

COMMITTEE ON OVERSIGHT AND  
GOVERNMENT REFORM,  
U.S. HOUSE OF REPRESENTATIVES,  
WASHINGTON, D.C.

DEPOSITION OF: PADGETT ROBINSON WILSON

Wednesday, August 22, 2007

Washington, D.C.

The interview in the above matter was held at 2157  
Rayburn House Office Building, Conference Room J, commencing  
at 10:00 a.m.

**Diversified Reporting Services, Inc.**  
1101 Sixteenth Street, NW Second Floor  
Washington, DC 20036  
(202) 467-9200

Appearances:

For COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM

SUSANNE SACHSMAN, COUNSEL

ANNA LAITIN, PROFESSIONAL STAFF MEMBER

KRISTIN AMERLING, CHIEF COUNSEL

ASHLEY CALLEN, COUNSEL

J. KEITH AUSBROOK, GENERAL COUNSEL

STEPHEN R. CASTOR, COUNSEL

For PADGETT ROBINSON WILSON

STEVEN MCCOOL, ESQ.

Ms. Sachsman. On behalf of the Committee on Oversight and Government Reform I want to thank you for being here today. This proceeding is known as a deposition.

The chairman of the committee has sought out this deposition as part of the committee's investigation of lobbying contacts between the White House and Jack Abramoff and his associates. The person transcribing this proceeding is a House reporter and a notary public authorized to administer oaths, and he will now place you under oath.

[Witness sworn.]

Ms. Sachsman. My name is Susanne Sachsman. I'm an attorney with the majority staff. I've been designated as the majority counsel for this deposition.

I'm accompanied by Kristin Amerling, who is the chief counsel for the committee and Anna Laitin, who is the committee professional staff member.

Would the minority counsel please identify yourselves for the record?

Mr. Ausbrook. I'm Keith Ausbrook, general counsel for the Republicans.

Ms. Callen. Ashley Callen, counsel for the Republicans.

Mr. Castor. Steve Castor.

Ms. Sachsman. Before beginning the deposition I'd like to go over some standard instructions and explanations

regarding the deposition.

Mr. Wilson, because you have been placed under oath your testimony here has the same force and effect as if you were testifying before the committee. If you knowingly provide false testimony you could be subject to criminal prosecution for perjury, making false statements or other related offenses. Do you understand that?

The Witness. Yes.

Ms. Sachsman. Is there any reason that you would be unable to provide truthful answers to today's deposition?

The Witness. No.

Ms. Sachsman. Under the committee's rules you're allowed to have an attorney present to advise you, and you do. For the record, would your attorney identify himself?

Mr. McCool. Sure. My name is Steven McCool, and for our court reporter it's S-t-e-v-e-n. My last name is spelled M-c-C-o-o-l.

Ms. Sachsman. The deposition will proceed as follows. I will ask you questions regarding the subject matter of the committee's investigation for up to one hour. When I'm finished the minority counsel will have the opportunity to ask you questions for up to one hour. Additional rounds of questioning will proceed between majority and minority counsel until we're completed.

The reporter will be taking down everything that you say and we will make a written record of the deposition. You will need to give verbal, audible answers because the reporter cannot record nods or gestures. Also for the record to be clear, please wait until I finish each question before you begin your answer, and I will wait for you to finish your response before asking you the next question. Do you understand that?

The Witness. Yes.

Ms. Sachsman. If you don't hear or understand a question, please say so and we will repeat or rephrase it.

If I ask you about conversations or events in the past and you are unable to recall the words or details you should testify as to the substance of such conversations or events to the best of your recollection. If you recall only a part of a conversation or an event you should give us your best recollection of those events or parts of conversations that you do recall. Do you understand that?

The Witness. Yes.

Ms. Sachsman. Do you have any questions before we begin the deposition?

The Witness. I don't.

EXAMINATION

BY MS. SACHSMAN:

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Q Would you please state your full name for the record?

A Padgett Robinson Wilson.

Q And where are you currently employed?

A I work for Governor Sonny Purdue, state of Georgia.

Q And what is your position there?

A Government affairs director.

Q And who do you report to there?

A The governor.

Q Directly to the governor?

A Yes, chief of staff, yes.

Q And before that position you held another position at the same job?

A Yes, I was federal affairs director.

Q I saw that you were recently promoted, right?

A Yes, I'm moving back to Georgia, which I'm really excited about.

Q Congratulations.

A Thank you.

Q Where were you before you were at -- working for the governor?

A Well, my background is that I came to D.C. right after I graduated college, worked for Nathan Deal, congressman from Georgia, as an intern for about four or five

months or so, got a job with Senator Coverdell and came in as a staff assistant, worked my way up to LC, legislative aide, and then went back to Georgia to do campaign work for him. And that was in '98.

At the end of the '98 election I wanted to come back to D.C. and there was not an opening in the D.C. office, so moved back to D.C. without a job and just kind of sent my resume around and ended up going to Preston Gates without knowing anything about the firm or anything, but that's -- and following that Greenberg Traurig.

Q When did you start at Preston Gates?

A It would be January -- February of '99. I was looking for a job for about a month.

Q And did you report to -- who did you report to there?

A My job at Preston Gates was as -- I was a government affairs assistant, which is the equivalent of paralegal for a lobby team. I spent, you know, most of my days doing research and reports.

My issue areas, and they did it a lot like you do it on the hill where LAs have different issue areas, and mine were -- it was maritime and transportation. So I reported to the head of the maritime practice group, which Manny Roubelas, and then of course all of his -- this maritime

group, all the lawyers within that group. I did all their research. So it was generally -- all my issues were specific to maritime issues.

Q And then how did you end up switching over to Greenberg Traurig?

A Well, because all my issues were maritime issues I really did not enjoy what I was doing. I loved the people that I worked for. The maritime group there, great guys, but I just did not enjoy -- that wasn't kind of in my wheelhouse of issues. It would be like healthcare.

So I started -- this was leading up to the 2000 election, started looking for a new job. My goal at the time was to hopefully get on in the White House should President Bush -- should Bush win that election. And so I started handing my resume out to all the Republicans in the firm, and the Republicans in the firm were, of course, Jack and then a smaller group of folks there as well.

So everybody knew I was looking for a job, but I guess right before Christmas in 2000 Jack called me to his office and said, "heard you're looking for a job; I'm moving to Greenberg Traurig and would love to have you join if you want to." And it was kind of a shock to me because I had never done any work for Jack or very little work for Jack.

My connection to him was through other Republicans in



the firm, and I would send -- get research projects from them and I would even do those after hours so I didn't take out time from my maritime work. So he basically said, "I need to know in two days if you want to go to Greenberg Traurig," for a significant raise even though it was a parallel position. It was assistant director of government affairs.

So I made that move, just came back and said, "this is a great entry into," you know, I can go from there to continue to look for a job or maybe I'll like this a little more because -- different issues. So that's how I ended up at Greenberg, just kind of on a very quick decision.

Q And at Greenberg you were assistant director of government affairs. What did that entail?

A Assistant director was a completely lateral move. It sounded better than government affairs assistant but it was basically a paralegal for the practice, and there were several assistant directors.

We did research not only for Jack's clients but for any clients that were -- that needed any kind of research.

Q Who was your direct report?

A My direct report at Greenberg would have been Jack because he was my -- he was the one who brought me over, but in actuality it was any attorney who was asking for research at that time. I worked with that attorney directly.

Q And did you cover specific subject areas or --

A No, not really, not in the beginning. There were no -- it was just whatever issue was big for the client at the time.

Q Who were the primary lobbyists who were working for Jack Abramoff at Greenberg at the time?

A When we went over -- there was a group that went over, Kevin Ring, Todd Boulanger, Shawn Vasell. Those guys went from Preston to Greenberg. Then at Greenberg, Tony Rudy, Neil Volz, Mike Smith, Eddy Aueb, Michael Williams, those were kind of the team, I believe of folks who worked on -- Allen Slommowitz\* was another one.

Q What about Duane Gibson?

A And Duane, yes.

Q Okay. And Stephanie Ledger-Short?

A Yes, I'm sorry. You're right. Tough to recall all those names.

Q Sure. Did you do research for all those different people?

A Sure.

Q And did they have specific roles or subject areas that they worked on?

A Well, there were client managers, so they had a client and then there would be, you know, whatever issues

that client was following at the time. Those would be their issues.

Q So each lobbyist then had their own clients?

A Right, right.

Q Did any of them specialize in clients that were tribes or were they all covering tribes?

A Those were some of Jack's clients, so of course some of the client managers would be tribal folks.

Q Did you ever have direct contact with clients?

A Yes, I did.

Q And how frequently would that have been?

A Not very frequently. It was mainly along the lines of alerting them to different issues, you know, articles. Part of my job as assistant director -- let me back up. In the morning, I would come in and I'd read through all these publications, you know, Congress Daily, CQ, and then trade publications and different magazines that are specific to these clients, you know, strange things that you -- you know, Casino Weekly or whatever the -- things that I had to look for any issues that might -- the client managers might need to know about.

And I would clip those and send them around on email to the distribution group, say D.C. Shoptalk. That was everybody who might be involved in an issue for that client.

So sure, there were I'm sure instances where I found a bill or something that I sent directly to a client, but that was rare, and I can't recall one right off the top of my head, but I'm --

Q Okay. Did you meet with clients face to face or is that just mostly by email?

A No, it was mostly by email, and it would be -- in my role as assistant director I was backing people up. You know, if there was a client meeting I would be there to -- as part of a team but not directly working for that client.

Q What about contact with the targets of lobbying activity, administration officials, congressional staff, White House officials?

A You know, again, as a lobby team I wasn't -- as an assistant director I was not a main lobbyist. I was not somebody who was out pounding the pavement. My job was to gather information. My job was to get congressional schedules. My job is -- you know, it's very basic, things that everybody in the group can use.

But so I would have contact with congressional staff, you know, House and Senate, administration officials, information gathering. I mean I could call somebody and ask for a committee report or something, you know, just things that I could go find or get out of the printing room myself

but it's just easier to make a call.

Q About how frequently would you have contact with White House officials?

A That's hard to say, and that would depend on -- there are a lot of White House folks who worked there who were friends, so you see them on a social basis. You don't necessarily -- if you're trying to go back and think of how many times I've talked to folks on work it would really be tough to do without looking at billing records or my notes from the time.

Q Did you have frequent contact with Jack Abramoff?

A I did. He was -- his office was actually three doors down from my cube at one time and then I was also in an office down from him eventually too. So yes, I saw Jack -- when he was in the firm I saw him all the time.

Q What was your last contact with Jack Abramoff?

A When all of this happened, when Jack -- when Susan Schmidt did the articles I was actually out of the firm. I had back surgery and I was at home, and I was recuperating. I was on Percocet, and Jack called me and said he'd like to talk to me about what was going on. And I said I'd like to wait until I'm back in the office and I'm not on back drugs, and I never heard from him after that.

Q Have you had contact with the other lobbyists from

Greenberg?

A We see each other socially every now and then. It's not something that I -- you know, we have a lot of mutual friends, so it's --

Q Are there specific people that you see more often though?

