1	Page 1 STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS	1	INDEX TO EXAMINATION	Page 3
	COUNTY OF CHARLESTON) THE NINTH JUDICIAL CIRCUIT		Witness:	
3) CASE NO: 2025-CP-10-00981	-	Donehue, Wesley (sworn)	
	GLT2, LLC,)		Examination by Mr. Brewer 4	
5	Plaintiff,)	5	Court Reporter's Certificate 81	
6	vs.)	6	-	
7)	7		
8	JANE DOE and JOHN DOE,)	8		
9	Defendants.)	9		
10)	10		
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12		12	Exhibit A 7	
13		13	Subpoena	
14		14	Exhibit B 27	
15		15	Federal Election Commission documents	
16	The Zoom deposition of WESLEY DONEHUE, taken	16	Exhibit C 28	
17	before Lori Webber, Stenographic Court Reporter and Notary	17	Complaint	
18	Public, at Clark Bolen, 29 Gamecock Avenue, Suite 200,	18	Exhibit D 53	
19	Charleston, South Carolina, on Monday, April 28, 2025,	19	Congressional floor speech	
20	commencing at 10:16 a.m.	20	Exhibit E 67	
21		21	WinRed text message	
22		22	Exhibit F 69	
23		23	X/Twitter compilation	
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	APPEARANCES:	1	WESLEY DONEHUE,	Page 4
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Page 5 Page 7 I am an entrepreneur and political consultant 1 BY MR. BREWER: 1 Α 2 0 I understand that you have or are a member of 2 0 Okav. 3 or have ownership in four different companies related to In coming to discuss your involvement with 3 4 your political consulting? 4 Ms. Mace professionally, individually, or through any of Yes. But it's more than that. I mean, for 5 these entities, we sent you a subpoena on April 3rd, 2025. 5 А 6 matters of this, Push Digital Group has four public 6 And I've got a picture of that up on the screen. Can you 7 companies, but it also has a few other subsidiary 7 confirm this is the subpoena that you received that led to 8 companies used for various things. 8 your deposition here today? 9 0 Gotcha. 9 А Yes, sir. I actually have no idea how many companies I Of course, you are represented by counsel here, 10 Α 10 0 11 own, if you wanna know the truth, but it's more than four. 11 which is Mr. MacKelcan; is that correct? 12 0 Gotcha. 12 А Yes, sir. So of the companies that you own that are All right. 13 13 0 14 relevant to our inquiry regarding Nancy Mace, her One of the things we asked is that you bring 14 15 campaign, or anything to do with her congressional office, 15 with you any notes, reports, basically, documentation that 16 that would be Push, Drive, and Campaign Solutions? 16 you thought might be relevant to the deposition today. It would be. But I will tell you, Drive Public 17 Did you produce any type of documentation, communications, 17 А 18 Affairs did a rebrand about a year, year and a half ago. 18 texts, et cetera, that you need to produce to us today or 19 So anything related could've been under a former company 19 that you might've produced to Mr. MacKelcan that we need 20 name called Push Advocacy. No; actually, it would've been 20 to see? 21 Laurens Group. I'm sorry; it would've been called Laurens I did not. 21 А 22 Group. 2.2 0 Okav. 0 Are these all South Carolina entities? 23 (Discussion held off the record.) 23 They are not. I have a partner based out of 24 BY MR. BREWER: 24 А 25 Dallas, Texas. I believe they're all Texas entities, if 25 0 So I've shown you Exhibit A, which is the Page 6 Page 8 1 subpoena. And obviously, sometimes we send subpoenas that 1 I'm not mistaken. 2 0 Okay. 2 have requests because I don't know what you have and what 3 you don't have. So I guess one thing that I'd like to ask 3 So to the extent I'm using the appropriate 4 name, when we talk about Push, what's the appropriate 4 right now is if you didn't bring any documents with you, 5 corporate name for Push? 5 I'd like to know what might exist out in the world; right? So there's Push Digital Group. 6 Α 6 And also, this is gonna be part of our communication for 7 0 Your umbrella. 7 the next hour or so because you had communications with 8 Ms. Mace. You could've had those in your capacity Δ The umbrella accompany. And there are four 8 9 main companies under that: Push Digital, which is a 9 personally or individually. 10 advertising and content development company; Campaign А Yes. 10 11 Solutions is a fundraising company; Drive Public Affairs, You could've had those communications through 11 0 12 formerly known as Laurens Group, is a corporate 12 any one of your multiple entities wearing that hat, if you 13 communication company that also handles congressional 13 will; right? 14 franking; (inaudible). А Yes. 14 15 THE STENOGRAPHIC REPORTER: I'm sorry; And that might control whether or not what 15 0 16 what was the last one? 16 records you may or may not have or what company may or may 17 THE WITNESS: Drive Public Affairs, 17 not have, so I just need to figure out what we're 18 previously known as Laurens Group. 18 discussing and what the world of potential things that THE STENOGRAPHIC REPORTER: Okay; I got 19 exist might be. 19 20 that one. 20 So did you ever have -- if you communicated THE WITNESS: And the fourth group is 21 with Ms. Mace, did you communicate with her by social 21 22 Right Country Lists. We call it RCL, but I don't think it 22 media apps or direct messaging apps or anything like that? 23 has anything to do with this. I don't think it ever did Δ Yes. Most of my communications with Nancy were 23 24 any business with the campaign or the congressional 24 either on the phone or through Signal. There were very 25 office. 25 few actual text messages; and anything e-mail would've

3 (9 - 12)

_	Page 9		Page 11
_	been actual work related. And I'm sure that I can pull	1	A Yeah.
