get a dollar amount on the cost of Obamacare vs. shutting down or anything else "Money" related.

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**From:** Hardman, Christine [mailto:[redacted]@mail.house.gov]  
**Sent:** Monday, August 26, 2013 11:07 AM  
**To:** Chow, Joanna  
**Subject:** RE: FOX Business Interview Request

Hi Joanna,

Yes, I can be sure to do that. When would you need the bullets by?

Christine

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**From:** Chow, Joanna [redacted@foxbusiness.com]  
**Sent:** Monday, August 26, 2013 11:03 AM  
**To:** Devins, Brooke; Hardman, Christine  
**Subject:** RE: FOX Business Interview Request

Hi Christine,

Could you please send me 3-4 bullets on why the Congressman thinks it's better to shut down the whole government than to fund Obamacare? The more quantitative the reason the better – we like to back up thoughts with an exact money amount on the show. Please give me a ring to talk further [redacted].  
Thanks!

---

**From:** Devins, Brooke  
**Sent:** Monday, August 26, 2013 11:01 AM  
**To:** 'Hardman, Christine'  
**Cc:** Chow, Joanna  
**Subject:** RE: FOX Business Interview Request

Hi Christine,

We're looking forward to having the Congressman on the show today!

The hit time is 5:10pm ET.

My colleague Joanna Chow (cc'd here) is producing the segment and will be in touch in case any information is needed.

Thanks so much and please let me know if I can answer any questions in the meantime.

Best,

--

Brooke Devins  
Booker  
Office: 212.601. [redacted]  
Cell: [redacted]  
[redacted@foxbusiness.com]

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**From:** Hardman, Christine [mailto:[redacted@mail.house.gov]]  
**Sent:** Friday, August 23, 2013 2:02 PM  
**To:** Devins, Brooke  
**Subject:** RE: FOX Business Interview Request

Great, thanks Brooke!

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**From:** Devins, Brooke [redacted@foxbusiness.com]  
**Sent:** Friday, August 23, 2013 1:50 PM  
**To:** Hardman, Christine  
**Subject:** RE: FOX Business Interview Request

Fantastic, thank you!

We would ideally like for the Congressman to arrive about 20-30 minutes before the hit, if possible. So the very earliest would be about 4:30 or 4:40, but I will have a confirmed time on Monday. The Congressman will be speaking for about 4-6 minutes.

Thanks again!

Best,

--

Brooke Devins

Booker

Office: 212.601. [REDACTED]

Cell: [REDACTED]

[REDACTED]@foxbusiness.com

---

**From:** Hardman, Christine [mailto:[REDACTED]@mail.house.gov]

**Sent:** Friday, August 23, 2013 1:45 PM

**To:** Devins, Brooke

**Subject:** RE: FOX Business Interview Request

Hi Brooke,

That will work with the Congressman's schedule, we'll be there on Monday. I know you won't have the exact time of the interview until Monday, but what time would you suggest the Congressman plans on arriving for the interview? Also, do you know how long he will be speaking for?

Thanks,  
Christine

---

**From:** Devins, Brooke [mailto:[REDACTED]@foxbusiness.com]

**Sent:** Friday, August 23, 2013 12:04 PM

**To:** Hardman, Christine

**Subject:** RE: FOX Business Interview Request

It would be sometime in the 5pm ET hour, but I would have the exact hit time that morning and will know around 11:15am – does that sound ok?

Thanks!

--

Brooke Devins

Booker

Office: 212.601. [REDACTED]

Cell: [REDACTED]

[REDACTED]@foxbusiness.com

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**From:** Hardman, Christine [mailto:[REDACTED]@mail.house.gov]

**Sent:** Friday, August 23, 2013 12:03 PM

**To:** Devins, Brooke

**Subject:** RE: FOX Business Interview Request

Ok, great. And would this be at 5pm?

**From:** Devins, Brooke [redacted@foxbusiness.com]  
**Sent:** Friday, August 23, 2013 11:56 AM  
**To:** Hardman, Christine  
**Subject:** RE: FOX Business Interview Request

Thanks, Christine.

We would like to do this in studio. We have studios in Atlanta and the one we typically use is located at:

260 NW 14th Street  
Atlanta, GA 30318

Thank you!

--

**Brooke Devins**  
Booker  
Office: 212.601. [redacted]  
Cell: [redacted]  
[redacted@foxbusiness.com]

**From:** Hardman, Christine [mailto:[redacted@mail.house.gov]]  
**Sent:** Friday, August 23, 2013 11:53 AM  
**To:** Devins, Brooke  
**Subject:** RE: FOX Business Interview Request

Hi Brooke,

Not a problem. What time were you looking to do the show on Monday? The Congressman will still be in Georgia at that time. Did you want to set up a phone interview or were you looking to have him come into the studio?

Thanks,  
Christine

**From:** Devins, Brooke [redacted@foxbusiness.com]  
**Sent:** Friday, August 23, 2013 11:49 AM  
**To:** Hardman, Christine  
**Subject:** RE: FOX Business Interview Request

Hi Christine,

We just changed things around in our show for today and looks like we want to do this on Monday instead. Any way Dr. Broun would be available on Monday?

Thanks!

--

**Brooke Devins**  
Booker  
Office: 212.601. [redacted]  
Cell: [redacted]  
[redacted@foxbusiness.com]

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**From:** Hardman, Christine [mailto: [REDACTED]@mail.house.gov]  
**Sent:** Friday, August 23, 2013 11:42 AM  
**To:** Devins, Brooke  
**Subject:** RE: FOX Business Interview Request

Hi Brooke,

Thanks for reaching out. Dr. Broun is in Atlanta today, were you thinking of having him come into the studio, or doing the interview by phone?

Thanks,  
Christine

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**From:** Devins, Brooke [ [REDACTED]@foxbusiness.com]  
**Sent:** Friday, August 23, 2013 11:28 AM  
**To:** Hardman, Christine  
**Subject:** FOX Business Interview Request

Hi Christine,

My name is Brooke Devins and I am a booking producer for Fox Business' 5pm ET show, *Money with Melissa Francis*. I hope you are well!

Would Rep. Broun be interested in doing an interview on our show today to talk about the letter to Speaker Boehner asking him to resist any spending bills that would accommodate the new health care law?

The interview would be sometime in the 5pm ET hour.

Thank you!

Best,

--

**Brooke Devins**  
Booker  
*MONEY with Melissa Francis*  
Office: 212.601. [REDACTED]  
Cell: [REDACTED]  
[REDACTED]@foxbusiness.com  
<image001.jpg>

# **EXHIBIT 32**

**Norton, Teddie**

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**From:** Norton, Teddie  
**Sent:** Monday, August 26, 2013 1:59 PM  
**To:** Heenan, David  
**Subject:** FW: Call today

**This message has been archived. [View the original item](#)**

fyi

Teddie Norton  
Director of Operations  
Congressman Paul C. Broun (GA-10)

2437 Rayburn House Office Building

Washington DC 20515  
Phone: (202) 225-  
Fax: (202) 226-0776  
[www.broun.house.gov](http://www.broun.house.gov)

**From:** Hardman, Christine  
**Sent:** Monday, August 26, 2013 1:55 PM  
**To:** Norton, Teddie  
**Subject:** FW: Call today

**From:** Brett O'Donnell [redacted]@odacommunications.com]  
**Sent:** Monday, August 26, 2013 1:55 PM  
**To:** Hardman, Christine  
**Subject:** Re: Call today

Yes. Lets do a call at 4 pm.

Sent from my iPhone

On Aug 26, 2013, at 9:32 AM, "Hardman, Christine" <[redacted]@mail.house.gov> wrote:

Would you be free anytime between 3:30 - 4:45pm to prep Dr. Broun for his Fox Business interview today?

Christine Hardman

Press Secretary

Congressman Paul C. Broun (GA-10)

2437 Rayburn Building

202-225-██████

Sign up for Dr. Broun's e-newsletters <<http://www.broun.house.gov/Forms/EmailSignup/>>

<image001.png> <<http://www.facebook.com/RepPaulBroun>> <image002.png>  
<<http://www.youtube.com/user/RepPaulBroun>> <image003.png> <<http://twitter.com/RepPaulBrounMD>>  
<image004.png> <<http://broun.house.gov/News/Rss.aspx>>

# **EXHIBIT 33**

## Hardman, Christine

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**From:** Hardman, Christine  
**Sent:** Monday, August 26, 2013 2:50 PM  
**To:** Miller, Erika; Bowser, David; [REDACTED]@odacomunications.com'  
**Subject:** RE: FOX Business Interview Request

Yep, agree as well. Brett and I can go over this with him beforehand.

---

**From:** Miller, Erika  
**Sent:** Monday, August 26, 2013 2:40 PM  
**To:** Bowser, David; [REDACTED]@odacomunications.com'; Hardman, Christine  
**Subject:** Re: FOX Business Interview Request

I agree with all of this.

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**From:** Bowser, David  
**Sent:** Monday, August 26, 2013 02:37 PM  
**To:** Bowser, David; 'Brett O'Donnell' <[REDACTED]@odacomunications.com>; Hardman, Christine  
**Cc:** Miller, Erika  
**Subject:** RE: FOX Business Interview Request

One other thing...I think PB should answer any question like the one the producer below asked about the "cost of shutting down the government" with how much Obamacare is going to cost in jobs...large companies based in Georgia like Delta who said Obamacare is going to cost it's employees over \$100 million and Georgia based UPS announced they have to drop 15,000 employee spouses from health plans because of Obamacare to small, family owned businesses that PB has several stories on already.

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**From:** Bowser, David  
**Sent:** Monday, August 26, 2013 2:27 PM  
**To:** 'Brett O'Donnell'; Hardman, Christine  
**Cc:** Miller, Erika  
**Subject:** RE: FOX Business Interview Request

My 2 cents: PB needs just a couple of bullet points to bring it all back to the spending and defunding of Obamacare. Nothing technical or wonky.

FIRST – PB, Mike Lee, Ted Cruz, et al are all on record as saying WE DO NOT WANT TO SHUT THE GOVERNMENT DOWN! This is not an attempt to shut the government down, this is an attempt to save America's future by defunding and eventually dismantling Obamacare, which the CBO projects will be nearly \$50 Billion in new spending this first year alone, that's half the sequester!

SECOND – Why the CR, what about Boehner & leaderships efforts to shift to the Debt Ceiling or some other piece of legislation – Obamacare is set to go into effect on October 1<sup>st</sup> and the funding resolution Congress must pass by the end of the month is the best and only piece of legislation to take a stand to defund Obamacare...remember, the defund Obamacare effort is only for the first year.

THIRD – Even if the government is shutdown temporarily, social security checks will still be paid, the military, law enforcement, border security will still function, our Veterans will continue to receive care and benefits, etc etc.

FOURTH – The funding resolution facing Congress was already under threat even without this Obamacare battle. The House has been writing and passing spending bills using the sequester numbers while the Senate has been proceeding at a level \$91 Billion higher as if the sequester has been repealed.

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**From:** Brett O'Donnell [redacted]@odacomunications.com]  
**Sent:** Monday, August 26, 2013 1:54 PM  
**To:** Hardman, Christine  
**Cc:** Miller, Erika; Bowser, David  
**Subject:** Re: FOX Business Interview Request

Yes. We should do a call before the interview.

Sent from my iPhone

On Aug 26, 2013, at 11:47 AM, "Hardman, Christine" [redacted]@mail.house.gov> wrote:

Fox Business wants bullets on the cost of Obamacare vs. shutting down the govt. I don't know if we should get into the cost of shutting down the govt. b/c those are not in PB's talking points ( we want to say that we want to shut down Obamacare, not the govt). Looking at giving these numbers. All were found on heritage, any thoughts?

- The Congressional Budget Office projects that spending on the subsidies and federal exchanges will grow from \$48 billion in fiscal year 2014 to \$250 billion in 2023—a more than five-fold increase. Source: <http://www.heritage.org/research/reports/2013/07/defunding-obamacare-the-next-best-option>
- Obamacare will increase Federal Health Care Spending to \$1.8 Trillion by 2023 Source: <http://www.heritage.org/multimedia/infographic/2013/08/federalspendingbynumbers2013/page-8-chart-2>
- According to updated numbers from the Congressional Budget Office (CBO), by 2023, Obamacare will still leave 31 million people without insurance. Source: <http://blog.heritage.org/2013/06/10/obamacare-2023-31-million-uninsured-1-8-trillion-taxpayer-dollars-spent/>

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**From:** Chow, Joanna [redacted]@foxbusiness.com]  
**Sent:** Monday, August 26, 2013 11:36 AM  
**To:** Hardman, Christine  
**Subject:** RE: FOX Business Interview Request

Would be great to get a dollar amount on the cost of Obamacare vs. shutting down or anything else "Money" related.

---

**From:** Hardman, Christine [mailto:[redacted]@mail.house.gov]  
**Sent:** Monday, August 26, 2013 11:07 AM  
**To:** Chow, Joanna  
**Subject:** RE: FOX Business Interview Request

Hi Joanna,

Yes, I can be sure to do that. When would you need the bullets by?

Christine

---

**From:** Chow, Joanna [redacted@foxbusiness.com]  
**Sent:** Monday, August 26, 2013 11:03 AM  
**To:** Devins, Brooke; Hardman, Christine  
**Subject:** RE: FOX Business Interview Request

Hi Christine,

Could you please send me 3-4 bullets on why the Congressman thinks it's better to shut down the whole government than to fund Obamacare? The more quantitative the reason the better – we like to back up thoughts with an exact money amount on the show. Please give me a ring to talk further [redacted].  
Thanks!

---

**From:** Devins, Brooke  
**Sent:** Monday, August 26, 2013 11:01 AM  
**To:** 'Hardman, Christine'  
**Cc:** Chow, Joanna  
**Subject:** RE: FOX Business Interview Request

Hi Christine,

We're looking forward to having the Congressman on the show today!

The hit time is 5:10pm ET.

My colleague Joanna Chow (cc'd here) is producing the segment and will be in touch in case any information is needed.

Thanks so much and please let me know if I can answer any questions in the meantime.

Best,

--

**Brooke Devins**  
Booker  
Office: 212.601.[redacted]  
Cell: [redacted]  
[redacted@foxbusiness.com]

---

**From:** Hardman, Christine [mailto:[redacted@mail.house.gov]]  
**Sent:** Friday, August 23, 2013 2:02 PM  
**To:** Devins, Brooke  
**Subject:** RE: FOX Business Interview Request

Great, thanks Brooke!

---

**From:** Devins, Brooke [redacted@foxbusiness.com]  
**Sent:** Friday, August 23, 2013 1:50 PM  
**To:** Hardman, Christine  
**Subject:** RE: FOX Business Interview Request

Fantastic, thank you!

We would ideally like for the Congressman to arrive about 20-30 minutes before the hit, if possible. So the very earliest would be about 4:30 or 4:40, but I will have a confirmed time on Monday. The Congressman will be speaking for about 4-6 minutes.

Thanks again!

Best,

--

**Brooke Devins**  
Booker  
Office: 212.601. [REDACTED]  
Cell: [REDACTED]  
[REDACTED]@foxbusiness.com

---

**From:** Hardman, Christine [mailto:[REDACTED]@mail.house.gov]  
**Sent:** Friday, August 23, 2013 1:45 PM  
**To:** Devins, Brooke  
**Subject:** RE: FOX Business Interview Request

Hi Brooke,

That will work with the Congressman's schedule, we'll be there on Monday. I know you won't have the exact time of the interview until Monday, but what time would you suggest the Congressman plans on arriving for the interview? Also, do you know how long he will be speaking for?

Thanks,  
Christine

---

**From:** Devins, Brooke [mailto:[REDACTED]@foxbusiness.com]  
**Sent:** Friday, August 23, 2013 12:04 PM  
**To:** Hardman, Christine  
**Subject:** RE: FOX Business Interview Request

It would be sometime in the 5pm ET hour, but I would have the exact hit time that morning and will know around 11:15am – does that sound ok?

Thanks!

--

**Brooke Devins**  
Booker  
Office: 212.601. [REDACTED]  
Cell: [REDACTED]  
[REDACTED]@foxbusiness.com

---

**From:** Hardman, Christine [mailto:[REDACTED]@mail.house.gov]  
**Sent:** Friday, August 23, 2013 12:03 PM  
**To:** Devins, Brooke  
**Subject:** RE: FOX Business Interview Request

Ok, great. And would this be at 5pm?

---

**From:** Devins, Brooke [redacted@foxbusiness.com]  
**Sent:** Friday, August 23, 2013 11:56 AM  
**To:** Hardman, Christine  
**Subject:** RE: FOX Business Interview Request

Thanks, Christine.

We would like to do this in studio. We have studios in Atlanta and the one we typically use is located at:

260 NW 14th Street  
Atlanta, GA 30318

Thank you!

--

**Brooke Devins**  
Booker  
Office: 212.601 [redacted]  
Cell: [redacted]  
[redacted@foxbusiness.com]

---

**From:** Hardman, Christine [mailto:redacted@mail.house.gov]  
**Sent:** Friday, August 23, 2013 11:53 AM  
**To:** Devins, Brooke  
**Subject:** RE: FOX Business Interview Request

Hi Brooke,

Not a problem. What time were you looking to do the show on Monday? The Congressman will still be in Georgia at that time. Did you want to set up a phone interview or were you looking to have him come into the studio?

Thanks,  
Christine

---

**From:** Devins, Brooke [redacted@foxbusiness.com]  
**Sent:** Friday, August 23, 2013 11:49 AM  
**To:** Hardman, Christine  
**Subject:** RE: FOX Business Interview Request

Hi Christine,

We just changed things around in our show for today and looks like we want to do this on Monday instead. Any way Dr. Broun would be available on Monday?

Thanks!

--

**Brooke Devins**  
Booker

Office: 212.601 [REDACTED]  
Cell: [REDACTED]  
[REDACTED]@foxbusiness.com

---

**From:** Hardman, Christine [mailto:[REDACTED]@mail.house.gov]  
**Sent:** Friday, August 23, 2013 11:42 AM  
**To:** Devins, Brooke  
**Subject:** RE: FOX Business Interview Request

Hi Brooke,

Thanks for reaching out. Dr. Broun is in Atlanta today, were you thinking of having him come into the studio, or doing the interview by phone?

Thanks,  
Christine

---

**From:** Devins, Brooke [mailto:[REDACTED]@foxbusiness.com]  
**Sent:** Friday, August 23, 2013 11:28 AM  
**To:** Hardman, Christine  
**Subject:** FOX Business Interview Request

Hi Christine,

My name is Brooke Devins and I am a booking producer for Fox Business' 5pm ET show, *Money with Melissa Francis*. I hope you are well!

Would Rep. Braun be interested in doing an interview on our show today to talk about the letter to Speaker Boehner asking him to resist any spending bills that would accommodate the new health care law?

The interview would be sometime in the 5pm ET hour.

Thank you!

Best,

--

**Brooke Devins**  
Booker  
*MONEY with Melissa Francis*  
Office: 212.601 [REDACTED]  
Cell: [REDACTED]  
[REDACTED]@foxbusiness.com  
<image001.jpg>

# **EXHIBIT 34**

**Norton, Teddie**

---

**From:** Norton, Teddie  
**Sent:** Monday, September 09, 2013 4:43 PM  
**To:** 'Brett O'Donnell'  
**Subject:** RE: this week

**This message has been archived. [View the original item](#)**

Fantastic.

Teddie Norton  
Director of Operations  
Congressman Paul C. Broun (GA-10)

2437 Rayburn House Office Building

Washington DC 20515  
Phone: (202) 225-  
Fax: (202) 226-0776  
[www.broun.house.gov](http://www.broun.house.gov)

**From:** Brett O'Donnell [redacted@odacommunications.com]  
**Sent:** Monday, September 09, 2013 4:25 PM  
**To:** Norton, Teddie  
**Subject:** Re: this week

Yes and yes.

Sent from my iPhone

On Sep 9, 2013, at 3:38 PM, "Norton, Teddie" <[redacted@mail.house.gov]> wrote:

Hey Brett-

Would you be available for a call w/ PB tomorrow morning between 10:45 and 11 to discuss his speech to the Defund Obamacare Rally? Christine is working on a draft now to send your way, we just would like it reiterated that this is not the time to go off message before he speaks.

Also, would 11 am on Thursday work for you to sit down with him?

Thanks-

Teddie

Teddie Norton  
Director of Operations  
Congressman Paul C. Broun (GA-10)

2437 Rayburn House Office Building

Washington DC 20515  
Phone: (202) 225-  
Fax: (202) 226-0776  
[www.broun.house.gov](http://www.broun.house.gov)

# **EXHIBIT 35**

**Norton, Teddie**

---

**From:** Norton, Teddie  
**Sent:** Thursday, September 19, 2013 1:30 PM  
**To:** 'Brett O'Donnell'; Bowser, David  
**Cc:** Hardman, Christine  
**Subject:** RE: Congressman Broun Today

**This message has been archived. [View the original item](#)**

That should be good.

Teddie Norton  
Director of Operations  
Congressman Paul C. Broun (GA-10)

2437 Rayburn House Office Building

Washington DC 20515  
Phone: (202) 225-  
Fax: (202) 226-0776  
[www.broun.house.gov](http://www.broun.house.gov)

**From:** Brett O'Donnell [redacted@odacommunications.com]  
**Sent:** Thursday, September 19, 2013 1:30 PM  
**To:** Bowser, David  
**Cc:** Hardman, Christine; Norton, Teddie  
**Subject:** Re: Congressman Broun Today

Does a call at 4:30 today work?

Sent from my iPhone

On Sep 19, 2013, at 12:09 PM, "Bowser, David" <redacted@mail.house.gov> wrote:

He's coming back after first votes, wants to run through the interview and speech tonight...any chance you can swing by Brett?

**From:** Brett O'Donnell [redacted@odacommunications.com]  
**Sent:** Thursday, September 19, 2013 12:06 PM  
**To:** Hardman, Christine  
**Cc:** Norton, Teddie; Bowser, David  
**Subject:** Re: Congressman Broun Today

Yes

Sent from my iPhone

On Sep 19, 2013, at 11:55 AM, "Hardman, Christine" <[REDACTED]@mail.house.gov> wrote:

FYI- confirmed for 5:10pm on Wed in the Cannon Rotunda.

Topics will surround Obamacare, but they also want to discuss Dr. Broun's latest article in Politico. Brett, let's make sure we discuss/prep him for this next week.

From: Whittemore, Chelsea [REDACTED]@theblaze.com]  
Sent: Thursday, September 19, 2013 11:51 AM  
To: Hardman, Christine  
Subject: RE: Congressman Broun Today

Sure - the interview will be about 10 minutes.

I will have topics the morning of but it will surround Obamacare. Also, Andrew wanted to discuss this article about him: [http://www.politico.com/story/2013/09/georgia-senate-2014-broun-gingrey-kingston-nunn-97032.html?hp=t1\\_3](http://www.politico.com/story/2013/09/georgia-senate-2014-broun-gingrey-kingston-nunn-97032.html?hp=t1_3)

Thanks!

From: Hardman, Christine [mailto:[REDACTED]@mail.house.gov]  
Sent: Thursday, September 19, 2013 11:50 AM  
To: Whittemore, Chelsea  
Subject: RE: Congressman Broun Today

5:10pm in the Cannon Rotunda would work best for us. Let's plan on scheduling for that time. Could you send me the topics for the interview and how long the interview will be?

Thanks!

Christine

From: Whittemore, Chelsea [REDACTED]@theblaze.com]  
Sent: Thursday, September 19, 2013 10:00 AM  
To: Hardman, Christine  
Subject: RE: Congressman Broun Today

We are live to tape (treated live but airs later) and then it airs at 7-8 PM.

We can do this from the Cannon Rotunda if that is easiest for you guys!

From: Hardman, Christine [mailto: [REDACTED]@mail.house.gov]  
Sent: Thursday, September 19, 2013 9:59 AM  
To: Whittemore, Chelsea  
Subject: RE: Congressman Broun Today

Quick question - since you wanted to tape the interview, where would it be?

Thanks,

Christine

From: Whittemore, Chelsea [mailto: [REDACTED]@theblaze.com]  
Sent: Thursday, September 19, 2013 9:48 AM  
To: Hardman, Christine  
Subject: RE: Congressman Broun Today

Christine - Our last interview slot is usually 5 PM would that work?

If not we can make it work until about 5:10 pm but that would really be the latest hit time.

From: Hardman, Christine [mailto: [REDACTED]@mail.house.gov]  
Sent: Thursday, September 19, 2013 9:46 AM  
To: Whittemore, Chelsea  
Subject: RE: Congressman Broun Today

Hi Chelsea,

Would Wednesday after 5 work?

Thanks,

Christine

From: Whittemore, Chelsea [REDACTED]@theblaze.com]  
Sent: Thursday, September 19, 2013 9:14 AM  
To: Hardman, Christine  
Subject: RE: Congressman Broun Today

Hey Christine –

Wanted to follow up. We would love to have the Congressman join us on Wilkow! Is there a good day next week for this? We tape Monday-Friday from 4:30-5:30 PM. Let me know!

Best,

Chelsea Whittemore

Associate Producer, Wilkow!

TheBlaze TV

212.520.[REDACTED]

# **EXHIBIT 36**

**Hardman, Christine**

---

**From:** Hardman, Christine  
**Sent:** Tuesday, October 08, 2013 11:13 AM  
**To:** [REDACTED]@odacommunications.com'  
**Subject:** Re: CNN Request/Broun

Great will do.

---

**From:** Brett O'Donnell [REDACTED]@odacommunications.com]  
**Sent:** Tuesday, October 08, 2013 11:07 AM  
**To:** Hardman, Christine  
**Subject:** Re: CNN Request/Broun

Call my cell at [REDACTED].

Sent from my iPhone

On Oct 8, 2013, at 9:44 AM, "Hardman, Christine" <[REDACTED]@mail.house.gov> wrote:

Ok, working on getting these together. We'll plan on chatting with you at 12:30.

---

**From:** Brett O'Donnell [REDACTED]@odacommunications.com]  
**Sent:** Tuesday, October 08, 2013 9:30 AM  
**To:** Hardman, Christine  
**Subject:** Re: CNN Request/Broun

Yes. Can you pull the latest debt statistics? How much has Obama added, what it stands at now, what it would go to, etc. I think Dr. B should have that data for the interview. He also needs the below quote from the Obama event on Thursday, Oct 3.

Brett

President Obama on the Debt Ceiling:

"It doesn't cost taxpayers a single dime. It doesn't grow our deficits by a single dime. It doesn't allow anybody to spend any new money whatsoever. So it's not something that raises our debt. What it does is allow the U.S. Treasury, the U.S. government to pay the bills that Congress has already racked up. I want you to think about this.

The only thing that the debt ceiling does is to let the U.S. Treasury pay for what Congress has already bought. That's why it's something that has been routine. Traditionally, it's not a big deal. Congress has raised it 45 times since Ronald Reagan took office. This is just kind of a routine part of keeping the government running."

**This is absurd! Raising the debt ceiling costs taxpayers enormous amounts because we have to pay that debt back and we have to service the debt (pay the interest). And its not routine. In fact, then Senator Obama voted against it.**

On Oct 8, 2013, at 9:11 AM, Hardman, Christine wrote:

12:30 works on our end, does that work for you?

---

**From:** Brett O'Donnell [REDACTED]@odacomunications.com]  
**Sent:** Monday, October 07, 2013 9:03 PM  
**To:** Hardman, Christine  
**Cc:** Norton, Teddie  
**Subject:** Re: CNN Request/Broun

Yes.

On Oct 7, 2013, at 7:30 PM, Hardman, Christine wrote:

Hi Brett,  
Would you be able to do a phone call tomorrow before this CNN interview at 1:30pm to prep Dr. Broun?  
Christine

---

**From:** Bowser, David  
**Sent:** Monday, October 07, 2013 07:22 PM  
**To:** Hardman, Christine  
**Subject:** Re: CNN Request/Broun

Let's do it. He should be rested, can we get Brett at least on the phone beforehand?

---

**From:** Hardman, Christine  
**Sent:** Monday, October 07, 2013 07:16 PM  
**To:** Bowser, David  
**Subject:** Fw: CNN Request/Broun

Thoughts on doing a CNN interview tomorrow on the shutdown? Don't know how tired he is from this weekend and if he'd be up for it.

---

**From:** Glaeser, Katie [REDACTED]@turner.com]  
**Sent:** Monday, October 07, 2013 07:06 PM  
**To:** Hardman, Christine  
**Subject:** CNN Request/Broun

Hi Christine,  
Katie from CNN here. Wondering if Congressman Broun is available to join Wolf Blitzer live at 1:30pET tomorrow to discuss the government shutdown and the looming debt ceiling crisis. We could do the interview from the most convenient location for Rep. Broun- Cannon?

Many thanks for your consideration,

Katie

**Katie Glaeser**

CNN Network Booking

@ktCNN

O: [REDACTED] | C: [REDACTED]

[REDACTED]@Turner.com

# **EXHIBIT 37**

**Bowser, David**

---

**From:** Brett O'Donnell [redacted]@odacommunications.com]  
**Sent:** Monday, November 11, 2013 4:05 PM  
**To:** Hardman, Christine  
**Cc:** Bowser, David; Norton, Teddie; Hayes, Jessica  
**Subject:** Re: Call with PB on Monday?

Sounds good.

Sent from my iPhone

On Nov 11, 2013, at 3:24 PM, "Hardman, Christine" [redacted]@mail.house.gov> wrote:

I can call you Brett and then dial in Dr. Broun.

**From:** Brett O'Donnell [redacted]@odacommunications.com]  
**Sent:** Monday, November 11, 2013 03:13 PM  
**To:** Bowser, David  
**Cc:** Norton, Teddie; Hardman, Christine; Hayes, Jessica  
**Subject:** Re: Call with PB on Monday?

How are we connecting at 5?

Sent from my iPhone

On Nov 8, 2013, at 12:30 PM, "Bowser, David" [redacted]@mail.house.gov> wrote:

Brett, can you do a quick call with Dr. Broun on Monday afternoon at 5pm? We have a "Veteran's Town Hall" that evening and he's been in the wilds of Montana all week, just want to make sure he is in the proper frame before this public event.

# **EXHIBIT 38**

**Bowser, David**

---

**From:** Hardman, Christine  
**Sent:** Monday, September 09, 2013 6:21 PM  
**To:** [REDACTED]@odacomunications.com"; GovBob  
**Cc:** Bowser, David  
**Subject:** RE: Exempt America Rally

Thanks, Brett, looks good. I'll pass along these changes to Dr. Broun.

---

**From:** [REDACTED]@odacomunications.com ([REDACTED]@odacomunications.com]  
**Sent:** Monday, September 09, 2013 6:19 PM  
**To:** Hardman, Christine; GovBob  
**Cc:** Bowser, David  
**Subject:** RE: Exempt America Rally

I made a few edits. Otherwise good with content.

----- Original Message -----

**Subject:** Exempt America Rally  
**From:** "Hardman, Christine" <[REDACTED]@mail.house.gov>  
**Date:** Mon, September 09, 2013 4:36 pm  
**To:** 'Brett O'Donnell' <[REDACTED]@odacomunications.com>, GovBob  
<[REDACTED]@aol.com>

This is Dr. Broun's speech for his Exempt America rally tomorrow morning - he's been invited to speak for just 90 seconds or so and so I kept it short and sweet. Please let me know if you have any changes or suggestions!

**Christine Hardman**  
Press Secretary  
Congressman Paul C. Broun (GA-10)  
2437 Rayburn Building  
202-225-[REDACTED]  
*[Sign up for Dr. Broun's e-newsletters](#)*



# **EXHIBIT 39**

## Bowser, David

---

**From:** Brett O'Donnell [REDACTED@odacomunications.com]  
**Sent:** Monday, July 08, 2013 4:59 PM  
**To:** Norton, Teddie  
**Cc:** Bowser, David; GovBob; Hardman, Christine; Austin Carson  
**Subject:** Re: SUPER last minute but good

I'll get something done by late tonight early in the morning.

Sent from my iPhone

On Jul 8, 2013, at 4:34 PM, "Norton, Teddie" <[REDACTED]@mail.house.gov> wrote:

We are all set for tomorrow at 2:30. If we want to get something for the tele-prompter, they need it by noon tomorrow at the very latest, but sooner the better.

Teddie Norton  
Director of Operations  
Congressman Paul C. Brown (GA-10)  
2137 Rayburn House Office Building  
Washington DC 20515  
Phone: (202) 225- [REDACTED]  
Fax: (202) 226-0776  
[www.brown.house.gov](http://www.brown.house.gov)

---

**From:** Bowser, David  
**Sent:** Monday, July 08, 2013 4:19 PM  
**To:** Norton, Teddie; GovBob; 'Brett ODonnell'; Hardman, Christine  
**Cc:** 'Austin Carson'  
**Subject:** FW: SUPER last minute but good  
**Importance:** High

Yes, definitely want to do this, hopefully after first vote series, let's reserve 2:30 Teddie if that is open.

Brett, do we have an updated 5 min on Big Govt & Spending?

Bob, can you take a shot at PBing the Tea Party generic message above?

I will deal with the lift note after we get the taping done tomorrow.

Thanks Team!  
David

---

**From:** Austin Carson [REDACTED@gmail.com]  
**Sent:** Monday, July 08, 2013 11:36 AM  
**To:** David Bowser; Norton, Teddie  
**Subject:** Fwd: SUPER last minute but good

FYI -

----- Forwarded message -----

From: **Dan Backer** <[REDACTED]@dbcapitolstrategies.com>  
Date: Mon, Jul 8, 2013 at 11:32 AM  
Subject: SUPER last minute but good  
To: Austin Carson <[REDACTED]@gmail.com>

Austin,

If the boss is in town, I have an opportunity for him. TeaParty.Net is taping videos of key Congressional Members which will appear on our outlets to activists across the country (3 MM & growing). The taping is scheduled for TOMORROW all day at the Capitol Hill Club.