A I see Todd more often because he and I have a lot of friends in common. The other guys would just be random meetings.

Q And have you discussed with any of them the Jack Abramoff issues, people pleading guilty, that kind of thing?

A No. It's not something that I want to sit around talking about. No, I have not.

Q All right. I want to turn now to contacts between the Abramoff team and the team in the White House. Did Jack Abramoff discuss with you his contacts within the White House?

A Jack made it be known in every client representation that he was close to or knew Karl Rove. He never discussed with me the extent of his contacts other than they were friends in the College Republicans.

Q So they had a previous friendship?

A Right, right.

Q Do you know whether he was having regular contact

with Karl Rove while Karl Rove was in the White House?

A I do not know that for sure.

Q But he gave the impression that he was doing that?

A Jack would -- I never saw him meet with Karl Rove and I never know that a call was placed, but I do -- he did give representation that he was talking to him.

Q Did -- when he was giving you -- when he was representing that he was talking to Karl Rove do you remember what subjects he was talking to Karl Rove about?

A I don't.

Q Do you know whether he had contact with anybody else at the White House?

A I don't know. I don't -- well, Susan Ralston, that's the only other.

Q And who is Susan Ralston?

A Susan was Jack's assistant who was -- went to work for Karl and maintained -- she was friends with Jack before, and I'm sure that if you're calling Karl that that's where you -- you would call Susan.

Q Do you know how often he had contact with Susan Ralston?

A I don't.

Q What about other members of the lobbying team? Did they have regular contact with the White House?

A It's hard for me to say. I mean, again, in your daily lobbying work or just being around town you see a lot of these people socially so it's --

Q What you're saying is that the other lobbyists saw people in the White House socially?

A No. What I'm saying is that it's -- what I'm saying is that it is possible that they had contact with folks at the White House. I don't know for a fact whether it was business or social or --

Q If they were having contact, do you know who they were having contact with?

A I don't.

Q That's kind of a general statement, but someone like, say, Todd Boulanger, if he was contacting people at the White House do you know who he would have been in touch with?

A I wouldn't know.

Q Did anyone discuss with you that they were going to go to somebody at the White House to discuss a specific subject matter or specific issue?

A I can't recall a conversation right now that that was outlined.

Q Would that have been -- I understand you don't recall a specific conversation, but would that have been something that someone would have said? I mean would that



have been a common conversation? Was it commonly known that people would reach out to people at the White House for assistance?

A Again, that would -- it would depend on the issue and it wasn't something that you would -- that you would tell everybody that you -- you know, you have a job to do and I don't tell my assistant now what I'm doing on a day-to-day basis, so it's not something that I would -- you know, you're reaching an end goal and that's how you get there. You know, it wouldn't be something you'd share.

Q By that do you mean that it wouldn't be something you'd share because you were trying to keep that private for some reason?

A No, because it's your job, you know, that's what you're paid to do.

Ms. Sachsman. I'd like to show you two emails. Let's mark these Exhibit No. 1, which is GTG - R 1234.

[Wilson Exhibit No. 1 was marked for  
identification.]

Ms. Sachsman. Let's mark the next one Exhibit No. 2, which is GTG - R 1235.

[Wilson Exhibit No. 2 was marked for  
identification.]

BY MS. SACHSMAN:

Q These are both email exchanges from August of 2001, and in both of them it looks like Susan Ralston is providing Jack Abramoff with the name of potential nominees for OIA. And then the email is getting forwarded on to you or to you through Kevin Ring to ask you to research the individual. Do you recognize these emails?

A You know, I don't recognize the emails, but this is right along the line of requests that I got.

Q What would you do when you got a task request like this?

A I would search the internet and Lexus-Nexus and just try to compile information.

Q What kind of information were you looking for?

A This is background information on who these people are. I mean it really -- it's tough to say without knowing, I guess, a little more context, and I don't -- but on this, Senator Redfield, I would just try to compile as much information as possible. I don't -- that's it.

Q Do you have any idea why Susan Ralston would have been asking Jack Abramoff for this kind of help?

A No, I don't.

Q Do you know why Jack Abramoff would have you doing this kind of research?

A Well, the -- it would be tough for me to say

what -- I mean looking back at this now I could probably fill in the blanks but at the time I'm not -- there was no way I would know what Jack's intent was.

My job was to sit down and do the research, was to do my job. And so I followed Jack's orders and probably put together a packet of articles and any kind of background stuff that I could find.

Q When you were -- were you asked to do research like this for potential nominees? Was that a common thing that you were asked to do?

A It's hard to -- you know, this is six years ago. It's hard to remember all the research projects that I did because I did a lot of them. It's not something that I would -- I mean it is -- I wouldn't think twice about doing it. I mean that's just part of the problem. It's hard to recall -- there's no telling how many research projects that I got, whether it be on this or a client or on a client issue. This was just regular occurrence type stuff.

Q Would you have been asked to, I guess, dig up dirt on people? Is that something that you did, sort of a negative research?

A Well, that's -- part of finding out somebody's background is finding as much information as possible, so --

Q Where would you go to find stuff like that?

A Public record. You know, that's -- Lexus searches. Google didn't really exist back then in its modern form, so you had to rely on the old search engines.

Q Okay. Are you aware whether this kind of information flow from Susan Ralston or for other people in the White House was common?

A I'm -- not to me. It would just be hard for me to know what any of the other guys were getting on a regular basis from the White House.

Q In both of these emails Susan Ralston is using an RNC email account. Do you know why she was using an RNC email account instead of her White House EOP account address?

A I don't want to speculate as to why Susan was using that. I didn't have much contact with Susan once she left the firm, so I wouldn't want to get into that.

Q Did you or anyone in your office ever express a preference for communicating with White House officials over non-governmental accounts?

A I never -- that was never verbalized to me, no.

Q You said it wasn't verbalized to you, but were you aware of such a preference that sort of existed?

A No. You know, I don't recall ever -- that's just not something that I remember from the time.

Q Did you ever hear that any White House officials

were using non-governmental electronic communications to avoid creating a record of such communications?

A No, I don't recall that.

Q And when you communicated back and forth with White House officials did you do that over their official addresses or their nongovernmental addresses?

A Official addresses. I only knew -- there was only one person that I knew that had a campaign address, and I never did any work with them.

Q And who would you have been contacting over their official addresses?

A I had a lot of very close friends. You know I worked for Senator Coverdell, and he was the President's -- then Governor Bush's, I guess, lead guy, lead liaison in the Senate. And when Senator Coverdell passed away the Bush campaign was nice enough to take many of our staff on and give them jobs.

So I had a lot of my good friends from my time on the Hill who went to work there. So socially I contacted a lot of people and that's something that I'm not ashamed of. They're still great friends and most of them were invited to my wedding. And these are -- I still see them all the time, so it's -- there were a lot of people that went over there that I kept in touch with.

Q Did you contact any people non-socially to discuss any kind of official work-related aspects?

A Sure, absolutely. I mean my job was to -- I was a lobbyist and I gathered information. I'm sure I talked to them one time or another over the course of this five years, four years to talk about business.

Q And who are those people?

A Without knowing, I mean I could list you a name -- a list of people that I know there, but without looking at billing records or something like that I wouldn't know if I talked to them about business or whether we talked about having lunch on Sunday. You know, it's just hard to look back and put that together.

Q I have billing records, and I think we'll go into this a little bit later, but if you could maybe just list out some of the people that you had contact with I think that would be useful sort of information for us to have.

A I'd like to -- I don't want to speculate and say somebody's name who maybe I didn't -- you know what I'm saying? I don't want to say something that is not truthful and maybe put somebody's name in the record when I didn't talk to them or meet with them or do anything with them.

Q Okay. But you've discussed that there are some people who you had apparently frequent, repeated contact with

at the White House.

Mr. McCool. I'm going to object to that. That's not his testimony that it was frequent, repeated contact.

Ms. Sachsman. It was social contact, I believe.

Mr. McCool. All right, but that's different.

BY MS. SACHSMAN:

Q Okay. For those people who you said you had social contact with, how often do you have social contact with them?

A Again, that's hard to say unless I'm -- you know, these are great friends. I mean looking back six years ago I'm not sure how often I had contact with them. I mean it's -- these are your -- I mean all the folks that you work with now I'm sure you talk to them on the weekends or hang out with them and that's -- it's just hard to say.

Q Okay. Can you tell us who those people were?

A Well, again, I would -- I don't see how my social friends get into contacts that we're dealing with now unless I saw billing records or something that I could look at and say that, yeah, I talked to them about something other than when we're going to hang out on the weekend.

Q All right. Let's move into some billing records then. Maybe that will help you out.

The Greenberg Traurig billing records indicate that you billed the Choctaw Coushatta and the Saginaw Chipiwa about

\$794 for hosting White House and congressional staff at the Dubliner for a dinner reception on January 26, 2002. Do you remember that?

A That one actually I do remember, yes.

Q Okay. Who attended that?

A Well, that gets into -- this was a large event. The reason I remember it is because it was on a Saturday afternoon and it's -- you know, I am -- I'm kind of the junior man on the totem pole. This is a going away party for a member of our team and there are a lot of people who come and go to this, so I couldn't tell you who was there, but I was asked to pick up the tab by the client managers.

And on an event like this I had either post or prior approval. I didn't have sign off capability on any of those clients for expenses, so I -- this is just a large afternoon event with people coming and going, so I couldn't tell you who was there, how long they were there.

Q Whose going away party was it?

A It was Shawn Vasell's going away party/

Q How come you were billing clients for Shawn Vasell's going away party?

A Well, this is Jack's -- the Abramoff -- let me figure out a way to -- Jack made it be known that our job was to be seen, our job is to be around town, and this is part of



a client matter. The fact that we're with -- that we're being seen by anybody in the government and building relationships is a client matter, so we're not supposed to spend our money on that. You bill clients for those interests, and that's -- that was my understanding as a junior staffer that I am to be there, you know, talking to people and building relationships.

Q How did you decide to bill it to these specific three tribes?

Mr. McCool. Objection. He didn't say that. He said that he did not have sign off authority and the client managers decided who to bill. Please don't mischaracterize his testimony. It's not fair.

I mean you're here to gather facts. You're not here to -- I'm sure you don't want misrepresentations or speculation, so please represent his testimony fairly.

Ms. Sachsman. I certainly agree that we wouldn't want misrepresentations on the record, so if you hear me making a misrepresentation or any information coming out incorrectly, please just correct it.

Mr. Castor. Before we go on, what's the date of this party for Mr. Vasell?

Ms. Sachsman. January 26, 2002.

Mr. Castor. Thanks.

BY MS. SACHSMAN:

Q Do you know how -- who told you that you should bill this to a client?

A The client managers make that decision, and that's -- I was told -- and this again is -- I don't know these people. I would rather spend my Saturday afternoon -- this is why it sticks out in my mind. I'd rather spend my Saturday afternoon at home with my new wife at the time, but I was there to pick up a tab, and I spent my time and I left.

Q Do you remember which client managers?

A Well, what were the billings, again?