_	hundreds, if not thousands, of those records if I needed	2	Q Okay.
	to.	3	A She ran I guess that was 2018?
4	Q I got it.	4	Q Sounds about right. It looks like, yeah, the
5	Well that's why I didn't want you to go through		election was where she beat him was November 4th of
	all that work at this moment unless we determined we might need; right?		2020.
		7	A Oh, '20; okay.
8	A It would be quite a big haul. O Well if you communicated via Signal, would	8	Q So to your credit, Joe must've started serving
9	y well if you communicated via Signal, would Signal be all work, all personal, or combination of work		in '18, which meant Nancy would've been mounting her
	and personal?		campaign sometime '18 or '19. A All these election years run together for me.
	A Combination.	11	Q I'm certain that's true.
12	Q Okay.	13	So initially when you reach out and have coffee
13 14	Did you save any Signal communications between		with Nancy, that initially is going to be a relationship
	yourself and Ms. Mace?		between you and Nancy individually and between what
15	A No.		company and Nancy? Is that the
17	Q And to make sure I'm using sometimes I find	17	A Push Digital.
	I have to ask questions different ways to make sure we're	18	Q Push Digital or Campaign Solutions in
	saying the same thing.	19	A We acquired Campaign Solutions in the end of
20	Are there any screenshots of any Signal		2022, so Campaign Solutions wouldn't have been under our
	communications?		umbrella at that moment.
21	A No.	22	Q So is this Laurens Group or Push Digital or
22	Q Okay.		both?
23	Do you remember when you first got introduced	24	A It would've been Push Digital.
	to Ms. Mace? Like roughly, when did the timeline of	25	Q In 2018 or '19 whenever started the
	Page 10	-	Page 12
	communications with her start? A I mean, I've known Nancy for well over a		arrangement with Ms. Mace's campaign is Push Digital
2	decade. I have no idea.		<pre>what is Push Digital doing for the campaign? A At that time you know, I don't recall</pre>
3 4	Q Okay.	3	A At that time you know, I don't recall exactly, but I believe it was, you know, just overall
4 5	So you had a personal relationship before it	-	digital strategy, content, and advertising. And probably
	became professional?		some fundraising, too. I'd have to go back and pull the
7	A No. I mean, it was always more professional. Nancy tried to start a digital agency 15 years ago when I		contract and look at those records. I just don't recall the exact dates, but it should've fallen under that
-	was you know, it failed and mine didn't; so we knew		category, digital strategy.
	each other when she was bouncing around in South Carolina	10	Q Do you enter into a new contract for every
	politics. And then I knew her when she was a House		campaign or one contract at the beginning and that governs
	member. And, you know, when she decided to run for		your whole relationship?
	Congress, I reached out to her and we met for coffee	13	A I don't know the answer to that. I believe it
	about, you know, helping her on her campaign.		just stays from the beginning.
15	Q Got it.	15	Look, I should also just very clearly state on
16	So was that the first professional initiation		the record the Push Digital is a larger company, over 80
	of your professional relationship with Nancy in terms of		staff. I think now we're probably at like 75 staff. So
	actually doing work, paid work, for her in some capacity		there's a lot that goes on at the company that I don't
	started with her initial run for the House seat in		necessarily know about. Like we have two guys that handle
	Charleston?		all these contracts; so I'm not always in the loop on how
20	A Yes. You can google that year. I don't even		certain things get done with the company, such as when
	remember when it was.		people sign contracts. I believe it's really a
23	Q I don't, either.		question I don't know the answer to that one.
24	A They're every two years.	24	Q So tell me about hold on one quick second.
25	Q The race that she ran against Joe Cunningham.		I just gotta text my wife something. I just got a note
-			

1	she needs me to confirm. Page 13	1	Page 15 Q When you write the Post and Courier article
1 2	So did you develop a personal relationship with		about the breakup of Patrick and Nancy, are you doing that
	Nancy simultaneous with the Push Digital relationship in		as a friend, do you do that as a campaign like is it
	2018 or '19?		involved with Nancy's campaign, do you do it involved with
5	A Yeah; we became friends. You know, in the		her office? Like what is that role?
	position I have, you become a close confidante to a lot of	6	A It's as Nancy's advisor. And, you know, I was
	these candidates.		helping Patrick as a friend; but also, as Nancy's advisor,
8	Q I can imagine that.		I wanted to make sure that he wasn't taking any stabs at
9	Did you come to know Patrick Bryant through		her. So I guess for Nancy, I was doing it for the
10	your relationship with Nancy Mace or did you know Patrick	10	campaign. For Patrick, I was doing it both for Patrick
11	separately?	11	and for Nancy. You know, I was just trying to make sure
12	A I knew Patrick separately. I knew Patrick, I	12	that neither one of them were going to get hurt in the
13	should say, probably around 10 years now. When I moved my	13	middle of this breakup so I was trying to help with a
14	family and the company from Columbia to Charleston, I	14	amicable public breakup, if that makes sense.