He can say whatever he likes (issue/values-oriented, not campaign) for 3-5 minutes (obviously you know shorter is better), and that's what we'll use generally to push out to our audience (tying it into one of the specific petitions we have online is always a plus!).

We'd also like him to film a generic piece about the movement and conservative principles (draft script attached, and he can edit as desired and we'll load it into the teleprompter). And, if amenable to sign a lift note a well (also attached, please feel free to edit).

The taping should take about 10 minutes give or take, and we have a few members booked (we set up 45 minute windows so plenty of flexibility).

I know this is super last minute, and you can completely blame it on me, but hopefully there's a window of time tomorrow that you guys can come over?

Thanks so much,

Regards,

Dan Backer, Esq.

202-210-[REDACTED] office

202-478-0750 fax

**DB Capitol Strategies PLLC**

*PAC \* CAMPAIGN \* NON-PROFIT \* POLITICAL LAW*

[www.DBCapitolStrategies.com](http://www.DBCapitolStrategies.com)

<http://twitter.com/DBCapStrategies>

<http://www.Facebook.com/CampaignFinance>

# **EXHIBIT 40**

**Hardman, Christine**

---

**From:** David Bowser [REDACTED]@yahoo.com]  
**Sent:** Tuesday, July 09, 2013 11:23 AM  
**To:** [REDACTED]@odacomunications.com; GovBob; Hardman, Christine  
**Subject:** Re: Tea Party video speech  
**Attachments:** Tea Party Video Final.docx

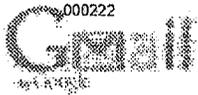
Here is the updated version, everything in yellow he cut, said it read out to around 4:30...sending it over to them in 15 min.

Thanks!  
David

**From:** David Bowser <[REDACTED]@yahoo.com>  
**To:** "[REDACTED]@odacomunications.com" <[REDACTED]@odacomunications.com>; Bob Bibee <[REDACTED]@aol.com>; [REDACTED]@mail.house.gov" <[REDACTED]@mail.house.gov>  
**Sent:** Tuesday, July 9, 2013 10:55 AM  
**Subject:** Tea Party video speech

Attached is the speech with some minor edits from PB...however as expected, he added a couple of lines and didn't cut anything, so it may be way over 5 min.

# **EXHIBIT 41**



**Re: Your video**

[REDACTED]

Brett ODonnell <[REDACTED]@odacomunications.com>

Thu, Aug 8, 2013 at 1:51 PM

To: David Bowser <[REDACTED]@yahoo.com>

Cc: Bob Bibee <[REDACTED]@aol.com>, "[REDACTED]@gmail.com" <[REDACTED]@gmail.com>, Jordan Chinouth <[REDACTED]@gmail.com>

Had to make cuts to get it in time. Pretty good though. He was tired the day we went to shoot this.  
On Aug 8, 2013, at 1:43 PM, David Bowser wrote:

Little under 5 min video PB did for TeaParty.net...couple of areas where he slightly misspeaks and no transition between spending and guns, but not too bad.

[http://www.youtube.com/watch?v=JBO\\_Koq3\\_YI](http://www.youtube.com/watch?v=JBO_Koq3_YI)

On Thursday, August 8, 2013 1:40 PM, David Bowser <[REDACTED]@yahoo.com> wrote:

Cool! What is the pledge? Assuming we can post/promote the video as well once you tell me we can...will you all keep it at the YouTube spot it is now?

On Thursday, August 8, 2013 1:26 PM, Alex Shively <[REDACTED]@gmail.com> wrote:

Sorry, should've caught that. We're going to email it to our list of nearly a million folks with an opportunity to sign a petition.

On Thu, Aug 8, 2013 at 1:10 PM, David Bowser <[REDACTED]@yahoo.com> wrote:

Not bad...one correction - his name is Broun, not Brown.  
What are we doing with this?

On Monday, July 29, 2013 11:40 AM, Alex Shively <[REDACTED]@gmail.com> wrote:

Hey,

Here's your boss's video TeaParty.Com taped a couple weeks ago, let me know what you think.

Thanks,  
Alex

000223

Paul Brown

[http://www.youtube.com/watch?v=JBC\\_Kog3\\_5I](http://www.youtube.com/watch?v=JBC_Kog3_5I)

000147

The Daily Caller. He added that he had voted multiple times "to repeal and replace this disastrous law," as well as working on provisions to protect businesses and individuals from his effects and to defund it. "I not only voted to ensure Congress was subject to Obamacare but have introduced a bill that would require the President, Vice President, and all political appointees to get their health care through the exchanges. If Washington wants to force something on the American people, then we need to force it on Washington as well," Kingston added. "If we are going to win, conservatives must shape the debate. We must be creative and put forward ideas that can gain traction. Every time we repeal or defund a portion of the law, we undermine its long-term survival," he said. "Many want to sit back and hope Obamacare falls off the cliff. I believe we have to be there to push it over the edge," Kingston concluded. Asked for comment, National Republican Senatorial Committee press secretary Brook Hugeson said: "For years, Republicans have consistently offered ObamaCare alternatives and fixes, like the Medical Device tax repeal. In all, the party has offered about 200 proposals on healthcare. Republicans still support repealing ObamaCare and replacing ObamaCare with more workable, affordable, and patient centered improvements to the system." *Follow Alexis on Twitter*

Read more: <http://dailycaller.com/2013/12/05/brown-attacks-kingston-for-wanting-to-fix-obamacare-and-not-just-repeal-it/#xzz2md2v3Xq>

On Thu, Dec 5, 2013 at 1:24 PM, David Bowser <[REDACTED]@yahoo.com> wrote:

He's also referencing the wrong vote.

Sent from my iPhone

On Dec 5, 2013, at 1:19 PM, Christine Hardman <[REDACTED]@gmail.com> wrote:

Agree- they have the youtube clip of our ad at the top of the article - free advertisement!

On Thu, Dec 5, 2013 at 1:17 PM, Jason Miller <[REDACTED]@jamestownassociates.com> wrote:

"Personal slap" tag is lame, especially when we're talking about an issue difference and there's nothing personal about it, but the pickup is good.

From: "Hardman, Christine" <[REDACTED]@gmail.com>  
Date: Thu, 5 Dec 2013 12:59:58 -0500  
To: David Bowser <[REDACTED]@yahoo.com>, Jason Miller <[REDACTED]@jamestownassociates.com>, Bob Bibee

JC\_0044

14-2533\_00639

<[REDACTED]@aol.com>, Brett  
O'Donnell  
<[REDACTED]@odacomunications.com>,  
Jordan Chinouth  
<[REDACTED]@gmail.com>,  
Josh Findlay  
<[REDACTED]@paulbrown.com>  
Subject: Fwd: Fw: Alert: Atlanta  
JC[Reg]: Paul Brown takes a  
personal slap at Jack Kingston

## AJC: Paul Brown takes a personal slap at Jack Kingston

In campaigns, attack ads or  
videos are usually performed  
by a third party -- not the  
candidate himself. By Jim  
Galloway.

But in the YouTube clip above, U.S.  
Rep. Paul Brown, R-Athens,  
delivers his attack on U.S. Senate  
rival Jack Kingston in person and  
on camera -- focusing on the  
Savannah congressman's recent  
statements on whether it is indeed  
possible -- or "responsible" -- to  
eliminate Obamacare in its entirety.  
Says Brown:

*"Jack Kingston wants  
to keep Obamacare.  
He voted to fund it,  
and now he's trying to  
fix it. I think that's  
wrong."*

Kingston says he's voted against  
the Affordable Care Act at every  
turn. The alleged vote to fund the  
ACA occurred last month, when the  
Republican-led House voted to  
allow insurers to sell for another  
year health insurance policies that  
do not meet the requirements of  
Obamacare.

# **EXHIBIT 42**

## **Bowser, David**

---

**From:** Brett ODonnell [redacted]@odacomunications.com  
**Sent:** Wednesday, November 06, 2013 11:35 AM  
**To:** Hardman, Christine  
**Cc:** Bowser, David; GovBob; Marsh, Julie  
**Subject:** Re: Politico: AFL-CIO targets GOP with immigration ad blitz

I'm against commenting on this.

On Nov 6, 2013, at 11:31 AM, Hardman, Christine wrote:

AFL-CIO is coming out with an ad that attacks House GOP on Immigration reform, and Dr. Broun is one of the people that is featured in the ad, with his quote from a Laura Ingraham interview. The AJC has contacted me seeking a comment before 4pm today. If we do respond I think we should just say something short and sweet, that just summarizes his stance and doesn't get defensive about the attack. What are everyone's thoughts?

**"As I have said from the beginning, I am firm opponent of amnesty for illegal immigrants, and I will continue to fight to enforce the laws on the books and stand for American jobs."**

### **Politico: AFL-CIO targets GOP with immigration ad blitz**

By ALEXANDER BURNS | 11/6/13 9:00 AM EST

The AFL-CIO is poised to launch a high-dollar television campaign assailing House Republicans for their inaction on immigration reform, in an attempt to ensure that the congressional GOP pays a price if it continues to stall on an overhaul of the nation's immigration system, strategists for the labor giant told POLITICO.

The powerful progressive group will spend a seven-figure sum on a wave of ads on Spanish-language television, broadcasting some of the most incendiary remarks conservative lawmakers have made about immigrants.

One ad shared with POLITICO shows Texas Rep. Lamar Smith calling the popular DREAM Act "a nightmare for the American people" and quotes Georgia Rep. Paul Broun saying undocumented immigrants are "criminals and they need to be treated as such." Iowa Rep. Steve King makes an appearance in one clip, referring to illegal immigrants "hauling 75 pounds of marijuana across the desert."

And in multiple commercials, the AFL-CIO highlights Alabama Rep. Mo Brooks's statement that he would do "anything short of shooting" undocumented workers in order to crack down in illegal immigration.

The ads adopt a confrontational approach toward congressional Republicans that some immigration reform groups have avoided so far this year. Other organizations, including conservative-leaning groups like the Chamber of Commerce and the American Action Network, have advocated for immigration reform on the center-right by casting the issue as a pro-business measure and emphasizing border protections in the reform bill approved by the Senate.

These new commercials are aimed at raising the stakes for the whole Republican Party in the debate over immigration, said AFL-CIO strategist Tom Snyder, who's heading up the group's campaign on comprehensive reform.

He said the harder-edged tone of the ads reflect a determination to increase the political pressure on reform opponents currently stonewalling immigration legislation. Republicans suffered badly from their lopsided loss among Latinos in 2012; the AFL-CIO aims to ensure that happens again in 2014, particularly if reform dies in the House.

"We feel it's time, and more than appropriate, to tell the Republicans that if they don't act on immigration reform, we plan to exact a price in upcoming elections," Snyder explained. "We want to spur House Republicans into action on immigration reform this year, right now, and we're going to hold Republican congressmen responsible for their hostile statements about Latino immigrants."

The first wave of ads will run in the Atlanta, Denver, Orlando, Fla.; Bakersfield, Calif., and Washington D.C. media markets. They will appear on both Univision and Telemundo, and run in English in the D.C. area.

Those markets include several congressional districts with competitive 2014 House race and touch important statewide elections in Georgia, Colorado and Florida.

Snyder said this is only the beginning of the next phase of the AFL-CIO's political action on immigration.

"This is just a beginning. This is a down payment," Snyder said, adding: "The Republican Party may control the immediate fate of immigration reform, but Latinos and other immigrants control the long-term fate of the Republican Party."

Read more: <http://www.politico.com/story/2013/11/afl-cio-immigration-ads-republicans-99421.html#ixzz2jsZNW1xS>

**Christine Hardman**  
Press Secretary

Congressman Paul C. Broun (GA-10)  
2437 Rayburn Building  
202-225-██████

*Sign up for Dr. Broun's e-newsletters*

<image001.png><image002.png><Image003.png><image004.png>

# **EXHIBIT 43**

**Bowser, David**

---

**From:** Bowser, David  
**Sent:** Thursday, September 13, 2012 9:25 AM  
**To:** Chinouth, Jordan; Griffanti, Meredith; [REDACTED]@odacomunications.com'; GovBob; Hayes, Jessica  
**Subject:** Re: Heads Up

Jordan, can you please setup a conf call and get everyone the numbres.

Thanks!

---

**From:** Chinouth, Jordan  
**Sent:** Wednesday, September 12, 2012 10:17 PM  
**To:** Bowser, David; Griffanti, Meredith; [REDACTED]@odacomunications.com' <[REDACTED]@odacomunications.com>; GovBob; Hayes, Jessica  
**Subject:** Re: Heads Up

Sounds good.  
Jordan Chinouth  
District Director  
US Representative Paul Broun  
Cell: [REDACTED]

Sent using BlackBerry

---

**From:** Bowser, David  
**Sent:** Wednesday, September 12, 2012 09:40 PM  
**To:** Griffanti, Meredith; [REDACTED]@odacomunications.com' <[REDACTED]@odacomunications.com>; Chinouth, Jordan; GovBob; Hayes, Jessica  
**Subject:** Re: Heads Up

Apologies as I just landed in DC, but so everyone knows, Meredith and I discussed this and I believe we agree there is a different tact we can and should take on this. I have also spoken to our attorney and suprisingly, he enthusiastically supports the idea. Let's discuss tomorrow, can we do a conf call at 11 am?

Thanks!  
David

---

**From:** Griffanti, Meredith  
**Sent:** Wednesday, September 12, 2012 04:46 PM  
**To:** [REDACTED]@odacomunications.com' <[REDACTED]@odacomunications.com>; Bowser, David; Chinouth, Jordan; GovBob; Hayes, Jessica  
**Subject:** RE: Heads Up

I just don't understand what more we can say that we haven't already said in statements, on the radio, to our opponent, etc. None of it has been helpful and I don't think pointing fingers at Dems or shifting to jobs/economy will take the heat off the fact that we screwed up. I just seriously think this is a "we've said all we're gonna say about this" type of situation... move on. Just my humble opinion. Anyways - wanted to make sure you're all aware of it before it hits anywhere.

**From:** [REDACTED]@odacomunications.com [REDACTED]@odacomunications.com]  
**Sent:** Wednesday, September 12, 2012 4:44 PM  
**To:** Griffanti, Meredith; Bowser, David; Chinouth, Jordan; GovBob; Hayes, Jessica  
**Subject:** RE: Heads Up

My suggestion is a response if we're asked. I don't think we should proactively seek press on this. But we need to have an answer when we get asked about and can't believe we won't.

----- Original Message -----

**Subject:** RE: Heads Up  
**From:** "Griffanti, Meredith" <[REDACTED]@mail.house.gov>  
**Date:** Wed, September 12, 2012 4:40 pm  
**To:** "[REDACTED]@odacomunications.com" <[REDACTED]@odacomunications.com>, "Bowser, David" <[REDACTED]@mail.house.gov>, "Chinouth, Jordan" <[REDACTED]@mail.house.gov>, GovBob <[REDACTED]@aol.com>, "Hayes, Jessica" <[REDACTED]@mail.house.gov>

But NOBODY has printed anything about this so far press wise... why draw more attention to the whole thing in the first place if nobody is writing about it? I doubt anyone is going to print quotes about what we have to say about Democrats/fiscal issues when we're specifically talking about CREW - a stupid liberal watchdog org that NOBODY takes seriously - and our campaign finance problems.

**From:** [REDACTED]@odacomunications.com [REDACTED]@odacomunications.com]  
**Sent:** Wednesday, September 12, 2012 4:38 PM  
**To:** Bowser, David; Griffanti, Meredith; Chinouth, Jordan; GovBob; Hayes, Jessica  
**Subject:** RE: Heads Up

I couldn't agree more. It's all focused around the loan problem. They need to put up or shut up. Offense is the best way to handle this. Want to talk about corruption, let's talk about the way democrats are spending money, their takeover of health care...

----- Original Message -----

**Subject:** Re: Heads Up  
**From:** "Bowser, David" <[REDACTED]@mail.house.gov>  
**Date:** Wed, September 12, 2012 4:30 pm  
**To:** "Griffanti, Meredith" <[REDACTED]@mail.house.gov>, "Chinouth, Jordan" <[REDACTED]@mail.house.gov>, "[REDACTED]@odacomunications.com" <[REDACTED]@odacomunications.com>, GovBob <[REDACTED]@aol.com>, "Hayes, Jessica" <[REDACTED]@mail.house.gov>

My first instinct is to go on the offense on this...

**From:** Griffanti, Meredith  
**Sent:** Wednesday, September 12, 2012 04:29 PM  
**To:** Bowser, David; Chinouth, Jordan; [REDACTED]@odacomunications.com <[REDACTED]@odacomunications.com>; GovBob; Hayes, Jessica  
**Subject:** RE: Heads Up

We're the #3 most corrupt Member of congress.

**From:** Bowser, David  
**Sent:** Wednesday, September 12, 2012 4:29 PM  
**To:** Griffanti, Meredith; Chinouth, Jordan; [REDACTED]@odacomunications.com'; GovBob; Hayes, Jessica  
**Subject:** Re: Heads Up

What's it say?

**From:** Griffanti, Meredith  
**Sent:** Wednesday, September 12, 2012 04:28 PM  
**To:** Bowser, David; Chinouth, Jordan; 'Brett O'Donnell' <[REDACTED]@odacomunications.com>; GovBob; Hayes, Jessica  
**Subject:** Heads Up

We absolutely cannot get roped into commenting on this or dwelling on it if and when the press picks it up. Just an FYI for everyone.

<http://www.crewsmostcorrupt.org/page/-/PDFs/Reports/Most%20Corrupt%20Reports/CREW-Most-Corrupt-Members-of-Congress-Report-2012.pdf?noecd=1>

**Meredith Griffanti**  
Communications Director  
U.S. Representative Paul C. Broun, M.D. (GA-10)  
Office: 202-225-[REDACTED]  
Cell: [REDACTED]

[Click here to sign up for Rep. Broun's e-newsletter](#)



# **EXHIBIT 44**

## Bowser, David

---

**From:** Brett ODonnell [REDACTED]@odacomunications.com]  
**Sent:** Friday, September 14, 2012 2:14 PM  
**To:** Griffanti, Meredith  
**Cc:** Bowser, David; Chinouth, Jordan; GovBob; Carson, Austin; Hayes, Jessica  
**Subject:** Re: Draft - please feel free to give your thoughts/suggestions...

This is good except no one knows who Melanie Sloan is. I would take out her name.  
On Sep 14, 2012, at 9:22 AM, Griffanti, Meredith wrote:

Just an FYI – I still have not had one media inquiry... but here are my thoughts on the quote.

"These allegations are ridiculous and nothing more than yet another attempt by CREW - the liberal attack group funded by George Soros - to slander my conservative values and principles," said Rep. Broun. "If the so-called 'watchdog group' would have taken the time to fact-check their accusations, they would have discovered that the House Ethics Committee - comprised of three Republicans and three Democrats - voted unanimously to drop all charges against me by CREW, as they were simply false. But it comes as no surprise that an organization run by the likes of Melanie Sloan couldn't be bothered with the truth. This just goes to show that CREW has an agenda, which is to disproportionately target conservatives at an 8 to 1 ratio. It is my hope that media outlets like the Athens Banner Herald (i.e. insert name of whatever paper inquires) will continue to hold CREW's feet to the fire when it comes to spreading these type of lies."

### Meredith Griffanti

Communications Director

U.S. Representative Paul C. Broun, M.D. (GA-10)

Office: 202-225-REDACTED

Cell: REDACTED

[Click here to sign up for Rep. Broun's e-newsletter](#)

<image001.png><image002.png><image003.png>

# **EXHIBIT 45**

## Bowser, David

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**From:** Brett O'Donnell [REDACTED]@odacomunications.com]  
**Sent:** Wednesday, March 06, 2013 11:19 AM  
**To:** Griffanti, Meredith  
**Cc:** GovBob; Miller, Erika; Bowser, David  
**Subject:** Re: Press Release

This is good by me. Hits all of the messages we need.  
On Mar 6, 2013, at 10:52 AM, Griffanti, Meredith wrote:

Bob/Brett – this is good by David & Erika. Please let me know what changes y'all have!

---

**From:** Griffanti, Meredith  
**Sent:** Wednesday, March 06, 2013 10:21 AM  
**To:** Bowser, David  
**Subject:** Take or leave the last paragraph. Lemme know what changes you have then will send to Erika. Then to Bob/Brett last.

<image001.jpg>

**Affordable ~ Necessary ~ Moral ~ Constitutional**

For Immediate Release  
Wednesday, March 6, 2013

Contact: Meredith Griffanti  
202-225-[REDACTED]

### **Broun Statement on Continuing Resolution Vote**

**(Washington, D.C.)** U.S. Congressman Paul Broun, M.D. (GA-10) today released the following statement after voting against H.R. 933, a continuing resolution to fund the government through the end of fiscal year 2013:

**“This vote represented the House’s opportunity to take a stand for liberty,”** said Congressman Broun. **“This was our chance to defund Obamacare, and we didn’t do it. I’m always true to my constitutional, conservative principles, and therefore could not support a continuing resolution that paved the way for the full implementation of Obamacare – one of the greatest attacks on our personal freedom in the history of this nation.**

**“Obamacare is set to add a near \$6.2 TRILLION to the deficit, it’s already killing jobs all across the country, it infringes on our freedom of choice, and it completely erodes the quality of healthcare for poor people and seniors. I ask my colleagues, if not now, then when? When will we protect the American people and stop Obamacare from taking effect?**

**“I supported both pieces of legislation included in H.R. 933 that provide for the military, which are critical to the safety and security of our country. But lumping such important funding for our troops together with funding for Obamacare was the wrong way to safeguard our defense capabilities. Moving forward, I will continue to work to defund Obamacare so that both our liberty and the greatest healthcare system in the world will remain intact for years to come.”**

H.R. 933 passed the House \_\_\_ to \_\_\_ votes.

###

**Meredith Griffanti**

Communications Director

U.S. Representative Paul C. Broun, M.D. (GA-10)

Office: 202-225-██████████

Cell: ██████████

[Click here to sign up for Rep. Broun's e-newsletter](#)

<image003.png><image004.png><image005.png><image006.png>

# **EXHIBIT 46**

From: Griffanti, Meredith [REDACTED]@mail.house.gov  
Subject: RE: feel free to play around with it - just now getting a chance to put something together!  
Date: December 4, 2012 at 2:40 PM  
To: Brett ODonnell [REDACTED]@odacommunications.com

I can say "The Democrats" or "President Obama and Harry Reid"

Ok I'll insert that line @ the end. Thanks.

---

From: Brett ODonnell [REDACTED]@odacommunications.com]  
Sent: Tuesday, December 04, 2012 2:39 PM  
To: Griffanti, Meredith  
Subject: Re: feel free to play around with it - just now getting a chance to put something together!

I thought the "go to hell" was attributed to Reid. I'm a little nervous about assigning that to the president. I would also say more about the debt burden on middle class americans--"if the president is really on the side of the middle class, he'll lighten the load of debt he had saddled them with over the last four years."

On Dec 4, 2012, at 1:18 PM, Griffanti, Meredith wrote:

<image001.jpg>

Affordable ~ Necessary ~ Moral ~ Constitutional

For Immediate Release  
Tuesday, December 4, 2012

Contact: Meredith Griffanti  
202-225-[REDACTED]

## **Broun:**

(Washington, D.C.) U.S. Congressman Paul Broun, M.D. (GA-10) today released the following statement in reaction to President Obama's dismissal of Republican efforts to provide a fix for the fiscal cliff:

**"President Obama has basically told Republicans to either raise taxes, or go to hell," said Broun. "Forcing us to choose between hurting small businesses or going off the fiscal cliff is not only counter-productive – it simply doesn't make sense for righting our nation's fiscal crisis. There is no way that we can tax our way out of this mess, the math just doesn't add up. Even if the President taxes all of the millionaires and billionaires at 100% of their earnings, he still couldn't even begin to put a dent in the kinds of deficits our federal government is running. The only way to begin restoring limited government is to attack the crux of our problem, which means drastically scaling back the amount of money this nation spends. This is exactly what the President wants – for the fiscal cliff debate to become about 2% of the population instead of about how he continues to saddle the middle class with inordinate amounts of spending and debt they won't ever be able to pay back. Let's not let him get away with it. "**

###

Meredith Griffanti

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Communications Director

U.S. Representative Paul C. Broun, M.D. (GA-10)

Office: 202-225-██████

Cell: ██████████

[Click here to sign up for Rep. Broun's e-newsletter](#)

[<image002.png><image003.png><image004.png><image005.png>](#)

# **EXHIBIT 47**

**Bowser, David**

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**From:** Brett O'Donnell [REDACTED]@odacomunications.com]  
**Sent:** Friday, November 08, 2013 3:48 PM  
**To:** Bowser, David  
**Cc:** Hardman, Christine; Norton, Teddie; Miller, Erika; Hayes, Jessica  
**Subject:** Re: 11/12 Special Order

Great idea. Let's stay out in front of this and beam everything we do back to GA.

Sent from my iPhone

On Nov 8, 2013, at 12:33 PM, "Bowser, David" <[REDACTED]@mail.house.gov> wrote:

Great, let's plan on him doing 5 minutes or so during the special order, I want him to have the draft/info on Monday, so please get it to Jessica to print out and give to him when he is in the ADO on Monday afternoon.

Thanks!

---

**From:** Hardman, Christine  
**Sent:** Friday, November 08, 2013 12:15 PM  
**To:** Norton, Teddie; Bowser, David  
**Subject:** RE: 11/12 Special Order

Think this is a great idea – we have been collecting stories too that we can use.

---

**From:** Norton, Teddie  
**Sent:** Friday, November 08, 2013 12:14 PM  
**To:** Hardman, Christine; Bowser, David  
**Subject:** FW: 11/12 Special Order

This might be worthwhile to get a good clip of him speaking—he doesn't have a conflict.

Teddie Norton  
Director of Operations  
Congressman Paul C. Broun (GA-10)  
237 Rayburn House Office Building  
Washington DC 20515  
Phone: (202) 225-[REDACTED]  
Fax: (202) 226-0776  
[www.broun.house.gov](http://www.broun.house.gov)

---

**From:** Perry, Elizabeth  
**Sent:** Thursday, November 07, 2013 5:18 PM  
**To:** GOP Doctors Caucus Schedulers  
**Cc:** GOP Doctors Caucus Health Staff; Talaber, Jen  
**Subject:** 11/12 Special Order

All,

The GOP Doctors Caucus will be hosting a Special Order on Tuesday, November 12<sup>th</sup> after votes. Exact time TBD. Topic: How the ACA implementation is affecting constituents.

If your boss will be able to participate, please let me know.

Thanks so much,

Elizabeth Perry  
Director of Operations  
Congressman Phil Gingrey (GA-11)  
Phone: (202) 225-[REDACTED]  
442 Cannon Building | Washington, DC 20515

# **EXHIBIT 48**

**Bowser, David**

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**From:** Brett ODonnell [REDACTED]@odacomunications.com]  
**Sent:** Wednesday, May 08, 2013 11:19 AM  
**To:** Paul Broun-Personal  
**Cc:** Griffanti, Meredith; Bowser, David  
**Subject:** Universal Background checks answer

Dr. Broun,

Below is the answer as we discussed:

"Why won't you support universal background checks?"

"I believe very strongly in our constitutional second amendment rights and will fight to protect those rights and to protect you from ever having them removed by our government. We already have a system of background checks in place. What we need are true solutions to the problem and not more and bigger government. More government spending isn't the answer to keeping our children safe and free. And the system of universal background checks that the President wants to put in place is more government power that lets him get a step closer to taking away your second amendment rights. I'll fight everyday for more limited government and to protect your rights and freedoms, including your second amendment rights."

# **EXHIBIT 49**

## Bowser, David

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**From:** Brett ODonnell [REDACTED]@odacomunications.com]  
**Sent:** Monday, April 29, 2013 11:11 AM  
**To:** Bowser, David  
**Subject:** FAA Material

David,

Here are some talking points for Dr. Broun on FAA (though I think the issue is dead) and some facts.

Brett

- In fact, the FAA has known about the sequester **for nearly 2 years**, but gave Congress and the airline industry less than a week's notice of its implementation plans.
- And now they've chosen the most counterproductive way to implement sequestration: by furloughing air traffic controllers – **and causing Americans to pay the price because of it.**
- **The President could have prevented this, but he chose not to.**
- Instead of saving millions of dollars on their conferences in Las Vegas, the FAA has chosen **to make you** sit on the tarmac. Instead of cutting nearly \$4 billion in cost overruns, the FAA has chosen **to make you miss your kids' graduations.**
- **The President is playing politics with people's plans. And it cannot go on any longer.**
- At a time when families are traveling across the country to see their kids graduate from college, fly to take care of their elderly parents, and take business trips to help support their families – **these delays are inexcusable.**
- In fact, just this morning, a school group from my home in Eastern Washington told me they were delayed so many hours they arrived too late to get their Capitol tours. And the representatives from Spokane's Chamber of Commerce sat for so long on the tarmac that they didn't arrive until the middle of the night.
- **And the worst part: this could have been prevented.** It *should have* been prevented. And it **WOULD have been prevented** if the President had worked with us to replace his sequester.

- But now we must look forward to solve the problem. It's time for these delays to end. And it's time for the President to stop playing politics with the American people.

On April 26, 2013, the House approved the Reducing Flight Delays Act of 2013 (H.R. 1765) to ensure the Federal Aviation Administration (FAA) can end furloughs of air traffic controllers. Read Chairman Shuster's statement on passage of the bill.

The FAA had recently chosen to furlough controllers and all other employees in order to implement sequestration and meet required savings of five percent. Although the Administration knew about the potential for sequestration since November 2011, it waited until April 16, 2013 – just days before the furloughs were set to begin – to inform Congress and U.S. airlines of the details of its plans.

Although the FAA had the necessary flexibility to implement the sequester in a responsible manner, H.R. 1765 ensures beyond a shadow of a doubt that the agency now has more than enough capacity to end air traffic controller furloughs, stop the pain for the traveling public, and protect the economy.

**Read here** about how many prominent media outlets held the Obama Administration and the Federal Aviation Administration accountable for their choices in implementing the sequester. More information about the sequester:

- FAA Sequester Fact Sheet
- Background Information on FAA Furloughs Air Traffic Organization (ATO) and Air Traffic Control (ATC) Facilities
- Top 10 Examples of FAA's Financial Mismanagement
- Chart: FAA Operations Budget vs. Domestic Departures

Recent press releases and letters on sequester from the Committee:

- **April 26, 2013:** Shuster Statement on Resolution of FAA Furlough Situation
- **APR 19, 2013:** Shuster Statement on Administration's FAA Furlough Plans
- **APR 12, 2013:** House & Senate Leaders Express Bipartisan Safety Concerns About FAA Shutting Down Towers
- **MAR 22, 2013:** Thune, Shuster Question Administration's Choice to Close Contract Towers
- **MAR 7, 2013:** Thune & Shuster Question Whether FAA Has Explored All Cost Savings Before Punishing Employees and Traveling Public
- **FEB 26, 2013:** Shuster and Thune Request Immediate Information on FAA's Sequester Plans
- **FEB 22, 2013:** Shuster, Thune, LoBiondo Critical of Administration's Stance on Sequestration Impacts on Aviation

## FAA Furlough Plans

On Sunday, April 21, 2013, the Federal Aviation Administration (FAA) chose to begin furloughing air traffic controllers and all other employees in order to implement sequestration and meet required savings of five percent. Although the Administration knew about the potential for sequestration since November 2011, it waited until April 17, 2013 – four days before the furloughs were set to begin – to inform Congress and U.S. airlines of its plans and warn that major delays could result.

Transportation Secretary Ray LaHood and FAA Administrator Michael Huerta issued a list of airports that could experience delays of up to two hours due to furloughs. Although the FAA has stated it has flexibility to reduce costs in other ways, it has chosen a very public and painful way to implement sequestration.

The Administration's choices appear designed to maximize the impact on the aviation system and the travelling public

FAA has chosen NOT to implement furloughs in a way that could protect the most critical air traffic control operations and facilities

- o FAA has 47,000 employees, of which 15,500 are air traffic controllers
- o Air traffic controllers are being furloughed at the same rate as non-controllers (up to 11 days between now and the end of September)
- o Furloughs are being applied at the same rate at the largest, busiest facilities as at the smallest facilities with minimal amounts of operations
- o For example, the FAA is implementing furloughs at the same rate at Waterloo Regional

Airport in Iowa (79 operations per day) as at the Chicago Air Route Traffic Control

Center (3,000,000 operations per year, or 8,200 per day)

FAA has known about the sequester for over a year and a half, but gave Congress and the airline industry less than a week's notice about its implementation plans

FAA has the flexibility to reduce costs elsewhere, and has yet to exercise existing authorities to reduce the impact of delays on the traveling public.

There are \$2.7 billion in non-personnel Operations costs – such as contracts, travel, supplies, and consultants – that should be examined before FAA personnel are furloughed

- Examples of non-personnel costs include:
  - Nearly \$500 million for consultants
  - \$325 million in supplies and travel
  - The FAA has 46 aircraft that cost \$143 million to operate

FAA has seen substantial growth in funding in recent years, while flights are down

FAA's Operations budget has grown by 109 percent since 1996, from \$4.6 billion to \$9.7 billion A five percent reduction in Operations approximates 2010 funding levels

Domestic flights are down 27 percent from 2000 traffic levels

Finding 5 percent in savings in FAA's Operations budget should not significantly impact the Nation's aviation system

Despite repeated inquiries by Congress, the FAA and the Department of Transportation have failed to produce detailed justifications about their decisions and what alternatives were evaluated.