Q Choctaw Coushatta and Saginaw Chipiwa.

A All right. The client managers for those were Shawn -- Choctaw Coushatta, Stephanie; and Sag was Todd. I mean there would be a pre or post approval on any of my expenditures as a non-client manager at that time.

Q Do you remember -- well, let's move on to another one. Billing records also indicate that you billed the Choctaw \$152 for a lunch at the Oval Room with White House legislative staff on February 1, 2002, so just a couple days later. Do you recall that event?

A I don't.

Q Did you pay the food and drink expenses for the

White House official at that event?

A I don't know that -- I don't know who was there. I do not remember that event at all.

Q Okay. The bill was for \$152.

A Right.

Q For lunch at the Oval Room.

A Right.

Q Would that have been a lunch purely for you?

A No, no.

Q So you paid for somebody's lunch?

A Absolutely. That's -- as I recall, I mean that would -- and again, is there a billing record that goes -- can I look at it?

Ms. Sachsman. Sure, sure. Let's mark this Exhibit No. 3.

[Wilson Exhibit No. 3 was marked for  
identification.]

BY MS. SACHSMAN:

Q And what we did here also -- we highlighted the bill that we're talking about out of a long summary description of the detailed parts of the bill for the client but we included the second page, which just mentions who the client is.

A Okay. I don't remember that particular lunch. I

really couldn't tell you who was there.

Q Do you know anyone in the White House legislative staff?

A Yes, I mean of course. I knew a lot of those folks over there.

Q Who are the possible people that could have been?

A Well, I don't want to guess. This could have been four people. It could have been six people. I don't want to guess at who's there without having -- if there's an instance where I can recall a lunch or an event I'll tell you, like the Dubliner that's -- I do have a solid recollection of that. I don't recall this at all.

Mr. McCool. Why don't you just ask him, did you ever take White House legislative staff people out to lunch and who'd you take and who paid for it?

Ms. Sachsman. Okay.

BY MS. SACHSMAN:

Q Did you ever take any legislative staff people out to lunch from the White House?

A Yes.

Q And who did you take to lunch?

A Well, without having a specific time, you know, if you're asking me to generalize over the entire time I'm there who did I take to lunch, you know, that's -- I can

name -- the one name of course is Allison Jones, who is my longtime friend, but a lot of the other people in the staff I did not know, you know, I didn't have name relationships with.

You know, basically it's a lot of folks going out. You know, it's not me calling a bunch of people and saying, "let's all go together," but it's -- the staff themselves -- again, my job is to go out and to be seen, and so I wouldn't have necessarily put a lunch together myself or -- today it's -- again, I didn't know a lot of the people by name until I meet them because I'm building relationships, so it's hard to look back now and say anybody else.

Q When you went to lunch with Allison Jones did you ever pay for lunch?

A Yes.

Q And was it you personally paying for lunch or Greenberg Traurig paying for lunch?

A The clients, not Greenberg Traurig, yes.

Q Okay. So it was -- you used your company credit card and it got billed to a client, correct?

A Yes, used my credit card, right.

Q When you were at lunch with her were you discussing client matters?

A No. And you know, lunch -- possibly. Lunch is a

time to -- I mean as congressional staff you get 50 calls a day. Your time is pulled back and forth. Lunch is a time to go sit down with somebody and actually have a conversation without being distracted by what's going on in the office.

And sure, you can talk about client issues. You can talk about what you had for lunch or what you had for dinner, you know, what you did the night before. But yeah, it's a time to actually talk to each other without being distracted.

Q Did you ever -- I guess when you went to lunch with Allison Jones did you ever take her to an expensive restaurant?

A Well -- it's hard -- there are not many restaurants in D.C. that aren't -- we've been to Cosi before, which is of course not that expensive, but there are also restaurants in D.C. that are, so yes. And that's -- I mean my relationship with Allison is such that she's picked up my tab before. You know we eat lunch at each other's homes on the weekends, you know.

I mean this is -- it's not a -- this is a longstanding friendship not necessarily a work relationship, so it's definitely not a work relationship.

Q The committee's review of the billing records indicates that you billed clients for quite a few meals and drinks with White House officials, and you've said that you

didn't have your own billing authority. How did you request the authority to bill a meal with a White House official?

A The authority came from -- a lot of these are -- at least in my recollection a lot of the events that you're probably referencing -- these are events. I mean these are -- there would be either somebody there, client managers there as well and leaves. I mean without talking about specific events it's hard for me to pinpoint, say, how it was -- how approval was given, but I definitely -- I did not have sign off authority on these clients, so it's -- these are things that I would -- somebody would have to approve it, and whether that be the firm or the client manager there was always a pre or post approval.

Q Under what circumstances would you request that kind of authority?

A Request -- I'm not sure what you mean.

Q The authority to bill a client for a meal with someone.

A Would I request the authority -- just explain that one more time.

Q So you said sometimes you had a meal with somebody like Allison Jones and it would be a purely social meal where she would pick up the tab. How did you decide for some meals that you were going to request the authority to bill that

meal to a client?

A : I don't know that there was -- there was never a -- there wasn't something set in stone. There was no Greenberg policy as to how you make a decision, one decision or another one what is -- for me, a lot of my decisions as to whether this could be billed or not was based on the fact that -- how it was billed, because again, it goes back to -- we were told that we weren't to spend our money making -- doing our job, and this was, according to Jack, doing our job.

It depended on the event or what was going on, and if this is a bar tab for drinks and food at Signatures with a lot of people, then that's definitely something that I split up to clients. And most of the time there was a client manager there and me as a -- someone who didn't have kids or kind of the low guy on the totem pole, I was always the last one to leave the party, I was tasked to -- you know, either pick it up or that's -- so that's how it was decided.

It wasn't necessarily -- there was no form of -- well, gosh, this fits this and I'm going to put there, or you know, I got to ask Kevin if I can do this because this was talked about. It really depended on the event and who was there and, you know, who from our office was there, and there's no generalization there about how we did things.



Q Okay. What I'm hearing from you is that in lots of circumstances you were at an event where client managers were and they instructed you to bill the event to a specific client. Is that what you said?

A Afterwards they would say, "bill this to -- yes.

Q Were there instances where you instigated a request to bill something to a specific client?

A There were instances where I -- again, I would go ask client managers. You know, this event last night, who do I bill this to? You know, this event that you left early, where does this go, this is not -- again, I didn't have the authority to make that decision on my own. Maybe a small event I would say -- I would still go and ask them where this should -- you know, "I had \$20 drinks last night, where should that go?"

But I always -- you know, that's -- they reviewed the bills. I wanted to make sure that I was -- that I had permission for those things.

Q How did you decide which person to ask for something like a small bill where they hadn't been involved previously?

A It would be the client manager. You know, I go to a client manager, and that's -- you know, this is -- again, there's no set process in how I would decide.

Q What I'm asking about is which client manager, like how would you know which client it was supposed to be for if it was just a meal with Allison Jones?

A Well, that's -- without -- again, there are going to be -- in my mind there would be some kind of -- something at a meal would drive me to talk to -- whether it be Todd or Kevin or Duane or whoever. Say, if I'm eating with Ways and Means staff and I picked up -- the President's tax bill is going to move in the next six months, you know, kind of the time table, that's relevant to probably four different clients who are doing tax issues, just that -- so I would go ask those client managers if this is something that is relevant and could be on their bill.

I need some water.

Mr. McCool. Actually, we're just about at an hour. Do you want to take a break now?

Ms. Sachsman. Sure. Let him finish his --

The Witness. That would be something that -- that's kind of -- I would go to client managers based on that. I mean that's --

Ms. Sachsman. All right. Do you want to take five minutes? Is that good?

[Recess.]

BY MR. CASTOR:

Q Mr. Wilson, what was Allison Jones's position at the White House?

A I believe Allison was administrative assistant in the leg affairs office.

Q Who did she report to?

A She reported to Zeo Jackley\* and then of course to Nick Calio.

Q How long was she at the White House?

A Three years, I believe.

Q Approximate dates were what?

A From the beginning of the administration up until -- I'm not sure. I guess she took her new job about -- it was right before the -- I guess about a year before the 2004 election, so November-ish of '03.

Q How frequently did you go to lunch with Ms. Jones?

A Socially or -- I mean Allison and I, we went to lunch a lot. We worked about a block away from each other and we would meet at Cosi or Au Bon Pain a lot, regular basis, when she could get away.

Q Approximately how many times a month did you have lunch with Ms. Jones?

A It's hard to say. You know, I really -- it's tough for me to put a number on that, but you know.

Q Is this a couple times a week or a couple times a

month?

A More than a couple times a month, less than a couple times a week.

Q How did you decide where you were going to go to eat lunch?

A Whatever was close, usually.

Q How did you decide who paid for lunch?

A No decision-making process, just I'll pick up the tab, you get it next time type of relationship.

Q Did she pick up the tab for lunch sometimes?

A She has, absolutely.

Q Did she pay for your lunch sometimes?

A Yes.

Q Did you also go to dinner with Ms. Jones?

A Sure.

Q Did these dinners get reimbursed by the firm and in turn a client sometimes?

A If Ms. Jones was at a dinner with a lot of other people then, you know, possibly. But without -- it's hard for me to say without, again, looking at specific instances.

Q Did you seek reimbursement for every time you went to lunch with Ms. Jones?

A No.

Q How would you determine whether you were to seek

reimbursement?

A Again, it would be -- I would have to go back and look at some records about how, you know, where it went. But many times if there was reimbursement for a lunch it would be with a large group of people. It wouldn't be me taking Allison to lunch every day to -- you know, I would not reimburse that.

Q So more times than not, is it fair to say, you did not seek reimbursement from Greenberg and in turn a client?

A Right, right.

Q Is it fair to say that you split who picks up the tab roughly equally?

A Probably not equally, but there was a -- it was close over the period of years. Again, that's hard to say too.

Q What types of matters would you talk about if it ultimately, if you ultimately made the decision to seek reimbursement for it?

A Again, in my job there was a lot of collection of information, and you know, a lot of what I could find from my friends, many of whom were fairly low level, could be found in Congress Daily, CQ, but it is -- a lunch with them helps me do my job easier, without having to sit down and go to Congress Daily or CQ.

I'm finding out a general -- the priorities of the next -- say, between -- leading up to the next recess what am I -- what's going to happen in Congress? You know, you can find that out through some research, but I can find -- those are the kinds of things that Allison and generally my friends could -- that we would talk about. That's the kind of information that I could get.

Q There certainly was some client benefit for you speaking with Ms. Jones and learning about what's going on in the White House legislative affairs department, right?

A That would be -- you know, you'd have to -- there is a definite -- there is a client benefit of knowing this information, absolutely. I mean that's -- knowing the schedule of the -- of what's happening in the Senate or when is the tax bill moving, you know, that's -- that's a definite client benefit if that client had an interest in that bill.

Q How is the White House office of legislative affairs divided up? You said that the person that Allison Jones reported to -- what was that person responsible for?

A The Senate.