15	joined The Harbor Entrepreneur Center. And through that,	15	Q Yeah.
16	I met Patrick.	16	To the extent let me ask you a different
17	Q When did	17	question. This is gonna be kinda about your background
18	A I knew them independently of each other before	18	and expertise with a political office. The purpose of my
19	they were dating.	19	questioning, as you've heard so far, I'm kinda asking
20	Q Do you recall when they started dating or how	20	questions about is this in this person's individual life,
21	that intertwined or intervened with your campaign	21	is a question involving their campaign organization or
22	relationship with Nancy?	22	that part of their life, or does it involve the actual
23	A Oh, yeah. I mean, I don't remember the	23	congressional office?
24	timeline or the dates or anything; but I very clearly	24	A Then or now?
25	remember like, you know, talking to both of 'em.	25	Q Let me ask a different question.
1	Q Okay. Page 14	1	Page 16 Tell me about the part of your business or
2	A You know, like this is interesting.	2	companies that deal with the campaign office. I wanna get
3	Q Yeah; right. Your world kinda came together,	3	an understanding of your experience with that. Because we
4	huh?	4	talked about the franking, but I get a sense that what you
5	A Right.	5	do is more involved for a politician's actual
6	Q Do you recall in your personal experience with	6	congressional office than just the franking. So tell me
7	Nancy Mace, either in her individual capacity or through	7	what your experience is in that role, about how a
8	her campaign or her congressional capacity, do you recall	8	congressional office works. Or what your intersection
9	when Nancy and Patrick's relationship began to show signs	9	with that is.
10	of trouble? Like do you have a recollection of when that	10	A In an official capacity from a congressional
11	was?	11	office, I've been pretty much limited to the franking
12	A I don't recall specifically, because there were	12	aspect. And again, franking being the money that
13	numerous instances of trouble along the way.	13	government gives a office to communicate with their
14	Q I got it. I understand. Let me be a little	14	constituents. With that said, when you're working with a
15	more precise.		politician, your role is all-encompassing and it often
16	Do you remember when Nancy and Patrick broke		blurs the lines between and in often, I mean always
17	up?		blurs the lines between their official capacity, their
18	A Oh, yeah; yeah. But they were having trouble		campaign life, and their personal life. They all flow
	before they broke up; but yeah, I remember clearly.		together, as you can imagine. What happens in an official
20	Q I get that.		office impacts a campaign. What happens in their personal
21	A Yeah.		life impacts the campaign. My primary job is to get
22	I know this isn't a question, but the Post and Courier article about their breakup, I literally wrote the		people elected and/or re-elected. Therefore, every action
	Courier article about their breakup, I literally wrote the statement for Patrick and for Nancy. I was very much in		a client takes impacts that. Does that make sense? Q Yeah.
	statement for Patrick and for Nancy. I was very much in the middle of their breakup.	24 25	
20	one middle of chell breakup.	40	A Okay.

1	0	No, I do understand. Page 17	1	Page 19 And she would just do that in the workplace
1 2	×	Were there ever any personal aspects to your		just unrelated to I guess the question is that she
	relationsh	hip that affected your professional relationship	-	would just talk about her own personal sex life, thus
	with Nancy			making it inappropriate because it has no bearing on her
-	A A	Yes.	-	congressional life or her job or her campaign?
5	Q	Okay.	6	A She would do it on you know, she would call
7	Ŷ	Tell me about that.		me directly. When we were talking, you know, say "Hey,
8	А	More so than any client I've ever worked with,		how you doing?" Then it would turn into a, you know
-		more so than any crient i ve ever worked with, cried the lines between personal and official. To		it's like every conversation would devolve into what's
	-	that a professional relationship becomes very		going on in her sex life. Sometimes it would be on the
		ional very soon, very quickly. And that the way		phone, sometimes it would be over drinks; but it's just
		alks to people because she thinks they're her		something that she talked about all the time and I always
		when she communicates with them at all hours of a and weekends and holidays, yelling at people	13	felt uncomfortable with. Q Did she admit to having sex partners outside of
	_	ime, talking about things that are very		Patrick Bryant while she's engaged with Patrick Bryant?
		late. And in this case, asking me to intervene	16	A No.
		Lationship problems with Patrick Bryant.	17	Q Was that a suspicion that you had based on the
18	0	Right.		conversations or when you said she talks about other
19	Ŷ	When do you first recall Nancy asking you to		partners
	intervene	with her relationship problems with Patrick	20	A No, no, no. I'm sorry; let me clarify. Other
		When about are we talking?		partners before Patrick.