Businesses and families across the country have had to tighten their belts and the FAA should be able to do the same

#### FAA's History of Poor Financial Management

The Administration's choices are particularly disappointing in light of FAA's history of poor financial management

FAA's lack of oversight and poor contract management has resulted in significant delays and cost overruns on major modernization programs

- Three key modernization programs have had cost overruns of a combined total of over \$4 billion

- Out of 30 modernization programs, at least 15 have experienced cost overruns

In the last 7 years, FAA has sent over 18,000 employees to conferences in destinations such as Las Vegas

In FY2010 alone, FAA spent over \$8 million on conferences for its employees – three conferences, all held in the same city during the same three week time span, cost FAA over \$5 million

# **EXHIBIT 50**

**Bowser, David**

---

**From:** Brett ODonnell [REDACTED]@odacomunications.com]  
**Sent:** Friday, February 08, 2013 9:58 AM  
**To:** Griffanti, Meredith  
**Cc:** Miller, Erika; Bowser, David; GovBob; Chinouth, Jordan  
**Subject:** Re: Sequester

Suggested: "Georgians agree that spending in Washington DC is out of control. When congress couldn't do its job to cut spending, the automatic spending cuts from the sequester were triggered. While these cuts weren't ideal, they shouldn't be revered unless there are real spending cuts at least equal to those of the sequester. We have to get our spending under control. It is our national enemy and a real threat to our national security."

Thoughts?

On Feb 8, 2013, at 8:52 AM, Griffanti, Meredith wrote:

> We need to work on this messaging that he wants to "see it go through because its the first real cut we've seen." Its not getting good reception in GA cause we're so military heavy. And just saying that we'll plus it back up after isn't cutting it.

>  
> Meredith Griffanti  
> Communications Director  
> U.S. Congressman Paul Broun, M.D.  
> Cell: [REDACTED]  
> -----  
> Sent using BlackBerry

# **EXHIBIT 51**

**Bowser, David**

---

**From:** Brett O'Donnell [REDACTED]@odacommunications.com]  
**Sent:** Tuesday, March 26, 2013 5:29 PM  
**To:** Griffanti, Meredith  
**Cc:** Bowser, David  
**Subject:** Re: Guns

"I'm a big supporter of the second amendment, but right now my focus is on spending" He has to stay on message. I'll make a call in a bit.

On Mar 26, 2013, at 4:26 PM, Griffanti, Meredith wrote:

> Alllllll people want to talk ab down here is guns - we have to work on tightening this up big time. I'm sitting next to him giving the stink eye and he's already pouting cause he knows I'm going to freak out.

>

> ----- Original Message -----

> From: Bowser, David

> Sent: Tuesday, March 26, 2013 04:24 PM

> To: Griffanti, Meredith; [REDACTED]@odacommunications.com' <[REDACTED]@odacommunications.com>

> Subject: Re: Guns

>

> Very unproductive statement.

>

>

> ----- Original Message -----

> From: Griffanti, Meredith

> Sent: Tuesday, March 26, 2013 04:18 PM

> To: Bowser, David; [REDACTED]@odacommunications.com' <[REDACTED]@odacommunications.com>

> Subject: Guns

>

> Ughghghhhhhh. Gun free zones are free killing zones. Just said that on the radio. I am not okay with that. Someone needs to back me up!

# **EXHIBIT 52**

**Bowser, David**

---

**From:** Brett ODonnell [REDACTED]@odacomunications.com]  
**Sent:** Tuesday, December 10, 2013 9:11 AM  
**To:** Hardman, Christine  
**Cc:** Bowser, David; Miller, Erika  
**Subject:** Re: One Minute and Five Minute Scheduling for the Week: December 9 - 13

We need them to put out their release as well so we have their release to point to. We need to get this out this week though--otherwise we should wait until after the first of the year.  
On Dec 9, 2013, at 2:37 PM, Hardman, Christine wrote:

FYI – I checked in with AAPS this morning to see where they are in terms of Dr. support. Still waiting to hear back from them, but last Friday that had told me that the process was moving slowly. In case this takes longer than we had thought, we might want to go ahead and put out our release, and as more doctors sign on, we can send out a follow-up release. I'm thinking if we don't hear anything from AAPS, that we might want to plan on sending out our release tomorrow morning.

---

**From:** Bowser, David  
**Sent:** Friday, December 06, 2013 5:16 PM  
**To:** Norton, Teddie; Miller, Erika; Hardman, Christine  
**Cc:** [REDACTED]@odacomunications.com  
**Subject:** Fw: One Minute and Five Minute Scheduling for the Week: December 9 - 13

Let's plan on a 5 min slot to hopefully roll out AAPS endorsement of Options and to tout it.

Thanks!

---

**From:** House GOP Communications  
**Sent:** Friday, December 06, 2013 05:07 PM  
**To:** Bowser, David  
**Subject:** One Minute and Five Minute Scheduling for the Week: December 9 - 13

**HOUSE  
REPUBLICANS**

**HOUSE REPUBLICAN CONFERENCE**  
Chair Cathy McMorris Rodgers

**One Minute and Five Minute Scheduling for the Week: December 9 - 13**

**Messaging Topic: Americans still need jobs, and Obamacare is still standing in the way of growth.**

---

Please see below for scheduling of One and Five Minute speeches for the week: December 9 - 13

### **Five Minute Speeches**

Members are recognized to speak for up to five minutes on a first-come, first-served basis during Morning Hour.

### **One Minute Speeches**

One Minute speeches are also on a first-come, first-served basis.

#### **Monday, December 9**

Morning Hour at **noon**

Five Minute Speech Period – not longer than one Republican hour (ends at **1:50 p.m.**)

House opens at **2:00 p.m.**

Unlimited One Minutes per side

#### **Tuesday, December 10**

Morning Hour at **10:00 a.m.**

Five Minute Speech Period – not longer than one Republican hour (ends at **11:50 a.m.**)

House opens at **noon**

Fifteen One Minutes per side

#### **Wednesday, December 11**

Morning Hour at **10:00 a.m.**

Five Minute Speech Period – not longer than one Republican hour (ends at **11:50 a.m.**)

House opens at **noon**

Fifteen One Minutes per side

#### **Thursday, December 12**

Morning Hour at **10:00 a.m.**

Five Minute Speech Period – not longer than one Republican hour (ends at **11:50 a.m.**)

House opens at **noon**

Fifteen One Minutes per side

#### **Friday, December 13**

House opens at **9:00 a.m.**

Five One Minutes per side

If you have any questions regarding the schedule for One and Five Minute Speeches, please contact the Conference Secretary's office at 5-██████.

### **Messaging Themes:**

- Last week's jobs report showed our economy - while improving - still has a long way to go on the road to recovery.
- The President's unworkable health care law continues to threaten jobs and hamper our economic growth.
- It's not fair that the Democrats who run Washington want to impose higher health care costs on Americans already struggling to make ends meet.
- We need real solutions that will protect hardworking Americans from the coverage cancellations, loss of access to doctors, premium spikes and destruction of jobs that

Obamacare is bringing and will continue to bring.

- House Republicans remain committed to real solutions that will spur economic growth, create more jobs, and give everyone a fair shot.

Please contact the Conference Communications Office at 6-██████████ with any questions about the messaging for the week.

---

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# **EXHIBIT 53**

**Bowser, David**

---

**From:** Hardman, Christine  
**Sent:** Tuesday, November 19, 2013 10:29 AM  
**To:** [REDACTED]@odacommunications.com  
**Cc:** Miller, Erika; Bowser, David  
**Subject:** Re: One Minute and Five Minute Scheduling for the Week: November 18-21

Sounds good. Included that in the speech.

---

**From:** Brett O'Donnell [REDACTED]@odacommunications.com]  
**Sent:** Tuesday, November 19, 2013 10:20 AM  
**To:** Hardman, Christine  
**Cc:** Miller, Erika; Bowser, David  
**Subject:** Re: One Minute and Five Minute Scheduling for the Week: November 18-21

I don't think we should ever say fix Obamacare. We don't want to say it is fixable and we just voted against it. Your line above that one says that. We should stay consistent with that message.

How about:

**I was one of only 4 Republicans to oppose this bill**, because we can't fix the President's broken promises in Obamacare. **I want to repeal it; and I want to repeal it for good.**

On Nov 19, 2013, at 9:26 AM, Hardman, Christine wrote:

One last thought Erika and I were just talking about— are yall ok with us saying "...because I don't want to fix Obamacare until after the election." I like it, but just want to make sure that's not too political.

---

**From:** Hardman, Christine  
**Sent:** Tuesday, November 19, 2013 9:23 AM  
**To:** Miller, Erika; Bowser, David; 'Brett O'Donnell'  
**Subject:** RE: One Minute and Five Minute Scheduling for the Week: November 18-21

One-Min for today that Erika helped with- let me know if you have any changes before he gives this at noon.

Mister Speaker,

Now more than ever, Americans are feeling the pain from Obamacare.

This law is hurting Americans with higher premiums and cancellation notices, and if it is left in place, our country will suffer under the new wave of entitlement spending that it is set to create.

**This destroyer must be stopped.**

Just last week, the House passed a symbolic messaging bill that merely nibbled at the edges of the problems caused by Obamacare.

But Mister Speaker, you cannot fix a law that will *cripple our economy, increase our nation's debt, and limit healthcare options for millions of Americans.*

I was one of only 4 Republicans to oppose this bill, because I don't want to attempt to fix Obamacare until after the election. I want to repeal it; and I want to repeal it for good.

I have introduced legislation, the Patient OPTION Act, which would do just that.

Mister Speaker, Congress must stop wasting their time to pass bills that continue to keep Obamacare in place! We must repeal and replace this disaster immediately, and I urge my colleagues to work towards this end.

Mister Speaker, I yield back.

---

**From:** Miller, Erika  
**Sent:** Monday, November 18, 2013 6:09 PM  
**To:** Bowser, David; Hardman, Christine  
**Subject:** RE: One Minute and Five Minute Scheduling for the Week: November 18-21

I'm cool with it (with some tweaking ☺)

---

**From:** Bowser, David  
**Sent:** Monday, November 18, 2013 6:02 PM  
**To:** Hardman, Christine; Miller, Erika  
**Subject:** Re: One Minute and Five Minute Scheduling for the Week: November 18-21

Can we have something for him tonight or tomorrow morning to give at noon tomorrow?

Obamacare is a destroyer, last week Congress voted to pass a symbolic bill that attempted to fix Obamacare by nibbling at the edges, I was one of only 4 of my Republican colleagues to oppose this bill because I don't want to just fix Obamacare until after the next election, I want to repeal it forever.

Thoughts?

---

**From:** Hardman, Christine  
**Sent:** Monday, November 18, 2013 05:47 PM  
**To:** Bowser, David  
**Subject:** FW: One Minute and Five Minute Scheduling for the Week: November 18-21

Looks like noon- 15 one-minutes per side.

---

**From:** House GOP Communications [REDACTED@mail.gop.gov]  
**Sent:** Monday, November 18, 2013 11:19 AM  
**To:** Hardman, Christine  
**Subject:** One Minute and Five Minute Scheduling for the Week: November 18-21

# HOUSE REPUBLICANS

HOUSE REPUBLICAN CONFERENCE  
Chair Cathy McMorris Rodgers

## One Minute and Five Minute Scheduling for the Week: November 18-21

**Messaging Topic:** Obamacare is making life harder for Americans, and an "administrative fix" won't help.

---

Please see below for scheduling of One and Five Minute speeches for the week: November 18-21

### Five Minute Speeches

Members are recognized to speak for up to five minutes on a first-come, first-served basis during Morning Hour.

### One Minute Speeches

One Minute speeches are also on a first-come, first-served basis.

#### **Monday, November 18**

Morning Hour at **noon**

Five Minute Speech Period – not longer than one Republican hour (ends at **1:50 p.m.**)

House opens at **2:00 p.m.**

Unlimited One Minutes per side

#### **Tuesday, November 19**

Morning Hour at **10:00 a.m.**

Five Minute Speech Period – not longer than one Republican hour (ends at **11:50 a.m.**)

House opens at **noon**

Fifteen One Minutes per side

#### **Wednesday, November 20**

Morning Hour at **10:00 a.m.**

Five Minute Speech Period – not longer than one Republican hour (ends at **11:50 a.m.**)

House opens at **noon**

Fifteen One Minutes per side

#### **Thursday, November 21**

House opens at **9:00 a.m.**

Five One Minutes per side

If you have any questions regarding the schedule for One and Five Minute Speeches, please contact the Conference Secretary's office at 5-██████.

### Messaging Themes:

- The President promised over and over that Americans who liked their health care plans could keep them, but it is just not true.
- Americans are seeing just how unworkable this law is, so the President announced a unilateral "administrative fix" last week that is more about politics than helping people keep their plans.
- The American people won't be helped by regulatory gimmicks - they deserve certainty.
- We need real solutions that will protect hardworking Americans from the coverage cancellations, loss of access to doctors, premiums spikes and destruction of jobs that Obamacare is bringing and will continue to bring.
- With our economy still struggling to recover, it's not fair that the Democrats who run Washington now want to make Americans pay more for their health care, or lose it altogether.
- House Republicans remain committed to solutions that will spur economic growth, create more jobs, and provide fairness for all.

Please contact the Conference Communications Office at 6-████ with any questions about the messaging for the week.

---

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# **EXHIBIT 54**

## Hardman, Christine

---

**From:** Hardman, Christine  
**Sent:** Wednesday, July 31, 2013 4:19 PM  
**To:** Miller, Erika; Bowser, David  
**Cc:** 'Brett O'Donnell'  
**Attachments:** Revised 5-Min on OPTION Act.doc

Here's a final copy of Dr. Broun's 5-min on the OPTION Act for tomorrow morning. Brett, Dr. Broun and I made our final changes to it this morning if you wanted to see the end product.

### **Christine Hardman**

Press Secretary

Congressman Paul C. Broun (GA-10)

2437 Rayburn Building

202-225-██████

*Sign up for Dr. Broun's e-newsletters*



# **EXHIBIT 55**

**Bowser, David**

---

**From:** Brett ODonnell [REDACTED]@odacomunications.com]  
**Sent:** Monday, November 18, 2013 6:28 PM  
**To:** Bowser, David  
**Cc:** Broun, Paul; GovBob; [REDACTED]@gmail.com'; Hardman, Christine  
**Subject:** Re: Messaging thought

I like this. I think we also need to push that Obamacare can't be fixed. How about "You can't fix something that totally destroys our economy and healthcare, only repeal it." I don't think we should ever admit that this was a fix--can't fix it.  
On Nov 18, 2013, at 6:00 PM, Bowser, David wrote:

> Thinking we can get a little stronger and tighter in messaging the vote last week, not only as a vote against fixing Obamacare rather than repealing it, but beefing it up stronger and more assertive as something like: "I don't want to fix Obamacare just until the next election, I want to repeal it forever."

>

> Thoughts?

# **EXHIBIT 56**

## Bowser, David

---

**From:** Brett O'Donnell [redacted]@odacomunications.com]  
**Sent:** Thursday, August 15, 2013 2:15 PM  
**To:** Bowser, David  
**Cc:** Miller, Erika; Hardman, Christine; GovBob; Jordan chinouth; Hayes, Jessica  
**Subject:** Re: Patient OPTION Act Messaging

**Importance:** High

Gotcha. We have been discussing this. Are you talking about his bill specifically or Obamacare in general?  
On Aug 15, 2013, at 2:07 PM, Bowser, David wrote:

Team,

Just got back from 3 days in God's country (aka Georgia) and has the opportunity to hear PB discuss the Patient OPTION Act a couple of times in different public settings.

I believe we need to have a messaging session ASAP on this topic alone so that he has ONE script to go off from each time he discusses it. One to two minutes tops that hits all the high points. I noticed he did a better job describing it at one event than he did at another but each time there were several times midway where he seemed to be trying to recall portions of it or struggling to come up with an example of an "association pool"...I think we are all familiar with the time he came up with the infamous "Black folks pool" as the example, Tuesday night he came up with a "Registered Voters Pool".

- 1) First thing - his bill completely repeals Obamacare, ripping it out by the roots.
- 2) His bill is a patient based program - he has used "market based", "consumer based", etc...I think we should use "patient based".
- 3) Provides the opportunity (key word) for all Americans to obtain health insurance by...(have one or two "pool" examples he always uses).
- 4) Lowers the cost of health care by...
- 5) Provides incentives for doctors to help the poor who cannot afford high end health care by...
- 6) Saves Medicare from going bankrupt (he never even brought this part up).

Erika knows this bill through and through, let's come up with a canned response he can use every time it is brought up or he refers to it, type it out, and run through it with PB as soon as we can.

Thoughts?

Thanks!  
David

# **EXHIBIT 57**

CANDICE S. MILLER, MICHIGAN  
CHAIRMAN

GREGG HARPER, MISSISSIPPI  
PHIL GINGREY, GEORGIA  
AARON SCHOCK, ILLINOIS  
TODD ROKITA, INDIANA  
RICH NUGENT, FLORIDA

SEAN MORAN, STAFF DIRECTOR

# Congress of the United States

## House of Representatives COMMITTEE ON HOUSE ADMINISTRATION

1309 Longworth House Office Building  
Washington, D.C. 20515-6157  
(202) 225-XXXX  
<http://cha.house.gov>

ROBERT A. BRADY, PENNSYLVANIA  
RANKING MINORITY MEMBER

ZOE LOFGREN, CALIFORNIA  
JUAN VARGAS, CALIFORNIA

ONE HUNDRED THIRTEENTH  
CONGRESS

KYLE ANDERSON, MINORITY STAFF  
DIRECTOR

May 21, 2014

Mr. Kedric L. Payne  
Deputy Chief Counsel  
Office of Congressional Ethics  
P.O. Box 895  
Washington, D.C. 20515-0895

Re: Request for Information

Dear Mr. Payne,

I write in response to your May 19, 2014 Request for Information pursuant to a Board-authorized review of the Office of Congressional Ethics. As a third party with potentially relevant information, your office requested any communications relating to:

- 1) A copy of any agreement(s) review by the Committee on House Administration or the staff thereof between Representative Paul Broun's congressional office and O'Donnell & Associates, LTD in effect at any point between January 1, 2012 and the present date.
- 2) A copy of any communications between the Committee on House Administration or the staff thereof and Representative Paul Broun or any person acting on his behalf regarding the agreement(s) described in request number one.
- 3) A copy of any communications between the Committee on House Administration or staff thereof and O'Donnell & Associates, LTD or any persons acting on its behalf, including Brett O'Donnell regarding the agreement(s) described in request number one.
- 4) The names and contact information of each staff member of the Committee on House Administration that communication with Representative Broun or any person acting on his behalf, or with O'Donnell & Associates, LTD or any person acting on its behalf, including Brett O'Donnell, regarding the agreement(s) described in request number one.

After a review of paper and electronic records, including, but not limited to: written letters, memoranda, emails, instant messages, other contemporaneous electronic communications, records and memoranda to file, or any document memorializing or reflecting a meeting, conversation, or telephone call, the Committee has been unable to locate any responsive documents. The review included, but was not limited to, all appropriate staff of the Committee.

If you have further requests, please do not hesitate to contact me at (202) 225-████.

Sincerely,

A handwritten signature in black ink, appearing to read 'RAS', with a long horizontal flourish extending to the right.

Robert A. Sensenbrenner  
Senior Counsel

# **EXHIBIT 58**

**Bowser, David**

---

**From:** Brett O'Donnell [REDACTED]@odacomunications.com]  
**Sent:** Wednesday, July 17, 2013 5:27 PM  
**To:** Hardman, Christine  
**Cc:** Bowser, David  
**Subject:** Re: news query - USA Today

I agree. Do not respond.

Sent from my iPhone

On Jul 17, 2013, at 2:58 PM, "Hardman, Christine" [REDACTED]@mail.house.gov> wrote:

FYI –  
Brett, what are your thoughts on this? I don't see a need to respond and draw any unwarranted attention.

---

**From:** Singer, Paul [REDACTED]@usatoday.com]  
**Sent:** Wednesday, July 17, 2013 2:53 PM  
**To:** Hardman, Christine  
**Subject:** news query - USA Today

Christine:

I am a reporter with USA Today and I spend a lot of time trolling through congressional expenditure records.

In December, January and February, Rep. Broun paid Brett O'Donnell (O'Donnell & Associates) for "training" – can you tell me what services O'Donnell provided –

The reports are not yet out for April –June .. can you tell me whether O'Donnell has continued to provide training in your office?

Thanks very much for your assistance

Paul Singer  
Politics Editor  
USA Today  
703-854-[REDACTED] phone  
[REDACTED] mobile  
@singernews

# **EXHIBIT 59**

**Bowser, David**

---

**From:** Brett O'Donnell [REDACTED]@odacomunications.com]  
**Sent:** Thursday, July 18, 2013 2:21 PM  
**To:** Bowser, David  
**Subject:** Re:

Canal in a bit. In a meeting.

Sent from my iPhone

On Jul 18, 2013, at 1:49 PM, "Bowser, David" <[REDACTED]@mail.house.gov> wrote:

I just talked to Admin, let me know when you can chat, I have more info.

Thanks!  
David

# **EXHIBIT 60**

**From:** Hardman, Christine [REDACTED]@mail.house.gov   
**Subject:** Statement  
**Date:** March 13, 2014 at 9:58 AM  
**To:** Brett O'Donnell [REDACTED]@cdacommunications.com

"Brett O'Donnell is a contract member of Congressman Broun's official communications team. As he does with several other members of Congress, he provides training with public speaking, on-camera interviews, and media appearances so that Dr. Broun can best communicate his legislative priorities, issues, and message with his constituents. As stated by the House Administration Committee, O'Donnell's communications training is in compliance with all House rules."

**Christine Hardman**

Press Secretary

Congressman Paul C. Broun (GA-10)

2437 Rayburn Building

202-225-[REDACTED]

[Sign up for Dr. Broun's e-newsletters](#)



# **EXHIBIT 61**

CANDICE S. MILLER, MICHIGAN  
CHAIRMAN

GREGG HARPER, MISSISSIPPI  
PHIL GINGREY, GEORGIA  
AARON SCHOCK, ILLINOIS  
TODD ROKITA, INDIANA  
RICH NUGENT, FLORIDA

SEAN MORAN, STAFF DIRECTOR

## Congress of the United States

### House of Representatives COMMITTEE ON HOUSE ADMINISTRATION

1309 Longworth House Office Building  
Washington, D.C. 20515-6157  
(202) 225-[REDACTED]  
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ROBERT A. BRADY, PENNSYLVANIA  
RANKING MINORITY MEMBER

ZOE LOFGREN, CALIFORNIA  
JUAN VARGAS, CALIFORNIA

ONE HUNDRED THIRTEENTH  
CONGRESS

KYLE ANDERSON, MINORITY STAFF  
DIRECTOR

June 25, 2014

Mr. Kedric L. Payne  
Deputy Chief Counsel  
Office of Congressional Ethics  
P.O. Box 895  
Washington, D.C. 20515-0895

RE: Request for Information

Dear Mr. Payne,

I am writing to you in response to the request from your office to the Committee on June 24, 2014. This request was initiated by Mr. Bryson Morgan, an Investigative Counsel in your office, regarding whether the Committee reviewed and/or approved any contract between O'Donnell and Associates and a House Office. After of search of the relevant digital and physical records, the Committee has been unable to find a record of any informal or formal approval or consultation on contracts from O'Donnell and Associates and a House Office.

In its search of records, the Committee did locate a correspondence between a USA Today Reporter, Paul Singer, and the Committee's then-Deputy Staff Director Salley Wood, who also served as the Committee's press contact, which did not indicate a review or approval of a contract, but did mention O'Donnell and Associates. In response to a request for comment from Paul Singer of USA Today, Mrs. Wood wrote:

How about this:

*Members may not use their official budgets for campaign purposes. Period. We are aware of the media training provided by O'Donnell and Associates, and our regulations permit such training services by contractors.*

*On the record or on background – your call. Determinations on the legitimacy of services provided to Members in their official capacity are based solely on those services. Our main concern is ensuring that tax dollars are used solely for official purposes and our rules are specifically tailored to delineate official expenses/services from campaign.*

The communication specifically states, "[w]e are aware of the media training provided by O'Donnell and Associates, and our regulations permit such training services *by contractors.*" (emphasis added). As noted before, the Members' Congressional Handbook specifically denotes the difference between the duties that can be performed by a consultant and the duties that can be performed by a contractor.

Mrs. Wood does not recall contacting Mr. Broun's office to indicate that the Committee had received a press inquiry from USA Today, but has indicated it may be possible that she spoke with the office over the phone. To the best of her recollection, at no point in this conversation, if it indeed occurred, was Mrs. Wood asked to review or approve of the specific contract that Mr. Broun's office entered into.

If you have any further questions, do not hesitate to contact the Committee at 202-225-



Sincerely,

A handwritten signature in black ink, appearing to read "Bob Sensenbrenner".

Bob Sensenbrenner  
Deputy General Counsel  
Committee on House Administration

# **EXHIBIT 62**

**Norton, Teddie**

---

**From:** Brett O'Donnell ([REDACTED]@odacomunications.com]  
**Sent:** Thursday, June 14, 2012 2:27 PM  
**To:** Bowser, David  
**Cc:** Griffanti, Meredith; Norton, Teddie; Chinouth, Jordan  
**Subject:** Re: Time next week

I can be there for the entire time. Let's talk early in the week about how to structure that session.

Brett

Sent from my iPhone

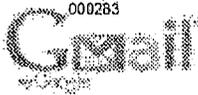
On Jun 14, 2012, at 2:07 PM, "Bowser, David" <[REDACTED]@mail.house.gov> wrote:

Brett,

As we discussed last week, there was a potential for a debate which has now turned into a scheduled event on June 22<sup>nd</sup> on television from 9:30 – 10:30 am in studio. We are in session next week with last votes no later than Thursday, June 21<sup>st</sup> at 3pm. The Congressman would like to schedule a couple of hours later that afternoon for debate preparations so we are going to hold from 3-6pm on our schedule and secure a conference room at the NRCC for this purpose. Please let me know if we can plan on you attending some or all of this prep time.

Thanks!  
David

# **EXHIBIT 63**



Jordan Chinouth: [REDACTED]@gmail.com

---

**Re: Debate Prep**

-----

Brett O'Donnell <[REDACTED]@odacomcommunications.com>

Thu, Jun 21, 2012 at 1:04 PM

To: David Bowser <[REDACTED]@yahoo.com>

Cc: Bob Bibee <[REDACTED]@aol.com>, Jordan Chinouth <[REDACTED]@gmail.com>, Meredith Griffanti <[REDACTED]@gmail.com>, Paul Broun-Personal <[REDACTED]@aol.com>

I have attached some questions that we should use for today's prep. This is obviously not exhaustive. Feel free to shoot others my way.

Brett

On Jun 20, 2012, at 5:36 PM, David Bowser wrote:

Jordan and team transcribed comments and statements made by Stephen Simpson at public events and from some news items, the first attached document labeled "Simpson Debate Prep File" is that document. I've also reviewed the interview he did with Randy Savage (link on the document) and looked through Simpson's videos at YouTube.

It is apparent and expected that Simpson says very little in the way of policy positions and ideas, although he is much weaker than most candidates, mainly because he is not getting a lot of media attention or credibility as a candidate. As we know, he focuses most of his statements as attacks on the Congressman. When he talks issues, it's nearly all vague. Primarily he has mentioned jobs & the economy, agriculture, education (his wife is a teacher), military (his profession) & national security, as well as spending/debt/balanced budget.

In the second attached brief document, "Debate Prep 2012", I wanted to create a foundation of brief responses from the Congressman focused primarily on the attacks he has instigated on Dr. Broun and the issues he has mentioned listed above as well as a couple of his usual catch phrases. This document is not meant to be the answers given verbatim by the Congressman, just a

suggested framework from which we begin to collectively formulate his responses to these high probably topic or attacks. I want to avoid "over-prepping" the Congressman and just have him prepared on the main issues we know are out there and may be topics based on what Simpson has said. I feel comfortable enough in the Congressman's knowledge of the issues that he can handle whatever not covered by this brief document such as transportation (except for TSPLOST, we need a response for this one), foreign affairs, health care, land use, etc etc.

Hope this makes sense, looking forward to thoughts and suggestions. We have a 2-3 hour briefing and prep time setup for tomorrow afternoon from 3-5 pm minimum.

Thanks Team!

David

<Simpson Debate Prep File.docx><Debate Prep 2012.docx>

---

 **Broun prep-6-21-12.doc**  
28K

# **EXHIBIT 64**

**From:** Griffanti, Meredith [REDACTED]@mail.house.gov  
**Subject:** FW: Contact Info  
**Date:** June 12, 2012 at 11:23 AM  
**To:** [REDACTED]@odacommunications.com

Brett – see below from our district press secy. It's on its way up. What is your address and we'll have it sent directly to you?

---

**From:** Hayes, Jessica  
**Sent:** Tuesday, June 12, 2012 11:17 AM  
**To:** Griffanti, Meredith  
**Subject:** RE: Contact Info

We didn't participate in any debates in 2010 but we did several in 2008. Our best one for viewing is the Atlanta Press Club debate that was televised on GPB between Broun and Bobby Saxon. I can ship you up the DVD.

Jessica Morris Hayes  
Press Secretary  
U.S. Rep. Paul Broun, M.D. (GA-10)  
Ofc: 706-447-[REDACTED]  
[Sign up for Dr. Broun's e-newsletters](#)



---

**From:** Griffanti, Meredith  
**Sent:** Tuesday, June 12, 2012 10:57 AM  
**To:** Hayes, Jessica  
**Subject:** FW: Contact Info

Any idea?

**From:** █████@odacomunications.com   
**Subject:** RE: Contact Info  
**Date:** June 12, 2012 at 10:57 AM  
**To:** Griffanti, Meredith █████@mail.house.gov

It would be very helpful if you can find any video (or online links) of him debating as I want to spend some time next week prepping him for the debate on the 22nd.

Thanks

Brett

| ----- Original Message -----

**From:** Griffanti, Meredith [REDACTED]@maif.house.gov   
**Subject:** RE: Contact Info  
**Date:** June 12, 2012 at 10:55 AM  
**To:** [REDACTED]@odacommunications.com

I don't... let me double check our files.

**From:** [REDACTED]@odacommunications.com   
**Subject:** RE: Contact Info  
**Date:** June 12, 2012 at 10:51 AM  
**To:** Griffanti, Meredith [REDACTED]@mail.house.gov

Thanks. Do you have any video of prior debates he has done?

| ----- Original Message -----

**From:** Griffanti, Meredith [REDACTED]@mail.house.gov   
**Subject:** RE: Contact Info  
**Date:** June 12, 2012 at 10:48 AM  
**To:** [REDACTED]@odacommunications.com

We ended up cancelling this week's debate... the first one will be June 22<sup>nd</sup> on tv in Macon. I'm excited to work with you too!

Teddie Norton  
[teddie.norton@mail.house.gov](mailto:teddie.norton@mail.house.gov) – email is the best way to get her  
202-225-[REDACTED]

Thanks!

**From:** [REDACTED]@odacomunications.com   
**Subject:** RE: Contact info  
**Date:** June 12, 2012 at 10:40 AM  
**To:** Griffanti, Meredith [REDACTED]@mail.house.gov

Hi Meredith,

Excited to be working for Dr. Broun and with your team. Can you send me the contact information for your scheduler? I'm out of town and forgot to take her card with me and wanted to get times set up for next week. I'd also like to get video of this week's debate as soon as possible.

Thanks and hope you're having a great week.

Brett

| ----- Original Message -----

**From:** Brett ODonnell [REDACTED]@odacommunications.com  
**Subject:** Re: Contact Info  
**Date:** June 1, 2012 at 5:21 PM  
**To:** Griffanti, Meredith [REDACTED]@mail.house.gov

Thanks Meredith. I enjoyed meeting you, David and Dr. Broun. Looks like you have a great team. Hope you have a great weekend as well.

Brett

**From:** Griffanti, Meredith [REDACTED]@mail.house.gov   
**Subject:** Contact Info  
**Date:** June 1, 2012 at 1:31 PM  
**To:** [REDACTED]@odacomunications.com

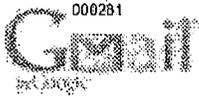
Hi Brett,

Thanks for meeting with us yesterday. Just wanted to pass along my contact info! Have a great weekend.

**Meredith Griffanti**  
Communications Director  
U.S. Representative Paul C. Broun, M.D. (GA-10)  
Office: 202-225-[REDACTED]  
Cell: [REDACTED]  
[Click here to sign up for Rep. Broun's e-newsletter](#)



# **EXHIBIT 65**



Jordan Chinouth <[REDACTED]@gmail.com>

---

## Debate Reminders

---

Brett O'Donnell <[REDACTED]@odacomunications.com>

Fri, Jun 22, 2012 at 12:05 AM

To: David Bowser <[REDACTED]@yahoo.com>

Cc: Bob Bibee <[REDACTED]@aol.com>, Jordan Chinouth <[REDACTED]@gmail.com>, Meredith Griffanti <[REDACTED]@gmail.com>, Paul Broun-Personal <[REDACTED]@aol.com>

Dr. Broun,

Below are the reminders from the prep session today.

1) You win the debate if

-You drive the message of the debate "I am the leader in congress of cutting wasteful spending, and can lead to turn this economy around and create jobs." (Don't forget to use caterpillar as an example) and the submessage-"I stand on principle in Washington, not for party or politics and 4 questions I ask before voting for any bill."

-You are competent in answering questions

-You only counterattack your opponent sparingly.

-You win the inside-outside Washington argument

2) You lose the debate if:

-You make a significant mistake in the debate.