Q The committee has obtained the firm's billing records, and as you probably recollect, the names of the specific White House staffers are almost never named. When you bill a meal, not you but when one of the Greenberg

professionals would bill a meal, I'll represent to you it was often described as White House policy staff or White House legislative affairs staff or White House office of political affairs staff.

Were you ever responsible for preparing the narratives on the client bills?

A Yes, and that is a -- the narrative is something that was -- that was the practice we were told to -- that was what was prescribed to us as how you would define your time.

Q So a meal, if you went out to lunch with your friend Ms. Jones, to a client they don't know whether that's a meal with Mr. Calio or whether it's with a lower level staff person; is that correct?

A That would be correct, unless it was named in the narrative there would be no way of knowing.

Q We've also -- we are also -- the committee is in receipt of a lot of the receipts used to seek reimbursement and, you know, going back to these meals that occurred in 2002, 2003, 2001, there's no -- there's often no way to tell who the Greenberg professionals were eating with or how many individuals were involved. You know, if a receipt for a couple hundred dollars, it's hard to know whether that was two people eating very well or whether that was 20 people having one drink or some of them no drinks.

Did anyone ever provide you with instructions about how to prepare these narratives in terms of discussing that? Clearly there was a client benefit if, you know, four or five White House officials are involved as compared to just one White House official, but yet on the bill it shows up just as staff.

A Right.

Q Did you ever get any direction about how to prepare those narratives?

A There was -- there's direction as far as the actual billing hours. There was never direction on expenses. And the reason that the billing hours -- for those of us who did a lot of the same stuff over and over and over again, you know, you have to make sure that the client knows that there's -- you know, that there's a lot of work involved in that.

So the direction in the billing side of things was how you show what you're doing in a day, but there was direction there. But again, there was no direction in how you do your expenses. And a lot of times, you know, if you're going back and recreating things it might be tough now to even look at that and figure things out, so I agree with you on what you were saying there.

Q Did anyone ever tell you that listing a meal with



Allison Jones doesn't sound as good as listing a meal with White House legislative staff?

A Nobody ever told me that, but you're of course -- you know, that is something that's obvious.

Q So it looked better if you just said White House staff rather than a specific person?

A Well, if -- or if you had lunch with a lot of different people then that's definitely a much cleaner way to put it as well than semicolons and commas separating five different people.

Q Were there different instructions that you were aware of for different clients? For example, was there different types of rules for billing the Choctaw versus the Saginaw Chipiwa tribe as one example?

A Not that I recall, no.

Q Did you ever get a reimbursement request denied?

A No, not that I recall.

Q Who would make the decision about which client manager you would ask for the reimbursement? Let's say you go to lunch with your friend, Ms. Jones. You could be talking about a number of general White House legislative affairs matters. That could apply to all the clients, certainly.

A Sure.

Q How would you determine which client manager to ask for reimbursement?

A I would go to those client managers and ask. But you know, without -- there would be some tie. You know, there would be some billing record tie that would help kind of determine where that would go.

Q For the Dubliner event, Shawn Vasell's party, do you have any recollection about which client was billed for that?

A I don't recall, but I do know that when we were talking about it earlier I think three clients were listed. I can't remember what -- Choctaw -- I can't remember.

Q So sometimes it would get racked up?

A Sure, yes. And that's an event with a client manager present.

Q Do you know if any other client managers or Greenberg professionals that you reported into ever just billed it to the firm administrative account?

A We -- that was an available option and we were told that these are business expenses. They shouldn't go to administrative or business development. But I know that in the past, that I have done administrative and business development.

Q Did you ever do administrative or business

development with an Allison Jones-related meal, ever?

A I don't recall, but that could be possible.

Q Do you have any recollection of any other White House officials that you had meals or drinks with that you ultimately sought reimbursement for?

A I don't recall. I mean again, there could be, but I don't remember a specific.

Q Did you ever seek reimbursement for a meal with Mary Beth Farr?

A It's possible. Mary Beth, much like Allison, is a longtime friend of mine and former Coverdell staffer. We're great friends.

Q If a meal or drink that shared with someone on the White House staff was purely social in nature did you ever seek reimbursement for that?

A Again, it's the -- well, the culture of the firm or Jack's -- we were told to be out and be seen, and I never sought reimbursement for something that was purely social, but the nature of our job is to be out and build relationships and that's -- but no, I never sought reimbursement for something purely social.

Q You said the client manager for the Choctaw was Kevin, Kevin Ring?

A Shawn originally and then Kevin when Shawn left.

Q How come it wasn't Jack?

A I don't know. I guess these were all Jack's clients and, you know, he needed somebody to manage the day to day, but I'm not sure.

Q In February '02, we looked at a lunch at the Oval Room. It was Exhibit No. 3, for \$152.29. Now that you've had a chance to think about it a little bit do you have any more specific recollections you can offer about that lunch, about who was there, how many people were there?

A No, I don't remember that lunch at all.

Q How many times have you been to the Oval Room?

A More times than I can count, many times.

Q More than 20 times?

A Easily 20 times.

Q More than 50 times?

A No.

Q So \$152 bill from the Oval Room, how many people do you think that probably was, your best estimate?

A That's hard to say. I really -- not sure.

Q So is it fair to say if you sought reimbursement for a meal or some drinks with someone on the White House staff that sometimes you'd ask permission to take the person out before the meal or the drink sometimes?

A Right, yes.

Q And then sometimes you would seek reimbursement, permission for reimbursement after the fact?

A That's happened.

Q Do you ever recall being denied permission to seek reimbursement?

A I don't recall.

Q So any time you asked for reimbursement, to the best of your recollection, it was reimbursed?

A As far as I can remember, but I -- I'm not sure.

Q Earlier you were asked to list the individuals in the White House that you had contacts with and you said that you didn't want to name anyone because you didn't want to -- if you didn't have a client related reason, you didn't think it was the right place to put that person out there.

And I will represent to you that the deposition transcripts from today may, in fact, be made public on the committee's website. And there is, as you know, an active interest in all things Abramoff, whether it's with the blogs or in the newspaper reports. So I would advise you of that, and so if you don't have a specific recollection of something, if you speculate about certain matters you ought to just consider that it does have -- there is a public component to this.

So with that being said, are there any other individuals

at the White House that you can specifically remember doing client business with on behalf of the firm at the White House, other than Ms. Jones?

A You know, it's -- that would be something I'd have to sit and think on for a little while, but I -- because I do have a lot of friends over there who I was in social contact with a good bit of time.

Q Fair enough.

The report that the committee prepared in relation to Mr. Abramoff's contacts with the White House and the meals and the drinks billed, Mr. Abramoff's Greenberg associates billed about \$24,000 worth of meals and drinks for contacts with White House officials. Some Greenberg professionals show up more frequently than others on the client bills.

For example, Shawn Vasell appears almost -- a great deal more frequently than some of the other Greenberg professionals. Do you know any reason why that would be the case?

A I don't. You know, I didn't see Shawn's bills and I didn't know what Sean was doing, so I wouldn't want to speculate into why he was there more often.

Q Is it fair to say that Boulanger, Ring and Vasell were Jack's top three lieutenants, for lack of a better word?

A Again, that would be me -- that would just be my

opinion of kind of the situation there, so I don't know that -- they were client managers, so they of course had a lot more responsibility and direct contact.

Q Was there a pattern of practice at Greenberg for -- you describe yourself as a paralegal. Was there a pattern of practice of having the paralegal pick up the meals and drink tabs?

A You know, it was more along the lines of who could be there, who's there until the end and who is -- you know, I'm -- when you're out socially, you're not a paralegal anymore, you're the low man on the totem pole sometimes. But again, I didn't have a -- for part of the time didn't have a wife, later on of course didn't have a child, so my social life was a little more flexible than some of the other guys, so a lot easier for me to stick around and be there until the end.

Q Do you have any recollection of Mr. Boulanger or Mr. Ring, Mr. Vasell, Mr. Abramoff taking you with them on a client lunch?

A Yes. I mean I know that it happened. I can't give you a specific instance, but I've had client lunches with them in the past.

Q Was it a common occurrence for them to want to bring a junior person on a client meal, whether it be lunch

or dinner?

A : If there's some way that I could add to a conversation, of course, but it's -- you know, if -- a lot of times if you're talking to someone from the south it's good to have somebody from the south there. You know, that's -- we had several southern clients. That's -- if there's a way to fit it in.

Q Do you ever call a meal with just Mr. Boulanger and clients, just you, Mr. Boulanger and clients?

A I don't recall one right now, no.

Q Do you think it may have happened?

A I don't recall. I mean I really just don't remember sitting down with just me, Todd and clients.

Q How about Mr. Ring, you and clients?

A I don't remember a specific instance, no.

Q How about you, Jack and clients?

A No, with possible clients but not with clients.

Q How many meals have you had with Jack?

A I wouldn't -- I don't know.

Q More than five, just you and Jack?

A Just me and Jack not more than five, no.

Q How about you and Mr. Ring?

A Just the two of us? Probably not more than five.

Q How about you and Mr. Boulanger?



A More, that's hard to say because Todd, again, is closer on a social level.

Q Do you know enough about Mr. Boulanger's practices to know whether it would be his practice to pick up the tab if he was out with clients or whether it would be his practice to have a more junior official with the firm pick up the tab?

A If it were Todd and clients he would pick up the tab.

Q And he would bill it?

A I'm sure he would.

Q How about with Mr. Ring?

A I don't remember off the top of my head if we had -- I can't recall a lunch, but you know, Kevin would, I'm sure, pick up that tab.

Q There's a distinction between maybe the Dubliner event where you're having drinks, could go on for a period of time, and a specific meal.

A Right.

Q You said sometimes you got stuck with the bill at the Dubliner event or an event like the Dubliner event. Would you ever get stuck with the bill at a specific meal where you were with a more senior Greenberg professional?

A I don't recall. I mean again, it could happen, but

I don't recall an instance.

Q Is it fair to say that you would much prefer another Greenberg person, if they were senior to you, to pick up the tab and to process the paperwork and seek the permission to bill the client?

A Yes.

Q Did you find yourself -- do you ever remember specific times when you were disappointed that you had to pick up the tab for a particular meal or drink and therefore seek the permission to bill the client and seek reimbursement and carry the cost on your credit card?

A You know, that's -- I just feel like that's hard to -- I mean I can't remember a time to fit that hypothetical, no.

Q So is it fair to say then that it was not a pattern or practice at Greenberg to have the junior person pick up the tab for a specific meal?

A Well, if you're getting into a pattern of practice then I don't know that -- I think --

Q Was it ordinary or customary to stick the junior guy with the bill?

A It has happened, but I can't say that -- how many times or reasons. That's -- I mean that really is -- it's tough to go back and think six years ago about what was going

on at the time.

Q But it wasn't the department's practice or Jack's team's practice, was it?

Mr. McCool. Excuse me. I think if you can point to a specific instance he might be able to answer your question, but I think you're just asking the same question over and over again, really.

Mr. Castor. Well, I can't point to specific instances because these meals or drinks, it's hard to know who was there, whether it was one person, whether it was four people, so I'm talking about -- practice.