22	A	I don't remember the date, but I remember one	22	Q Okay; sorry.
		rst times was when Patrick Bryant's son got into	23	A I understand how that comment could've made it
		problems and Nancy was worried that the son's		sound like that. I meant partners before Patrick. I
		plems were gonna hurt her reputation. She wanted		never got and indication that she was seeing someone else
			20	
		Page 18	3	Page 20
1	Patrick's	Page 18 son and I don't remember his name out of		while she was with Patrick. Page 20
2	their hous	son and I don't remember his name out of se and to not come around anymore; and she asked		<pre>while she was with Patrick. Q Gotcha; gotcha; gotcha; gotcha.</pre>
2 3	their hous me to meet	son and I don't remember his name out of se and to not come around anymore; and she asked : with Patrick, which I did, at a restaurant on	1 2 3	<pre>while she was with Patrick. Q Gotcha; gotcha; gotcha; gotcha. All right; so you I asked you a question</pre>
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1	Page 21 about Nancy finding photos and videos on Patrick's phone?	1	Page these questions.	23
_	A Yes.	-	So when you met with her at Shiki, do you know,	
2	Q I guess let's start there.	2	-	
			was that personal, was it related to campaign, was it	
4	What did she tell you?		related to official or	
5	A She called me one day, asked me to meet her for	5	A It definitely wasn't official. I mean, again,	
	lunch, which I did, at Shiki, which is a sushi restaurant		it's that blurred line between campaign and personal.	
7	on East Bay Street right next door to my office. And she		Trying to be her friend and trying to be her campaign	
8	showed me some photos and told me that she found a number		advisor at the same time, which is not an abnormal	
	of photos and videos that Patrick had taken of women	-	situation for me to be in.	
10	without their consent or knowledge.	10	Q Well let me clarify that real quick.	
11	Q Do you recall what the videos she showed you	11	To the extent we talk about a lot of things	
12	depicted?	12	with blurred lines dealing with Nancy, for you, that would	
13	A I don't think she showed me any videos that	13	primarily be a blurred line between you in your capacity	
14	day; she showed me photos. One was of a girl on a couch	14	working with her campaign or being basically a campaign	
15	as she says passed out with a blanket over her. She	15	manager and Nancy's personal life as opposed to her	
16	showed me a picture of a picture	16	congressional office; is that fair?	
17	seemingly up skirt taken by (inaudible).	17	A Yeah; that's fair.	
18	When I say skirt, I mean one of those coverups that women	18	Q And because your role with the campaign was	
19	wear over bikinis.	19	somewhat limited to the franking, that's why ${\tt I}$ asked that	
20	Q Yep.	20	question.	
21	A And a picture of her that was more blurry. I	21	A Yes. Yeah; but again, in my capacity, I don't	
22	couldn't really see Nancy naked, but a picture of Nancy	22	look at I understand that there is a legal separation	
23	that she said she was getting up to go to the bathroom and	23	between them; but when you're helping a candidate, you're	
24	that Patrick took pictures of her; and then there was a	24	helping that person in all of their capacities. So it's	
25	few other women in similar situations that Nancy told me	25	normal to blur the lines between personal and campaign;	
1	Page 22 Patrick took without these women knowing about it.	1	Page it's just not normal for a personal relationship to become	24
2	Q Okay.	2	so hostile.	
3	What was her purpose in meeting with you to	3	Q Yeah.	
4	show you those pictures at Shiki on this date?	4	When you get paid by Nancy's or your company	
5	And let me just go back.	5	gets paid by Nancy's company, how does that compensation	
6	Do you remember roughly when the lunch meeting	6	structure work?	
7	at Shiki would've been?	7	A We get paid hourly no, I'm sorry; let me	
8	A I remember roughly, because I remember the	8	back up.	
9	circumstances surrounding it, which was Patrick was	9	We get paid a retainer that's a flat fee; but	
10	celebrating his 50th birthday in the Caribbean. And it	10	we also make money off of advertising fees, as well as	
	was about three to four days before Nancy was leaving to	11	fundraising fees whenever we raise money for her.	
12	meet him for his birthday. Because that was a large part	12	Q So there's no like hourly billing where you	
13	of the conversation.		could go back and find this meeting at Shiki on an hourly	
14	Q Okay.		billing sheet of some sort; right?	
15	A I believe that was in, you know, like late	15	A We just can't do that because we get calls,	
	November of 2023, but I don't know when Patrick's birthday		texts. There's just no way. I mean, our staff does keep	
	is. But if you look it up, it would be basically a few		track of hours, but not the consultant level. The	
	days before his birthday in 2023.		designers, videographers, those kind of people track their	
10	Q Okay; thank you.		hours. But those of us that are consultants, we don't	
20	g okay, thank you. So was she you know, listen. I want you to		have the capacity to do that.	
	know that I heard your answer about the blurring of lines	20	MR. BREWER: That sounds good, doesn't	
	between capacities, and that's probably not gonna change		it, Doug?	
	the fact that I'm gonna ask you in what capacity were you	23	THE WITNESS: You guys have it good;	
	meeting with her. And if you need to give me a similar		trust me.	
25	answer, just understood I heard you but I need to ask	25	///	

	Deposition of v	v CSI	r (25 - 28)
1	Page 25 Page 25	1	Page 27 answer your question. I know they co-owned two houses
2	Q All right.		together, one on Capitol Hill and one on Isle of Palms.
3	All right; so Nancy shows you these videos and	3	Q Let me stop and do things for a second. I just
	photos that we just discussed, and I'm gonna break 'em		wanna show a couple of records, just kinda get caught up
	down. The picture of the girl with the blanket on her,	-	on exhibits, because I didn't show you B, and C is
	the up skirt, the picture of her that was		relevant to this. So let me share my screen real quick,
	blurry, and then several other women in similar situations		because I have a question I wanted to ask you briefly
	is how you described it.		about Exhibit B. Exhibit B is only a short detour in the
9	A Yep.		extent that I'm talking about Nancy's campaign.
10	Q What did she have to say about those photos?	10	A Uh-huh (witness indicated an affirmative
	What was she telling you about 'em?		response).