-You lift up Simpson by initiating attacks or by engaging with him too much in the debate

-You fail to drive the message

-You don't appear likeable

3) Remember the answer strategy:

Conclusion or 40,000 foot view first.  
then the details  
don't wander to an answer

-Remember to talk from experience on Obamacare, and use the story of the business that have had their premiums increase 43%

4) Questions are just a vehicle for the answer you want to give and to drive message--control the ground of the debate

5) Listen carefully to the questions (don't always accept the premise of the question and listen to your opponent

6) The camera is always on you.

7) To win the inside outside argument

"Washington is broken and we need someone who understands the magnitude of the problem, knows what to do, to fix and has demonstrated the leadership necessary to fix it."

8) Be yourself, trust your judgment and act like you're having fun

God Bless.

Bratt

# **EXHIBIT 66**

**From:** Norton, Teddie [REDACTED]@mail.house.gov  
**Subject:** RE: Dr. Broun  
**Date:** June 25, 2012 at 5:04 PM  
**To:** [REDACTED]@odacommunications.com

I have reserved the political conference room at the NRCC.

Teddie Norton  
Director of Operations  
Congressman Paul C. Broun (GA-10)  
Phone: (202) 225-[REDACTED]  
Fax: (202) 226-0776  
[www.broun.house.gov](http://www.broun.house.gov)

**From:** Norton, Teddie [REDACTED]@mail.house.gov  
**Subject:** Re: Dr. Broun  
**Date:** June 25, 2012 at 3:40 PM  
**To:** [REDACTED]@odacommunications.com

Let's do 1130-1230 and hope that works with votes.

Teddie Norton  
Congressman Paul Broun.

---

**From:** [REDACTED]@odacomunications.com  
**Subject:** RE: Dr. Broun  
**Date:** June 25, 2012 at 3:35 PM  
**To:** Norton, Teddie [REDACTED]@mail.house.gov

I could do 9-9:45 am or 11:30-12:30 or from 4 pm on.

Brett

| ----- Original Message -----

**From:** Norton, Teddie [REDACTED]@mail.house.gov  
**Subject:** RE: Dr. Broun  
**Date:** June 25, 2012 at 2:34 PM  
**To:** [REDACTED]@odacommunications.com

Great-

Friday is tricky because votes are going to be over at 3 so we were trying to get this session in as early as possible to avoid votes messing with things. What time would be better? I can check to see how flexible we can be-

-Teddie

Teddie Norton  
Director of Operations  
Congressman Paul C. Broun (GA-10)  
Phone: (202) 225-[REDACTED]  
Fax: (202) 226-0776  
[www.broun.house.gov](http://www.broun.house.gov)

From: [REDACTED]@odacomunications.com  
Subject: RE: Dr. Broun  
Date: June 25, 2012 at 2:32 PM  
To: Norton, Teddie [REDACTED]@mail.house.gov

Teddie,

Thursday works great. I'll need to see if I can move another appointment for Friday. Are there other times on Friday that work?

Brett

----- Original Message -----

Subject: RE: Dr. Broun  
From: "Norton, Teddie" <[REDACTED]@mail.house.gov>  
Date: Mon, June 25, 2012 2:18 pm  
To: "'Brett ODonnell'" <[REDACTED]@odacomunications.com>

Hi Brett-

This week is a bit tricky because of the healthcare decision as well as the amendment activity on the floor.

Could you come in Thursday morning from 9-10 to go over healthcare messaging (in our office). We are also working on getting video from the debate so could you come in Friday morning from 9-10:30 (at the NRCC) to go over that and to prep for the one on the 1st? Friday's time might shift around a bit based on the floor activity, but this will give us a good start.

Thanks!

-Teddie

Teddie Norton  
Director of Operations  
Congressman Paul C. Broun (GA-10)  
Phone: (202) 225-[REDACTED]  
Fax: (202) 226-0776  
[www.broun.house.gov](http://www.broun.house.gov)

-----Original Message-----

From: Brett ODonnell [REDACTED]@odacomunications.com]  
Sent: Monday, June 25, 2012 9:54 AM  
To: Norton, Teddie  
Subject: Dr. Broun

Hi Teddie,

I wanted to get an hour scheduled with Dr. Broun for this week. I am out of town Tuesday afternoon through Wednesday evening.

Thanks

THANKS  
Brett

# **EXHIBIT 67**

**From:** David Bowser [REDACTED]@yahoo.com  
**Subject:** Re: Debate Prep  
**Date:** July 2, 2012 at 10:11 AM  
**To:** [REDACTED]@gmail.com, [REDACTED]@odacomunications.com  
**Cc:** Meredith Griffanti [REDACTED]@gmail.com, Jordan Chinouth [REDACTED]@gmail.com, BobBibee [REDACTED]@aol.com

I wish.

**From:** [REDACTED]@gmail.com  
**Subject:** Re: Debate Prep  
**Date:** July 2, 2012 at 9:54 AM  
**To:** [REDACTED]@odacommunications.com  
**Cc:** Meredith Griffanti [REDACTED]@gmail.com, [REDACTED]@aol.com [REDACTED]@aol.com, David Bowser [REDACTED]@yahoo.com,  
Jordan Chinouth [REDACTED]@gmail.com, BobBibee [REDACTED]@aol.com

He sounds great!!

Sent from my iPhone

**From:** [REDACTED]@odacomunications.com  
**Subject:** RE: Debate Prep  
**Date:** July 1, 2012 at 3:02 PM  
**To:** Meredith Griffanti [REDACTED]@gmail.com

Why don't we shoot for between 9 and 9:30. Talkers looked great. Made a couple of minor edits and added a section on debates. Great work.

Brett

----- Original Message -----

**Subject:** Re: Debate Prep  
**From:** Meredith Griffanti <[REDACTED]@gmail.com>  
**Date:** Sun, July 01, 2012 2:55 pm  
**To:** "Brett O'Donnell" <[REDACTED]@odacomunications.com>

He told me to call him when I got into athens to see what his status was and then to work it out with you. My guess is later this evening. I'm about to take off - ill call ya after I get into athens and touch base with him (probably about 7). Whatever works for you. Talkers look ok?

On 7/1/12, Brett O'Donnell <[REDACTED]@odacomunications.com> wrote:

> Do you know what time we're talking to Dr Broun?

>

>

>

> Sent from my iPhone

>

> On Jul 1, 2012, at 2:13 PM, Meredith Griffanti <[REDACTED]@gmail.com>  
> wrote:

>

>> Hello all -

>>

>> I am attaching Dr. Broun's debate talkers (that I will print out and bring  
>> down) with me as well as some top line news clips for the Athens area.

>>

>> See you soon!

>>

>> Meredith

>> <6 29 12 Athens Top Lines.doc>

>> <7.2.12 Debate Prep.doc>

>

--

Sent from my mobile device

**From:** █████@odacommunications.com   
**Subject:** RE: Debate Prep  
**Date:** July 1, 2012 at 3:00 PM  
**To:** Meredith Griffanti █████@gmail.com, █████@aol.com █████@aol.com, David Bowser █████@yahoo.com,  
Jessica Morris █████@gmail.com, Jordan Chinouth █████@gmail.com, Bob Bibee █████@aol.com

I made a few edits. They are noted by track changes in the doc.

Brett

----- Original Message -----

Subject: Debate Prep  
From: Meredith Griffanti <█████@gmail.com>  
Date: Sun, July 01, 2012 2:13 pm  
To: Brett ODonnell <█████@odacommunications.com>, "█████@aol.com"  
<█████@aol.com>, David Bowser <█████@yahoo.com>, Jessica Morris  
<█████@gmail.com>, Jordan Chinouth <█████@gmail.com>,  
Bob Bibee <█████@aol.com>

Hello all -

I am attaching Dr. Broun's debate talkers (that I will print out and bring down) with me as well as some top line news clips for the Athens area.

See you soon!

Meredith



**From:** Meredith Griffanti [REDACTED]@gmail.com  
**Subject:** Re: Debate Prep  
**Date:** July 1, 2012 at 2:55 PM  
**To:** Brett O'Donnell [REDACTED]@odacommunications.com

He told me to call him when I got into athens to see what his status was and then to work it out with you. My guess is later this evening. I'm about to take off - ill call ya after i get into athens and touch base with him (probably about 7). Whatever works for you. Talkers look ok?--  
Sent from my mobile device

**From:** Brett O'Donnell [REDACTED]@odacommunications.com  
**Subject:** Re: Debate Prep  
**Date:** July 1, 2012 at 2:48 PM  
**To:** Meredith Griffanti [REDACTED]@gmail.com

Do you know what time we're talking to Dr Broun?

Sent from my iPhone  
<7.2.12 Debate Prep.doc>

**From:** Meredith Griffanti [REDACTED]@gmail.com 

**Subject:** Debate Prep

**Date:** July 1, 2012 at 2:13 PM

**To:** Brett O'Donnell [REDACTED]@odacommunications.com, [REDACTED]@aol.com [REDACTED]@aol.com, David Bowser [REDACTED]@yahoo.com, Jessica Morris [REDACTED]@gmail.com, Jordan Chinouth [REDACTED]@gmail.com, Bob Bibee [REDACTED]@aol.com

Hello all -

I am attaching Dr. Broun's debate talkers (that I will print out and bring down) with me as well as some top line news clips for the Athens area.

See you soon!

Meredith



# **EXHIBIT 68**

## **TRANSCRIPT OF INTERVIEW OF REPRESENTATIVE BROUN'S CAMPAIGN CONSULTANT**

1 MR. MORGAN: All right. It is June 20,  
2 2014. Speaking is Bryson Morgan, investigative  
3 counsel with the Office of Congressional Ethics.  
4 I'm joined by Paul Solis, also an investigative  
5 counsel with the Office of Congressional Ethics,  
6 and we are here with [REDACTED].

7 BY MR. MORGAN:

8 Q. And, Mr. [REDACTED], I mean, first, you know,  
9 we have already covered the False Statements Act  
10 and its application.

11 First, we'd like to just ask you  
12 some -- some basic background questions.

13 A. Sure.

14 Q. What is -- what is your current position?

15 A. I currently am the owner of J. Russell &  
16 Associates.

17 Q. Okay. What is -- what is J. Russell &  
18 Associates?

19 A. It's a campaign events and public relations  
20 firm.

21 Q. And where is it located?

22 A. Athens, Georgia.

23 Q. Okay. How long have you been in that  
24 position?

1 A. Since April of 2013.

2 Q. Okay. What were you doing before then?

3 A. I worked for U.S. Congressman Paul Broun.

4 Q. And when you say "worked," do you mean on  
5 his official staff?

6 A. Yes. I was his, I mean, district director,  
7 Deputy Chief of Staff and field representative.

8 Q. Okay.

9 A. I was with him for -- since 2007.

10 Q. Okay. What -- okay. So let's break that  
11 down a little bit.

12 A. Sure.

13 Q. When you first were hired on by  
14 Representative Broun in 2007, what was your title?

15 A. Field representative.

16 Q. Field representative. Were you based here  
17 out of -- out of Athens?

18 A. Yes.

19 Q. Okay. And then how long were you field  
20 representative?

21 A. I was field representative from August  
22 of -- I mean, I worked on his campaign previous and  
23 during special election. We won that and then --

24 Q. Okay.

1       A.    -- became a field representative.  I was  
2 field representative from August of 2007 until  
3 February of 2008, at which time, I switched over to  
4 the campaign and --

5       Q.    In February 2008?

6       A.    Yes, and then --

7       Q.    And what was your role with the campaign?

8       A.    I was deputy campaign manager and then was  
9 promoted to campaign manager.

10      Q.    Okay.  And how long were you in that -- in  
11 those positions?

12      A.    Let's see, July 2008, November of 2008 --  
13 until December of 2008.

14      Q.    Okay.  What did you -- and then what did  
15 you do in December of 2008?

16      A.    I went back over to be on the Congressman's  
17 official staff --

18      Q.    Okay.

19      A.    -- and I was still a field representative at  
20 that point and then was promoted to district  
21 director in January or February of 2009.

22      Q.    Okay.  And then how long were you in that  
23 position?

24      A.    I went to -- back over to the campaign in

1 2010.

2 Q. Okay.

3 A. In approximately -- sorry, gentlemen --  
4 September maybe.

5 Q. Okay.

6 A. Maybe September.

7 Q. As campaign manager?

8 A. Correct.

9 Q. Okay.

10 A. And then went through the general election  
11 and then came back over to the Congressional side  
12 in 2000 -- late 2010 so --

13 Q. Okay.

14 A. -- around December of 2010.

15 Q. And then you were -- did you then go back  
16 over to the campaign for 2012?

17 A. I was then -- then became district  
18 director --

19 Q. Okay.

20 A. -- in 2000 and -- let's see, 2010, went  
21 back over to the Congressional side in late 2010  
22 and then became district director in 2011 and then  
23 went back to the campaign in 2012, in approximately  
24 April --

1 Q. Okay.

2 A. -- and went back over to the Congressional  
3 staff in 2012, in approximately August.

4 Q. August 2012, would that have been after the  
5 primary was over?

6 A. Yes.

7 Q. And I believe -- well, did Representative  
8 Broun not have a general election challenger that  
9 year?

10 A. That is correct.

11 Q. Okay. Okay, and so then you went back over  
12 to August 2012, and then how long were you there?

13 A. Became Deputy Chief of Staff at some point,  
14 I don't recall the month, and then --

15 Q. Still based out of Athens here?

16 A. Yes.

17 Q. Okay.

18 A. Yeah, and then stayed in that role until  
19 April of 2013.

20 Q. Okay. And then in April of 2013, you  
21 went -- started working on his Senate campaign?

22 A. No. At that point --

23 Q. Okay.

24 A. -- I started my own.

1 Q. At that point, you started J. Russell &  
2 Associates?

3 A. That's correct, yes.

4 Q. And what -- was there any relationship  
5 between J. Russell & Associates or you and  
6 Representative Broun's Senate campaign?

7 A. Yes.

8 Q. Okay. What was that relationship?

9 A. To build a statewide infrastructure of  
10 volunteers throughout the State and build a grass  
11 roots plan of voter turnout for the Senate  
12 campaign.

13 Q. Okay. So you were -- you were a --

14 A. Consultant.

15 Q. -- not an employee of the campaign?

16 A. Correct.

17 Q. You were a consultant of the campaign?

18 A. Yes.

19 Q. Are you still a consultant to his -- to his  
20 campaign?

21 A. There is no campaign.

22 Q. So his campaign is -- has been closed up?

23 A. Yes.

24 Q. Okay.

1 A. I mean, for -- for my purposes, yeah.

2 Q. When was your -- when was your last  
3 involvement in -- in the campaign?

4 A. May 20th.

5 Q. May 20th, okay.

6 A. The day of the primary.

7 Q. The day of the primary, okay.

8 MR. SOLIS: And then when -- when was the  
9 first day you sort of started working from J.  
10 Russell & Associates, you started working with the  
11 Senate campaign? Is it would have been in April of  
12 2013?

13 A. Yes, late -- somewhere in that month, to  
14 the best of my recollection, somewhere in that  
15 month, middle -- middle part of the month,  
16 probably.

17 MR. SOLIS: Okay.

18 BY MR. MORGAN:

19 Q. What did you do prior to working on his  
20 campaign in 2007?

21 A. Prior to 2007, working on his campaign, I  
22 worked in Nashville, Tennessee at Olive Garden.

23 Q. Okay. The 2012 -- Representative Broun's  
24 2012 Congressional campaign, who were the other

1 individuals involved in running that campaign?

2 A. The 2012 campaign would have been -- I have  
3 to revisit -- it would be me, Josh Findlay and then  
4 we had two field representatives, Shay Phelps and  
5 Kelsey -- I can't recall Kelsey's last name, I'm  
6 sorry.

7 Q. That's fine, okay.

8 Who -- who was involved in handling  
9 communications for the 2012 campaign?

10 A. Communications for the 2012 -- I mean,  
11 there were no -- like are you talking about press  
12 releases and things like that?

13 Q. Yeah, yeah.

14 A. Okay. That would have been done by -- like  
15 we had a like a press at Paul Braun.com and that  
16 would be -- I guess that would have been Meredith  
17 Griffanti.

18 Q. Okay. And in 2014?

19 A. 2014, that would be Christine Hardman.

20 Q. Okay. Do you recall if in 2012, the  
21 campaign hired any -- any media consultants, or if  
22 there were any media consultants involved?

23 A. In 2012, no -- I mean, there's two  
24 separate -- like there's a Georgia -- I mean, you

1 know, obviously most of the stuff that I was  
2 involved in was on the ground in Georgia, making  
3 sure events got covered and signs got put out and  
4 stuff like that. I believe communications, no.  
5 No, I think Meredith put out everything.

6 Q. Okay. What's -- well, I would like to ask  
7 you about Brett O'Donnell. When did you first  
8 become acquainted with Brett O'Donnell, remember  
9 hearing about him or --

10 A. In 2012.

11 Q. 2000 -- do you remember what about that was  
12 in 2012?

13 A. Spring -- some time in the spring.

14 Q. Okay. And how were you -- how were you  
15 introduced to him?

16 A. I was introduced to him as a person that  
17 worked with Dr. Broun and he -- at one point, I had  
18 a telephone phone call with him just to get some  
19 advice about a -- a forum that I was doing.

20 Q. Do you recall what that forum was?

21 A. Yeah, it was Green County, Lake Oconee.

22 Q. Was it a campaign forum?

23 A. Yes.

24 Q. Okay. When -- do you remember when about

1 that was?

2 A. No. I don't remember what month.

3 Q. That was -- that was in connection with the  
4 2012 campaign?

5 A. Yes, yes.

6 Q. Okay.

7 A. I don't remember what month or --

8 Q. Okay.

9 MR. SOLIS: And what was his advice?

10 A. I don't recall that either, actually.

11 BY MR. MORGAN:

12 Q. What -- do you -- he was introduced to you,  
13 how did you understand his role to be or his  
14 relationship with Representative Broun?

15 A. I didn't really understand a role with him.  
16 It was just, you know, I was on my way to that  
17 event, and I remember being on the phone with him  
18 and that's about it. I mean, that's my first  
19 interaction with him that I can -- that I can  
20 recall.

21 Q. Okay. Did you call him?

22 A. I don't -- I don't remember that.

23 Q. Okay.

24 A. I just remember being on the phone with him

1 on the way down to that -- that event at Lake  
2 Oconee.

3 Q. Do you recall how Brett O'Donnell became  
4 connected to Representative Broun, how that  
5 relationship was established? Were you involved at  
6 all in that?

7 A. No.

8 Q. No? Okay. I want to show you an e-mail --

9 A. Sure.

10 Q. -- see if this -- or ask you if can maybe  
11 you can explain the circumstances surrounding this  
12 a bit. This is, for the record, PBDB 0086, and  
13 this is an e-mail on June 14, 2012 from David  
14 Bowser to Brett O'Donnell cc'ing Broun, all staff.  
15 You know, I -- I believe that may have included you  
16 because you ended up responding to the e-mail.

17 But David Bowser writes, "We are pleased to  
18 announce the addition of Brett O'Donnell to Team  
19 Broun as a communications and messaging consultant  
20 to our official office," talks about some of  
21 Brett's accomplishments. He says, "Brett will be  
22 working with the Congressman and key staff starting  
23 next week so you may be hearing his name." It --  
24 you respond shortly thereafter saying,

1 "Congrats" -- you respond to David Bowser,  
2 "Congrats. Had no idea we were close to making a  
3 decision," and I guess at this time you were in the  
4 Congressional office?

5 A. Yes. During this time, I would have  
6 been --

7 Q. I think you said during this time, you  
8 were -- you were working on the campaign. Was  
9 there --

10 A. Yeah.

11 Q. -- overlap?

12 A. Yeah. I mean, I was always a split  
13 employee, if that makes sense.

14 Q. Yeah.

15 A. I mean, but my focus and salary changed  
16 based on --

17 Q. Based on what you were more focussed on?

18 A. Correct, yes.

19 MR. SOLIS: So you were never off the  
20 official payroll during all this time?

21 A. That -- up until April -- April of '13,  
22 that would be correct, yes.

23 BY MR. MORGAN:

24 Q. Okay. Did you go to part-time status?

1 A. Yes.

2 Q. Okay. So when you were -- during  
3 the -- I'm just trying to understand.

4 A. I think -- I mean --

5 Q. In the times when you said you went to the  
6 campaign, did your status with the Congressional  
7 office go to part-time?

8 A. I don't know how it was classified. All I  
9 know is that the salary was greatly reduced --

10 Q. Okay.

11 A. -- to -- to offset -- I mean, obviously, if  
12 I'm focusing the majority of my time on a campaign,  
13 I'm not gonna be focusing as much time with the  
14 district.

15 Q. Okay.

16 A. Does this answer --

17 Q. No, that's -- that's -- I think --

18 MR. SOLIS: You -- I mean, you know that  
19 your salary was reduced, right, so --

20 A. Yeah.

21 MR. SOLIS: Okay.

22 A. Yeah. Well, I mean, it was reduced, you  
23 know, on one side based on where the focus was,  
24 yes.

1 BY MR. MORGAN:

2 Q. That makes sense. So you were responding  
3 to -- do you recall the circumstances? Then David  
4 Bowser responds to you saying, "This is not a media  
5 consultant for the campaign. That part is  
6 dragging."

7 So can you explain to me the circumstances  
8 surrounding this exchange? Was there a search for  
9 a media consultant for the campaign and you were  
10 perhaps thinking that was Brett?

11 A. No, I don't -- I don't recall searching for  
12 a media consultant during the 2012 campaign.

13 Q. Okay. You said, "Had no idea we were close  
14 to making a decision."

15 A. Right.

16 Q. So were you involved in some discussions  
17 about hiring a person to be a media consultant?

18 A. No. I mean, not -- not during 2012.

19 Q. Yeah.

20 A. I don't -- this is confusing. I don't know  
21 what this is --

22 Q. This is you responding to David --

23 A. I understand, but I'm saying I don't  
24 know -- I don't know how to answer this. Like we

1 did not hire a media consultant until the 2014  
2 race, so I don't know why I would have --

3 Q. You would have --

4 A. -- said that.

5 Q. Were you -- when -- when, you know, David  
6 Bowser's e-mail to you says, "This is most a media  
7 consultant for the campaign, that part is  
8 dragging" --

9 A. Right.

10 Q. -- you don't recall there being any  
11 discussion about hiring a media consultant for the  
12 campaign?

13 A. No, not for the '12 campaign.

14 Q. Okay. Do you recall were you -- do you  
15 recall being -- thinking that Brett O'Donnell was  
16 perhaps a media consultant for the campaign? Was  
17 there some confusion there in your mind that you  
18 recall?

19 A. No, I don't recall -- I don't -- no, I  
20 don't recall.

21 Q. Okay. Do you -- was this the first time  
22 you were introduced to Brett O'Donnell? Do you  
23 know if you had any --

24 A. Like I said, the first time that I ever

1 remember speaking with him was during that phone  
2 call --

3 Q. Okay.

4 A. -- on the way down to that event.

5 Q. When do you recall first hearing of him?  
6 Do you recall -- do you recall receiving this  
7 e-mail?

8 A. No, I don't.

9 Q. You don't?

10 A. I don't. No, I don't know what I remember  
11 first --

12 Q. Okay.

13 A. -- recall hearing about him. Like I said,  
14 the first interaction I had with him or remember  
15 his name coming up was that phone call that we had.

16 Q. Okay. I think -- so that phone call you  
17 remember in 2012. What else do you remember about  
18 Brett O'Donnell's involvement with the 2012  
19 campaign?

20 A. Nothing really, to my recollection. I  
21 mean, nothing that comes -- comes to mind.

22 Q. Okay. How frequently did you interact with  
23 Brett O'Donnell during the 2012 campaign? You said  
24 that one phone call?

1 A. That's the one that sticks out in my mind.

2 Q. Sticks out, okay. We do have some e-mails  
3 to take you through to see if that --

4 A. Okay.

5 Q. -- helps jog your memory.

6 A. Sure.

7 Q. I know that can be -- can be helpful.

8 Were you -- just to close the loop on that,  
9 do you -- were you involved in any discussions when  
10 Brett O'Donnell was brought on, or was this -- this  
11 e-mail you received, was this news to you? Were  
12 you involved in a process of interviewing  
13 candidates for a media consultant position?

14 A. No.

15 Q. Okay.

16 A. No, I was not.

17 Q. You were not? Do you remember having any  
18 conversations with anybody on the Congressional  
19 staff about hiring a media consultant?

20 A. No.

21 Q. Or any discussions about needing to bring  
22 someone on help Representative Broun with his  
23 public speaking skills or his --

24 A. I do --

1 Q. -- his messaging?

2 A. I do remember -- yes, I do.

3 Q. And what do you recall about that?

4 A. Just that, you know, we needed to sharpen  
5 up our communication, but I don't recall anything  
6 other than that. It was just general --

7 Q. Was that about that time period, 2012, that  
8 you recall there being those discussions?

9 A. I don't know. There's no way I could put a  
10 date to that --

11 Q. Okay.

12 A. -- or a -- no, I don't recall.

13 Q. Okay. Well, let's see if some of these  
14 documents help out a little bit here.

15 A. Okay.

16 Q. Let's see.

17 A. Do you need this back?

18 Q. You can -- you can keep that next to you  
19 there, in case I want to go back to -- this next  
20 document is PBTN 9, and it starts with an e-mail  
21 from David Bowser to Brett O'Donnell writing:

22 "Brett, as we discussed last week, there  
23 was a potential for a debate which has now turned  
24 into a schedule event on June 22nd on television

1 from 9:30 to 10:30."

2 And then, you know, skipping a  
3 sentence, "That the Congressman would like to  
4 schedule a couple of hours later that afternoon for  
5 debate preparations so we're with going to hold  
6 from 3:00 to 6:00 p.m. on our schedule and secure a  
7 conference room at the NRCC for this purpose."

8 Brett O'Donnell responds saying, "I can be  
9 there for the entire time. Let's talk earlier in  
10 the week about how to structure that session."

11 You were -- you were cc'ed on these  
12 e-mails, it appears. Do you recall a June 22nd  
13 televised debate?

14 A. June 22nd, televised debate, no.

15 Q. Do you recall if, you know, this  
16 event -- June 22nd event that David Bowser was  
17 referring to?

18 I mean it says -- he said, "It's a  
19 potential for a debate which has now turned into a  
20 scheduled event." Do you recall that event?

21 A. No, I do not, June 22nd of 2012.

22 Q. 2012.

23 A. No, I don't recall what specific event that  
24 would be.

1 Q. Do you recall a -- a WGAU Georgia 10th  
2 District debate that was on Athens radio?

3 A. Yes.

4 Q. It was on or about July 2, 2012?

5 A. Yes, I do.

6 Q. Okay. So were you involved in helping  
7 prepare Representative Broun for -- for that WGAU  
8 debate or this television appearance?

9 A. No, I -- I staffed him at the WGAU.

10 Q. You staffed him?

11 A. Yeah.

12 Q. Who else was there?

13 A. Well, I mean obviously his opponent.

14 Q. Who was Simpson?

15 A. Yeah, and he -- I don't recall if he had a  
16 staff or -- and then of course there was Tim  
17 Bryant, who -- you're talking about the WGAU,  
18 correct?

19 Q. Uh-huh.

20 A. Yes.

21 MR. SOLIS: We're interested in who from  
22 Representative Broun staffers --

23 A. Oh, forgive me, I'm sorry.

24 MR. SOLIS: -- either Congressional or

1 campaign was there.

2 A. All that I recall is that -- is that I was  
3 the one there.

4 BY MR. MORGAN:

5 Q. Okay.

6 A. I don't recall any other Broun staffers  
7 being there.

8 Q. Was David Heenan his body man in 2012?

9 A. No.

10 Q. No? That was 2014?

11 A. '13.

12 Q. '13?

13 A. Yes.

14 Q. Okay, fair enough. Okay.

15 Do you recall there being any preparation  
16 sessions for those debates?

17 A. Not from -- no, not down here.

18 Q. Okay. So I'm looking at this e-mail,  
19 this --

20 A. Sure.

21 Q. -- e-mail exchange. This appears to  
22 suggest that Brett O'Donnell was involved in debate  
23 preparation sessions for -- for that appearance.

24 Is -- are you aware, to your knowledge, did

1 Brett O'Donnell help prepare Representative Broun  
2 for any debates in 2012?

3 A. I mean, not down here, no. I don't --

4 MR. SOLIS: What about in DC?

5 A. No. I mean, I wouldn't know -- I would not  
6 know that. I mean, obviously, it says he did, I  
7 guess, but I mean, I don't recall --

8 BY MR. MORGAN:

9 Q. Okay. You don't recall a session or --

10 A. No, not --

11 Q. -- even hearing about a preparation  
12 session?

13 A. Yeah, there were talks about preparation  
14 sessions --

15 Q. Okay.

16 A. -- but it wasn't -- it wasn't down here.

17 Q. Okay.

18 A. It wasn't -- it wasn't here.

19 Q. And do you know who was involved in those  
20 preparation sessions?

21 A. No, I don't know.

22 Q. You were not -- you were not involved?

23 A. No, I'm --

24 Q. So why would you be --

1 A. -- I'm a Georgia guy.

2 Q. -- cc'ed on an e-mail about setting up a  
3 prep session?

4 A. I do not know the answer to that.

5 Q. Okay. But you had -- you didn't have any  
6 role in the -- in the preparation sessions in 2012?

7 A. No. The role that I would have had, if  
8 any, would have been to say here's some of the  
9 local issues that would -- that are going on.

10 Q. Okay.

11 A. I mean, that would -- I'm a very Georgia  
12 person, I think.

13 Q. Okay. Let's -- this next document is  
14 PBTN --

15 A. Okay.

16 Q. -- 0010. You see the -- the e-mail  
17 conversation starts on the next page --

18 A. Okay.

19 Q. -- with an e-mail from Teddy Norton to  
20 Brett O'Donnell saying, "Hey, Brett. Dr. Broun  
21 wants to set up about 90 minutes next week to go  
22 over both debates. What days/times are better for  
23 you, Tuesday to Thursday?"

24 This e-mail was on -- on July 3rd?

1 A. Okay.

2 Q. Top of that page, Brett responds, "Hi,  
3 Teddy. I'm wide open on Tuesday. Wednesday, I'm  
4 free until 10:30."

5 Are you aware -- and then the last  
6 communication in the chain is Teddy e-mailing Brett  
7 saying, "Okay. I have requested a room at the NRCC  
8 and let you know which one it is once they assign  
9 it."

10 I have -- now, I realize you were not, you  
11 know, cc'ed on these e-mails, but are you aware of  
12 there being a -- a session with Representative  
13 Broun to go over those two debates?

14 A. No. I mean, there could have been but  
15 that's out of my --

16 Q. Okay.

17 A. I'm down here.

18 Q. Would you -- so I think you were the only  
19 staffing him at the Athens radio. Were you -- did  
20 you film that?

21 A. No.

22 Q. No? Were you involved at all in  
23 transmitting video or audio from either of those  
24 debates to other people so that they could go

1 through it, do review sessions?

2 A. No.

3 Q. No? Okay.

4 A. Not to my knowledge, no.

5 Q. The -- I'll show you this document, PBTN  
6 14, and I'm sure as you realize that, you know,  
7 your answers -- saying that you have no knowledge  
8 of something is just as relevant to our review as  
9 saying you had knowledge, right?

10 So this is a calendar item from Teddy  
11 Norton's calendar, subject is Brett O'Donnell,  
12 location finance conference room, NRCC. This is  
13 July 19th from 3:00 to 5:00. Were you -- were you  
14 involved at all in this session? The category is  
15 listed as, "Political."

16 Were you at all involved as -- were you at  
17 all involved in a meeting on July 19th?

18 A. No, not that I --

19 Q. Okay.

20 A. -- not that I recall. This is obviously in  
21 DC.

22 Q. In DC.

23 A. Yeah.

24 Q. And here's another. This is PBTN 19.

1 It's -- it says, "Meet with Brett, main conference  
2 room NRCC on July 24, 2012." Were you involved at  
3 all in this meeting?

4 A. No.

5 Q. Okay. Moving onto the 2014 Senate  
6 campaign --

7 A. Sure. Am I supposed to keep these in some  
8 sort of order or --

9 Q. No, that's fine.

10 A. Okay.

11 Q. Put that one there. I got a series of  
12 documents I was hoping you could help us understand  
13 a little bit better. This is PBCH 33.

14 A. Starting on Page 3?

15 Q. Yeah, I'm starting on Page 3. That's an  
16 e-mail from David Bowser on August 16, 2013 to  
17 Brett O'Donnell saying, "Brett, if you're  
18 available, I would like to set up some brief  
19 messaging calls with you, Christine and PB next  
20 week," and then putting forth a few dates.

21 This is an e-mail you were -- you were  
22 cc'ed on and I'm just wondering -- take your time  
23 to review this -- this e-mail conversation.

24 I wonder if you could tell me why it is

1 that Brett O'Donnell would be -- or what his role  
2 was in these messaging calls? Do you recall  
3 participating in these messaging calls?

4 A. No, I don't. I don't. To my knowledge, I  
5 didn't participate in these messaging calls.

6 Q. Okay. What was Brett O'Donnell's role with  
7 messaging during the 2014 campaign?

8 A. Just suggestions; I mean --

9 Q. Okay.

10 MR. SOLIS: What suggestions?

11 A. Like on -- I don't know anything specific,  
12 just -- there was a lot of like -- to be completely  
13 -- there was a lot of disorganization so there's  
14 not really -- like I couldn't point to one specific  
15 thing that he like honed in on or whatever. It was  
16 always just kind of a suggestion here or there  
17 so --

18 BY MR. MORGAN:

19 Q. How would you -- how would you become aware  
20 of those suggestions? Was it via e-mail --

21 A. I was on -- yeah, e-mail.

22 Q. Were you -- were you on phone calls with  
23 Brett, as well, in 2014?

24 A. Yes, there were campaign conference calls

1 but --

2 Q. How often would those take place?

3 A. Sporadically.

4 Q. As in like once a month or once a week?

5 A. Once a month, at best.

6 Q. Okay.

7 MR. SOLIS: Who would be on the calls?

8 A. It would be -- I mean, Brett, David Bowser,  
9 when Josh came on -- Josh came on in August or  
10 September, Josh Findlay, finance director --

11 BY MR. MORGAN:

12 Q. Who was the finance director?

13 A. Well, there was Kay Stoddard and then there  
14 -- let's see, there was Carrie Johns.

15 There was a series -- I mean, some of them  
16 came and went -- or they came and went so there was  
17 Kay Stoddard, Carrie Johns, Mallory Whitfield.