Mr. McCool. No, I'm looking at -- I read the report, and you know, you can look at a dinner at Signatures that's \$1,000. You can ask him whether, as a junior man on the totem pole, he's putting together \$1,000 dinner at Signatures or that's something that he's directed to pick up the tab. And I think that's a more specific question that he may be able to provide you with information, as opposed to just, you know, trying to speculate as to what may have been customary.

BY MR. CASTOR:

Q So you weren't aware of any pattern or practice at Greenberg in Jack's department of sticking the junior guy with the bill for a meal when there were just two or three Greenberg professionals there, right?

A Again, it goes back to -- you know, it would be what's going on at the time, who's there and who can -- who's staying out the latest or who's --

Q I'm talking about not a drink tab.

A Well, then if there's a meal in question, then I'll see if I can deal with it. But you know, maybe -- I just don't want to get into hypotheticals because I could fill in blanks that aren't there.

Mr. Castor. We're done. Thanks.

BY MS. SACHSMAN:

Q Okay. Let me ask you a couple questions about Signatures. I assume you went to Signatures restaurant?

A I know of the place.

Q When you went to Signatures did you pay for their meal in a normal fashion or was there some sort of a comp list?

A I paid for my meal in a normal fashion.

Q Do you know if Karl Rove ever ate at Signatures?

A I don't.

Q How about other White House officials who ate at Signatures?

A You know, I don't recall hearing of anybody other than the people I might be with.

Q Do you remember what people you might have eaten at

Signatures with?

A Well, then you -- if we get into some specific meals I might be able to recall some, but I do know that I've been to Signatures before and there have been a lot of people there. And if you're talking about a large bar tab there could be a lot of people and I'm sure that there are instances.

Q When White House officials came to Signatures did they pay their own tab?

A I wouldn't know.

Q Did Signatures provide valet parking free of charge?

A They did.

Q And do you know whether they charge people to use their rooms for receptions?

A I don't know that.

Q Do you know whether they had a practice or a policy of covering the cost of gratuities for certain types of events or for patrons?

A I don't know that.

Q Or a practice of comping the cost of some patrons?

A I wouldn't know that then. I read the report.

Q Do you know if Matt Cook ever ate at Signatures?

A He could have. I don't know for a fact.

Q Did you ever have a meal with Matt Cook?

A I don't recall eating with Matt, no.

Q Do you know Matt Cook?

A I do know Matt Cook, yes.

Q How do you know Matt Cook?

A Through Shawn.

Q On April 17, 2003 you billed four clients for a total of more than \$850 for what's called 'dinner at Signatures with House leadership and White House legislative staff.' That same day you sent an email to Shawn Vasell, and I'll show you that email.

Mr. McCool. What's the date on this?

Ms. Sachsman. The date is April 17, 2003.

Mr. McCool. Thank you.

Ms. Sachsman. Let's mark this Exhibit no. 4.

[Wilson Exhibit No. 4 was marked for  
identification.]

The Witness. Okay.

BY MS. SACHSMAN:

Q In the email we've now marked Exhibit No. 4, which is 3503 there is an email from you to Shawn Vasell. The subject line is Join us at Sigs, and you emailed him, "Matt Cook is here with us. Where are you now?"

That's an email from the same day that you billed the

\$850 for dinner at Signatures with House leadership and White House legislative staff. Does that refresh your memory as to what happened during that dinner?

A No, I mean this would be -- I think this -- Matt is Shawn's friend. I emailed him and asked him if he wanted to come join us because Matt is there. I mean do you have the record for the meal itself?

Q The billing record, sure.

A Yes.

Ms. Sachsman. We'll mark this as Exhibit No. 5. And just to let you know because this was bill that went to four separate clients it's going to be four different billing records. Let me make this all one -- Exhibit No. 5. I'll give you a paperclip for it.

[Wilson Exhibit No. 5 was marked for  
identification.]

The Witness. Thank you. I mean something this large --

Mr. McCool. Hold on. Wait for the questions.

He's ready.

BY MS. SACHSMAN:

Q Do you recall whether Matt Cook was one of the people from the White House who joined you for dinner?

A I really don't recall who was there. This shows that he was at least at Signatures, but I really don't

remember this specific event. I mean this -- it's apparent that there were House staff there as well, something along the lines -- this is a -- this could be a bar tab. This could be -- I mean there are any number of things that could happen. And just because Matt is there this email does not necessarily mean that he was having dinner with us or having drinks. So no, I don't recall exactly the context of this.

Q Do you remember anything about this context?

A No, I don't.

Q Does this refresh your recollection as to whether you had a meal with Matt Cook at Signatures?

A No, I mean I don't think that -- this doesn't say that we're eating, and it doesn't say that we're -- he's at Signatures. I mean I'm letting his friend Sean know that he's at Signatures. I don't remember who was at this or what we were doing or whether it's a meal or whether it's drinks or whether it's hors d'oeuvres or both or all and who else was there.

Q Who it be fair to say that whoever did join you at the dinner at Signatures that was the House leadership and White House legislative staff, whoever that was had their meal paid for by you?

A Yes.

Q And did any of those people request reimbursement



or attempt to reimburse you for that meal?

A Without knowing what the event was, you know, if this is a bar tab then they could have been coming and going and it's almost impossible to know who pays or who doesn't. If this is a sit down dinner then, you know, I would have a little better recollection, but I really don't remember the context of this at all.

Q Did anyone from the White House ever attempt to give you money to pay you back for a meal that you had paid for and billed to a client?

A I don't recall. It could have happened, but I don't remember an instance.

Q You weren't the only person who billed clients for meals and drinks with White House officials. All the billing records we've reviewed show that the Abramoff team as a whole billed meals and drinks on 156 occasions between January 2001 and March 2004, which is the equivalent of about once a week.

Do you know whether Mr. Abramoff or any of your other colleagues were paying for meals and drinks with White House officials?

A I don't know that for a fact.

Q Do you know whether it was a general practice to do so?

A It was a general practice as a lobbyist to go to

lunches and dinners, but I don't -- without knowing their billing records or habits I don't want to speculate.

Q As a general practice as a lobbyist when you went to lunches and dinners did you pay or did everyone split up the tab?

A That would depend on the person who you're going to lunch with or dinner. But again, I don't want to speculate on somebody else.

Q Was there an occasion when you had a meal with somebody from the White House where you billed your meal to clients but the person from the White House paid for their own meal?

A That's possible. I can't remember right off, but I'm sure that that's happened before.

Q Was that the general practice or was the general practice for you to bill the entire meal to the client?

A It's tough to get into general practice, but for me it's -- it would be more likely that I -- again, that comes back to who you're having a meal with or who you're having lunch with because there is the possibility that they could offer, so that -- you know, I think that I would at least offer to pick up the tab. Whether or not it happened it would be tough to remember.

Q Did anyone of the White House officials that you

met for meals and drinks ever express concern to you that accepting a meal or a drink from you could pose a problem with compliance with rules from accepting gifts from lobbyists?

A I can't remember a conversation such as that.

Q I want to ask you some questions about tickets to concerts and sporting events that Mr. Abramoff purchased each year. When worked for Mr. Abramoff what tickets did he hold?

A He had Camden Yards, Orioles, MCI Center. He also had the FedEx Field.

Q Is that all?

A Yes.

Q Can you describe the process he used to allocate the tickets?

A Really no specific process. You know, it was -- Jack wanted to make sure that the box was filled. I mean that was his -- he wanted to make sure that people attended games. So there was no -- other than emailing -- if I wanted tickets to U2 I would email his secretary, but Jack approved everybody who went to the box and, you know, there wasn't some kind of form you filled out.

Q How are the tickets actually physically distributed?

A That depends. It could be by courier. Somebody

could meet you at a game. I mean it really would depend on the event.

Q Do you know who paid for the tickets? Did clients pay for them or Mr. Abramoff himself?

A I did not know then the structure of how it was paid for.

Q If you used tickets were you expected to pay for your seats?

A No.

Q Did you ever pay for your own seat?

A If I went to sporting events -- you know, I've paid for seats at Camden Yards, I mean that's hard to --

Q I mean seats in these particular boxes.

A No.

Q If you provided tickets to others did they ever offer to reimburse you?

A Not that I recall.

Q Did you know how the tickets were paid for?

A How the tickets were paid for?

Q Oh, sorry. Do you now know how the tickets were paid for?

A I read the -- I mean I've read the report. I do know that there was some kind of corporation, Sports Suites or whatever. I think Susan Schmidt had an article on it.

Q To your knowledge did anyone ever reimburse you or Mr. Abramoff for the cost of tickets?

A I don't recall somebody ever doing that.

Q Did anyone ever seek to reimburse you for anything, for tickets?

A I don't remember.

Q You mentioned a U2 concert?

A Mm-hmm.

Q Did you go to U2?

A I did.

Q Do you remember where you sat?

A I was in the box.

Q Ken Mehlman's name was also on the list of people who went to the U2 concert. Do you remember if he went to it?

A I don't.

Q How many people were there?

A I really -- I don't know. I mean I was there to see U2. I was there to watch the concert, so --

Q How large is the box?

A More than 10. I'm not sure how many seats are in the box.

Q Have you met Ken Mehlman before?

A I don't think so.

Q Would you recognize him if you saw him?

A He's a pretty recognizable figure, yes.

Q But you don't recall if you saw him there?

A I don't recall, no.

Ms. Sachsman. I'm going to show you an email. Let's mark this Exhibit No. 6.

[Wilson Exhibit No. 6 was marked for identification.]

Ms. Sachsman. This email is GTG-R 2426.

BY MS. SACHSMAN:

Q In this email exchange Julie Plocki emailed Jack Abramoff and indicated to him that you had asked for the box for the Orioles game on May 26 for a thank you get together with administrative staff that has been helpful to date, and there is a list of names. Do you recall asking to see that game?

A I don't recall asking to see the game. No, I don't.

Q Do you recall going to an Orioles game in 2001 with this group of people?

A You know, I went to Orioles games but I'm not -- I don't remember this group of people being together, no.

Q Did you ever organize a group to go to another kind of game or event?

A Yes. I mean like I said Jack had the expectation that the box would be filled, and whether or not -- back up.

He had the expectation that the box would be filled and Jack liked to know that -- he liked titles to be there, not necessarily people. He wanted to know that there were important people in the box.

And so that's -- you send a list of people to Jack. Whether or not they all go, it's hard to say. You know, whether or not I end up going -- I may not go myself. So it's hard to place how many of these people went or if any of them actually went, but that's -- you know.

Q This was a game that was originally scheduled for May 26 and was rained out and the people ended up going in July. Does that help refresh your recollection?

A Just from what I've seen in the report. I don't remember the game specifically.

Q Does that refresh your recollection as to whether you went to the game with this group of people?

A Sure. I believe I did, but I don't remember this particular game. That's what I'm saying.

Q Do you remember whether any of these people offered to reimburse you for the cost of the tickets to this game?

A Well, I'm not sure how many of these people actually went to the game, but I don't remember getting a

reimbursement request.

Q Do you remember getting a reimbursement request for any tickets that you provided to administration officials?

A No.