12	A That Patrick was doing some shady things and	12	Q I got this off the Federal Election Commission
13			website.
14	planning on breaking up with him.	14	A Okay.
15	Q Okay.	15	Q And this shows is the formal name of Nancy's
16	A Also forget it; go ahead. I'm sorry.		campaign Nancy Mace For Congress? Does that seem
17	Q Go ahead.		accurate?
18	A This conversation at Shiki was there was	18	A Seems accurate; yeah.
19	much more to it than that, I guess is what I'm saying.	19	Q To the extent that I know she has an interest
20	Q Okay.	20	in running for governor and I don't know if you know
21	What was more to the meeting at Shiki than just	21	this is her campaign for governor still this Nancy Mace
22	the photos that you recall?	22	For Congress entity or is there a separate one or do you
23	A I'm just trying to figure out the best way to	23	not know the answer?
24	word this.	24	A I do not know the answer; but she would not
25	Nancy said she felt for her safety and that she	25	have filed for governor yet, so such an entity probably
	Page 26	-	Page 28
	believed that Patrick was taking pictures of women without their knowledge.		does not exist. I don't know that for a fact; but putting my campaign hat on the official answer I know I'm
			supposed to give is I don't know, but I'm also telling you
3	Q Okay. A She then said she was going to the Caribbean		she wouldn't of. Nobody's filed for governor yet.
4	with Patrick and some of his friends, which I questioned;	4 5	Q Do you know who Paul Kilgore is? This guy
	because I said "Nancy, you can't say you fear for your		who's listed right here?
	safety and you're going to the Caribbean with him and some	7	A No, sir.
	of his friends." Then she said I remember as clear as	8	Q Is he, to your knowledge, in any way involved
	day "I'm taking my free vacation to the Caribbean."		with the campaign? You don't know who he is, but have you
	And she said while she was there she was gonna try to get		ever heard of him?
	more information out of his phone; and I told her that she	11	A I have no idea who that is.
	needs to contact the authorities, and she asked me why.	12	Q All right.
13	And I said "Because, Nancy" I remember it as clear as	13	Let's do this again. I'm now gonna show you a
	day. I said "Nancy, as your campaign consultant, if it	14	new document, which is Exhibit C. I'm gonna pull that up.
15	ever comes out that you knew of women being harmed and you	15	I'm gonna share the screen again. Can you guys see
	didn't do anything about it, your career is over. But		Exhibit C now, the complaint?
	also, it's just the right thing to do."	17	A Yes, sir.
18	Q Uh-huh (counsel indicated an affirmative	18	Q This was a lawsuit that Nancy Mace brought
	response).		against Patrick Bryant on April 2nd, 2024. And this
20	A And she said "I'm going to use this information	20	involves a dispute of a real property. I'm looking at
21	to get my houses."	21	paragraph 3 on the second page of Exhibit C. And it says
22	Q Okay.	22	"The real property herein, which is the subject of this
23	Let's talk about that for a minute. What do	23	action, is at Palm Island Boulevard." Do you know if
24	you know about quote Nancy's houses?	24	that's that the house the local house that Nancy and
25	A During the breakup what do I know? Let me	25	Patrick share together or do you have any knowledge of

1	that address? Page 29	1	Page 31 him "If you don't give me the houses" or excuse me.
2	A I don't recall the specific address, but that		"If you don't give me the full interest of the houses,
2	sounds right. I have been to that house before, so that	-	I'll make these pictures public." But you refused to do
	sounds right.		that; correct?
5	0 Then I don't see the D.C. house listed.	5	A Yes. I met with Patrick; we had drinks on the
6	All right; so let me ask this: To the extent		outside deck of his office in Mount Pleasant. And we did
	that Nancy's conversation with you in November 2023 turned		discuss Nancy, but we also discussed other things.
	to her telling you that she was gonna use the pictures she	8	Q Did you communicate this is gonna sound
	got off Patrick's phone to get her houses, is it your	9	convoluted, so I'm gonna try to ask this. Please forgive
10	understanding that that became a solely personal goal or	10	me if I have to reask it once it comes out of my mouth.
11	objective of Nancy Mace at that time, as opposed to a goal	11	I understand that Nancy asked you to convey
12	or object that would be associated with her campaign or	12	well let's go back.
13	her congressional office?	13	Would you agree with me that Nancy's request to
14	A Yes.	14	you to tell Patrick "If he doesn't give me the interest in
15	Q What did you understand or how did you	15	both houses, I'll make these pictures public," that was
16	understand that Nancy wanted to use the information about	16	effectively her effort to extort or blackmail Patrick; is
17	Patrick's or excuse me. The information about	17	that correct?
18	photographs that she found on Patrick's phone let me	18	A Yeah. And that was on March 27th, 2024.