18 Q. Okay. So one of the -- one of the events  
19 referenced here to the prep is -- is the  
20 Conservative Republican Women of North Atlanta --

21 A. Uh-huh.

22 Q. -- a speech that it appears Representative  
23 Broun gave. Do you recall that event?

24 A. Oh, no, at this point, I stopped travelling

1 with Dr. Broun when David Heenan was hired.

2 Q. Okay. So was David Heenan onboard in  
3 August of 2013?

4 A. August of 2013, I'm -- yes, he was.

5 Q. Okay. So you didn't -- you did not attend  
6 that event, or you do not recall attending that  
7 event?

8 A. I don't recall attending that event.

9 Q. Okay. All right.

10 Do you recall -- well, when Dr. Broun would  
11 give campaign speeches, who was involved in putting  
12 those speeches together in 2014 for that election?

13 A. Well, Dr. Broun was very much his own  
14 person. There was really -- I mean, there were  
15 very, very few speeches written for him.

16 Q. Okay.

17 A. So there would be people that would give  
18 him, you know, advice on what to say, but there was  
19 no one -- he -- he gave his own speeches --

20 Q. Okay.

21 A. -- and -- and they were written --

22 Q. Who was -- who was involved in giving him  
23 advice on the speeches that you're aware of?

24 A. That I'm aware of, I mean, well, it would

1 be more along the lines of -- I'm trying to  
2 remember, honestly, gentlemen. There was -- a lot  
3 of times, there was no -- there were very few  
4 speeches where he would actually get input from  
5 anyone but if it was -- there's no way I could tell  
6 you, to be honest with you.

7 Q. Okay.

8 A. I mean, there's no -- it's extremely  
9 disorganized. I don't know -- by the time he got  
10 down here, you know, we have him one week out of  
11 the month, pretty much, in -- in the district, it  
12 was go, go, go. There's no way that I could answer  
13 that question intelligently.

14 Q. Are you aware of Brett O'Donnell ever  
15 provided input on campaign speeches?

16 A. Yes.

17 Q. Yes? Do you recall any specific instances?

18 A. Yes. The Convention speech of 2013, in  
19 May.

20 Q. Okay. What was Brett O'Donnell's role in  
21 that speech?

22 A. Just -- again, there's -- just weighing in  
23 on what should be changed or said or anything like  
24 that, as were other people too.

1 MR. SOLIS: And how do you know that  
2 happened?

3 A. Others -- there's e-mails about it.

4 BY MR. MORGAN:

5 Q. Okay.

6 A. Yeah.

7 Q. Would -- were there any rehearsals for the  
8 speech?

9 A. I know that we rehearsed his speech before  
10 he went on stage.

11 Q. When you say "we," you mean --

12 A. Me, Dr. Broun and Meredith Griffanti --

13 Q. Okay.

14 A. -- rehearsed his speech in a -- in a  
15 holding room.

16 Q. Was Brett O'Donnell involved in that  
17 rehearsal at all?

18 A. No.

19 Q. Was that -- were any rehearsals filmed and  
20 sent to Brett for his comment?

21 A. No.

22 Q. Okay. So his role -- Brett O'Donnell's  
23 role was in --

24 A. The only rehearsal that -- I don't -- the

1     only rehearsal I can speak to is the one that was  
2     here.

3           Q.     Okay.

4           A.     Yeah.

5           Q.     Okay, but his involvement that you are  
6     aware of was -- was what exactly, with that speech;  
7     providing input on the content of it or --

8           A.     Yes.

9           Q.     -- (unintelligible) or --

10          A.     Yeah.

11          Q.     Content?

12          A.     Yes, content.

13          Q.     Okay.

14                 MR. SOLIS:  What other instances can you  
15     think of?

16          A.     The only other one that I can think of was  
17     the announcement speech in February of 2013.

18     BY MR. MORGAN:

19          Q.     Was that here in Georgia?

20          A.     Yes, it was.

21          Q.     And was Brett O'Donnell here in Georgia at  
22     that time?

23          A.     No.

24          Q.     Okay.  What was his involvement in that

1 announcement speech?

2 A. Just content.

3 Q. We do -- we do show that around February of  
4 2013, it does appear that Brett O'Donnell, at one  
5 point, did travel down here to Georgia. Do you  
6 recall him ever travelling to the district or to  
7 the State?

8 A. Yes.

9 Q. What -- do you recall if that was  
10 about -- well, what do you recall about his visit  
11 to the State? Was it on one occasion or multiple?

12 A. The only one I recall was the staff  
13 retreat.

14 Q. The staff retreat?

15 A. Yes.

16 Q. And when about was that?

17 A. Early 2013.

18 Q. Okay.

19 A. Early 2013.

20 Q. Was that was a Congressional staff retreat  
21 or was it a campaign?

22 A. Congressional.

23 Q. Congressional, okay. Was that before or  
24 after the announcement speech?

1 A. I don't remember.

2 Q. You don't remember, okay. What was -- what  
3 was done at the staff retreat?

4 A. We had just gone through a redistricting.  
5 We had 15 new counties so it was kind of  
6 getting to know our new district.

7 Q. And why was -- why was Brett O'Donnell  
8 involved in that staff retreat?

9 A. It -- all the staff was involved in that  
10 staff retreat.

11 Q. Okay. And so you considered him as part of  
12 the staff?

13 A. That's -- I mean, that's not my -- I don't  
14 know how to answer that question.

15 Q. Okay.

16 MR. SOLIS: You were Deputy Chief of Staff  
17 at the time, right?

18 A. Correct. My job was to oversee district  
19 operations, make sure that casework was getting  
20 done, the Congressman was represented in the field  
21 and that was very much my role. I mean, that's --

22 BY MR. MORGAN:

23 Q. What did you understand Brett's role to be  
24 at that time?

1 A. I -- I never even thought about it.

2 Q. You just -- he's a guy who's there?

3 A. Yeah.

4 Q. Okay. I mean -- I mean, you had to have --  
5 I would imagine you had some sort of understanding  
6 of what he -- why he was there? I mean, how  
7 big -- how many people are on -- were at the staff  
8 retreat?

9 A. We had all the caseworkers, field reps, the  
10 DC staff. I mean, there was the team, it was.

11 MR. SOLIS: Was Brett O'Donnell paid by the  
12 House of Representatives at that time?

13 A. I don't know.

14 MR. SOLIS: You don't know?

15 A. No.

16 MR. SOLIS: You don't know if he had a  
17 contract with Representative Broun's office?

18 A. I don't, no.

19 MR. SOLIS: So -- so again, to follow-up on  
20 Bryson's question to you, you're at the staff  
21 retreat --

22 A. Right.

23 MR. SOLIS: -- you know who Brett O'Donnell  
24 is, but you don't know why he's there?

1           A.    I'm saying everyone -- there was -- there  
2    were many people there with Dr. Broun's official  
3    staff and that's -- that's all I did -- my focus  
4    that weekend was giving a presentation on the new  
5    counties and what those counties were and who lived  
6    there and what the industries were and those kind  
7    of things.  I didn't really think too much about  
8    anything else.

9    BY MR. MORGAN:

10           Q.    What was -- what was Brett's involvement in  
11    the staff retreat?

12           A.    Well, they were just, I mean listening.

13           Q.    Listening?

14           A.    Listening, yeah.

15           Q.    Did he have any -- did he present anything?

16           A.    Not that I recall.

17           Q.    Or do any training sessions with anyone?

18           A.    Not that I can recall.

19           Q.    Okay.  Do you recall if he did any campaign  
20    related things while he was down here?

21           A.    Any campaign related things while he was  
22    down here, I mean, after -- after the staff  
23    retreat, we had a -- had a brief meeting, yeah,  
24    about the campaign.

1 Q. Where was that meeting?

2 A. Do what?

3 Q. Where was that meeting?

4 A. At the -- at the same place the staff  
5 retreat was.

6 Q. And that was just in -- well, who  
7 was -- who was at that meeting?

8 A. I mean, there was myself and David Bowser,  
9 Brian Tringali, Brett O'Donnell, Michael Shafford  
10 and Bob Bibee.

11 Q. Okay. How long was that meeting; do you  
12 recall?

13 A. I don't recall.

14 Q. Was it just one meeting?

15 A. Yeah.

16 Q. What was discussed?

17 A. Just -- I don't even recall what was  
18 discussed.

19 MR. SOLIS: You just said it was a campaign  
20 meeting?

21 A. Yeah.

22 MR. SOLIS: So --

23 A. There was discussion about hiring a body guy  
24 and raising money. Those are the only two things

1 that I recall coming out of the that meeting.

2 BY MR. MORGAN:

3 Q. Okay. Still sticking to this e-mail here,  
4 if you go to Page 2 --

5 A. Yeah.

6 Q. -- there's a -- the middle of the page  
7 there, an e-mail from David Bowser to Brett  
8 O'Donnell and Teddy Norton cc'ing Christine Hardman  
9 and you. David Bowser writes, "One other thing:  
10 ██████████ has" -- referring to you, "██████████ has met  
11 with Niki and she is now scheduled to start making  
12 appearances at target events on PB's behalf and he  
13 is already scheduled somewhere else. Many of these  
14 appearances will have speaking opportunities for  
15 Niki and it will be a good idea if we can set up  
16 some time early next week to have you talk with  
17 Niki, get her the top point messaging and topics so  
18 try to get film of her speaking, if possible."  
19 Then he's asking you, "██████████, can you give Brett a  
20 quick rundown on where Niki will be next week,  
21 speaking."

22 You then respond saying, "Brett, hope all  
23 is well. Here's a rundown of where Niki will be."  
24 There was quite a list.

1           There's it looks like, you know, five  
2 events listed for that week or three for the next  
3 and other upcoming events and then there's a  
4 further exchange here. Do you -- do you recall  
5 these e-mails?

6       A.    Yeah.

7       Q.    Did Brett O'Donnell end up speaking with  
8 Niki Broun?

9       A.    I don't -- I don't know.

10      Q.    You don't know?

11      A.    I don't know if he did or not.

12      Q.    Why -- why were you -- why did you want to  
13 put Brett O'Donnell in touch with Niki Broun to go  
14 over messaging?

15      A.    I was just following -- somebody asked me  
16 to do something, I did it.

17      Q.    Well, I think, if you look back on Page  
18 2 --

19      A.    Sure.

20      Q.    -- David Bowser says, "[REDACTED] has met with  
21 Niki and she's now scheduled." Did -- was it your  
22 idea to have Niki meet with Brett or those two  
23 connect?

24      A.    No.

1 Q. No? That was David Bowser's idea?

2 A. I guess. I mean, I just gave him the  
3 events.

4 Q. Yeah. Well, why -- and what was Brett  
5 O'Donnell's role to be, in touching base with Niki;  
6 what was he going to do?

7 A. I don't know.

8 Q. You don't know?

9 A. No.

10 Q. So why would -- why would you all be  
11 putting Niki in touch with Brett?

12 A. My role in the campaign was to recruit  
13 volunteers, do all of that stuff, making sure that  
14 volunteers were recruited and staffing, going to  
15 events and so I would know where the events were.  
16 So I gave that information.

17 Q. You write on the first page here, you know,  
18 e-mail, the bottom there, "Even though she is  
19 attending them with him," referring to Paul Broun,  
20 "She still needs to stay on message, even in one on  
21 one conversations."

22 Do you recall was there some issue with her  
23 staying on message that you recall?

24 A. Not that I recall. I mean, it's a constant

1 thing to stay on message during a campaign.

2 Q. So was putting Niki in touch with Brett,  
3 was that so that Brett could help coach her on  
4 staying on message?

5 A. I don't -- again, I was asked for these  
6 upcoming events, I gave them to her -- or to him  
7 and that's -- that's the extent of it that I can  
8 tell you.

9 Q. Okay. I am going to show you another  
10 e-mail.

11 A. Okay.

12 Q. Well, I mean, just actually, that third  
13 page --

14 A. Okay. The third page, all right.

15 Q. -- to this. So there refers here to a  
16 lunch time Cobb GOP women lunch.

17 A. Sorry, the third page?

18 Q. Third page.

19 A. Yes, okay.

20 Q. It's the (unintelligible)?

21 A. Okay.

22 Q. Do you recall that event?

23 A. That's the -- there's a regular monthly  
24 meeting.

1 Q. Okay. Were you involved at all in  
2 preparing Representative Broun for that speech?

3 A. No.

4 Q. What about the next line, Barrow GOP  
5 barbecue, were you involved at all in preparing  
6 Representative Broun for that speech?

7 A. No.

8 Q. Okay. All right. I think we will move on  
9 with the e-mail. This is PBTN 97, the e-mail I  
10 want to ask you about is an e-mail at the bottom of  
11 Page 1 from Brett O'Donnell to David Bowser.

12 You're cc'ed on this. Brett writes, "We need a  
13 debate forum calendar started with contact info so  
14 I could help negotiate formats and we can track."  
15 Was Brett O'Donnell involved in helping negotiate  
16 debate formats?

17 A. What I do know is that I put Brett  
18 O'Donnell in touch with the -- I gave Brett  
19 O'Donnell the person at the party headquarters, the  
20 State GOP headquarters who is was responsible for  
21 the debates.

22 Q. And why did you do that?

23 A. Because I was asked to do it.

24 Q. Okay, and what did you understand Brett's

1 role in reaching out to them would be?

2 A. I -- I mean, to talk to them about the  
3 debates.

4 Q. Okay, and as in get logistics from them or  
5 as in negotiate formats, or talk about questions;  
6 do you have any sentence of what Brett was going to  
7 do?

8 A. Yes. I mean, I think it had some -- there  
9 was something to do with formatting yes.

10 Q. Okay. Next e-mail I want to show you this  
11 is PBDB 60, bottom e-mail on Page 1, e-mail from  
12 Teddy Norton writing, "Carrie doesn't need December  
13 9th (unintelligible), are we good to confirm JC's  
14 debate."

15 A. Uh-huh.

16 Q. Then in response to that, Josh Findlay  
17 writes, "████████ said that we can use the conference  
18 room in his office all day on the 9th," so this  
19 would have been November 9th -- or actually  
20 December 9th, "For debate prep if we want it."

21 Do you recall if JC's debate took place?

22 A. It did not.

23 Q. It did not? Did a prep session for that  
24 debate take place?

1 A. Not to my knowledge.

2 Q. Not to your knowledge, okay.

3 MR. SOLIS: So the -- just so we're clear,  
4 this is in the conference room in your office,  
5 right?

6 A. At J. Russell & Associates.

7 MR. SOLIS: At J. Russell Associates?

8 BY MR. MORGAN:

9 Q. Here -- here in Athens?

10 A. Correct.

11 MR. SOLIS: So you don't know whether or  
12 not in your own office, there was a debate prep on  
13 December 9th --

14 A. No, I don't.

15 MR. SOLIS: -- 2013?

16 A. No.

17 BY MR. MORGAN:

18 Q. You don't recall it?

19 A. I don't recall there being one, no.

20 Q. Okay.

21 MR. SOLIS: That was only about six months  
22 ago.

23 BY MR. MORGAN:

24 Q. Do you recall the JC's debate being

1 canceled?

2 A. Yes.

3 Q. Do you recall that?

4 A. Absolutely. I know that was canceled  
5 because I was the one that was in touch with the  
6 JC's.

7 Q. Okay. Was it canceled right before or a  
8 couple of weeks in advance?

9 A. No, it was canceled -- it was canceled --  
10 there were multiple attempts to host the debate and  
11 then they couldn't get the people to come.

12 Q. Okay.

13 MR. SOLIS: Is this something you  
14 frequently do, you clear out your office and, you  
15 know, a client you're working with, a campaign, and  
16 of them conduct a prep session in your office?

17 A. They're welcome to do that.

18 MR. SOLIS: Is it something you have done  
19 in the past?

20 A. Yes.

21 MR. SOLIS: How often do you do that?

22 A. I mean, I'm only in my first year of  
23 business so, I mean, there's -- I mean, there's no  
24 really -- I don't have a number to put on that.

1 MR. SOLIS: When is the lasts time you did  
2 that?

3 A. The last time I did that was one of the  
4 last debates Dr. Broun was in, but that wasn't even  
5 a prep session. He had notes and he was studying  
6 them in my conference room.

7 MR. SOLIS: Who else was there?

8 A. I don't recall anyone else being there. It  
9 may have not even been the last debate. I  
10 don't -- the answer is I do not recall. There  
11 was --

12 BY MR. MORGAN:

13 Q. Well, we have some more documents we will  
14 take you through --

15 A. Sure.

16 Q. -- to see if you recall in any of the  
17 specific instances.

18 A. Okay.

19 Q. This is PBN 125. I want you to take the  
20 time to look through this. This is --

21 A. Starting on Page 2?

22 Q. No, it's starting on Page 3 -- well, this  
23 is a request from Georgia public Broadcasting.

24 A. Uh-huh.

1 Q. They were doing a get to know the candidate  
2 piece on December -- that was gonna be filmed on  
3 December 19, 2013. Do you recall that?

4 A. Okay. Let me -- can I read this a second  
5 before --

6 Q. Yes, definitely. This is a little broken  
7 up in the format so --

8 A. Okay.

9 Q. The relevant e-mail I want to call your  
10 attention to is on the first page.

11 A. Okay.

12 Q. It's sort of in the middle of the page,  
13 it's from David Bowser where he says, "Yes," in  
14 response to Christine's question, "Are we okay to  
15 schedule this?" David Bowser writes, "Yes, but I  
16 want heavy Brett time beforehand."

17 A. No.

18 Q. Do you recall that Georgia Public  
19 Broadcasting get to know the candidate --

20 A. I do not.

21 Q. -- piece?

22 A. No.

23 Q. You don't recall? Do you recall any  
24 preparation for that?

1 A. No.

2 Q. Okay. All right. Moving onto this next  
3 e-mail, PBTN 129 --

4 A. Okay.

5 Q. -- this starts on Page 2 with an e-mail  
6 from Margaret -- Margaret Williamson with the Tea  
7 Party of Gillmore County --

8 A. Uh-huh.

9 Q. -- saying that there was some confusion  
10 about their event being scheduled on the same day  
11 as the Kenneth Saw, I think GOP Senate debate?

12 A. Uh-huh.

13 Q. On the first page there -- well, David  
14 Bowser reaches out to Brett O'Donnell saying,  
15 "Brett, what do you think? Although we told them  
16 we cannot do both, I'm leaning towards doing this  
17 forum with the second GOP -- Georgia GOP debate  
18 that evening. Want your thoughts." Brett  
19 responds, "Will be good warm-up and it's our crowd.  
20 Do both." You were cc'ed on these e-mails.

21 What was -- what was Brett's role here?  
22 Why was he advising on whether or not it would be  
23 good to do both debates? Was that the type of  
24 advice he would regularly provide?

1       A.    I mean, there was communication among  
2 several different people.  I don't know why he was  
3 consulted on this.  I was copied on the e-mail, I  
4 can only imagine, because it was in Georgia and I  
5 would be responsible for making sure that there  
6 were people at both events.

7       Q.    Okay.  I am going to show you the document,  
8 this is PBDB 25, the second page is -- well, we  
9 will start here.  This is a calendar item from  
10 Teddy Norton's calendar, subject is, "Prep with  
11 Brett for debate," location is Jamestown  
12 Associates, January 10, 2014 from 11:30 to 1:00  
13 p.m.

14       A.    Uh-huh.

15       Q.    Do you recall this -- what debate this  
16 related to during this time, around January 10th of  
17 2014?  On the first page, there's some discussion  
18 of prepping Representative Broun to respond to gay  
19 marriage questions.

20       A.    I don't remember what debate this would be.

21       Q.    Okay.  What -- when -- if debate  
22 preparation sessions were held in DC, do you recall  
23 being involved in any of those --

24       A.    No.

1 Q. -- debate preparation sessions?

2 A. No.

3 Q. Okay. I am going to show you this  
4 document. This is PBTN 135 -- or go to the back  
5 here.

6 A. Sure.

7 Q. On 141, calendar item from Teddy Norton's  
8 calendar, "Debate prep, [REDACTED]'s office,"  
9 January 31, 2014 from 2:00 to 4:30 p.m., organizer  
10 Paul Broun; required attendees were listed as  
11 Christine Hardman and then PB campaign, legal -- or  
12 campaign calendar, Gmail.com.

13 So this -- and then if you look at the  
14 e-mail communications on the front here, Teddy  
15 Norton e-mails Brett, "Hey, Brett, we've set aside  
16 2:00 to 4:30 for PB to debate -- debate prep for  
17 you while he is in Athens. Christine will be with  
18 him. Want him to Skype you in?"

19 Do you recall this debate prep session? It  
20 appears that it occurred in your office?

21 A. Yeah, and my office has Skype capability.

22 Q. Do you recall this session?

23 A. But I don't recall, no.

24 Q. Did you -- did you attend any debate

1 preparation sessions in your office? Were any of  
2 those sessions held in your office; do you recall  
3 any?

4 A. Yeah, there were debate prep sessions held  
5 in my office.

6 Q. In your office? Okay. How many do you  
7 recall being held in your office with regards to  
8 the 2014 campaign?

9 A. There's no -- I don't know.

10 Q. Was it more than one session?

11 A. I -- there's no record. I mean, yeah, more  
12 than one but I don't know how many.

13 Q. Could we say more than five?

14 A. No, I mean, very few --

15 Q. Very few?

16 A. -- that I can recall.

17 Q. Do you recall Brett O'Donnell being  
18 involved in those sessions?

19 A. No.

20 MR. SOLIS: Has Brett O'Donnell ever been  
21 to your office?

22 A. No.

23 MR. SOLIS: Never?

24 A. Never.

1 BY MR. MORGAN:

2 Q. So here, when it talks about Skyping him in  
3 or putting him on speaker, you don't recall if that  
4 happened?

5 A. Yeah.

6 Q. I mean, I didn't -- that was a follow-up to  
7 his question?

8 A. Okay.

9 Q. Do you recall him ever being Skyped in  
10 or --

11 A. Yes.

12 Q. -- conference called in to a debate  
13 session --

14 A. Yes.

15 Q. -- in your office?

16 A. No -- well, I remember him being Skyped in  
17 one time and it was for --

18 Q. Okay.

19 A. -- that I can remember, and that had to do  
20 with some preparation for a New York Times  
21 interview.

22 Q. Okay.

23 A. That's the only thing -- the only time that  
24 I can firmly recall him being Skyped into my

1 office.

2 Q. What about conference called in?

3 A. I don't recall him being conference called  
4 in.

5 Q. Okay.

6 MR. SOLIS: And -- and just so -- you know,  
7 you recall the one time he was Skyped in --

8 A. Right.

9 MR. SOLIS: -- you said it was about a New  
10 York Times piece.

11 A. Yes.

12 MR. SOLIS: I mean, the first page of this  
13 e-mail Bryson referenced where it says, "Debate  
14 prep, January 31, your office, Skype," is there any  
15 chance that -- that Brett O'Donnell was Skyped in  
16 to also discuss debate prep on that day?

17 A. I don't know the answer to that.

18 MR. SOLIS: You don't?

19 A. I'm just telling you what I firmly can  
20 recall.

21 MR. SOLIS: Okay.

22 BY MR. MORGAN:

23 Q. Okay. I think we will -- do you recall an  
24 NFIB Senate candidate forum --

1 A. Yes.

2 Q. -- on or about February 18, 2014?

3 A. Yes, sir.

4 Q. I am going to show you, this is a PBTN 45.  
5 It's a calendar item from Teddy Norton's calendar,  
6 "Called for debate prep." Were you involved in  
7 prepping Representative Broun for that forum?

8 A. No.

9 Q. Were you aware of there being a preparation  
10 session for that forum?

11 A. Not that I recall.

12 Q. Okay. I am going to show you another  
13 document. This is PBTN 146, subject here is,  
14 "Debate prep, Skyping with Brett, February 21,  
15 2014, 4:00 to 6:00 p.m." do you recall this debate  
16 preparation session? It says "skyping." Do you  
17 recall if this occurred in your office?

18 A. No, I don't.

19 Q. You don't recall?

20 A. No.

21 Q. This would have been the day before the  
22 Georgia Republican Senate debate.

23 A. Okay.

24 Q. Does that refresh your recollection at all?

1 A. No, I'm sorry, it doesn't.

2 Q. Okay.

3 A. The only one that -- the only time I  
4 remember, I can tell you that he was Skyped in was  
5 the one I told you about previously.

6 MR. SOLIS: Do you remember what that New  
7 York Times piece was about?

8 A. I don't. I don't. I just remember New  
9 York Times.

10 BY MR. MORGAN:

11 Q. Was Brett O'Donnell involved in -- in  
12 campaign messaging, that you recall?

13 A. Yes.

14 Q. Let's make sure we get those -- those  
15 instances. What do you recall about his role in  
16 the campaign messaging?

17 A. The campaign messaging was, you know,  
18 the --

19 Q. You already talked about the 2013  
20 Convention speech and the February 2013  
21 announcement speech, but beyond those two  
22 instances, what do you -- what do you recall Brett  
23 O'Donnell involvement in the messaging to be?

24 A. Nothing specific.

1 Q. Nothing specific?

2 Would he provide talking points to

3 Representative Broun, to your knowledge?

4 A. Not to my knowledge -- not that I can  
5 recall.

6 Q. Okay. What do you recall?

7 A. I mean, nothing. He's just cc'ed on a lot  
8 of e-mails. I mean, I --

9 Q. Okay.

10 A. -- or, no, I am cc'ed on a lot of e-mails  
11 or he is. I mean, there's no -- I can't point to  
12 anything.

13 MR. SOLIS: How could he be involved in  
14 campaign messaging as you say if he's only cc'ed on  
15 e-mails? Wouldn't he have to provide some input to  
16 be -- to get involved in messaging?

17 A. I mean, I -- there's -- I can -- I cannot  
18 tell you, sitting here, any specific circumstance  
19 where I can recall him being involved in messaging  
20 strategy. I mean, he would -- he would advise  
21 different things to say in debates and things  
22 like that but --

23 BY MR. MORGAN:

24 Q. Okay.

1 MR. SOLIS: Well, Bryson asked you if he's  
2 involved in messaging, and you said yes.

3 A. Yes.

4 BY MR. MORGAN:

5 Q. And so what do you mean? One instance of  
6 that, one thing you recall is him advising  
7 Representative Broun of what to say in debates?  
8 You just said that. Is that --

9 A. I was not part of those -- if you will  
10 rename e-mails, I mean, that would -- that's all I  
11 know. All I know is what I have given you in my  
12 e-mails.

13 Q. To be clear --

14 A. Yes.

15 Q. -- do you recall any instances in which  
16 Brett O'Donnell was involved in preparing or  
17 reviewing debates -- preparing for debates or  
18 reviewing debates with Representative Broun?

19 A. No.

20 Q. You don't recall any specific instances?

21 A. No. Sometimes he would ask for a video of  
22 the debate and that would be, again, given and  
23 that's -- that's all I know of it.

24 Q. Who would he ask for a video?

1           A.    Again, it's in my e-mails.  I don't recall  
2    who that would be.

3           Q.    Okay, but you -- other than seeing it in  
4    your e-mails, do you recall that happening?

5           A.    Recall what happening?

6           Q.    Him asking for videos of debates?

7           A.    Just via e-mail.

8           Q.    Okay.

9           A.    Yeah.

10          Q.    Just via e-mail.  Were you involved at all  
11    in the campaign -- the finances of the campaign?

12          A.    No.

13          Q.    No, okay.  Would you describe the campaign  
14    as short on funds or having plenty of funds?

15          A.    Short on funds.

16          Q.    Do you recall there being any newspaper  
17    articles in around July 2013, raising some  
18    questions about Representative Broun's relationship  
19    with Brett O'Donnell?

20                 This is -- this would have been earlier  
21    than -- than the articles that came out in the  
22    spring?

23          A.    There was some -- there was some article,  
24    but I don't recall anything beyond what you just

1 said. It was just those two.

2 Q. Okay. Were you involved in any  
3 conversations at any point with anybody on the  
4 campaign or in the Congressional office about the  
5 permissibility of Brett O'Donnell's relationship  
6 with Representative Broun?

7 A. No.

8 Q. No, okay. Were you involved at all with  
9 any or did you hear any talk of -- of discussions  
10 with the Ethics Committee or the committee on  
11 Administration or any other body in Congress about  
12 the permissibility of the Congressional office's  
13 relationship with Brett O'Donnell?

14 A. No. I got your guys letter about 10 days  
15 ago, yes.

16 Q. All right.

17 A. Is that what you're talking about?

18 Q. Well, no, I mean, besides that.

19 A. No.

20 Q. Okay. I think those are all the questions  
21 I have.

22 MR. SOLIS: How was Brett O'Donnell paid,  
23 either by the Congressional or by the campaign?

24 A. I do not know.

1           MR. SOLIS: Did you ever have any  
2 discussions with anybody about how Brett O'Donnell  
3 was paid?

4           A. No.

5           MR. SOLIS: Either before or after the news  
6 articles started to mention this?

7           A. No, not that I can recall, no.

8 BY MR. MORGAN:

9           Q. Did you have any conversations with David  
10 Bowser about Brett O'Donnell after -- after the  
11 news articles broke, that you recall?

12          A. Just that -- I mean, obviously, as a  
13 campaign, we wanted to know -- okay, let  
14 me -- there -- how was -- I mean, he was -- it was  
15 just that he was a person who worked on our  
16 official side, if that's what you're talking about.

17          MR. SOLIS: Okay. I'm -- my -- I'm just  
18 asking what you know about how he was paid.

19          A. I don't know anything about how he was  
20 paid. I know he works on the official side.

21          MR. SOLIS: Okay.

22          A. That's the extent.

23          MR. SOLIS: And so you understood Brett  
24 O'Donnell's work as far as, you know, Bryson went

1 down the list that you mentioned to us of things he  
2 has done for the campaign, and you understood that  
3 to be what, volunteering?

4 A. Volunteering, yeah.

5 BY MR. MORGAN:

6 Q. But you didn't know -- did you know that he  
7 wasn't being paid by the campaign? Did you know  
8 did you have knowledge of whether or not he was  
9 being paid by anybody?

10 A. Did I know whether or not he was being paid  
11 by --

12 Q. Well, how did you know he was a volunteer?

13 A. Because he's -- because when the news  
14 articles broke, it was made clear that he was a  
15 part of the official side. So obviously, anybody  
16 that's doing anything campaign, would be  
17 volunteering.

18 MR. SOLIS: What about before that, before  
19 the news articles? How would you know he's a  
20 volunteer?

21 A. Because it was -- it was made clear that  
22 was a part of the official side.

23 BY MR. MORGAN:

24 Q. Yeah, I think we saw that in the -- in that

1 first e-mail we showed you, but I'm just saying you  
2 assumed he -- when he was doing campaign work he  
3 was volunteering, but you didn't have -- I just  
4 want to be clear. Did you have knowledge of how he  
5 was being paid or who was paying him?

6 A. No.

7 Q. You didn't? Okay.

8 A. No.

9 Q. So you -- when you say you think he was  
10 volunteering, that's just based on --

11 A. Based on --

12 Q. -- what you assumed?

13 A. Yes.

14 Q. Okay. All right. All right. I think --

15 MR. SOLIS: Have you talked to anybody  
16 about the fact that you would be speaking with us  
17 today?

18 A. Yeah. I mean, I talked to Josh about it a  
19 little bit just because I didn't know, quite  
20 honestly, how to configure the e-mails the way that  
21 y'all wanted them and I wanted to make sure it was  
22 appropriately.

23 MR. SOLIS: What about Representative  
24 Broun?

1 A. No.

2 MR. SOLIS: Brett O'Donnell?

3 A. No.

4 MR. SOLIS: All right.

5 BY MR. MORGAN:

6 Q. I think those are all the questions we  
7 have. Is there anything you would like to State  
8 for the record or share with us that you think  
9 would be helpful?

10 A. I don't think so.

11 Q. Okay.

12 A. I have given you everything I think that  
13 you requested so --

14 Q. Okay. Well, I think we will go ahead and  
15 finish the recording then.

16

17

18 (END OF PROCEEDING)

19

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24

1           I, Susanne M. Carlin, do hereby certify or  
2 affirm that I have impartially transcribed the  
3 foregoing from an audiotape record of the  
4 above-captioned proceedings to the best of my  
5 ability.