Q In this email you mention that this group of people, the administration staff, has been helpful to date. Was it a common practice of the firm to provide tickets to administrative officials and others who had been helpful?

A It's not a common practice for me and I don't want to speculate on other people. But this is wording from Jack's secretary to Jack so I'm not sure exactly what I said or what my email to her was in advance or if I sent her one, so I'm not sure exactly what that means, but I don't -- I would never provide tickets as a thank you for something.

Q Looking at that list of people can you tell us what they might have done that would have been helpful?

A What I can tell you about this list of people is that they all worked with me in Senator Coverdell's office. These are -- I don't know -- other than that I can't say anything else. I mean that's --

Mr. McCool. Can we go off the record? This is about an hour. It's probably a good time to take a break.

[Recess.]

BY MS. SACHSMAN:



Q I want to discuss with you -- this was a list of former Coverdell staff, you said. I want to discuss with you some other former staff who were in the White House and whether you had meals with those people or business contacts with those people that entailed meals or tickets.

Did you have any meals with Mary Beth Farr?

A Yes.

Q Did you pay for those meals?

A You know, and that goes back to -- Mary Beth, much like Allison is -- she started two weeks before I did in Senator Coverdell's office. She is probably one of my best friends in D.C. She's friends with my wife from high school, even though we met separately.

My relationship with her was such that, sure, I had lunches with her, but many of them are social and many of them are -- we probably split lunches. She was -- Mary Beth is the kind of person -- she was invited to my baptism of my son, you know. I mean she is just a great friend. So of course there were lunches with her, and that applies with a lot of these folks on this list. These are just really close friends, but Mary Beth more so than probably anybody else.

Q Did you ever have meals with her that you billed to a client?

A I don't recall a specific instance. I mean

that -- if you had a bill maybe I could look at it, it's possible.

Q What about Krista Bailey? She was the White House gift shop director.

A Krista actually was post my time in Senator Coverdell's office. I don't know Krista so well.

Q Okay. Zeo Jackley\*?

A Yeah, Z was chief of staff for the office and our time didn't overlap a lot but he's -- I know him pretty well.

Q Did you have meals with him that you billed to clients?

A No, not that I recall.

Q How about Lauren Alden?

A Lauren, again, very close friend. I mean it's possible but I don't remember one right off.

Q But it's possible that you had meals with her that you billed to clients?

A It's possible.

Q How about -- is it possible that you had -- are there other former Coverdell staff that are now in the White House that it's possible that you had meals with that you billed to clients?

A That are now in the White House?

Q That were then in the White House.

A I don't know. I mean the list is here I think as far as -- like I said, when the Senator died they took a lot of -- White House took a lot of the Coverdell staff.

Q So there's no one else that you remember?

A I'm sure there are, but I'm not -- I can't -- I mean I'd have to sit down and think and write that out. This is a pretty good list, I think, of everybody who was there.

Q I'm going to ask you about some specific clients and subject matter interests of Jack Abramoff's. First, the Choctaw jail. Did you work on matters relating to the Mississippi band of the Choctaw Indians?

A Yes.

Q And what was your role as part of that team?

A My role as part of the Choctaw team was as it was with most of the clients, you know, information gathering. Every morning -- my job is to understand their issues, know what is important and to make sure that I'm -- that everybody is up to date and up to speed. If there is a -- maybe there is an issue area where I might be called to do additional research or additional work, but that's -- generally for all clients that's what I did.

Q Do you recall efforts by the Abramoff team to secure a \$60 million grant for jail construction for the Choctaw in 2001 and 2002?

A This was -- I do recall it. It was the top issue for that client, so it would be my job to be up to speed on that.

Q When did you first become aware of it?

A I don't recall.

Q Do you recall whether they received it?

A Yes, they did.

Q Do you recall what happened in the time period leading up to them receiving it, as in what caused them to receive the grant?

A You know, I don't know. That would be speculating as to what the Justice Department believed or -- I don't know.

Q Did anyone ever tell you how that decision came to be made or discuss it in front of you?

A There was no -- nothing was ever discussed in front of me as far as how the Justice Department came to their final decision. In reading the materials -- you know, this was a big win for the firm, for a client. And while I didn't have -- I didn't know anybody at Justice Department, I wasn't involved in kind of the process of the actual lobbying, but we of course did know that it was a big win. And I think the client -- the folks who really worked on it cheered it, so I know I heard some office scuttle about it, but I don't recall

any specific conversations.

Q What was the office scuttle about on the issue?

A That this is a big win for the client.

Q Do you know whether anyone in the office reached out to the White House to try and move -- to lobby to move this project forward?

A Do I know now or did I know then? Then I probably had very little idea of the actual lobby strategy and what's going on. Now, of course, I know a lot more because I've -- you know, it's hard not to read this. Again, that's in your report.

Q Do you remember when you started working on the Choctaw jail issue?

A I don't -- no, I really don't have a time frame for that. It had to be early in the time that we were at Greenberg, but I'm not positive.

Q In November of 2001 Tony Rudy had a meeting with Ken Mehlman. Do you recall that that occurred?

A I don't recall it, no.

Q According to an email from Mr. Rudy, Mr. Mehlman promised to begin a campaign immediately to get Justice to release some of the fiscal year 2001 money. Were you aware of any campaign on the part of Mr. Mehlman or any other White House official?

A No.

Q Do you know of any steps that Mr. Mehlman took to assist the Choctaw in securing funds for a jail?

A I don't.

Q Similarly there was a discussion of another round of donations to turn the screws even further. Do you have any knowledge regarding whether Choctaw contributions were discussed with anyone from the White House?

A I don't -- no, I don't know that those were discussed.

Q Do you have any knowledge whether Tony Rudy or Jack Abramoff or any of your other colleagues at Greenberg actually gave a political contribution check to Ken Mehlman at the White House?

A I don't know.

Q Were you aware of any sort of the specific people at Justice who were dealing with the Choctaw jail issue?

A No.

Q Were you aware that there was one particular person that people were -- that the lobbyists at Greenberg were unhappy with?

A No.

Ms. Sachsman. I want to show you an email chain. It's GTG-R 1253. We'll mark that as Exhibit No. 7.

[Wilson Exhibit No. 7 was marked for  
identification.]

BY MS. SACHSMAN:

Q This appears to be an email chain discussing  
tickets to the Dave Matthews Band, is that correct?

A Yes.

Q And you -- an email exchange with Kevin Ring, and  
Kevin Ring refers to the fact that he has a suite filling up  
with DOJ staffers that just got our client \$60 million and he  
invites you to come.

Did you go to the Dave Matthews Band show?

A I don't -- I was and am still a big Dave Matthews  
fan. I'm sure I went to the concert. I don't know that I  
was in the box. I don't -- actually I don't recall going to  
the concert. I can't see that Dave Matthews would come and I  
didn't go though, so.

Q They are from Georgia.

A Actually, they're from Virginia, but I saw them in  
Georgia a lot at fraternity parties a long time ago.

Q You refer to the DOJ staffers and the fact that  
they should get anything they want for the rest of the time  
that they're in office, opening day tickets, Skins versus  
Giants, et cetera.

A Et cetera.

Mr. McCool. Thank you, Susanne, appreciate it. I'm serious. Thanks.

BY MS. SACHSMAN:

Q What were you talking about, and by that I mean what had they done that you were very happy about?

A Well, the context of this email -- you know, like I said, I was a huge Dave Matthews fan. Events like this -- these are big, big events. I didn't get to go to those so much because the box filled up, and I -- this was me and my wife wanting to go to a concert.

So if you look at the kind of -- in the full string of the email my first response to him is basically, "Kevin, you got everything, I'd really like to go to this," pretty much.

And the second response I'm not so proud of. It's not something that -- it's not me and it's definitely not something I would ever say today, and it's definitely not the way I was raised, but it was a smart aleck comment back to Kevin wanting to -- kind of pointing out the fact that I'd really like to go to this and a bad attempt at sarcasm at best.

Q It appears. I understand that. I'm not concerned about the second part of the email. What I'm interested in is what the DOJ staffer has done that made you think that they should get anything that they want for the rest of the



time that they're in office.

A Well, Kevin says something there and it was again a direct response to his comment, but you know, again, it's bad sarcasm. And did I -- would I ever think that somebody should be rewarded as a thank you? No, I really -- I would never give tickets or dinner or anything as a thank you, so this is -- this is just me being smart and a bad attempt at locker room humor.

Q Was it your understanding that Mr. Ring credited the DOJ staffers with securing the grant for the Choctaw?

A You know, I think there's -- you'd have to ask Kevin that, what he -- who he thought did it. I don't know that I would fill that in.

Q My question is, from your conversations with him what was your understanding.

A I don't -- other than this email I don't know that I've ever had a conversation with Kevin where he gave his reasoning for why the award was positive other than -- this was, as I remember it, a deal where congressional intent was one thing and what DOJ said was another thing and so I've -- that is as far as I, as my knowledge base of why the award came down the way it did was that it was the right thing to do.

Q Okay. Were you aware of efforts by the Abramoff

team on behalf of the Saginaw Chipiwa in 2002 to secure \$3 million for a school construction program in the Department of Interior appropriations bill?

A Again, I do know that project because it was a big deal for the client.

Q Was your role in that the same as your role in doing research for other --

A It was an appropriations project, so not necessarily, no.

Q What was your role?

A Well, I don't recall what I would -- I know that issue. It's generally appropriations. I would be putting together approps requests and information and -- but I don't remember -- those could be for any approps issue for any client, so it's not necessarily -- you know, I can't recall what I did for that one.

Q Were you aware of any efforts by the lobbying team to secure assistance from the White House?

A I don't recall, no.

Q Were you aware of any efforts by the White House, by White House officials to contact Appropriations Committee staff on this issue?

A I'm not directly aware but that would be -- you know, it's an approps issue.

Q Are you indirectly aware? You said you're not directly aware; are you aware in some other way?

A I don't recall an instance where there was contact, but as an approps issue that would be -- generally you would talk to the appropriations committee.

Q I'm talking about White House officials not the lobbying officials.

A Oh, I thought you said appropriations.

Q Are you aware of any efforts by White House officials to contact the Appropriations Committee staff?

A No, no, no, no. I am not. I apologize for that. I got lost in your question there, but my fault.

Q No problem. How about on the Jena gaming compact? Do you have any knowledge of the Abramoff team's efforts in opposition to a gaming compact for the Jena tribe of the Choctaw Indians that was under consideration by the Department of Interior in 2002 and 2003?

A Again, that was the main issue for the Coushatta tribe, so I -- yes, I know that issue.

Q What was your role in that issue?

A I did not have a direct role in that issue other than, again, maintaining information. I don't recall anything other than that.

Q What were the primary targets of the team's

lobbying efforts on that issue, the Department of Interior, the White House?

A I don't recall.

Q In 2002 the Department of Interior did not approve the compact. What was your understanding about why the compact was rejected?

A I don't remember. I really --

Q Do you know whether there was any White House involvement in the rejection of the compact?

A I don't know.