19	rephrase.	19	Q How can you relate it to that date?
20	What was your understanding for how Nancy	20	A Because I just remember I'm sitting here in
21	intended to use the information about photos she found on	21	front of my computer, and I just punched in Patrick Bryant
22	Patrick's phone in relation to quote getting her houses?	22	on my scheduling. And the meeting with him on Shem Creek
23	A Based on follow-up conversations, numerous	23	about his son was May 30th, 2023, and the meeting at his
24	follow-up conversations, I understood that Nancy was going	24	office was March 27th, 2024.
25	to use all the information that she found as leverage to	25	Q Okay. Give me one quick second here.
1	Page 30 gain 100 percent ownership of the Isle of Palms and	1	Page 32 Apologize. My wife keeps trying to get in touch with me.
2	Washington, D.C. home.	2	A Any time I tried to meet with Patrick was
3	Q Did Nancy ever task you with communicating with	3	always scheduled. I just remembered that all I have to do
4	Patrick Bryant about her possession of these alleged	4	is punch his name in and I can get those dates.
5	photographs in asking you to essentially help her	5	Q So this is the question I was trying to ask
б	blackmail Patrick into giving over 100 percent ownership	6	before: When you met with Patrick, even though Nancy
7	of the D.C. and South Carolina homes?	7	asked you to convey her message of blackmail and
8	A Yes.	8	extortion, I'm clearly under the impression you did not
9	${\tt Q}$ $\;$ And would you agree with me that when she did	9	try to be her fixer in that capacity, but did you convey
10	that, that was also in her personal interest as opposed to	10	to Patrick that she had asked you to do that and you had
11	the interest of her campaign or congressional office?	11	refused?
12	A Yes.	12	A No. I didn't bring it up at all.
13	Q Do you remember, did she specifically say to	13	Q Okay.
	you "Please meet with Patrick and show him these images	14	You can see why that's like somewhat of a
	and tell him I'll make them public if he doesn't give me	15	distinction.
	both houses"?	16	A I do.
17	A Yes.	17	Q "Hey, I'm not leveraging you, but let me tell
18	Q Did she say that subsequent to the Shiki		you, Nancy asked me to leverage you."
	meeting?	19	A In my career as a fixer, as you say, I'm often
20	A Yes.		asked to intervene in situations; and I'm always very
21	Q Did you do as she asked?		clear not to cross any legal boundaries. And in my eyes,
22			that was blurring some legal lines that I didn't want to
23 24	that to him. Q Right.		be part of. I met with Patrick, we discussed the breakup. He kept talking about how he was still in love with her.
24 25			I remember that as clear as day. He did ask me if I knew
20			

	1			/
1	Page 33 where she was living, and I said "I don't know." And then	1	$$\operatorname{Page}$ objectives regarding the house, that that ultimately led	35
2	we started talking he asked how she was doing and was	2	to your dissociating from her campaign; and then you went	
3	concerned about her. I remember that. And then we were	3	into some other stories about how she was emotionally	
4	mostly just sitting out on the deck talking about	4	unstable or mentally unstable, whichever phrase you used.	
5	business.	5	So let me pick up there.	
6	Q When you met with Patrick, did it go ahead.	6	How did this series of communications starting	
7	A No; that's okay.		with "I found things on Patrick's phone" lead to talking	
8	- Q When you met with Patrick at this time, March		about houses, her seeming to be unstable, how did all that	
9	27th of 2024, I'm assuming from your testimony so far that		relate to your comments about what led to be dissociating	
-	it seemed to you that Patrick was legitimately concerned		from the campaign?	
	about Nancy, whereas Nancy was not legitimately concerned	11	A I would say I left the campaign for three	
12			primary reasons. The first is that I'll say four	
13	A As yes; I guess that would be a good		things. The first being that I felt uncomfortable with	
14			the things that Nancy was asking me to do, and I didn't	
14	concerned about someone else. I mean, he was asking about		want to get in any legal trouble. That was the first	
	-			
16			thing. The second thing is, which is the reason I'm being	
	best way to say it.		subpoenaed and wouldn't provide a statement to you guys,	
18	Q Well and I guess a better way for me to ask		is I didn't wanna get sucked into this any further because	1
19	that question is: March 27th, 2024, was Patrick		I saw what was coming. I saw that devolving into	
20			something pretty bad. And being that I was Patrick's	
21			friend, Nancy's friend, I saw that I was gonna get caught	
22			in the middle; and I didn't want to be there, because I	
23	A Not at all. But I know, Doug, I'm not		have a business and family, too, and this was gonna get	
	supposed to I wanna be very clear here so we can have		ugly. The third reason is because of my own to be	
25	some because it's not a question as Nancy was an	25	honest with you, my own anxiety and stress levels. Her	
1	emotional wreck at this time. She took the breakup	1	Page erratic behavior was causing problems in my own personal	36
2	extremely hard. And I believe that Nancy believed the	2	life in that the constant phone calls, the constant	
3	things that she was saying.	3	yelling, the erratic behavior was just too much. And the	
4	Q Okay.	4	fourth reason is she started tweeting and doing things on	
5	A If they were true or not; and I don't know if	5	the internet that I thought was unprofessional and people	
6	they were true or not. And she believed it. She was	6	were blaming me because I was her digital guy, and I	
7	losing a lot of weight, she was getting what she called	7	didn't want to be associated with what I found to be a	
8	stress tattoos. She was just because she wasn't saying	8	level of unprofessionalism on the internet.	