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Susanne M. Carlin

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<p>Shay 8:4  short 58:14,15  shortly 11:24  show 11:8 25:5 33:3  41:9 43:10 49:7 50:3  54:4,12  showed 62:1  side 4:11,21 13:23  60:16,20 61:15,22  signs 9:3  Simpson 20:14  since 2:1,9  sir 54:3  sitting 56:18  six 44:21  skills 17:23  skipping 19:2  Skype 50:18,21 53:14  Skyped 52:9,16,24 53:7  53:15 55:4  skyping 52:2 54:14,16  Solis 1:4 7:8,17 10:9  12:19 13:18,21 20:21  20:24 22:4 27:10  28:7 31:1 32:14  34:16 35:11,14,16,19  35:23 37:19,22 44:3,7  44:11,15,21 45:13,18  45:21 46:1,7 51:20,23  53:6,9,12,18,21 55:6  56:13 57:1 59:22  60:1,5,17,21,23 61:18  62:15,23 63:2,4  some 1:12,12 5:13 9:13  9:18 11:20 14:16  15:17 17:2 18:13  23:8 26:7,18 28:15  35:5 38:16 40:22  43:8 46:13 48:9  49:17 52:20 56:15  58:17,23,23  somebody 39:15  someone 17:22  something 25:8 39:16  43:9 45:13,18  Sometimes 57:21  somewhere 7:13,14  38:13  sorry 4:3 8:6 20:23  41:17 55:1  sort 7:9 26:8 35:5 47:12  speak 32:1  speaker 52:3  speaking 1:2 16:1  17:23 38:14,18,21  39:7 62:16  special 2:23  specific 19:23 27:11,14  30:17 46:17 55:24  56:1,18 57:20  speech 28:22 30:18,21  31:8,9,14 32:6,17</p>	<p>33:1,24 42:2,6 55:20  55:21  speeches 29:11,12,15  29:19,23 30:4,15  split 12:12  Sporadically 28:3  spring 9:13,13 58:22  staff 2:5,7 3:17 5:3,13  11:14,22 17:19 20:16  33:12,14,20 34:3,8,9  34:10,12,16 35:7,10  35:20 36:3,11,22 37:4  staffed 20:9,10  staffers 20:22 21:6  staffing 24:19 40:14  stage 31:10  start 38:11 49:9  started 5:21,24 6:1 7:9  7:10 42:13 60:6  starting 11:22 26:14,15  46:21,22  starts 18:20 23:17 48:5  State 6:10 33:7,11  42:20 63:7  Statements 1:9  statewide 6:9  status 12:24 13:6  stay 40:20 41:1  stayed 5:18  staying 40:23 41:4  sticking 38:3  sticks 17:1,2  still 3:19 5:15 6:19 38:3  40:20  Stoddard 28:13,17  stopped 28:24  strategy 56:20  structure 19:10  studying 46:5  stuff 9:1,4 40:13  subject 25:11 49:10  54:13  suggest 21:22  suggestion 27:16  suggestions 27:8,10,20  supposed 26:7  sure 1:13 2:12 9:3 11:9  17:6 21:20 25:6 26:7  34:19 39:19 40:13  46:15 49:5 50:6  55:14 62:21  surrounding 11:11  14:8  Susanne 64:1,8  switched 3:3</p>	<p>talking 8:11 20:17 56:2  59:17 60:16  talks 11:20 22:13 52:2  target 38:12  Tea 48:6  team 11:18 35:10  Teddy 23:19 24:3,6  25:10 38:8 43:12  49:10 50:7,14 54:5  telephone 9:18  televised 19:13,14  television 18:24 20:8  tell 26:24 30:5 41:8  55:4 56:18  telling 53:19  Tennessee 7:22  their 48:10  thing 27:15 38:9 41:1  52:23 57:6  things 8:12 36:7,20,21  37:24 56:21,21 61:1  think 9:5 12:7 13:4,17  16:16 23:12 24:18  32:15,16 36:7 39:17  42:8 43:8 48:11,15  53:23 59:20 61:24  62:9,14 63:6,8,10,12  63:14  thinking 14:10 15:15  third 41:12,14,17,18  thought 40:18  thought 35:1  thoughts 48:18  three 39:2  through 4:10 17:3 25:1  34:4 46:14,20  throughout 6:10  Thursday 23:23  Tim 20:16  time 3:3 9:13 12:3,5,7  12:20 13:12,13 15:21  15:24 18:7 19:9  26:22 30:9 32:22  34:17,24 35:12 38:16  41:16 46:1,3,20 47:16  49:16 52:17,23 53:7  55:3  times 13:5 30:3 52:20  53:10 55:7,9  title 2:14  today 62:17  together 29:12  told 48:15 55:5  top 24:2 38:17  topics 38:17  touch 39:13 40:11 41:2  42:18 45:5  touching 40:5  towards 48:16  track 42:14  training 36:17  transcribed 64:2</p>	<p>transmitting 24:23  travel 33:5  travelling 28:24 33:6  Tringali 37:9  try 38:18  trying 13:3 30:1  Tuesday 23:23 24:3  turned 18:23 19:19  turnout 6:11  two 8:4,23 24:13 37:24  39:22 55:21 59:1  type 48:23</p>	<p>weighing 30:22  welcome 45:17  well 5:7 9:6 13:22  18:13 20:13 27:23  28:13 29:10,13,24  33:10 36:12 37:6  38:23 39:17 40:4  41:12 46:13,22 48:13  49:8 52:16 57:1  59:18 61:12 63:14  went 3:16,24 4:10,20  4:23 5:2,11,21 13:5  28:16,16 31:10 60:24  were 2:2,13,16,19 3:10  3:22 4:15 5:12 6:13  6:13,17 7:24 8:11,22  9:14,14 11:5 12:2,3,8  12:8,17,19 13:2 14:2  14:9,13,16 15:5,14,22  17:8,9,11,17 19:11,11  20:6 22:13,22,22  24:10,18,19,22 25:13  25:13,16,16 26:2,21  26:21 27:22,22,24  29:14,21 30:3,24 31:7  31:19 34:16 35:7  36:2,5,6,12 39:12  40:14,15 42:1,5 45:10  47:1 48:20 49:6,22  50:10 51:1,4 54:6,9  58:10 59:2,8  we're 19:5 20:21 44:3  we've 50:15  WGAU 20:1,7,9,17  while 36:20,21 50:17  Whitfield 28:17  wide 24:3  Williamson 48:6  women 28:20 41:16  won 2:23  wonder 26:24  wondering 26:22  work 60:24 62:2  worked 2:3,4,22 7:22  9:17 60:15  working 5:21 7:9,10,19  7:21 11:22 12:8  45:15  works 60:20  wouldn't 22:5 56:15  write 40:17  writes 11:17 38:9 42:12  43:17 47:15  writing 18:21 43:12  written 29:15,21</p>
			<hr/> <b>U</b> <hr/>	
			<p>Uh-huh 20:19 28:21  43:15 46:24 48:8,12  49:14  understand 10:13,15  13:3 14:23 26:12  34:23 42:24  understanding 35:5  understood 60:23 61:2  unintelligible 32:9  41:20 43:13  until 3:2,13 5:18 12:21  15:1 24:4  upcoming 39:3 41:6  use 43:17  U.S 2:3</p>	
			<hr/> <b>V</b> <hr/>	
			<p>very 23:11 29:13,15,15  30:3 34:21 51:14,15  via 27:20 58:7,10  video 24:23 57:21,24  videos 58:6  visit 33:10  volunteer 61:12,20  volunteering 61:3,4,17  62:3,10  volunteers 6:10 40:13  40:14  voter 6:11</p>	
			<hr/> <b>W</b> <hr/>	
			<p>want 11:8 18:19 39:12  42:10 43:10,20 46:19  47:9,16 48:18 50:18  62:4  wanted 60:13 62:21,21  wants 23:21  warm-up 48:19  wasn't 22:16,16,18,18  46:4 61:7  way 10:16 11:1 16:4  18:9 30:5,12 62:20  Wednesday 24:3  week 11:23 18:22 19:10  23:21 26:20 28:4  30:10 38:16,20 39:2  weekend 36:4  weeks 45:8</p>	
			<hr/> <b>Y</b> <hr/>	
			<p>yeah 5:18 7:1 8:13,13  9:21 12:10,12,14  13:20,22 14:19 20:11  20:15 22:13 25:23  26:15 27:21 31:6</p>	

<p>32:4,10 35:3 36:14,23  37:15,21 38:5 39:6  40:4 50:21 51:4,11  52:5 58:9 61:4,24  62:18  <b>year</b> 5:9 45:22  <b>York</b> 52:20 53:10 55:7  55:9  <b>y'all</b> 62:21</p> <hr/> <p style="text-align: center;"><b>0</b></p> <hr/> <p>0010 23:16  0086 11:12</p> <hr/> <p style="text-align: center;"><b>1</b></p> <hr/> <p>1 42:11 43:11  <b>1:00</b> 49:12  10 49:12 59:14  <b>10th</b> 20:1 49:16  <b>10:30</b> 19:1 24:4  <b>11:30</b> 49:12  12 15:13  <b>125</b> 46:19  129 48:3  13 12:21 21:11,12  <b>135</b> 50:4  14 11:13 25:6  <b>141</b> 50:7  146 54:13  15 34:5  <b>16</b> 26:16  18 54:2  19 25:24 47:3  <b>19th</b> 25:13,17</p> <hr/> <p style="text-align: center;"><b>2</b></p> <hr/> <p>2 20:4 38:4 39:18 46:21  48:5  <b>2:00</b> 50:9,16  20 1:1  <b>20th</b> 7:4,5  <b>2000</b> 4:12,20 9:11  <b>2007</b> 2:9,14 3:2 7:20,21  <b>2008</b> 3:3,5,12,12,13,15  <b>2009</b> 3:21  <b>2010</b> 4:1,12,14,20,21  <b>2011</b> 4:22  <b>2012</b> 4:16,23 5:3,4,12  7:23,24 8:2,9,10,20  8:23 9:10,12 10:4  11:13 14:12,18 16:17  16:18,23 18:7 19:21  19:22 20:4 21:8 22:2  23:6 26:2  <b>2013</b> 2:1 5:19,20 7:12  26:16 29:3,4 30:18  32:17 33:4,17,19  44:15 47:3 55:19,20  58:17  <b>2014</b> 1:2 8:18,19 15:1  21:10 26:5 27:7,23  29:12 49:12,17 50:9</p>	<p>51:8 54:2,15  21 54:14  <b>22nd</b> 18:24 19:12,14,16  19:21  <b>24</b> 26:2  <b>25</b> 49:8</p> <hr/> <p style="text-align: center;"><b>3</b></p> <hr/> <p>3 26:14,15 46:22  <b>3rd</b> 23:24  <b>3:00</b> 19:6 25:13  <b>31</b> 50:9 53:14  <b>33</b> 26:13</p> <hr/> <p style="text-align: center;"><b>4</b></p> <hr/> <p>4:00 54:15  <b>4:30</b> 50:9,16  45 54:4</p> <hr/> <p style="text-align: center;"><b>5</b></p> <hr/> <p>5:00 25:13</p> <hr/> <p style="text-align: center;"><b>6</b></p> <hr/> <p>6:00 19:6 54:15  60 43:11</p> <hr/> <p style="text-align: center;"><b>9</b></p> <hr/> <p>9 18:20  <b>9th</b> 43:13,18,19,20  44:13  <b>9:30</b> 19:1  <b>90</b> 23:21  <b>97</b> 42:9</p>			
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# **EXHIBIT 69**

**RE: Debate Prep**

1 message

[REDACTED]@odacomunications.com <[REDACTED]@odacomunications.com> Sun, Jul 1, 2012 at 3:00 PM  
To: Meredith Griffanti <[REDACTED]@gmail.com>, [REDACTED]@aol.com <[REDACTED]@aol.com>, David Bowser <[REDACTED]@yahoo.com>, Jessica Morris <[REDACTED]@gmail.com>, Jordan Chinouth <[REDACTED]@gmail.com>, Bob Bibee <[REDACTED]@aol.com>

I made a few edits. They are noted by track changes in the doc.

Brett

----- Original Message -----

Subject: Debate Prep  
From: Meredith Griffanti <[REDACTED]@gmail.com>  
Date: Sun, July 01, 2012 2:13 pm  
To: Brett ODonnell <[REDACTED]@odacomunications.com>, [REDACTED]@aol.com <[REDACTED]@aol.com>, David Bowser <[REDACTED]@yahoo.com>, Jessica Morris <[REDACTED]@gmail.com>, Jordan Chinouth <[REDACTED]@gmail.com>, Bob Bibee <[REDACTED]@aol.com>

Hello all -

I am attaching Dr. Broun's debate talkers (that I will print out and bring down) with me as well as some top line news clips for the Athens area.

See you soon!

Meredith

 **7.2.12 Debate Prep-bmo edits.doc**  
44K

# **EXHIBIT 70**

**Norton, Teddie**

---

**From:** Brett O'Donnell [REDACTED]@odacomunications.com]  
**Sent:** Tuesday, July 10, 2012 2:50 PM  
**To:** Norton, Teddie  
**Subject:** Re: Meeting room

**This message has been archived. [View the original item](#)**

Any ETA?

On Jul 10, 2012, at 2:00 PM, Norton, Teddie wrote:

> Yes- the finance conference room. He will probably be there a little late (2:45) but otherwise should be fine.

>

> Teddie Norton

> Director of Operations

> Congressman Paul C. Broun (GA-10)

> Phone: (202) 225-[REDACTED]

> Fax: (202) 226-0776

> [www.broun.house.gov](http://www.broun.house.gov)

>

>

> -----Original Message-----

> From: Brett O'Donnell [REDACTED]@odacomunications.com]

> Sent: Tuesday, July 10, 2012 2:00 PM

> To: Norton, Teddie

> Subject: Meeting room

>

> Teddie

>

> Do you know what meeting room at NRCC we've been assigned

>

> Sent from my iPhone

# **EXHIBIT 71**

**Norton, Teddie**

---

**From:** Norton, Teddie  
**Sent:** Tuesday, July 03, 2012 2:37 PM  
**To:** 'Brett O'Donnell'  
**Subject:** RE: next week

**This message has been archived. [View the original item](#)**

Ok great- I've requested a room at the NRCC and I will let you know which one it is once they assign it.

Have a great 4th!

-Teddie

Teddie Norton  
Director of Operations  
Congressman Paul C. Broun (GA-10)  
Phone: (202) 225-  
Fax: (202) 226-0776  
[www.broun.house.gov](http://www.broun.house.gov)

**From:** Brett O'Donnell [[\[REDACTED\]@odacomcommunications.com](mailto: [REDACTED]@odacomcommunications.com)]  
**Sent:** Tuesday, July 03, 2012 2:33 PM  
**To:** Norton, Teddie  
**Subject:** Re: next week

Yes.

Sent from my iPhone

On Jul 3, 2012, at 1:53 PM, "Norton, Teddie" <[\[REDACTED\]@mail.house.gov](mailto: [REDACTED]@mail.house.gov)> wrote:

Could we do 2-3:30 on Tuesday?

Teddie Norton  
Director of Operations  
Congressman Paul C. Broun (GA-10)  
Phone: (202) 225-  
Fax: (202) 226-0776  
[www.broun.house.gov](http://www.broun.house.gov)

From: [REDACTED]@odacommunications.com [REDACTED]@odacommunications.com]  
Sent: Tuesday, July 03, 2012 1:16 PM  
To: Norton, Teddie  
Subject: RE: next week

Hi Teddie,

I'm wide open on Tuesday, on wednesday I'm free until 10:30 and then between 1-4 and I'm out of town on Thursday.

Brett

----- Original Message -----

Subject: next week

From: "Norton, Teddie" <[REDACTED]@mail.house.gov <mailto:[REDACTED]@mail.house.gov>

Date: Tue, July 03, 2012 9:20 am

To: "Brett ODonnell" <[REDACTED]@odacommunications.com <[REDACTED]@odacommunications.com>

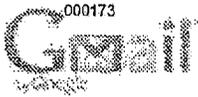
Hey Brett-

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?

-Teddie

Teddie Norton  
Director of Operations  
Congressman Paul C. Broun (GA-10)  
Phone: (202) 225-[REDACTED]  
Fax: (202) 226-0776  
[www.broun.house.gov](http://www.broun.house.gov)

# **EXHIBIT 72**



000173

Downloaded from [redacted]

**Re: Campaign Conference Call**

1/14/2013

Brett O'Donnell <[redacted]@odacomcommunications.com> Thu, Nov 14, 2013 at 5:50 PM  
 To: David Bowser <[redacted]@yahoo.com>  
 Cc: Brian Tringali <[redacted]@tarrance.com>, "[redacted]@aol.com" <[redacted]@aol.com>, "[redacted]@jamestownassociates.com" <[redacted]@jamestownassociates.com>, "[redacted]@paulbroun.com" <[redacted]@paulbroun.com>, "[redacted]@gmail.com" <[redacted]@gmail.com>, "[redacted]@campaignsolutions.com" <[redacted]@campaignsolutions.com>, "[redacted]@gmail.com" <[redacted]@gmail.com>, "[redacted]@campaignsolutions.com" <[redacted]@campaignsolutions.com>, "[redacted]@campaignsolutions.com" <[redacted]@campaignsolutions.com>, Michael Wiener <[redacted]@tarrance.com>

Works for me. Brett

Sent from my iPhone

On Nov 14, 2013, at 5:44 PM, David Bowser <[redacted]@yahoo.com> wrote:

How about 1 pm, anyone have a conflict at 1 pm tomorrow? Apologies for the last minute notice, but the boss' schedule has been packed lately with a lot of moving pieces...

**From:** Brian Tringali <[redacted]@tarrance.com>  
**To:** "[redacted]@yahoo.com" <[redacted]@yahoo.com>; "[redacted]@aol.com" <[redacted]@aol.com>; "[redacted]@jamestownassociates.com" <[redacted]@jamestownassociates.com>; "[redacted]@paulbroun.com" <[redacted]@paulbroun.com>; "[redacted]@gmail.com" <[redacted]@gmail.com>; "[redacted]@odacomcommunications.com" <[redacted]@odacomcommunications.com>; "[redacted]@campaignsolutions.com" <[redacted]@campaignsolutions.com>; "[redacted]@gmail.com" <[redacted]@gmail.com>; "[redacted]@campaignsolutions.com" <[redacted]@campaignsolutions.com>; "[redacted]@campaignsolutions.com" <[redacted]@campaignsolutions.com>  
**Cc:** Michael Wiener <[redacted]@tarrance.com>  
**Sent:** Thursday, November 14, 2013 5:42 PM  
**Subject:** Re: Campaign Conference Call

I have a conflict, I would need at least a delay until 10:30.

**From:** David Bowser [redacted]@yahoo.com  
**Sent:** Thursday, November 14, 2013 04:24 PM Central Standard Time  
**To:** Bob Bibee <[redacted]@aol.com>; Brian Tringali; Jason Miller <[redacted]@JamestownAssociates.com>; Josh Findlay <[redacted]@paulbroun.com>; Jordan Chinouth <[redacted]@gmail.com>; Brett O'Donnell <[redacted]@odacomcommunications.com>; Guy Short <[redacted]@campaignsolutions.com>; Christine Hardman

0 [REDACTED]@gmail.com>; Whitney Clark [REDACTED]@campaignsolutions.com>; Cristina Mintsian

[REDACTED]@campaignsolutions.com>

Subject: Campaign Conference Call

Team - first, I'd like to welcome two key new team members: Jason Miller from Jamestown Associates is our new media consultant (replacing Nelson Warfield) and as many of you know, Josh Findlay is back for another Paul Broun campaign, this time as our on the ground campaign manager. We are lucky to have both of them bolster our team! Attached is an updated campaign contact spreadsheet, as always, please keep it private.

I'd like to do a core team conference call, no need for fundraisers, research, compliance, etc etc...would anyone have a scheduling conflict tomorrow (Friday) morning at 10 am? If not, Josh will setup the conf call and send the information.

Tentative Agenda:

- Opponents
- Direct Mail - first piece and next
- Messaging & earned media
- New Media
- Debates
- Field report
- Fundraising brief
- Schedule for remainder of the year
- Next step in polling

# **EXHIBIT 73**

## **TRANSCRIPT OF INTERVIEW OF REPRESENTATIVE BROUN'S CAMPAIGN MANAGER**

1           MR. MORGAN: Speaking is Bryson Morgan,  
2 Investigative Counsel with the Office of  
3 Congressional Ethics. I'm joined here with Paul  
4 Solis, Investigative Counsel with the Office of  
5 Congressional Ethics, and we are here with [REDACTED]  
6 [REDACTED] on June 20th, 2014.

7 BY MR. MORGAN:

8       Q.    So Mr. [REDACTED], we've already gone over the  
9 False Statements Act and its application but -- so,  
10 first we want to ask you just some questions,  
11 general back -- background questions. So what is  
12 your -- what was your first position with  
13 Representative Broun or -- or one of his elections  
14 campaigns?

15       A.    In 2007, I was an intern in the  
16 congressional office.

17       Q.    Okay. In Washington, D.C.?

18       A.    No, no. In the district office.

19       Q.    In the district office.

20       A.    I started in either August or September.

21       Q.    Okay. How long did you serve as an intern?

22       A.    Until about February of 2008.

23       Q.    Okay. What was the next position you had  
24 with Representative Broun?

1 A. I started interning on his campaign.

2 Q. Okay. When did you start interning on his  
3 campaign?

4 A. About February 2008.

5 Q. Okay. And then how long were you an intern  
6 on his campaign?

7 A. I interned until that summer sometime, and  
8 they started paying me to work on the campaign.

9 Q. Okay. I want to make sure I get the  
10 timeline correct here. Do you -- do you know when  
11 Representative Broun was first elected to Congress?

12 A. He was elected in a special election in  
13 2007.

14 Q. Okay.

15 A. And so after he was elected, they opened  
16 the district office here.

17 Q. Okay.

18 A. That's when I started interning.

19 Q. So the next year, 2008, you went right into  
20 an additional election?

21 A. Yeah. I mean, it was the regular election  
22 cycle.

23 Q. Regular. Okay. And then what -- you  
24 started being paid by the campaign in summer 2008.

1 How long did you -- you work with the campaign?

2 A. Until the general election ended in  
3 November of 2008.

4 Q. Okay. And then your next position with --  
5 with Representative Broun or his campaign?

6 A. Was in 2012 --

7 Q. Okay.

8 A. -- for that election cycle.

9 Q. What was your title in 2012?

10 A. Political director, I guess.

11 Q. And were you based here out of Athens?

12 A. Yes.

13 Q. Okay. So let's talk about the 2012  
14 campaign. Who -- other than yourself, who was --  
15 who were the staffers of the campaign?

16 A. There was Jordan Chinouth who was the  
17 campaign manager --

18 Q. Okay.

19 A. -- and we had two staffers below us, Kelsie  
20 and Shay and I'm not remembering their last names.

21 Q. What were their roles?

22 A. They were just like office staff. I mean,  
23 they kind of helped with answering phones and  
24 emails and you know, going to events.

1 Q. Okay. Were you involved in the 2014 senate  
2 campaign?

3 A. Yes.

4 Q. What was your role in that campaign?

5 A. Campaign manager.

6 Q. Okay. Who else was involved?

7 A. So Jordan Chinouth was kind of like -- he  
8 didn't have an official title but I guess he was  
9 like a political consultant. He organized the --  
10 like our county coordinators basically. David  
11 Heenan was Dr. Broun's bodyman.

12 Q. Okay.

13 A. And then there was a bunch of different  
14 people in like Washington, D.C. but that was it on  
15 the ground here.

16 Q. On the ground.

17 BY MR. SOLIS:

18 Q. When did you start that role for the senate  
19 campaign?

20 A. Officially in October of 2013 but they  
21 didn't like really do an email introduction of me  
22 to the staff until November.

23 Q. And the role that you were hired on was  
24 campaign manager, and you stayed on that role

1 throughout the campaign?

2 A. Yes.

3 BY MR. MORGAN:

4 Q. Is that your current position?

5 A. No.

6 Q. Okay. What is your current position?

7 A. Unemployed, I mean, campaign is over.

8 Didn't make it past the primary, so I don't have a  
9 current position.

10 Q. Okay. What were your duties as campaign  
11 manager in 2014?

12 A. So basically, I made sure everything ran  
13 smoothy in Georgia. I mean, we were very  
14 underfunded, so we didn't have a staff. So I did  
15 everything from answer the phones and the emails to  
16 make sure that volunteers had their supplies to you  
17 know, make sure we had volunteers at events. I  
18 mean, mostly, I was -- just made sure everything  
19 went smoothy in Georgia.

20 Q. Okay. But you said the campaign was  
21 underfunded?

22 A. Um-hmm.

23 Q. Can you got into -- did that -- was there a  
24 strain on resources or a strain on the ability to

1 hire staffers?

2 A. I mean, yeah. You can look at the  
3 financial -- I mean, running a senate campaign with  
4 two paid people on the ground in the state is just  
5 really hard to do. I mean, we were -- by on  
6 volunteers the whole time, you know. We had unpaid  
7 college interns trying to do stuff and volunteers  
8 all of the state, and it's just hard to run a  
9 senate race that way.

10 BY MR. SOLIS:

11 Q. And who were the paid people? It was you  
12 and Jordan?

13 A. David Heenan. I guess Jordan was paid also  
14 to do the organizing, but he wasn't like on the  
15 campaign staff.

16 BY MR. MORGAN:

17 Q. He was a consultant?

18 A. Right.

19 Q. So the two paid staffers were you and --  
20 and Mr. Heenan?

21 A. Right.

22 Q. And then who -- who handled the  
23 communications aspect of the campaign?

24 A. Mostly Christine Hardman.

1 Q. Okay. And she is in the Washington, D.C.  
2 congressional office?

3 A. Right.

4 Q. Okay. Anybody else involved in the  
5 communications aspects?

6 A. David Bowser.

7 Q. David Bowser, and his role is?

8 A. Yeah.

9 Q. Do you know his position? Chief of staff?

10 A. Chief of staff, yes.

11 Q. In the congressional office?

12 A. Right.

13 Q. Who was involved in drafting speeches for  
14 the campaign?

15 A. Dr. Broun mostly did a lot of that himself.

16 Q. Okay.

17 A. I know his wife helped a lot of with -- she  
18 gave him a lot of notes.

19 Q. Were there people who were involved in  
20 editing or providing feedback to him on those?

21 A. Yeah, I mean, he had a lot of people that  
22 he listened to. We -- there was not like a  
23 traditional campaign structure on this campaign.

24 Q. Okay.

1           A.     There was like -- he had a lot of  
2 volunteers who had his cell phone number who would  
3 call him like the day of the debate and you know,  
4 you'd show up and there'd be a new line in there  
5 and he knew which volunteer it came from. You  
6 know, his wife was doing the same thing, David  
7 Bowser, Christine. He had kind of a lot of people  
8 he confided in and I guess grabbed the best of  
9 those -- whatever he liked the best and put it into  
10 his speeches.

11          Q.     Okay. What about -- let's talk about Brett  
12 O'Donnell.

13          A.     Um-hmm.

14          Q.     When did you first become acquainted with  
15 him?

16          A.     Depends on what you mean by acquainted?

17          Q.     Okay.

18          A.     I have never like had a conversation with  
19 him --

20          Q.     Um-hmm.

21          A.     -- I've been on -- so the campaign kind of  
22 had what we called a multitude of counsels and what  
23 it was is like I said, it was this group of people  
24 that Dr. Broun confided in and you know, they would

1 be like group emails that would go out to this  
2 group --

3 Q. Um-hmm.

4 A. -- and so we were on this -- these emails  
5 together or you know, I don't even know that we  
6 were on a conference call together. If so, I don't  
7 recall it but so, I'm not -- depends on what you  
8 mean by acquainted. Like I'm familiar --

9 Q. Yeah.

10 A. -- with him but I've never had a  
11 conversation with him or anything like that.

12 Q. Have you ever met him?

13 A. I have not.

14 Q. Have not met him?

15 A. No.

16 Q. What did you understand his role to be when  
17 he was being CC'd on emails, when he was perhaps on  
18 conference calls? What -- I would imagine you had  
19 a general sense of who's --

20 A. Right.

21 Q. -- who was on the email and why --

22 A. Um-hmm. Yeah.

23 Q. -- understanding?

24 A. He was one of these confidants that

1 Dr. Broun had.

2 BY MR. SOLIS:

3 Q. Who is in this multitude of counsels?  
4 Could you name the people who were in this group?

5 A. Yeah. I mean, it ranged from generally  
6 like six to twelve people, all right. So like at  
7 the smallest, it would be Dr. Broun, Jordan, Bob  
8 Bibee, David Bowser --

9 BY MR. MORGAN:

10 Q. Who's Bob Bibee?

11 A. He was Dr. Broun's campaign manager in 2007  
12 and 2008 and then he got in a bad car wreck --

13 Q. Okay.

14 A. I guess not campaign manager. Campaign  
15 consultant.

16 Q. Okay.

17 A. And then he got in a bad car wreck and so  
18 he was kind of around this time but not -- you  
19 know, not like for the grind of a campaign kind of  
20 thing.

21 Q. Okay. So who else was in that group?

22 A. Um, let's see. Jordan. Who did I say?  
23 Dr. Broun, Bob Bibe, Jordan, David Bowser, me at  
24 the end -- once they hired me -- Brian Tringali.

1 Q. What was -- who's Brian?

2 A. He was Dr. Broun's pollster.

3 Q. Okay.

4 A. And then sometimes there would be expanded  
5 emails that would go out to like a bigger group and  
6 that would include Guy Short, some people from  
7 Campaign Solutions. Brett O'Donnell was in this  
8 group.

9 Q. Would you consider Brett as part of the  
10 core group of confidants or counsels or the  
11 expanded group?

12 A. Expanded group.

13 Q. Okay. Do you have any -- do you have any  
14 knowledge about how Brett O'Donnell and  
15 Representative Broun's relationship came about?

16 A. I don't, no.

17 Q. Were you involved in any discussions  
18 regarding Brett O'Donnell being hired by -- by  
19 Representative Broun's congressional office?

20 A. No. This campaign started in February and  
21 I came on --

22 Q. February of?

23 A. Of 2013.

24 Q. 2013?

1           A.     Right.  That's when he announced, I think.  
2     So everyone was kind of in place.  I was like a  
3     very late addition.

4           Q.     Okay.

5           A.     So...

6           Q.     Did -- did Brett O'Donnell ever volunteer  
7     for the campaign?

8           A.     I mean, I don't know.  I'm not sure I  
9     understand that question.  Like he -- like I said,  
10    he was on those multitude of counsels emails.

11          Q.     But you don't know if he was doing that in  
12    a paid capacity or volunteer capacity?

13          A.     Well, he was not getting paid by the  
14    campaign.

15          Q.     Okay.

16          A.     So yeah, I mean, I guess he was  
17    volunteering.

18    BY MR. SOLIS:

19          Q.     When you say he was not getting paid by the  
20    campaign, did you know of any other source of  
21    income he was receiving?

22          A.     No, not until the news stories came out.

23                 MR. MORGAN:  Okay.

24                 MR. ██████████:  I guess that was in March.

1 BY MR. SOLIS:

2 Q. And just to -- just so I understand how you  
3 sort of came to know Brett O'Donnell was involved  
4 with Dr. Broun, one day you're just on a series of  
5 emails and you see his name or was there any sort of  
6 other introduction -- like the first moment you  
7 realized he had something to do with the campaign  
8 --

9 A. Yeah. So when I came in -- right, right.

10 Q. -- for Dr. Broun?

11 A. Right. So when I came in in October, it  
12 was -- so my role in 2012 was just strictly  
13 Georgia. Like I was -- everyone below me. You  
14 know, I barely even saw Dr. Broun.

15 MR. MORGAN: Um-hmm.

16 MR. ████████: When I came in this time,  
17 there was like a whole structure in place that I  
18 was copied on emails to, but I didn't really know  
19 who people were and like in October, Jordan was  
20 supposed to be my bridge but he spent a lot of time  
21 out of town. So I was basically just getting the  
22 office in order at that point, you know. So we did  
23 a formal introduction, I think it was November. It  
24 was like an email introduction, and it was kind of

1 just through that process of I'm getting copied on  
2 this stuff. I don't even know if I'm supposed to  
3 be doing anything yet but like Brett O'Donnell  
4 would show up on those emails and it was like he  
5 and I didn't really have interaction. So it was  
6 like I knew of him, but you know, just -- I knew  
7 him as the Brett O'Donnell who was on these emails  
8 who gives advice.

9 BY MR. MORGAN:

10 Q. Did you know what his expertise was or what  
11 his background was?

12 A. Like I said, not at first. Not until, you  
13 know, stuff started coming out --

14 Q. Okay.

15 A. -- in the news and that sort of things.

16 Q. How -- how frequently did you -- were you  
17 CC'd on emails with Brett O'Donnell?

18 A. Decently frequently. Like whenever we'd do  
19 one of those bigger ones, you know, and it would  
20 depend on what was going on, but sometimes like two  
21 or three times a week, sometimes a couple of times  
22 a day. It would just kind of depend.

23 Q. Okay.

24 A. Like a lot of those emails were like, "This

1     came out in the news. Thoughts on this?" You  
2     know?

3           Q.     Um-hmm.

4           A.     And so you know, there'd be a lot of those  
5     back and forth about what thoughts are and things  
6     like that.

7           Q.     So would he -- would he chime in with his  
8     -- his opinion on how to respond to events or?

9           A.     Very rarely actually. He was like -- like  
10    I said, he was a minor -- he was in that expanded  
11    group. So he was kind of a minor --

12          Q.     Um-hmm.

13          A.     -- player. His would be like, "Sounds  
14    good," or "Let's do it," or you know, "Don't worry  
15    about it."

16          Q.     Um-hmm.

17          A.     You know, but usually he did not have like  
18    a lot of input, I guess.

19          Q.     Do you -- do you remember any specific  
20    instances of his input?

21          A.     I mean, yeah, he -- he would talk about  
22    messaging like --

23          Q.     Yeah.

24          A.     -- you know, there would be a news article

1 that would come out that was -- you know, and he'd  
2 say, "You know, let's hit them hard on this." I  
3 can't think of anything specific and then of  
4 course, when it came time to like around the  
5 debates, he would you know, have more to say about  
6 messaging then.

7 Q. Let's talk a little bit about debates.  
8 Were you involved in preparing Representative Broun  
9 for debates in 2012?