Q The following year the compact was approved and Jack Abramoff reached out to Susan Ralston on the issue, asking her to pass on to Karl Rove that Interior was about to approve a gaming compact and land for a tribe that was anathema to his supporters. Do you have any knowledge of him making that request to Susan Ralston?

A I don't.

Q Do you have knowledge of any response that Susan Ralston gave him?

A I don't remember one.

Q Did your work at Greenberg Traurig involve any lobbying effort on behalf of the commonwealth of the Northern Mariana Islands or interests in the islands?

A Again, I know their issues and maintained a lot of

information flow on that.

Q Were you aware of a letter sent to Congress from the Department of Justice in May of 2001 that expressed support for legislation to strengthen immigration enforcement in the CNMI?

A I don't remember it, no.

Q It was a letter that Jack Abramoff was unhappy about because it -- he felt that it didn't -- it was sent out without adequate OMB approval or review. Does that ring a bell?

A I don't remember the letter, but I -- no. I could see him being angry, but I don't remember the letter.

Q Do you have any knowledge of interest by Jack Abramoff in preventing the Department of Justice from releasing a 2001 assessment of terrorism threats in the CNMI?

A No, I don't.

Q Do you have any knowledge regarding Jack Abramoff's interest in the administration replacing Frederick Flack, who is the former U.S. Attorney for Guam?

A No.

Q Were you involved in any of the lobbying efforts on behalf of the Sandia Pueblo's efforts to preserve the Sandia Mountains in New Mexico?

A No, not that I recall.

Q DO you know who Allen Stayman is?

A I know now. You know, I know that I was asked to do research to figure out who he was, but I -- again, my knowledge of Allen Stayman was on a research-based background.

Q And what kind of research did you do about Allen Stayman?

A General background information, which is what I would do for anybody who is -- who came across my desk; articles or --

Q Did you at the time have any knowledge regarding Jack Abramoff's efforts to remove him from his position and he was chief negotiator for the compacts of free association regarding the Marshall Islands and Federated States of Micronesia?

A That's quite a title. I don't know when I found out the interest, so I really can't recall when I knew that. So it's hard for me to say.

Q Mr. Abramoff appeared to take a close interest in the appointment of the head of the Office of Insular Affairs at the Department of Interior, and we looked at two emails earlier. You were asked to research two potential candidates for that position. Were you aware of Mr. Abramoff's efforts in this area?

A Because of the emails.

Q Do you have any memory or any idea of who he supported, who he opposed?

A Which position was that again?

Q The head of the office of insular affairs at the Department of Interior.

A No, I don't remember who was -- I don't recall who was the other side.

Q If in the nominations process -- are you aware of any times when he involved himself in a nominations process?

A It's hard to say. I don't know if his -- my involvement would be along the lines of background and making sure that everybody had all the articles that are relevant on these people, so I wouldn't be able to tell you if he was directly involved in anything, no.

Q Okay. But it sounds like from what you said he sought out background information from you on different people who were being nominated. Is that right?

A Jack would ask -- you know, there were any number of times where Jack asked me for information on different people, whether they be in the government or, you know, businesses or whatever, and I would do what he asked.

Now looking back, I have of course a much better idea of what he was doing. I don't know how much I knew and when I

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knew it basically since we've -- now six years down the road a lot of these blanks have been filled in. I'm not sure whether I knew it at the time or knew it later. It's just hard to say. So I guess my answer was that there are a lot of different people that I was asked to research or to look up. So I'm not sure what his -- what he did on his own with that information.

Q Were there people who you were asked to research or look up that you have later figured out were nominees?

A Well, I mean because of the fact that I've read the reports and there have been numerous articles now, you know, of course there are people that I've figured out were nominees.

Q Who are those people? These would be people you specifically did research on.

A Right. The one that I can think of right now is Mark Zakaris\* which -- it's obvious. I think that was outlined in his court case and also in your report, I believe. I can't remember.

Q If he wanted to promote or to stop, prevent, I guess, someone from being nominated, do you know what he would have done?

A Jack?

Q Yes.



A I'm not -- no, I would not know who he would contact or who Jack called. As a lobbyist, he wouldn't share that with me.

Q Do you know who Angela Williams is?

A No.

Q How about Grover Norquist? Do you know of any knowledge of Jack Abramoff's relationship with Grover Norquist?

A Sure. Jack and Grover -- my background knowledge of their history is that they were College Republicans together, so it was a long, long history.

Q Were you aware that Grover Norquist was setting up meetings at the White House for his group Americans for Tax Reform and that some of Jack Abramoff's clients were attending those events?

A Yes. I do know that ATR did numerous meetings with officials from all over the country and that Jack's clients were invited to those.

Q Do you know how Jack's clients got invited to those events?

A No, I mean I didn't know then, no.

Q Was there ever any discussion in the office about those events or about getting the clients invited to those events?

A It's possible. I don't remember a discussion right off.

Q You said numerous events. How many events were there?

A I have no idea. I just know that it was more than one. I don't know. I don't know.

Q Was it more than 10?

A I really couldn't put a number on it. More than one is about all I could say.

Q Were you aware that Jack Abramoff's clients made contributions to ATR in order to attend the events?

A I'm not sure when I -- that's another bit of knowledge and I'm not sure when I found that out, but -- so I can't say when I was aware of that.

Q I assume from that you can't say how you became aware of that?

A No, that really is something that I can't -- I'm not sure whether that was something I read in the paper or in a report or that I heard in the office or -- you know, that's just back of my mind somewhere.

Q Do you ever remember any discussions in the office about clients making contributions?

A Clients making contributions. To ATR?

Q To ATR.

A No, I don't. I don't remember.

Q How about clients making contributions to anyone?

A Yes, there were discussions about clients making contributions.

Mr. McCool. Do you guys want us to step out for a second, make it easier?

Ms. Sachsman. No.

BY MS. SACHSMAN:

Q Do you remember any discussion about clients making contributions that was related to events or meetings or discussions with people at the White House?

A No. I'm not sure what you meant by that.

Q Well, in this instance it would have been contributions in order to attend an event at the White House.

IN another instance it was making a contribution specifically to somebody who -- and handing the check to somebody at the White House.

A No, I don't recall anything of that sort.

Ms. Sachsman. Okay. Do you guys want to --

Mr. Castor. Are you done for -- unless I inspire you?

Ms. Sachsman. I am done unless you inspire me.

BY MR. CASTOR:

Q Mr. Wilson, going back to Exhibit No. 5, the Signatures event, \$214.44.

A All right.

Q It shows up on a number of different clients' bills, right?

A Yes.

Q The Choctaw, Saginaw Chipiwa, Agua Caliente -- I know you're not responsible for sending the client the bills but do you have any idea how this works? I mean were these clients all billed -- were each of the clients billed for \$214 or did this get split up somehow? Do you have any idea how this works?

A I'm not sure what you mean, Steve. Do you mean the process or --

Q The dinner at Signatures with House leadership and White House legislative affairs for \$214.44, this figure appears on the bill for numerous clients. Do you have any knowledge of whether each of those clients were billed \$214?

A That would be my -- I mean just looking at this, yes, I --

Q So the total bill was \$214 times -- it was like \$800 or something. What was the total bill? Did we know?

Ms. Sachsman. Little over \$800. Can we go off the record for just one minute?

Mr. McCool. Sure.

[Recess.]

BY MR. CASTOR:

Q So they divided the total bill up between a number of particular clients?

A Yes.

Q And do you have any knowledge of how that was specifically done?

A You know, in that particular instance, no. You know, I don't remember exactly how it was done, but you know, calculator and expense report. I mean I really don't know that anything other than that --

Q Well, dinner with House leadership and White House legislative affairs staff could touch on any number of issues, and I'm not saying that you do have specific information with regard to this dinner and how it was billed out, but it seems that there are other clients at the time that didn't get billed for this particular meal, and I was wondering whether you had any specific information about why a specific client was billed and a specific client may not have been billed.

A I don't remember exactly why on this instance. You know, I really don't remember why on this one.

Q Okay. Looking at Exhibit No. 6, Julie Plocki writes Jack Abramoff an email about the box at the Orioles game, and it -- the folks that are in the box are described

as being helpful. Is it fair to say that the term helpful can have a number of different meanings and may, in fact, be an ambiguous term?

Mr. McCool. Steve, I'm sorry. Can you clarify what you mean? What Julie Plocki meant by the word 'helpful' or what one means by the word?

BY MR. CASTOR:

Q Well, Julie Plocki writes, "Pat Wilson asked for the box on Saturday, May 26 for a thank you get together for the administration staff that has been helpful to date." So granted, there is some hearsay going on here, which we don't like, but I'm just wondering whether or not that term 'helpful' could have had a number of different meanings.

A Of course. It could have had a number of different meetings, and Julie -- again, I'm not sure what I expressed to Julie as my reasoning, but you know, how she saw it, that's what's in this email. And she may have been thinking any number of definitions for helpful; it is very ambiguous.

Q Now how long were you with the Greenberg firm again?

A 2001 through I guess the end of 2005, that's right. No, through the end of 2004, excuse me.

Q And before that, at Preston Gates, you were there for almost a year?

A It was almost -- the beginning of '99 through the end of 2000, so it's about two years.

Q So you were a lobbyist for about five or six years?

A Approximately.

Q And you've been in government service with Governor Purdue, Senator Coverdell, Representative Deal for how many years?

A Well, in my current job -- I left in January of -- or took it in February of 2005 and so I've been there for two-and-a-half years, and it would be probably -- what is it? '96 is when I graduated, so I came to D.C. in September of '96, which would put me with Deal and Coverdell through the end of '98, which is about two years.

Q So you've had a chance to see both sides of the lobbying sense. You've been lobbied certainly, and you've done some lobbying, albeit at what you describe as a paralegal level.

Is it fair to say that sometimes lobbyists among themselves and to their clients do a bit of puffing about their influence that they might have with those that they lobby?

A With those that they -- I mean if you're asking about whether I did it, I would say no. I don't think I've tried to increase me influence in any representations, but as

far as generalization for lobbyists I just -- you know, I'd be hesitant to go down that road.

Q Earlier for example you said Jack Abramoff talked a lot about his friendship with Karl Rove. Do you think he used that as a marketing tool?

A Again, it's kind of my opinion about whether he did or not. That's possible.

Q We talked about some of the lobbying representations that you were involved with at the Greenberg firm, the Choctaw jail; there was the funds for the school in Michigan for the Saginaw Chipiwa tribe. When you're working on those two specific representations or any representation it's hard to know, isn't it whether the efforts of the lobbyists are the specific cause for an end result, isn't that true?

A Again, my opinion is that, you know, you don't know what leads someone to make a decision so it would be hard to make that case.

Q So with regard to the Choctaw jail there were Greenberg folks that were talking to individuals in the Senate, individuals on the White House staff and individuals at the Department of Justice, and at the end of the day the client achieved a favorable result. It's hard to know, isn't it, whether it was specifically the lobbyists that achieved



the result or not?

A Sure. That's -- you know, again, if you're talking about that specific instance you would hope that the congressional intent was followed. And that's what I think a lot of -- if you believe in good government then that's what you would say.