9	things like "How is Patrick?", she was emotionally	9	Q Okay.	
10	distraught at this point in the year. And in my view, her	10	A So I cut ties with her.	
11	emotional stability was crumbling. So I don't wanna make	11	Q Okay.	
12	it seem like she was just this machine that didn't care	12	The first thing you mentioned that I wanna	
13	about anything. She very much cared. But it was coming	13	kinda go down the road on is she was asking you to do	
14	across as erratic and unstable. Does that make sense? I	14	things that made you feel uncomfortable. We've discussed	
15	wanna don't get mad at me, Doug. I'm kidding. But she	15	her sharing the photos on Patrick's phone with you and	
16	did care, and that's the only way I can say that. That	16	asking you to go blackmail him over the properties. Were	
17	make sense?	17	there other things she was asking you to do that made you	
18	Q Yes.	18	feel uncomfortable?	
19	MR. BREWER: Madam court reporter, let's	19	A No; I mean, it was primarily that. And you	
20	go off the record for a second.	20	used the word "blackmail." That was actually a word I was	
21	(Discussion held off the record.)	21	using, too, internally when I was talking to people in $\ensuremath{\mathtt{my}}$	
22	BY MR. BREWER:	22	company or talking to my wife and literally said, you	
23	$\ensuremath{\mathtt{Q}}$ $% \ensuremath{\mathtt{So}}$ So Wes, you were telling me a minute ago that	23	know, "Like she's asking me to blackmail someone." You	
24	this line of interaction with Nancy where she asked you to	24	know, asking me do something that I thought was illegal.	
25	go and essentially blackmail Patrick for her own personal	25	And I'm no I'm no jurist. I have the I don't know	
		-		

11A1A1A1AC2abs. It is doubt life to may, and it had no actromaty warded.0711 does had to that.3bat them man 1 wouldn't at it, you haw, if could get1A04Fileds st. And the class to have store we concerned about way1A05class throw whether or or the the Storey we concerned about way1A06class throw whether or or the the Storey we concerned about way1A07lass, throw may to or -1 dust throw, 1 dust throw to a20111 dust, heat with it is in that9lass, throw may to or -1 dust throw, 1 dust throw to a20111 dust, heat we way, if is in that10add that we an ethical lengt that (lang, but there eration is lifed about havey the index that (lang, were)1111add that we an ethical lengt that (lang, were)111112fewer and an isolarity.1111113have any thy11111114dust we construct that were an outhout one of the class that (lang, were)11115fewer and when were that (lang, were)1111116dust were an ethical lengt that (lang, were)1111116dust were an ethical lengt that (lang, were)1111116dust were an ethical lengt that (lang, were)<	 1 fit was lead or next, subject by properly service. 2 when the how what is southed if he may were the how were provided by a second or that is an other than y was areas and the second or that. And the second is a fact it may be the the second is that we are set if and it may were the lead in the second is a fact it may be second is a fact it may be the second is a fact it may be the second is a fact it may be the second is a fact it may be second is fact it may be second is a fact it may be second is a fact it m		-		
 a bat there where i wouther's do it, you theory, i wouth grant b and there where i wouther's do it, had the south thing is use concerned who two it c it do it is work who where it or a that the two it is had it is that the south it is is a south it is that the south it is do. It is that the south it is that the south it is do. It is that the south it is that the south it is do. It is that the south it is do. It is that the south it is do. It is that the south it is that the south it is do. It is that the south it is that the south it is do. It is that the south it is do. It is that the south it is that the south it is do. It is that the south it is that the	 a lot itse when I wouldn't do it, you how, I would get A pieled st. And Let the there they I use concerned about was its its thick the happend or not. And cettaid of the blackmini I issue, that we was been not its and the black its and it it is and that we have you are concerned about was its its and I it is and that was and that was and that was and that was and that its and that it is and that was and that was and that its and that it is and that was and that was and that its and that it is and that was and that was and that its and that it is and that was and that was and that its and that it is and that the there was and black was and that its and	1	Page 37 if it was legal or not. But just by googling it, that's		
 4 yolia di. An the other then you decould be decomposed on the second second	401 if if contract here that the dense if if if if contracts that the there is the ther	2	what it looked like to me, so it had me extremely worried.	2 Q I'll come back to that.	