10 A. No.

11 Q. No. Do you recall -- from the documents  
12 we've received and gone through, it appears that  
13 there was a couple of debates with the -- Simpson  
14 --

15 A. Um-hmm.

16 Q. -- who was the republican challenger in the  
17 2012 primary. Around late June or early July of  
18 2012, were you involved with the campaign at that  
19 time?

20 A. Yeah, would've been.

21 Q. Do you recall those debate? I think one  
22 was on WGAU radio. The other one was on June 22nd.  
23 I'm not sure where there was -- was located. Those  
24 sound familiar to you?

1       A.    Yeah, sound familiar.  I don't remember  
2 anything specific about them, but I do remember  
3 there were debates.

4       Q.    Okay.  Were you involved in preparing  
5 Representative Broun for debates in 2012?

6       A.    No.

7       Q.    Do you know who was?

8       A.    No, no idea.

9       Q.    Were you involved in -- did you attend  
10 those debates?

11      A.    I think I might have, but I don't remember  
12 to tell you the truth.  The only reason I think I  
13 might have is because if we had to have staff and  
14 volunteers there, I would have.

15      Q.    Okay.

16      A.    I think.

17      Q.    So your role in the debates would've been

18      --

19      A.    Put up signs outside.

20      Q.    Okay.

21   BY MR. SOLIS:

22      Q.    Who's responsible for prepping Dr. Broun  
23 for debates?

24      A.    Who is?

1 Q. Yeah.

2 MR. MORGAN: In 2012.

3 BY MR. SOLIS:

4 Q. In 2012?

5 BY MR. MORGAN:

6 Q. Yeah, who was?

7 A. I have no idea. Like I said, I was like I  
8 was very much managing myself and below. I had no  
9 idea what was going on above me really. I mean --

10 Q. Okay.

11 A. -- Jordan -- like a typical day in the  
12 office in 2012 was Jordan was locked in his room  
13 doing stuff and I was with the volunteers making  
14 phone calls and knocking doors and going to --  
15 getting people ready to go to events and stuff like  
16 that.

17 Q. Okay. Want to go through a few documents.  
18 See if it -- well, before I -- I do that. Did you  
19 ever go up to Washington, D.C., in connection with  
20 the 2012 campaign?

21 A. No.

22 Q. No? Okay. Okay. Going to 2014, were you  
23 involved in preparing Representative Broun for  
24 debates in 2014?

1 A. No.

2 Q. Do you know who was?

3 A. I don't -- I don't know that anybody really  
4 was. At least, I never saw anything. Like what  
5 would happen is we would schedule debate time for  
6 Dr. Broun --

7 Q. Okay.

8 A. -- and he would sit in the office and  
9 sometimes make phone calls, sometimes read over  
10 like, you know, notes or something like that but --

11 Q. Okay.

12 A. -- there was not a lot of like actual  
13 debate prep going on that I know about.

14 Q. That you knew about? Okay. Well, we can  
15 go through some documents here, see if this helps  
16 refresh your recollection. 2014 -- this is from --  
17 I'll read the number at the bottom here for the  
18 record. This is PBTN97.

19 A. Um-hmm.

20 Q. Take a minute to review that.

21 A. Um-hmm.

22 Q. So this is an email chain that you were on.  
23 Starts on the back with an email from David Bowser,  
24 talking about for scheduling purposes, talking

1 about debates scheduled for looks like the fall of  
2 2013 and then on the first page there, you see  
3 Brett O'Donnell responds to David Bowser, writing,  
4 "We need a debate and forum calender started with  
5 contact info, so I can help negotiate formats and  
6 we can track," and then I think it's -- it's --  
7 it's after that that you're brought into the loop  
8 --

9 A. Um-hmm.

10 Q. -- with an email from Teddie Norton. Do  
11 you know if Brett O'Donnell had a role in -- what  
12 -- what do you think this means when he says, "So I  
13 can negotiate formats and we can track?"

14 A. Yeah, I mean, like I said I know he helped  
15 organize stuff. Um --

16 Q. When you say organize stuff, can you be a  
17 little bit more specific?

18 A. Sure. So when we -- like when these group  
19 emails were go around right and there would be talk  
20 about a debate coming up, right, he was one of the  
21 people that put in input in like, you know, how the  
22 debate would be --

23 Q. As in the format of the debate?

24 A. Sometimes. Like I know he was the contact.

1 He talked to the state party about format of the  
2 debate.

3 Q. Okay.

4 BY MR. SOLIS:

5 Q. And how do you know that?

6 A. Because it was on one of those email  
7 chains.

8 BY MR. MORGAN:

9 Q. Okay. So did he -- did he have a certain  
10 format for debate that he preferred and he was  
11 trying to help negotiate -- get to that place -- a  
12 certain that he thought was best for Representative  
13 Broun?

14 A. I don't think so. I think he was just  
15 finding out what it was.

16 Q. Finding out the setup?

17 A. Right.

18 Q. And why -- why would he be in that role?

19 A. 'Cause he knows about debates.

20 Q. Okay. All right. Show you another email.

21 This is PBTN95.

22 A. Um-hmm.

23 Q. So here -- this appears to be what you're  
24 talking about, a few different people. Jordan

1 Chinouth, David Bowser. Gov Bob, is that Bob  
2 Bibee?

3 A. Right.

4 Q. And Teddie Norton --

5 A. Um-hmm.

6 Q. -- Brian Tringali are on this email. What  
7 -- on the first page here, you have Brett O'Donnell  
8 chiming in saying -- he says, "I agree," in  
9 response to Brian Tringali's email in which he  
10 says, "I think we pubically say this is not enough,  
11 and they need to begin earlier."

12 A. Um-hmm.

13 Q. So do you recall anything surrounding the  
14 circumstances of this email? It appears that maybe  
15 there was -- there's a proposed debate schedule put  
16 out by the Georgia GOP and it looks like the  
17 messaging response to that was that it was not  
18 enough debates. Do you have -- does this bring  
19 anything to mind? Do you recall this messaging or  
20 there being some discussion --

21 A. Um.

22 Q. -- about there not being enough debates?

23 A. I don't. I remember when we first came on  
24 -- I don't remember when exactly the Georgia GOP

1 announced their debate schedule, but I remember  
2 when we first came on, we were talking about  
3 wanting to get a lot of debates because thought Dr.  
4 Broun's strength would be him talking to people.

5 Q. Okay. Do you recall if there ended up  
6 being a campaign messaging criticizing the number  
7 of debates being too few? Did that end up  
8 happening? Was that part of the message?

9 A. No. Because when they actually came out  
10 with the schedule, they scheduled a ton of debates.  
11 I think we had like six --

12 Q. Okay.

13 A. -- and they were pretty much every two  
14 weeks and that seemed kind of excessive actually.

15 Q. Okay. All right. Well, I want next --  
16 take these -- some documents here. I'll talk about  
17 specific debates.

18 A. Um-hmm.

19 Q. This is PBDB0060, and it starts -- you  
20 know, on the first to second page with an email  
21 from Teddie Norton saying he -- you know, "We are  
22 good to confirm the Jaycee's debate" --

23 A. Um-hmm.

24 Q. -- then he asks, "What do we need to

1 arrange that day for prep?" Do you recall the  
2 Jaycees debate?

3 A. That debate did not happen.

4 Q. Okay. The next email on that chain is I  
5 think [REDACTED]@gmail. Is that your email?

6 A. Yes.

7 Q. You're emailing Jordan Chinouth and David  
8 Bowser -- Teddie Norton CC'ing Jordan and David  
9 saying, "Jordan said that we can use the conference  
10 room in his office all day on the 9th for debate  
11 prep if we wanted. He will clear out the office  
12 except for Team Broun, a couple of other people."  
13 Do you recall if that debate preparation session  
14 happened?

15 A. It did not happen.

16 Q. Okay. Does Jordan have an office here in  
17 Athens?

18 A. Yes.

19 Q. Is that at Jamestown --

20 A. Yes.

21 Q. -- Associates? Is that his firm? Okay.

22 A. Um-hmm.

23 Q. Okay. So that debate did not happen. Next  
24 document I want to take you through is PBTN0125,

1 and I'll let you review these few pages here.

2 This, I think, refers to a "Georgia Public  
3 Broadcasting Get to Know the Candidates" piece --

4 A. Okay.

5 Q. -- it was filmed in -- in December of 2013  
6 --

7 A. Right.

8 Q. -- in Atlanta --

9 A. Um-hmm.

10 Q. There is sort of on the middle of the page  
11 one, an email from David Bowser where he writes,  
12 you know, "Yes." He's basically saying, "Yes, we  
13 are okay to schedule this, but I want heavy Brett  
14 time beforehand."

15 A. Um-hmm.

16 Q. Do you recall that Georgia Public  
17 Broadcasting "Get to Know the Candidates" piece?

18 A. Vaguely. What I mean is like I did not go  
19 to it. I remember that it was scheduled, and I  
20 remember some circumstances about that day, but  
21 Dr. Broun was not in the office I don't think at  
22 all that day. He was with his bodyman, David  
23 Heenan.

24 Q. Okay --

1 BY MR. SOLIS:

2 Q. What do you remember about that day?

3 A. Basically that. I remember that it was  
4 scheduled. I remember that he was with his  
5 bodyman, David Heenan and I think he had lunch with  
6 his daughter who lives in Atlanta that day. I  
7 remember that for some reason -- the reason I  
8 remember it is because for some reason he didn't  
9 want David Heenan to go into the debate with him,  
10 so wanted like David to sit out in the car and we  
11 had this group discussion about whether David  
12 Heenan should go in and film it which he ended up  
13 doing.

14 BY MR. MORGAN:

15 Q. Why did he film it?

16 A. 'Cause we filmed everything he did. We  
17 tried to get everything that he did on film.

18 Q. Okay. Do you recall if there were any  
19 preparation sessions --

20 A. I don't --

21 Q. -- for that?

22 A. No.

23 Q. Do you recall Brett O'Donnell being in  
24 anyway involved in -- in preparing Representative

1 Broun for that?

2 A. No.

3 Q. Let's go to the next email I want to show  
4 you. This is PBTN0129. This is starts -- the  
5 email chain starts on page two with an email from  
6 Margaret Williamson who is with the Tea Party of Gilmer  
7 County --

8 A. Right.

9 Q. She's basically -- she's saying here that  
10 it appears that their debate will occur on the same  
11 day as the state GOP debate. So there was some  
12 discussion -- David Bowser writes to -- to Brett  
13 saying, "Brett, what do you think? Although we  
14 told them we cannot do both, I'm leaning towards  
15 doing this forum with the second Georgia GOP debate  
16 that evening. Want your thoughts." Brett  
17 responds, "Would be good warmup, and it's our  
18 crowd. Do both." You know, ultimately, at the  
19 top, David Bowser says, "Talk to PB, wants to do  
20 all three." So he wanted to do this breakfast and  
21 two debates.

22 A. Um-hmm.

23 Q. Was this -- I see this is -- your CC'd on  
24 this, [REDACTED]@hotmail.com. That is another

1 email account you had?

2 A. Right.

3 Q. Was it -- was it common, was this typical  
4 for Brett to -- to chime in on whether or not  
5 Representative Broun should participate in a  
6 debate?

7 A. Um-hmm. Yeah.

8 Q. That was common?

9 A. Yeah. He chimed in on everything, but yes,  
10 definitely on debates it was common.

11 Q. Okay.

12 BY MR. SOLIS:

13 Q. Would his recommendations be or suggestions  
14 be followed?

15 A. Depends. Not 100 percent of the time.

16 Q. But sometimes?

17 A. Sometimes, yeah.

18 BY MR. MORGAN:

19 Q. Take you through the next document here.  
20 This is PBDB0025, bottom -- this appears to be --  
21 if you look at -- I gave you the next page as well.  
22 If you look at PBTN0133, the second page there,  
23 it's a calender item from Teddie Norton's calender.  
24 Subject is, "Prep with Brett for debate." Location

1 is listed as Jamestown Associates conference room.  
2 This is on January 10, 2014 from 11:30 a.m. through  
3 1:00 p.m. Organizer is Paul Broun, required  
4 attendees David Bowser and Christine Hardman. Do  
5 you recall if this -- the email on this first page  
6 which was that same day is an email from Christine  
7 Hardman to David Bowser referring to some  
8 anticipated questions about gay marriage.  
9 Christine Hardman writes, "Yes. He'll be good on  
10 this. Brett -- Brett was asking him the tough  
11 questions on this and we discussed answers for  
12 awhile." So it appears that this session did take  
13 place and in that session, they discussed gay  
14 marriage and how to respond to those questions and  
15 then it also appears that this session occurred  
16 here in Athens at Jamestown Associates. Do you  
17 recall this preparation session?

18 A. No. This -- Jamestown Associates is in  
19 Washington, D.C. That is Jason Miller's firm.

20 Q. That is Jason Miller's firm?

21 A. Yeah.

22 Q. Okay.

23 A. I think the -- what you're thinking of is  
24 the office part where Jordan's office is -- is that

1 Jamestown? No. It's Double Tree. Yeah. So  
2 Jamestown is in Washington, D.C.

3 Q. Okay. In Washington, D.C.

4 BY MR. SOLIS:

5 Q. And whose firm is it?

6 A. Jason Miller.

7 BY MR. MORGAN:

8 Q. So I thought -- I asked you a little bit  
9 earlier, what is the name of Jordan Chinouth's  
10 firm?

11 A. The name of it is J. Russell and  
12 Associates.

13 Q. J. Russell and Associates?

14 A. Right, right.

15 Q. Okay. Okay. So you weren't involved in  
16 this debate preparation session?

17 A. No.

18 Q. Okay. All right. Next document I want to  
19 take you through is another calender item. This is  
20 PBTN0134. Here, explicit -- says the location is  
21 D.C. but this is January 16, 2014 and it says,  
22 "Prep for debate with Michael Hall. Organizer Paul  
23 Broun. Required attendees David Bowser and  
24 Christine Hardman." Do you know who Michael Hall

1 is?

2 A. I don't.

3 Q. If I -- if I said he was a substitute for  
4 Brett O'Donnell, would that ring a bell that he was  
5 also an associate of Brett O'Donnell's who did  
6 debate preparation services? Does that at all  
7 sound familiar?

8 A. No.

9 Q. So you were not involved in this -- this  
10 preparation session?

11 A. No.

12 Q. Do you recall the republican -- the Georgia  
13 GOP Senate Debate on January 18th? Does that ring  
14 a bell?

15 A. Yes.

16 Q. I think -- well, I think you said there  
17 were -- there were like six debates?

18 A. Um-hmm.

19 Q. Can you run me through which ones you  
20 recall?

21 A. Well, I recall all of them. I don't know  
22 if I'm going to get them all in right order but --

23 Q. Okay.

24 A. -- there was one in Adel which was the

1 first one --

2 Q. Okay.

3 A. The second one I believe was in Cobb County  
4 at Kennesaw state --

5 Q. Okay. Was that the one that was on the  
6 same day as that Gilmer County Tea Party debate?

7 A. Yes, yes.

8 Q. Okay.

9 A. The third one I want to say was in  
10 Gainesville. I think the fourth one was Savannah,  
11 the fifth one was Augusta and the sixth one was  
12 Columbus.

13 Q. And were these all -- these were all  
14 organized by the Georgia Republican Party?

15 A. Correct.

16 Q. Okay. Which one do you recall was the one  
17 on the 18th?

18 A. The one -- the first one in January was in  
19 Adel definitely.

20 Q. Okay. This was the first one?

21 A. Right.

22 Q. Okay. And this one that occurred on the  
23 18th here, not sure where that was located?

24 A. On January 18th?

1 Q. Yeah.

2 A. No. That was the one in Adel.

3 Q. That was the first --

4 A. That was the first.

5 Q. -- that was the very first one?

6 A. Right.

7 Q. Okay. Were there any preparation sessions  
8 for Representative Broun here in the district or  
9 here in Georgia?

10 A. Not in Georgia.

11 Q. Okay. Do you recall who attended that  
12 debate with Representative Broun?

13 A. Yes. So I was down there, Niki Broun,  
14 Jordan and then we had David Heenan obviously was  
15 there and then we had some interns.

16 Q. Was David Bowser there?

17 A. David Bowser was not there.

18 Q. Do you recall if Christine Hardman was  
19 there?

20 A. I don't recall if she was at that debate.  
21 I don't think she was.

22 Q. Move on to the next document here. This is  
23 PBTN 1 -- 5. This is what appears to be on  
24 January 17, a debate preparation session with

1 Michael Hall. So this would've been the day before  
2 that first debate. Were you involved at all in  
3 this preparation session?

4 A. No.

5 Q. Okay. Move on to the next document here  
6 which is PBDB23. Do you recall an RJC, I guess,  
7 Jewish community Georgia senator job interview?

8 A. Right.

9 Q. Does that ring a bell for you?

10 A. Yes.

11 Q. What do you recall about it?

12 A. Almost nothing. I remember it was on a  
13 Sunday and David Heenan attended with Dr. Broun.

14 Q. So in these emails here, the email at the  
15 top here is from Brett O'Donnell to Julie Marsh,  
16 CC-ing Teddie Norton, Jordan Chinouth, you, David  
17 Bowser, David Heenan and Christine Hardman where he  
18 says, "Absolutely, he needs to be able to go a  
19 little deeper with this group, talk about Iran  
20 peace talks, plan for piece in Egypt, also  
21 Hezbollah and Hamas." This appears to be Brett  
22 O'Donnell advising on what Representative Broun  
23 needs to prepare for in advance of that job  
24 interview. Is that correct?

1 A. It looks like it.

2 Q. Do you recall any preparation for -- for  
3 the -- for that event taking place?

4 A. I don't.

5 Q. Do you recall if there were any other  
6 emails discussing the messaging for it or --

7 A. I don't think so --

8 Q. -- talking points?

9 A. I don't recall anything, no.

10 Q. Okay. Next document is PBCH130, if you  
11 recall this. This is what appears to be a Georgia  
12 Municipal Association Debate that occurred on or  
13 about January 27th.

14 A. Right.

15 Q. Is that -- do you recall that debate?

16 A. I do recall that debate, yes.

17 Q. Was that one of the six GOP debates or is  
18 this something separate?

19 A. This is something separate.

20 Q. Okay. What do you recall about that  
21 debate?

22 A. I remember it was on a Monday. It was in  
23 downtown Atlanta. There were a lot of people there  
24 because they're all like the local elected

1 officials from the state. It was televised, and I  
2 think it was the first televised debate. At least  
3 there were TV cameras. The debate was not  
4 televised. Let me correct that. There were TV  
5 cameras there, so they were planning on putting it  
6 on the news. I attended that with Niki Broun and  
7 two interns. That morning, Dr. Broun went with  
8 David Heenan and Niki Broun. They met us there.

9 Q. Okay. Were you involved in any preparation  
10 sessions for that debate?

11 A. No.

12 Q. Do you recall there being any emails about  
13 the messaging for that debate or talking points?

14 A. No. I don't.

15 Q. Do you recall Brett O'Donnell being  
16 involved at all in that debate?

17 A. No, I don't.

18 Q. Next document, here PBTN137. This is a  
19 calender item from Teddie Norton's calender.  
20 Subject is "Debate prep with Brett. Location  
21 Jamestown Associates on Wednesday, January 29th  
22 from -- 2014 -- from 9:00 to 11:00. Organizer is  
23 Paul Broun. Attendees David Bowser and Christine  
24 Hardman." Do you recall this preparation session?

1 A. I don't.

2 Q. Do you have any sense of which -- which  
3 debate this would've been a preparation session  
4 for?

5 A. My -- So they did the Georgia GOP debates  
6 about two weeks apart.

7 Q. Okay.

8 A. So I think -- well, until May and so I'm  
9 think I'm thinking it would've been the Cobb,  
10 Kennesaw debate.

11 Q. Okay. What do you recall about the Cobb,  
12 Kennesaw debate?

13 A. So that day was kind of a crazy day because  
14 that was the same day as the Gilmer forum.

15 Q. Um-hmm.

16 A. So I went -- basically we had two cars.  
17 David Heenan was with Dr. Broun all day that day  
18 and then I went to set up the signs and get  
19 everything ready for that Gilmer County debate with  
20 interns and Jordan was there with me.

21 Q. Okay.

22 A. In fact, I think Dr. Broun had a Douglas  
23 GOP meeting that morning. So he was already in  
24 Atlanta, and they drove up to Gilmer County to do

1 that and then afterwards, we had another team that  
2 was setting up signs for that Kennesaw debate --

3 Q. Okay.

4 A. -- and then I went with -- from Gilmer with  
5 the interns that we had there to go get ready for  
6 the Kennesaw debate. So we -- just putting up a  
7 ton of signs and we got a hot chocolate booth and  
8 tent and all that --

9 Q. Okay. Do you recall -- were you involved  
10 at all in the prep for either -- either of those  
11 debates that day?

12 A. No.

13 Q. Do you recall Brett O'Donnell being at all  
14 involved --

15 A. I don't --

16 Q. Okay.

17 A. No.

18 Q. Show you another document. This is PBTN139  
19 through 141 -- you a minute to take a look at this.  
20 So this -- going back to page -- well PBTN141, it's  
21 a calender item from Teddie Norton's calender.  
22 Subject is listed as "Debate prep." Location is  
23 Jordan's office.

24 A. Um-hmm.

1 Q. And so, would that refer to J. Russell --

2 A. Yes.

3 Q. -- Associates here in Athens?

4 A. Correct.

5 Q. The date was January 31st, 2014 from 2:00

6 to 4:30 p.m. Organizer is Paul Broun, required

7 attendees -- listed -- an email here

8 [REDACTED]@gmail.com. Who -- who had

9 access to that email?

10 A. To the campaign.

11 Q. The campaign -- the calender at gmail.com

12 email?

13 A. I think Teddie.

14 Q. Okay.

15 A. She did all of the scheduling, so and she's

16 the only one that put stuff on the calender. So

17 I'm guessing it was her.

18 Q. And Christine Hardman was also in the --

19 the email -- on page 139, email from Teddie Norton

20 to Brett saying, "Hey, Brett. We set aside time

21 from 2:00 to 4:30 for PB to do debate prep with you

22 while he is in Athens. Christine will be with him

23 but wanted to Skype you in," and then there's a

24 couple of emails about arranging that. I think

1 ultimately they decide to just put him on -- on  
2 speakerphone. Do you recall this debate  
3 preparation session?

4 A. I don't. I recall it being scheduled, but  
5 I was out of the office. I don't even know if it  
6 actually happened. Got no reason to think it  
7 didn't happen, but I was out of the office. I was  
8 getting ready for the next day with all of those.

9 Q. Okay.

10 A. Lot of logistical stuff.

11 Q. So was this January 31st, was this -- would  
12 this be leading up to that -- the Cobb, Kennesaw  
13 debates?

14 A. Yes, think so.

15 Q. So this -- so this is on a Friday --

16 A. Right.

17 Q. -- this prep session was scheduled for.

18 Were those debates on a Saturday? Does that sound  
19 right?

20 A. They were -- they were both --

21 Q. Okay.

22 A. -- they were both on -- yes, the debates --  
23 those Georgia GOP debates were always on Saturdays,  
24 and I remember that one specifically, yeah.

1 Q. Do you recall Christine Hardman being in  
2 town?

3 A. She was in town for that one. I don't know  
4 if she was in town on Friday. I think she was in  
5 town on Friday. I think -- yeah, she got in I  
6 think Thursday night.

7 Q. Okay.

8 A. I think she got in Thursday night, but I'm  
9 not sure.

10 Q. But you didn't -- you did not attend this  
11 prep session?

12 A. I did not --

13 Q. And you're not sure if it occurred or not?

14 A. No. Like I said, I remember it being  
15 scheduled. I remember specifically being out of  
16 the office. I got no reason to think it didn't  
17 happen but I don't --

18 Q. Okay. Only want to know what you know.  
19 This is -- next document I'll show you, PB -- 5.  
20 This is again from Teddie Norton's calender.  
21 Subject is, "Call with Brett for debate prep."  
22 Date is February 18, 2014 from 9:00 to 9:30 a.m.  
23 Organizer is Paul Broun. Required attendees  
24 Christine Hardman and then again this

1 [REDACTED]@gmail.com. Do you recall --  
2 well, it appears from the documents we've seen that  
3 there was an NFIB Senate Candidate Forum --

4 A. Yes.

5 Q. -- that occurred on February 18th --

6 A. I don't remember the date but I remember  
7 the event well.

8 Q. What -- what do you recall about that  
9 event?

10 A. That was held at Turner Field, same thing.  
11 David Heenan attended that with Dr. Broun. We took  
12 a separate car early to go get everything setup as  
13 far as the signs and all of that sort of thing. It  
14 was held at Turner Field mid-morning. I think all  
15 of the senate candidates were there.

16 Q. Okay.

17 A. Yeah.

18 Q. Were you involved at all in preparing  
19 Representative Broun for that debate?

20 A. I was not.

21 Q. You were not? Okay. Do you recall this  
22 debate prep session that's listed on this calender  
23 here? Do you recall hearing about it --

24 A. I don't.

1 Q. -- being aware of it being scheduled?

2 A. No.

3 Q. Next document is PBTN146. This is from  
4 Teddie Norton's calender. Subject is "Debate prep  
5 -- you know, hyphen -- Skyping with Brett." Date  
6 is Friday, February 21st, 2014 from 4:00 to 6:00  
7 p.m. Organized by Paul Broun. Required attendees  
8 are Christine Hardman, pbcampaigncalender@gmail.com  
9 and David Bowser. It appears that on Saturday,  
10 February 22nd, there may have been the Georgia GOP  
11 Senate debate. Do you recall?

12 A. If it was on -- I don't remember the exact  
13 date but that makes sense. They're always on  
14 Saturdays.

15 Q. Okay. So could that -- could that -- that  
16 have been the Gainesville debate?

17 A. Maybe. Like I said, I think they were  
18 doing them every two weeks. So the second one in  
19 Kennesaw would've been about the like the first  
20 weekend of February probably, and I don't know if  
21 there was one in between. I want to say there was  
22 one in between that one and whatever date this  
23 would've been, but I'm not positive about that.

24 Q. Okay. Were you involved at all in this

1 debate prep session --

2 A. I was not --

3 Q. Were you aware of it being scheduled at the  
4 time?

5 A. No.

6 Q. Next document I'll show you is PBTN148.  
7 This is a series of emails that appears to show  
8 that on -- it's a bit harder to follow here but on  
9 February 25th, they were -- Teddie Norton was --  
10 was scheduling with Brett a prep session for the  
11 following Tuesday, March 4th and then on the 7th as  
12 well. Do you recall debate preparation sessions on  
13 March 4th or 7th?

14 A. I don't recall any, no.

15 Q. Okay. Okay. Move on...

16 It appears that the March 7th session may  
17 have been to prepare for a Macon debate --

18 A. Um-hmm.

19 Q. Do you recall a debate occurring in Macon,  
20 Georgia?

21 A. Yes.

22 Q. Would that have been one of the GOP  
23 debates?

24 A. It was.

1 Q. Okay.

2 A. Yeah.

3 Q. Do you recall when about that was? Does  
4 March 8 sound familiar as the date for that?

5 A. That sounds familiar. Yeah, I mean, it  
6 would've been a Saturday around that time.

7 Q. Okay. Were you involved in preparing  
8 Representative Broun for that debate?

9 A. No.

10 Q. I think you said that -- just want to  
11 confirm -- February of 2013, what was your status  
12 with the campaign at that time?

13 A. I did not have a status.

14 Q. Did not have a status? Were you even  
15 informally involved or volunteering for the  
16 campaign at that time?

17 A. No. I mean, I attended the announcement,  
18 you know. Jordan told me they were going to  
19 announce, so I went to the hotel --

20 Q. Do you -- do you recall if Brett O'Donnell  
21 was there for the announcement?

22 A. I don't. I don't think so.

23 Q. We -- it appears that from the documents  
24 we've received that Brett O'Donnell did at some

1 point in February of 2013 travel to Georgia.

2 A. Um-hmm.

3 Q. And some of the expenses related to his  
4 travel were paid for by the campaign.

5 A. Um-hmm.

6 Q. Do you have any knowledge of why Brett  
7 O'Donnell traveled down here to Georgia in that  
8 time period?

9 A. No. I -- I was completely out of -- I was  
10 not doing anything at that time. Like I said, I  
11 attended the announcement and that was it.

12 Q. Okay. All right. I think those are all  
13 the documents I wanted to show you. I want to ask  
14 you just a few more questions and then I think  
15 we'll be -- we'll be done. Do you recall that in  
16 -- in about July of 2013 there was, I believe, a  
17 U.S.A. Today article raising some questions about  
18 Brett O'Donnell's payments from Representative  
19 Broun? Do -- do you recall that article? You  
20 recall there being some controversy during that  
21 time period?

22 A. July 2013?

23 Q. Yes.

24 A. No.

1 Q. No?

2 A. Un-uh.

3 Q. When was the first time you heard of there  
4 being any -- any controversy or any media attention  
5 focused on Brett O'Donnell's relationship with  
6 Representative Broun?

7 A. March 2014.

8 Q. Okay. When those -- you know, those news  
9 stories broke, did you have any conversations with  
10 Representative Broun about those articles?

11 A. Not with Representative Broun, no.

12 Q. Who did you have -- who did -- have any  
13 conversations with David Bowser about those  
14 articles?

15 A. Yes.

16 Q. What were those conversations?

17 A. Basically asked him, you know, what was  
18 going on -- "What -- what do we need to worry -- be  
19 worried about here?"

20 Q. What did he say?

21 A. He said there's nothing to worry about. Of  
22 course, he would say there's nothing to worry  
23 about, but he said that Brett was a contract worker  
24 for the congressional side. He said that he helped

1 Dr. Broun with messaging over there. Specifically,  
2 he mentioned Dr. Broun's Patient Option Act --

3 Q. Okay.

4 A. -- that he helped with and I think he  
5 talked about the Jobs Bill as well but basically  
6 talking about Dr. Broun's you know, legislative  
7 stuff and he said that basically his campaign --  
8 any work that he did on the campaign on those  
9 emails was volunteer stuff, and he was one of  
10 Dr. Broun confidants and he could do what he wanted  
11 on his free time.

12 BY MR. SOLIS:

13 Q. Did that seem right to you? Did you share  
14 that impression?

15 A. Well, Brett wasn't like really, really  
16 involved. So it made sense. I didn't know  
17 anything about his congressional involvement at  
18 that time, and he wasn't really, really involved  
19 with campaign stuff as far as I know. So it wasn't  
20 like he was making a big sacrifice. You know, like  
21 I never saw him -- like I said, I never talked to  
22 him. I never saw him in Georgia. He was not doing  
23 any -- he was based -- what it seemed to me like is  
24 he is a political consultant or pundit who gives

1 his opinion, you know, every now and then and  
2 wasn't really involved in day to day stuff. So it  
3 did make sense.

4 BY MR. MORGAN:

5 Q. And when he said any of the stuff on those  
6 emails was volunteer, what emails was he referring  
7 to?

8 A. The multitude of counsel emails.

9 Q. Okay. Were you involved -- well, did you  
10 have any -- who else did you talk to about those  
11 news stories?

12 A. That was pretty much it. I talked to  
13 Jordan about it obviously 'cause he was here in  
14 Georgia?

15 Q. What did -- what did Jordan say?

16 A. I mean basically the same thing. Jordan  
17 was on the official side as well.

18 Q. Um-hmm.

19 A. And so he knew Brett O'Donnell from before  
20 and knew that he was a contract worker and had been  
21 helping out with stuff and then basically just said  
22 the same thing. That he, you know, helps out with  
23 debates on his own time.

24 Q. Do you recall there being any discussions

1 with David Bowser or Jordan or anybody else about  
2 reaching out to the Ethics Committee or reaching to  
3 the House Administration Committee or any other  
4 sort of supervisory body in Congress to discuss the  
5 permissibility of the relationship with Brett  
6 O'Donnell?

7 A. Yeah. I thought David Bowser said that  
8 they -- like everything that -- they had talked to  
9 somebody. I don't remember which body it was  
10 specifically --

11 Q. Um-hmm.

12 A. -- but they had reached out and they said  
13 that all of the -- I guess what he said was that  
14 all of the payments that they had made to Brett  
15 O'Donnell were permissible through the Ethics --  
16 whatever board that they had talked to. I don't  
17 know who it was specifically.

18 Q. Okay. It appears that the relationship  
19 between Brett O'Donnell and Representative Broun  
20 was -- or ended or was terminated around April 2014  
21 --

22 A. Right.

23 Q. Were you involved at all or in any  
24 discussions about that?

1 A. No.

2 Q. Okay. Were you aware that the relationship  
3 had ended?

4 A. Yes. David Bowser sent out an email saying  
5 that basically that it had ended and asked David  
6 Heenan to change the passwords on some -- you know,  
7 like the G drive where we keep stuff.

8 Q. What stuff was kept on that G drive?

9 A. Pictures of Dr. Broun from events --

10 Q. Is that a campaign drive?

11 A. Yeah.

12 Q. Okay.

13 A. And I think it was mostly pictures and like  
14 I said, we tried to film Dr. Broun everywhere he  
15 was --

16 Q. So would you upload --

17 A. Right --

18 Q. -- the film to that and Brett O'Donnell had  
19 access to that?

20 A. I don't know actually.

21 Q. You don't know? Okay. But you assumed  
22 that he had access to it because the password was  
23 changed? Is that --

24 A. Yeah, yeah, I would think so. In fact, I

1 would be -- yeah, I think so.

2 Q. I -- in a few of the news articles, it  
3 appears that Representative Broun's office put  
4 together an official sort of response --

5 A. Um-hmm.

6 Q. -- in -- in March of this year. Were you  
7 involved at all in putting that response together?

8 A. No.

9 Q. I just want to be clear on one thing. You  
10 were not aware -- is it correct that you were not  
11 aware whether or not Brett O'Donnell was being paid  
12 by Representative Broun before these news stories  
13 broke?