Q Is it fair to say that a lobbyist might overstate or do a little bit of puffing when it comes to the client, brag a little bit about how they were influential in obtaining a specific result?

A You know, it's tough for me to say without being in a room with somebody who I -- I mean I can't recall specifically seeing somebody do that, but of course it could possibly happen.

Mr. Castor. That's it.

Ms. Sachsman. Okay. I think we're going to be done. Thank you very much for coming in. We appreciate it. Let's go off the record.

Mr. McCool. We want to read and sign, thanks.

[Whereupon, the deposition of PADGETT ROBINSON WILSON was concluded at 12:55 p.m.]

I have read the foregoing pages, which are a correct transcript of the answers given by me to the questions therein recorded.

Deponent \_\_\_\_\_

Date \_\_\_\_\_

## CERTIFICATE OF DEPONENT/INTERVIEWEE

I have read the foregoing 86 pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

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PADGETT ROBINSON WILSON

**ERRATA SHEET**  
**FOR DEPOSITION OF PADGETT WILSON**

| <b><u>PAGE</u></b> | <b><u>LINE</u></b> | <b><u>CORRECTION</u></b>   |
|--------------------|--------------------|--|
| 3                  | 15                 | Change “the” after “is” to “a.” Change noted by Committee staff.   |
| 7                  | 24                 | Change “Roubelas” to “Rouvelas.” Change noted by Committee staff.  |
| 10                 | 10                 | Change “Eddy Aueb” to “Eddie Ayoob.” Change noted by Committee staff.  |
| 10                 | 12                 | Change “Allen Slommowitz” to “Alan Slomowitz.” Change noted by Committee staff.  |
| 18                 | 11                 | Change “Lexus-Nexus” to “Lexis-Nexis.” Change noted by Committee staff.  |
| 20                 | 1                  | Change “Lexus” to “Lexis.” Change noted by Committee staff.  |
| 23                 | 24                 | Add a comma between “Choctaw” and “Coushatta.” Change “Saginaw Chipiwa” to “Saginaw Chippewa.” Changes noted by Committee staff. |
| 24                 | 19                 | Remove the punctuation from the end of the sentence and add a period. Change noted by Committee staff.                           |
| 28                 | 13                 | Change “McCool” to “Ausbrook”. Change noted by the witness.  |
| 35                 | 6                  | Change “Zeo Jackley” to “Ziad Ojakli”. Change noted by Committee staff.  |
| 41                 | 14                 | Change “Saginaw Chipiwa” to “Saginaw Chippewa.” Change noted by Committee staff.   |
| 46                 | 20                 | Change “Sean” to “Shawn.” Change noted by Committee staff.   |
| 56                 | 14                 | Change “Sean” to “Shawn.” Change noted by Committee staff.   |
| 59                 | 3                  | Change “from” after “rules” to “about.” Change noted by Committee staff.   |
| 59                 | 8                  | Add “you” after “When.” Change noted by Committee staff.   |
| 66                 | 3, 5               | Change “Krista” to “Christa.” Changes noted by Committee staff.  |

- 66 7 Change "Zeo Jackley" to "Ziad Ojakli." Change noted by Committee staff.
- 67 23 Change "\$60" to "\$16." Change noted by Committee staff.
- 71 9 Change "\$60" to "\$16." Change noted by Committee staff.
- 74 1 Change "Saginaw Chipiwa" to "Saginaw Chippewa." Change noted by Committee staff.
- 77 18 Change "Flack" to "Black." Change noted by Committee staff.
- 78 12-13 Change "and he was" to "as." Change noted by Committee staff.
- 80 17 Change "Zakaris" to "Zachares." Change noted by Committee staff.
- 84 5 Change "Saginaw Chipiwa" to "Saginaw Chippewa." Change noted by Committee staff.
- 87 24 Change "me" to "my." Change noted by Committee staff.
- 88 11 Change "Saginaw Chipiwa" to "Saginaw Chippewa." Change noted by Committee staff.

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**From:** Ring, Kevin (Shld-DC-Gov)  
**Sent:** Thursday, August 23, 2001 8:31 AM  
**To:** Wilson, Padgett (AstDir-DC-Gov)  
**Subject:** FW: OIA

Are you in? I need as much info on this guy ASAP!!!!

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

**From:** Abramoff, Jack (Dir-DC-Gov)  
**Sent:** Thursday, August 23, 2001 9:26 AM  
**To:** 'ringk@gtlaw.com'  
**Subject:** Fw: OIA

Here's the guy. Let's get drilling.  
Jack Abramoff

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

**From:** Susan Ralston - @GWB [REDACTED] <Ralston@rnchq.org>  
**To:** 'abramoffj@gtlaw.com' <abramoffj@gtlaw.com>  
**CC:** 'laner@gtlaw.com' <laner@gtlaw.com>  
**Sent:** Thu Aug 23 09:18:23 2001  
**Subject:** OIA

Clark Dean Horvath  
Counterpart International inc  
Worked for Ford, Carter, and Reagan at AID, SBA and Cost of Living Council

Susan Ralston

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Please send all replies to [REDACTED] <ralston@georgewbush.com>

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**From:** Abramoff, Jack (Dir-DC-Gov)  
**Sent:** Thursday, August 30, 2001 12:48 PM  
**To:** Wilson, Padgett (AstDir-DC-Gov)  
**Subject:** FW: Holland Redfield

Can you do a search on this guy and tell me who he is?

-----Original Message-----  
**From:** Susan Ralston - @GWB [redacted] Ralston@rnchq.org]  
**Sent:** Thursday, August 30, 2001 10:24 AM  
**To:** 'abramoffj@gtlaw.com'  
**Subject:** Holland Redfield

Former Sen. Redfield may be interested in OIA.

Susan Ralston

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Please send all replies to [redacted] ralston@georgewbush.com

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**From:** Vasell, Shawn (Dir-DC-Gov/Adm)  
**Sent:** Thursday, April 17, 2003 5:14 PM  
**To:** Wilson, Padgett (AstDir-DC-Gov)  
**Subject:** RE: Join us at Sigs

at work. still have a few things to complete. how long will you all be there?

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

**From:** Wilson, Padgett (AstDir-DC-Gov)  
**Sent:** Thursday, April 17, 2003 6:13 PM  
**To:** Vasell, Shawn (Dir-DC-Gov/Adm)  
**Subject:** Join us at Sigs

Matt Kirk is here with us. Where are you now?

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Padgett Wilson

GTG-R003503



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**From:** Abramoff, Jack (Dir-DC-Gov)  
**Sent:** Tuesday, April 24, 2001 2:35 PM  
**To:** Plocki, Julie (AdmAsst-DC-Legis)  
**Cc:** Lane, Rodney (AdmAst-DC-Gov)  
**Subject:** RE: May 26th Orioles game

fine

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

**From:** Plocki, Julie (AdmAsst-DC-Legis)  
**Sent:** Tuesday, April 24, 2001 3:28 PM  
**To:** Abramoff, Jack (Dir-DC-Gov)  
**Cc:** Lane, Rodney (AdmAst-DC-Gov)  
**Subject:** May 26th Orioles game

Pat Wilson asked for the box on Saturday, May 26th for a thank you get together for the Administration staff that has been helpful to date. Below are the names of the folks that would like to come. OK? This is a 1:35p game Please let me know. Thanks. jp

Mary Beth Farr - Administration  
Alison Jones - Administration  
Justin Maierhofer and guest (Department of Energy)  
Alex McGee (Department of Energy)  
Ashley McGee (Department of Energy)  
Lea Ann McBride (NRCC)  
Marcus Veazey (RGA)  
Christopher Smith (USDA)  
[REDACTED] (Rep. [REDACTED])  
Me and guest

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**From:** Wilson, Padgett (AstDir-DC-Gov)  
**Sent:** Monday, February 04, 2002 1:35 PM  
**To:** Ring, Kevin (Shld-DC-Gov)  
**Subject:** RE: dave matthews band

Are there any tickets left?

And as for DOJ staffers, those guys should get anything they want for the rest of the time they are in office – opening day tickets, Skins v Giants, oriental massages, hookers, whatever...

—Original Message—

**From:** Ring, Kevin (Shld-DC-Gov)  
**Sent:** Monday, February 04, 2002 2:32 PM  
**To:** Wilson, Padgett (AstDir-DC-Gov)  
**Subject:** RE: dave matthews band

A what? I have the suite filling up with DOJ staffers that just got our client \$16 million. Come to the show, baby.

—Original Message—

**From:** Wilson, Padgett (AstDir-DC-Gov)  
**Sent:** Monday, February 04, 2002 2:31 PM  
**To:** Ring, Kevin (Shld-DC-Gov)  
**Subject:** RE: dave matthews band

You are officially a ticket hoard. You go to everything, damnit. Didn't your doctor say you can't listen to that kind of music in your condition...

—Original Message—

**From:** Ring, Kevin (Shld-DC-Gov)  
**Sent:** Monday, February 04, 2002 2:29 PM  
**To:** Wilson, Padgett (AstDir-DC-Gov)  
**Subject:** RE: dave matthews band

Damn straight.

—Original Message—

**From:** Wilson, Padgett (AstDir-DC-Gov)  
**Sent:** Monday, February 04, 2002 2:29 PM  
**To:** Ring, Kevin (Shld-DC-Gov)  
**Subject:** RE: dave matthews band

Are you going to the concert?

—Original Message—

**From:** Ring, Kevin (Shld-DC-Gov)  
**Sent:** Monday, February 04, 2002 2:29 PM  
**To:** Wilson, Padgett (AstDir-DC-Gov)

**GTG-R001253**

6/2/2004

002423302

Subject: FW: dave matthews band

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

From: [REDACTED]  
Sent: Monday, February 04, 2002 12:51 PM  
To: ringk@gtlaw.com  
Subject: RE: dave matthews band

Kevin- You're the best. I really appreciate it. Please let me know if and when anything comes up and ya'll need Jack's help. Thanks so much, [REDACTED]

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

From: ringk@gtlaw.com [mailto:ringk@gtlaw.com]  
Sent: Monday, February 04, 2002 11:58 AM  
To: [REDACTED]

Subject: RE: dave matthews band  
Life is good, but ridiculously busy. I hope you are well. You will get 2 tickets delivered as concert approaches. Thanks.

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

From: [REDACTED]  
Sent: Monday, February 04, 2002 9:12 AM  
To: ringk@gtlaw.com  
Subject: RE: dave matthews band

Kevin: How's life as the Dad-to-be? Would LOVE tix to Dave Matthews if you have any available. I have loved him since his days of playing a fraternity parties at UGA- Am I that old??? Thanks, [REDACTED]

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

From: ringk@gtlaw.com [mailto:ringk@gtlaw.com]  
Sent: Friday, February 01, 2002 7:14 PM  
Cc: [REDACTED]; [REDACTED]; [REDACTED]  
lori.sharpeday@usdoj.gov; robert.coughlin@usdoj.gov; DTrigg@doc.gov  
Subject: dave matthews band

April 4 at MCI. If any of you are interested in tickets, let me know ASAP.  
Kevin Ring

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**GTG-R001254**

6/2/2004

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