14 A. Correct.

15 Q. And so when he was involved to whatever  
16 extent you saw with the campaign, you weren't sure  
17 if he was getting paid by the campaign or not?

18 A. I assumed he was not getting paid by the  
19 campaign.

20 Q. Who managed the finances for the campaign?

21 A. David Bowser.

22 Q. David Bowser did?

23 A. Um-hmm.

24 Q. Okay. And you didn't know whether or not

1 he was getting paid by Congressional Office at that  
2 time?

3 A. I did not know.

4 Q. So you -- the way you view him as a  
5 volunteer, the basis of that is -- what's your --  
6 what's your basis for saying that you believed he  
7 was volunteering?

8 A. He wasn't getting paid by the campaign.

9 Q. Okay.

10 BY MR. SOLIS:

11 Q. So how would you know that if -- if David  
12 is in charge of finances? Why -- why would you  
13 know who's not getting paid by the campaign?

14 A. Because I would see the expense reports.  
15 Like -- and I was somewhat involved, right. So  
16 like people would send in invoices to the campaign  
17 and they would sent it to the campaign email and  
18 then I would have to send it on to David Bowser.  
19 All right. And I would see the expense reports  
20 sometimes but I had no -- like I didn't authorize  
21 any payments. Basically, I had a campaign credit  
22 card to buy supplies here on the ground, and if it  
23 was bigger than like \$100, I had to get  
24 authorization to pay something, you know.

1 Q. Would you ever discuss with David salary --  
2 payment issues to you as paid staff for the  
3 campaign?

4 A. We negotiated my salary before I started,  
5 but after that, no.

6 Q. Did you ever have any discussions with  
7 David about payments to Jordan, about his -- his  
8 negotiations for payment for work on the campaign?

9 A. Negotiations? No, no. Like -- so Jordan  
10 and I were obviously down here and he would say  
11 things like, "I haven't gotten paid yet this month.  
12 Can you send something to David." You know but --  
13 BY MR. MORGAN:

14 Q. You were -- and you did not know whether or  
15 not Brett O'Donnell was being paid by another  
16 source for his campaign activity?

17 A. Correct.

18 Q. Okay. You just assumed he was not?

19 A. He was not being paid by another source? I  
20 guess I don't know. I never really thought about  
21 that.

22 BY MR. SOLIS:

23 Q. Did you ever have a discussion with David  
24 at all about payments to Brett O'Donnell, whether

1 it was that he was being paid or wasn't being paid  
2 by the campaign?

3 A. Not until after the news story.

4 Q. Not until after.

5 A. Right.

6 Q. I just had some questions. You know, you  
7 had said that you had -- after the news stories  
8 came out, you heard that Brett had some work on the  
9 official side. You mentioned he was a contract  
10 worker, the Patient Option Act, that he had some  
11 work on and the Jobs Act. At anytime did anybody  
12 mention to you that Mr. O'Donnell had done any  
13 training of the congressional staff?

14 A. No. Like I -- we don't really talk about  
15 what his congressional duties were. Basically,  
16 just said he helped with messaging, so.

17 BY MR. MORGAN:

18 Q. Helped with messaging? Okay.

19 A. Yeah.

20 BY MR. SOLIS:

21 Q. Bryson went through extensively with you  
22 all of the calender entries of those debate preps  
23 and you know, most often you said either you didn't  
24 recall or you weren't there. Did you do any debate

1 prep with Dr. Broun for the Senate campaign?

2 A. No.

3 Q. None at all?

4 A. No.

5 MR. MORGAN: I think that's -- those are  
6 all the questions we have. Stop the recording.

7 (Whereby, a recess was had.)

8 MR. MORGAN: Let me --we are back on the  
9 record here with [REDACTED]. This is Bryson  
10 Morgan speaking with Paul Solis on June 20, 2014.

11 BY MR. MORGAN:

12 Q. So Mr. [REDACTED], we've asked you all the  
13 questions we want to ask, but we want to give you  
14 the opportunity to add anything to the record that  
15 you feel is important for us to know. So that's --  
16 this is your opportunity to do that now.

17 A. I think just to clarify the context of how  
18 all of this -- these things were happening, my  
19 title on the campaign was campaign manager --

20 Q. Um-hmm.

21 A. -- but I was -- two things. One, Dr. Broun  
22 did not confide in me. We did not have like a  
23 close working relationship, right. Like I had no  
24 -- we just -- I was not like on the inner circle,

1 right other than like a secretary role --

2 Q. Okay.

3 A. -- and then basically because there was no  
4 staff on the ground, I spent most of my time doing  
5 secretary stuff. So I know in a traditional  
6 campaign it seems unreasonable that a campaign  
7 manager wouldn't like know anything that's going on  
8 but you kind of need to understand the context of  
9 this campaign. Like I was essentially a glorified  
10 secretary for most of it, and I was definitely not  
11 on the inner circle, so I was kept out of a lot of  
12 stuff. I know I was kept out of a lot of stuff,  
13 but you know, that was -- there was stuff on the  
14 ground that needed to happen to look like a senate  
15 race. So that's what I did. I put up signs and I  
16 you know, did whatever you did to look like senate  
17 race, so.

18 BY MR. SOLIS:

19 Q. Last thing is have you talked to anybody  
20 about the fact that we'd be speaking with you  
21 today?

22 A. I talked to Jordan about it because he got  
23 the letter. I actually didn't get the letter.

24 BY MR. MORGAN:

1 Q. Got it via email.

2 A. Got it via email. Right, right. I got it  
3 via email. So he received it and asked me about it  
4 'cause he quite honestly had no idea what it said  
5 and so we looked at it and then David Bowser  
6 basically said that y'all were trying to get in  
7 touch with me and I think he copied you on --

8 Q. Um-hmm.

9 A. -- on those emails and then because I don't  
10 check that Paul Broun email a lot, he told me that  
11 I needed to get on there and check my email once  
12 you had sent stuff. So that's -- that's it.

13 BY MR. SOLIS:

14 Q. Any contact with Representative Broun or  
15 Brett O'Donnell?

16 A. None with Brett O'Donnell. Since the  
17 campaign ended, I've had two contacts with  
18 Dr. Broun. One is to get him to sign a letter of  
19 recommendation for an intern and one was, we had a  
20 campaign computer that was getting repaired that he  
21 wanted to know the status of. That's all we've  
22 talked since the end of the campaign.

23 BY MR. SOLIS: All right.

24 (END OF PROCEEDING)

1           I, Blanca Wier, do hereby certify or affirm  
2           that I have impartially transcribed the foregoing  
3           from an audiotape record of the above-captioned  
4           proceedings to the best of my ability.

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Blanca Wier

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# **EXHIBIT 74**

**From:** David Bowser [REDACTED]@yahoo.com  
**Subject:** Team Broun Meeting  
**Date:** February 14, 2013 at 9:33 AM  
**To:** Paul Broun-Personal [REDACTED]@aol.com, Brian Tringali [REDACTED]@tarrance.com, Jordan Chinouth [REDACTED]@gmail.com, Michael Shaffer [REDACTED]@me.com, Bob Bibee [REDACTED]@aol.com, Brett O Donnell [REDACTED]@odacommunications.com  
**Cc:** Teddie Norton [REDACTED]@mail.house.gov

Good morning, I have spoken with each of you individually and it seems we are set for a meeting of the Team Broun braintrust next Thursday, February 21st during the 9 am through 12 noon timeframe in or near Chateau Elan where our full staff retreat will follow that afternoon. Jordan is securing a location and will let us know where it will be.

Additionally I will be sending out a seperate email shortly to the full political team regarding a conference call this Friday at 10 am, which we will make a regular weekly deal.

Please let me know if you have any questions and thanks!

David

# **EXHIBIT 75**

**Norton, Teddie**

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**From:** Norton, Teddie  
**Sent:** Monday, September 09, 2013 10:11 AM  
**To:** [REDACTED]@gmail.com; Brett O'Donnell; David Bowser  
**Cc:** GovBob; [REDACTED]@tarrance.com; [REDACTED]@hotmail.com  
**Subject:** RE: RLC/FreedomWorks debate

**This message has been archived. View the original item**

October 22nd PB will be in NYC for a fundraiser.

Teddie Norton  
Director of Operations  
Congressman Paul C. Broun (GA-10)

2437 Rayburn House Office Building

Washington DC 20515  
Phone: (202) 225-[REDACTED]  
Fax: (202) 226-0776  
[www.broun.house.gov](http://www.broun.house.gov) <<http://www.broun.house.gov>>

**From:** [REDACTED]@gmail.com [REDACTED]@gmail.com]  
**Sent:** Wednesday, September 04, 2013 7:19 PM  
**To:** Brett O'Donnell; David Bowser  
**Cc:** Norton, Teddie; GovBob; [REDACTED]@tarrance.com; [REDACTED]@hotmail.com  
**Subject:** Re: RLC/FreedomWorks debate

Brett,

No problem. I can put that together tomorrow. There will be a debate request coming for October 22nd . I will start the calendar with that.

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

**From:** Brett O'Donnell

**Sent:** Wednesday, September 4, 2013 6:50 PM

**To:** Bowser, David

**Cc:** Norton, Teddie; [REDACTED]@gmail.com; GovBob; Hardman, Christine; [REDACTED]@tarrance.com; [REDACTED]@hotmail.com

**Subject:** Re: RLC/FreedomWorks debate

We need a debate and forum calendar started w contact info so I can help negotiate formats and we can track.

Sent from my iPhone

On Sep 4, 2013, at 6:27 PM, "Bowser, David" <[REDACTED]@mail.house.gov> wrote:

> For scheduling purposes...we have not heard for months from the organizers of the RLC/FreedomWorks debate originally scheduled for Sat Sept 14th and Jordan has called them three times over the past couple of weeks. Tonight I talked to the national FreedomWorks guy, he said the Sept 14th debate was cancelled and he was told the local organizers contacted all the campaigns to let them know...which is of course not the case with us. Anyway, the debate is done for now and we have a variety of options for Sat the 14th to look at.

>

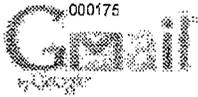
> I also believe this requires a discussion at some point soon on the political side as my conspiracies voice is yelling at me again.

>

> Thanks!

> David

# **EXHIBIT 76**



Jordan Chinouth <[REDACTED]@gmail.com>

**Re: Debates**

Nov 14, 2013

**Brett O'Donnell** <[REDACTED]@odacomunications.com> Fri, Nov 15, 2013 at 12:38 AM  
**To:** [REDACTED]@gmail.com  
**Cc:** David Bowser <[REDACTED]@yahoo.com>, Josh Findlay <[REDACTED]@paulbroun.com>, Bob Bibee <[REDACTED]@adl.com>

Thanks  
On Nov 14, 2013, at 8:53 PM, [REDACTED]@gmail.com wrote:

Yes, Here is his cell.

Jordan Chinouth

[REDACTED]

**From:** David Bowser  
**Sent:** Thursday, November 14, 2013 8:46 PM  
**To:** Jordan Chinouth; Brett O'Donnell  
**Cc:** Josh Findlay; Bob Bibee  
**Subject:** Debates

Jordan, we want Brett to take the lead in setting up our debates...regarding the state party plan, should he call Pipken to organize with the 6 state party debates? Thanks!

Sent from my iPhone  
<Adam.Pipken.vcf>

# **EXHIBIT 77**

Re: Debates?

Brett O'Donnell <[redacted]@odacomunications.com>  
To: Jordan Chinoth <[redacted]@gmail.com>  
Cc: David Bowser <[redacted]@yahoo.com>

Wed, Jan 8, 2014 at 9:18 AM

I spoke to Adam yesterday afternoon. He's sending a packet later this week. I'll brief Dr. Braun and David this morning on the debate. He basically let me write the format.  
On Jan 7, 2014, at 11:25 AM, Jordan Chinoth wrote:

I have not heard from him either. I know he had the flu last week. Do you want to try him again today or do you want me to. I am good either way.

From: Brett O'Donnell <[redacted]@odacomunications.com>  
Sent: Tuesday, January 07, 2014 11:25 AM  
To: [redacted]@gmail.com  
Subject: Re: Debates?

Jordan,

I still haven't heard from Adam. I need to discuss the format and other logistics with him.

Thanks

Brett  
On Jan 3, 2014, at 1:06 PM, [redacted]@gmail.com wrote:

Absolutely.

Jordan Chinoth  
[redacted]  
From: Brett O'Donnell  
Sent: Friday, January 3, 2014 11:06 AM  
To: [redacted]@gmail.com  
Subject: Re: Debates?

Can you steer him in any direction?

Thanks

Brett

Sent from my iPhone

On Jan 3, 2014, at 8:07 AM, [redacted]@gmail.com wrote:

Adam sent me a text late last night, said he had the flu, said he would call me today

Jordan Chinoth  
[redacted]  
From: David Bowser  
Sent: Thursday, January 2, 2014 5:26 PM  
To: [redacted]@gmail.com  
Cc: Brett O'Donnell; Norton, Taddie; Josh Findlay  
Subject: Re: Debates?

Let's not read too much into lack of details, they are a disorganized, inexperienced bunch who will probably have to be told how to do this - Zolka as the moderator is good for us as far as friendly, but worrisome a bit as I doubt she has ever done anything like this before and has the potential to become another Jiro Leher, getting run over by the more pushy candidates. Basically, we need Brett to talk to them ASAP and hammer this out; if he's not getting a callback by Monday, please let me know and I will call Adam and raise hell.

Sent from my iPhone.

0000Jan 2, 2014, at 4:57 PM, [REDACTED]@gmail.com wrote:

They are still working through all of the things like length of debate, rebuttals, response lengths, etc. The moderator is, I think, Zuber. Brett, that is not possible. I have her call though.

Jordan Chinouth

[REDACTED]

From: Brett O'Donnell

Sent: Thursday, January 2, 2014 4:32 PM

To: [REDACTED]@gmail.com

Cc: Norton, Teddie; David Bowser; Josh Findley

Subject: Re: Debates?

My guess is they'll do everything in their power to disadvantage Dr. Brown.

Sent from my iPhone:

On Jan 2, 2014, at 4:01 PM, [REDACTED]@gmail.com wrote:

The time is set for 6pm. No idea on any other details. I have made the ask though. They need to be keeping a tight lid on things. What do y'all make of that?

Jordan Chinouth

[REDACTED]

From: Norton, Teddie

Sent: Thursday, January 2, 2014 3:15 PM

To: [REDACTED]@gmail.com; Brett O'Donnell

Cc: David Bowser; Josh Findley

Subject: RE: Debates?

Have they announced the time?

Teddie Norton

Director of Operations

Congressman Paul C. Brown (R-IO)

2357 Rayburn House Office Building

Washington, DC 20515

Phone: (202) 225- [REDACTED]

Fax: (202) 226-8776

www.brown.house.gov

From: [REDACTED]@gmail.com [REDACTED]@gmail.com

Sent: Thursday, January 02, 2014 4:36 PM

To: Brett O'Donnell

Cc: David Bowser; Norton, Teddie; Josh Findley

Subject: Re: Debates?

Importance: High

The debate for the 13th is on.

Jordan Chinouth

[REDACTED]

From: Brett O'Donnell

Sent: Thursday, January 2, 2014 12:54 PM

To: Jordan Chinouth

Cc: David Bowser; Teddie Norton; Josh Findley

Subject: Re: Debates?

Jordan,

Can you pass along Adam's info? The contact info I have isn't working.

Thanks.

Brett

On Jan 2, 2014, at 11:53 AM, Jordan Chinouth wrote:

000079

> I just left a message for Adara Pipken the ED of the party. I did speak  
> to Ryan Mahoney who is basically their communications director. He  
> said that he is supposed to be sending out a press release Monday with  
> the final debate dates and details. I asked about the debate on the  
> 18th. He said he would find it hard to believe that the debate would  
> still be a go. He is going to make some calls and get back to me. I  
> will keep you posted.  
>  
> Thanks!  
>  
> On Thu, Jan 2, 2014 at 1:43 AM, David Bowser <[REDACTED]@gmail.com> wrote:  
>> Remembering this article from the week before Christmas...we tend to know  
>> for sure if there is a debate on Jan 18th and whether Brent has talked to  
>> them about format?  
>>  
>> Your daily job: A rush of debates to drive 2014 GOP Senate race  
>>  
>> By Greg Bluestein and Jim Galloway  
>> It won't be a replay of the 2012 presidential contest -- we do not believe  
>> CNN's Candy Crowley will be invited as moderator -- but you should prepare  
>> for a five-month rush of debates highlighting next year's Republican Senate  
>> contest.  
>> We've heard from several folks who were at GOP chair John Padgett's event in  
>> Marietta last night when he said the party will be hosting between six and  
>> seven debates next year. That's not including any unofficial forums that pop  
>> up.  
>> Party spokesman Ryan Mahoney says there are seven debates now on the  
>> schedule, but that details will be released in January. We're told that the  
>> debates could begin as early as mid-January and only one or two will be held  
>> in metro Atlanta. The rest will be scattered across Georgia. No word yet on  
>> whether all the candidates have agreed to the schedule.  
>> Kerwin Swint, the political scientist over at Kennesaw State University,  
>> just sent us this note:  
>>  
>> Kennesaw State is hosting the only U.S. Senate debate in metro Atlanta, Sat.  
>> Feb 1 at 6 p.m. in the Daily Performing Arts Center. I expect all the  
>> candidates will be there. The other debates are scattered across the state,  
>> including one in far off Gainesville.  
>>  
>> Gov. Nathan Deal, meanwhile, seems far less likely to agree to a debate  
>> before the Republican primary. As an incumbent, his camp likely feels like  
>> he has more to lose appearing side-by-side with two GOP challengers who are  
>> sure to snipe at him about ethics and education.  
>> But that hasn't stopped one of them, Dalton Mayor David Pennington, from  
>> issuing a challenge. The mayor said he's willing to go into Deal County --  
>> the Gainesville Civic Center -- to debate the governor on his turf.  
>> "He is afraid of me," said Pennington, blunt as ever. "He knows me too  
>> well."

# **EXHIBIT 78**



Jordan Chincuth <[REDACTED]>

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## Saturday Debate

1 message

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Brett O'Donnell <[REDACTED]@odacomcommunications.com>

Tue, Mar 4, 2014 at 9:29 PM

To: David Bowser <[REDACTED]@yahoo.com>, Bob Bibee <[REDACTED]@aol.com>, Jordan Chincuth <[REDACTED]@gmail.com>

Adam just emailed confirming only qualified candidates will be allowed in Saturdays debate. What are the chances Grayson qualifies?

Sent from my iPhone

# **EXHIBIT 79**

**Norton, Teddie**

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**From:** Bowser, David  
**Sent:** Tuesday, January 07, 2014 9:44 AM  
**To:** Norton, Teddie; 'Brett O'Donnell'  
**Cc:** [REDACTED]@gmail.com; [REDACTED]@hotmail.com; GovBob  
**Subject:** RE: TEA Party/GOP GC Senate Candidate Forum

Just talked to PB, he wants to do all three.

**From:** Norton, Teddie  
**Sent:** Tuesday, January 07, 2014 9:44 AM  
**To:** 'Brett O'Donnell'; Bowser, David  
**Cc:** [REDACTED]@gmail.com; [REDACTED]@hotmail.com; GovBob  
**Subject:** RE: TEA Party/GOP GC Senate Candidate Forum

Sounds good to me.

Another concern though is that we committed a while ago to the Douglas GOP to speak at their breakfast, it will really be pushing it for him to be there by 11:30 for the meet/greet, prior to the forum's start at noon. Will that be fine?

Teddie Norton  
Director of Operations  
Congressman Paul C. Broun (GA-10)  
2437 Rayburn House Office Building  
Washington DC 20515  
Phone: (202) 225-[REDACTED]  
Fax: (202) 226-0776  
[www.broun.house.gov](http://www.broun.house.gov)

**From:** Brett O'Donnell [REDACTED]@odacommunications.com]  
**Sent:** Monday, January 06, 2014 6:19 PM  
**To:** Bowser, David  
**Cc:** Norton, Teddie; [REDACTED]@gmail.com; [REDACTED]@hotmail.com; GovBob  
**Subject:** Re: TEA Party/GOP GC Senate Candidate Forum

Will be good warm up. And it's our crowd. Do both.

Sent from my iPhone

On Jan 6, 2014, at 5:52 PM, "Bowser, David" <[REDACTED]@mail.house.gov> wrote:

Brett, what do you think, although we told them we cannot do both, I'm leaning towards doing this forum with the 2nd GAGOP debate that evening...want your thoughts.

Thanks!  
David

**From:** Norton, Teddie  
**Sent:** Monday, January 06, 2014 05:48 PM  
**To:** [REDACTED]@gmail.com' <[REDACTED]@gmail.com>; [REDACTED]@hotmail.com' <[REDACTED]@hotmail.com>; Bowser, David

**Subject:** Fw: TEA Party/GOP GC Senate Candidate Forum

See below--

Teddie Norton  
Congressman Paul Broun.  
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**From:** Margaret Williamson [redacted]@elijay.com]  
**Sent:** Monday, January 06, 2014 05:09 PM  
**To:** Chris D'Aniello <[redacted]@JackKingston.org>; Corry Bliss <[redacted]@karenhandel.com>; Ryan Bonifay <[redacted]@perduesenate.com>; Jada Johnson <[redacted]@yahoo.com>; Jesse Greener <[redacted]@perduesenate.com>; Barbie (Grayson) <[redacted]@gmail.com>; Tyler Jacobs <[redacted]@EugeneYuforSenate.com>; Tori Wester <[redacted]@karenhandel.com>; Bobby Saparow <[redacted]@gmail.com>; Norton, Teddie  
**Cc:** Chip Pearson <[redacted]@paramont.net>; Sally Forest <[redacted]@yahoo.com>; Barbara and Don MURRAY <[redacted]@elijay.com>; John Williamson <[redacted]@yahoo.com>  
**Subject:** TEA Party/GOP GC Senate Candidate Forum

Good afternoon everyone,

There was some consternation raised this morning when the state GOP announced their candidate forum in Kennesaw on the same day our forum is scheduled.

This announcement came as a surprise to many. After discussion with Sally Forest, Gilmer County chair, the TEA Party board, and a number of you we have decided to go forward with our forum.

The Kennesaw event is scheduled for 6:00 in the evening and is only one hour away - easy drive down I 575. Our even starts at 11:30 with a "Meet and Greet", and forum begins at 12:00. We anticipate the formal part of the forum will last a little over 2 hours followed by approximately 1/2 hour of questions from audience - written out and prepared in advance of this time.

Your candidate will have plenty of time to arrive in a timely fashion at the next event.

We are extremely grateful for the candidates who have already committed to participate.

Margaret Williamson  
TEA Party of Gilmer County  
706-635-[redacted]  
706-273-[redacted]

# **EXHIBIT 80**

**From:** Jason Miller <[REDACTED]@jamestownassociates.com>  
**Subject:** Re:  
**Date:** January 18, 2014 at 2:49 PM  
**To:** Brett O'Donnell <[REDACTED]@odacomunications.com>, Christine Hardman <[REDACTED]@gmail.com>  
**Cc:** David Bowser <[REDACTED]@yahoo.com>

Strongly agree. Broun proved again that he's the real conservative.

---

**From:** Brett O'Donnell <[REDACTED]@odacomunications.com>  
**Date:** Saturday, January 18, 2014 at 2:44 PM  
**To:** "Hardman, Christine" <[REDACTED]@gmail.com>  
**Cc:** David Bowser <[REDACTED]@yahoo.com>, Jason Miller <[REDACTED]@jamestownassociates.com>  
**Subject:** Re:

We should not say "Broun won the first debate" Message is more important than declaring victory and it makes us look small.

On Jan 18, 2014, at 2:42 PM, Christine Hardman wrote:

FYI- from Bob. Did you have any changes?

Sent from my iPhone

Begin forwarded message:

**From:** Bob Bibee <[REDACTED]@aol.com>  
**Date:** January 18, 2014 at 1:58:38 PM EST  
**To:** Christine Hardman <[REDACTED]@gmail.com>  
**Subject:** RE: Fwd:

YES!!

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

**From:** Christine Hardman  
**Date:** 01/18/2014 12:46 PM (GMT-05:00)  
**To:** Bob Bibee  
**Subject:** Fwd:

Sent from my iPhone

Begin forwarded message:

**From:** Christine Hardman <[REDACTED]@gmail.com>  
**Date:** January 17, 2014 at 2:38:26 PM EST  
**To:** "[REDACTED]@aol.com" <[REDACTED]@aol.com>  
**Subject:** Fwd:

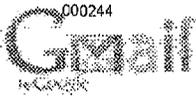
Let me know if you have any edits!

**Broun Wins First Debate; Demonstrates He is the True Conservative**

Broun for Senate released the following statement after Dr. Paul Broun won the first Georgia GOP debate in Adel, Georgia.

"Dr. Paul Broun was undoubtedly the winner of tonight's first debate. As the true conservative in the race, Dr. Broun once again demonstrated that he is the only candidate with the proven track record of working to repeal Obamacare, cut spending, and rein in out-of-control government. With Dr. Broun's credentials as both a medical doctor and as the only candidate with the solution to repeal and replace Obamacare, it is clear that he will be the strongest advocate in protecting Georgians from Obamacare and eliminating the law altogether. Furthermore, having introduced more targeted spending cuts than any other Member of Congress, and with the strongest Balanced Budget Amendment in Congress, Paul Broun stood out on stage tonight as the true conservative with the proven, consistent record of fighting against Washington's reckless spending and government overreach. Now more than ever, Georgians need a true conservative that will fight to repeal Obamacare, stop Washington's outrageous spending, and offer positive solutions to the issues facing Georgians. Tonight, Paul Broun affirmed to Georgians that he is the true conservative that will do just that."

# **EXHIBIT 81**



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**Re: CHARGE Forum Details**

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Brett O'Donnell <[REDACTED]@odacommunications.com>

Mon, Jun 17, 2013 at 12:07 PM

To: David Bowser <[REDACTED]@yahoo.com>

Cc: Brian Tringali <[REDACTED]@tarrance.com>, Jordan Chinouth <[REDACTED]@gmail.com>, Bob Bibee <[REDACTED]@acl.com>

So we'll work on all of the process questions to prep and then work on expanding the 10 minute into 15—that won't be a problem. We'll work on moving the process to his bio.  
On Jun 17, 2013, at 11:27 AM, David Bowser wrote:

Jordan just got off the phone with CHARGE, he got the following information:

Each candidate will speak for 15 minutes, the order will be determined by drawing a number from a bowl. After all the candidates speak, they will then go in reverse order from the speeches and draw one question from the bowl to answer themselves. The questions will be more personal in nature than issue, ie - what do you enjoy about being a Congressman, what do you like to do in your free time, etc etc.

Obviously we need to nail him down on a 15 minute speech, I believe so far Brett we have a 10 minute deal. With no open Q&A, we need to make the most of these 15 minutes.

As far as the one personal question goes, my first thought is to have something centered around being in the military, a Marine and current active duty reservist for the Navy...anything of a personal nature he can pivot to an answer highlighting he is the only candidate in the race who has been in the military. I don't know how long he will be given to answer the one question, I forgot to ask Jordan to check on that.

Thoughts?

# **EXHIBIT 82**

**From:** Bowser, David [REDACTED]@mail.house.gov  
**Subject:** Re: Congratulations  
**Date:** June 28, 2013 at 3:41 PM  
**To:** [REDACTED]@odacommunications.com

He has it, just put him on a plane and he will practice it tonight and all morning tomorrow.  
Thanks!

----- Original Message -----

**From:** Brett O'Donnell [REDACTED]@odacommunications.com]  
**Sent:** Friday, June 28, 2013 01:15 PM  
**To:** [REDACTED]@aol.com Broun-Personal <[REDACTED]@aol.com>  
**Cc:** Bowser, David  
**Subject:** Congratulations

Dr. Broun,

Congratulations on your amendment passing. Let me know if you need any other edits on speech. Lets talk tomorrow before Charge to make sure you're set.

Brett

# **EXHIBIT 83**

From: [REDACTED]@aol.com  
Subject: Re: How did Charge Go?  
Date: June 30, 2013 at 8:54 PM  
To: [REDACTED]@odacommunications.com

I thought it went well. I'll have to tell you about it next week. Thanks for all your help.

In a message dated 6/30/2013 7:28:55 P.M. Eastern Daylight Time, [REDACTED]@odacommunications.com writes:

| Let me know  
| Brett

# **EXHIBIT 84**

**Bowser, David**

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**From:** Brett O'Donnell [redacted@odacomunications.com]  
**Sent:** Monday, July 08, 2013 10:54 PM  
**To:** Bowser, David  
**Subject:** Re: Messaging Conf Call

I wrote earlier about the charge video. I'd like to go over that with him tomorrow.  
On Jul 8, 2013, at 7:52 PM, Bowser, David wrote:

- > Tues at 11 am:
- >
- > Dial-in Number: (513) [redacted]
- > Participant Access Code: [redacted]
- >
- > Thanks!

# **EXHIBIT 85**

**Norton, Teddie**

---

**Subject:** Meet w/ Brett  
**Start:** Tue 7/9/2013 4:00 PM  
**End:** Tue 7/9/2013 5:00 PM  
**Recurrence:** (none)  
**Meeting Status:** Meeting organizer  
**Organizer:** Broun, Paul  
**Required Attendees:** Bowser, David; Hardman, Christine  
**Categories:** Press

**Norton, Teddie**

---

**Subject:** Meet w/ Brett  
**Start:** Tue 7/9/2013 2:00 PM  
**End:** Tue 7/9/2013 2:30 PM  
**Recurrence:** (none)  
**Meeting Status:** Meeting organizer  
**Organizer:** Broun, Paul  
**Required Attendees:** Bowser, David; Hardman, Christine  
**Categories:** Press

# **EXHIBIT 86**

**From:** Norton, Teddie [REDACTED]@mail.house.gov  
**Subject:** debate prep schedule  
**Date:** January 2, 2014 at 4:05 PM  
**To:** Brett ODonnell [REDACTED]@odacommunications.com

1/8 (Wednesday)—10:30-12  
1/10 (Friday) – 10-11:30  
1/14 (Tuesday) – 10-11  
1/16 (Thursday) – 4-6  
1/17 (Friday) 10-12

Teddie Norton  
Director of Operations  
Congressman Paul C. Broun (GA-10)  
2437 Rayburn House Office Building  
Washington DC 20515  
Phone: (202) 225-[REDACTED]  
Fax: (202) 226-0776  
[www.broun.house.gov](http://www.broun.house.gov)

# **EXHIBIT 87**

**From:** Norton, Teddie [REDACTED]@mail.house.gov  
**Subject:** this morning  
**Date:** January 8, 2014 at 9:02 AM  
**To:** Brett O'Donnell [REDACTED]@odacomunications.com

David's arranged for yall to prep for the debate at the Jamestown Associates townhouse. The address is below. If you want you can just meet them there.

10 E Street SE  
Washington DC 20010

If you're coming from your office, it might be easier for you to head south on New Jersey Ave from Longworth, turn right on Ivy Street, and walk towards the back of the staff parking lot in front of the DNC. We are the gray townhouse all the way to the left.

Teddie Norton  
Director of Operations  
Congressman Paul C. Broun (GA-10)  
2437 Rayburn House Office Building  
Washington DC 20515  
Phone: (202) 225-[REDACTED]  
Fax: (202) 226-0776  
[www.broun.house.gov](http://www.broun.house.gov)

# **EXHIBIT 88**

## Norton, Teddie

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**Subject:** Prep w/ Brett for debate  
**Location:** Jamestown Associates Conference Room, 10 E St, SE

**Start:** Fri 1/10/2014 11:30 AM  
**End:** Fri 1/10/2014 1:00 PM

**Recurrence:** (none)

**Meeting Status:** Meeting organizer

**Organizer:** Broun, Paul  
**Required Attendees:** Bowser, David; Hardman, Christine

**Categories:** Press

# **EXHIBIT 89**

## Bowser, David

---

From: Hardman, Christine  
Sent: Friday, January 10, 2014 4:42 PM  
To: Bowser, David  
Subject: Re: Latest issue

Yes, he'll be good on this. Brett was asking him the tough questions on this, and we discussed answers for awhile.

----- Original Message -----

From: Bowser, David  
Sent: Friday, January 10, 2014 04:29 PM  
To: '[REDACTED]@odacommunications.com' <[REDACTED]@odacommunications.com>  
Cc: Hardman, Christine; GovBob; Miller, Erika; Marsh, Julie  
Subject: Re: Latest issue

Duh...thanks for un-freezing my brain.

----- Original Message -----

From: Brett ODonnell [REDACTED]@odacommunications.com]  
Sent: Friday, January 10, 2014 04:27 PM  
To: Bowser, David  
Cc: Hardman, Christine; GovBob; Miller, Erika; Marsh, Julie  
Subject: Re: Latest issue

We talked about this at today's meeting. He'll say that he's for marriage between a man and a woman, but the most important issue facing all families is an out of control government... On Jan 10, 2014, at 4:24 PM, Bowser, David wrote:

> I'd like to have a response for PB in case this gets brought up this weekend as it very well could. Thinking that he should affirm his strong traditional marriage position, then pivot to big, overreaching government, just not sure how. Appreciate all thoughts!

>

> HOLDER RECOGNIZES UTAH SAME-SEX MARRIAGES: The Obama administration waded into the increasingly complicated same-sex marriage situation in Utah. Holder said the federal government will recognize the unions of couples who married before the Supreme Court issued a stay on a federal ruling that the state's ban on same-sex marriage was unconstitutional. The couples will be eligible for "all relevant federal benefits," Holder said (Charlie Savage, NYT)

>

> SO COUPLES A