 5 Induit how watter or not wat Hanny was accurding 6 Straich of Agreemed or not. And outside of the blockming 7 Induit how watter or not. And outside of the blockming 8 Isance there way be or - 1 four them. A four them the factor of anything. I saw there was all same there are was any encoded anything. I saw there was all same there are was any encoded factor between the factor of anything. I saw there was all same there are was any encoded factor between the factor of anything. I saw there was all same there was a selection in the same that the wave all same there was a selection in the same that there was all same there was a selection in the same that there was all same there was a selection in the same that there was all same there was a selection in the same there was any moving or there was any factor in the factor back for the same there was any factor in the factor back for the same there was any factor in the same there was any factor in the factor back for the same there was any factor in the same there was all same there was a same there was all same t	 5 Indian't mow watcher or not wat Hunry was accounting 6 Trainer throw watcher or not wat Hunry was accounting 6 Trainer throw watcher or not wat Hunry was accounting 6 Trainer throw watcher or not wat Hunry was accounting 7 Indiant many was and a chart hunry. The dual three was accounting in the same three was and the dual to the ware should be the hunry was a trainer in the accounting in the same three was and the dual to the same trainer. 9 A the was and the dual to the three was accounting in the three was accounting in the same trainer. 9 A three accounting in the trainer provide dual to the same trainer. 9 A three accounting three many hunry three three van accounting in the trainer. 10 A three accounting three many hunry three three van accounting in the trainer. 11 A three accounting three many hunry three three van accounting three three many hunry three three was accounting three three many hunry three thre	3	And then when I wouldn't do it, you know, I would get	3 A Okay.	
 Fattick of kappened or not. And outside of the blackmain if is easy that have not in the your destine way were destine outside is the the set all fair is the the outside is that were destine outside is destine that your destine way and your of anything. If all dist the way angle is thing Hancy data — every action, every at the set all dist is the way angle is thing Hancy data — every action, every at the way angle is thing Hancy data — every action, every at the way angle is thing Hancy data — every action, every at the way angle is thing Hancy data — every action, every at the way angle is thing Hancy data — every action, every at the way angle is thing Hancy data — every action, every at the way angle is thing Hancy data — every action, every at the way angle is thing Hancy data — every action, every at the way angle is thing Hancy data — every action, every at the way angle is thing Hancy data — every action, every at the way angle is thing Hancy data — every action, every at the way angle is thing Hancy data. (a) A the way and your data way is that for a minute. (b) Is the second of that for a minute. (c) Is the second of that for a minute. (c) a the second of that for a minute. (c) a the second of way you take any tourises when the ever the second is a second of way you take any tourises when the ever the second at the second angle. (c) a the second of way you take any tourises when the ever the second is a second of way any tourises when the ever the second at the second at the second ever the	 6 Partick of hardened or not. And outside of the blackmail 7 lease, there may be or -1 don't know. I don't know but 8 least. And all '2 were that your generation was worded verying to ash. And it 9 works are any proof of anything. I are platners, in 10 and, instead, using victum for her was personal gain. 11 and is the was entitled lease that c coldition very compared that there was proof of anything. I are platners, in 12 ones was any proof of anything. I are platners, in 13 those platners, there was no additional 14 context was any proof of anything. I are platners, in 15 those platners, there was no additional 16 sequences and using any there was no additional 16 sequences and way proof of anything. I are platners, in 17 the set was using any theory context in the train basis 18 on the way in the train basis poet on authorities, insec 19 contained way, and was any monouspane was not a way that 19 contained have a ward to the train the train basis 19 on the form the trainbase was not attend that the set 19 contained have a ward to the trainbase was that before and music. 19 contained have a ward to the trainbase was that before a music. 19 contained have a ward to that and trainbase 19 contained was provided was not attend that the trainbase 19 contained have a ward to that and that 19 contained was provided was not attend that the 19 contained was provided was not attend to the the trainbase was that before a music. 19 contained was provided was not attend that the 19 contained was provided was not attend to the the trainbase was that before a music. 19 contained was provided was not attend to the the trainbase was that the trainbase was the trainbase was that the trainbase was that the trainbase was the trainbase was the the trainbase was the	4	yelled at. And the other thing I was concerned about was	4 Q I'll come back to that question, because I	
 i sense, there may be or 1 don't know. I don't know the stans. Add I still don't to this day, but there each hand i sense to it. Seconds I's my belief i to and, instand, using victims for her on personal gain. i don't know the samer to it. Seconds I's my belief i that the same and interial is asset hat I couldn't overcome. i that has as a singling. Nowew, I don't know the samer to it. Seconds I's my belief i that the same and interial is asset hat I couldn't overcome. i that has as a singling. Nowew, I don't know the samer to it. Seconds I's my belief i that the same a singling. Nowew, I don't know the samer to it. Seconds I's my belief i that the same a singling. Nowew, I don't know the samer to it. Seconds I's my ask you to drow some i that the that has as a singling. Nowew, I don't know the samer to it. Seconds I's my ask you to drow some i that the that has as a singling. Nowew, I don't know the samer to it. Seconds I's my ask you to drow some i that that has as a singling. Nowew, I that that the same a singling. Nowew, I that that the same a singling. Nowew, I that that the same and that that the same a singling. Nowew, I that that the same a singling. Nowew, I that that the same and that the that the same and that that the same and that the that the same and that that the same and that the that as a singling. Nowew, I that the same and that the that the same and the same that the same and that the same and the same that the same and the same that the same and that the same and that the that the same and that the same and that the same and the same that the same and the same that the same and the same that the same that the same and the same that t	 1 issue, there may be or 1 don't know the it have it has a light of the the it have a shift of the the it have a shift of the order order of the it has been at high of the order order of the it have a shift of the order order of the it have a shift of the order order of the it have a shift of the order order of the it have a shift of the order order order	5	I didn't know whether or not what Nancy was accusing	5 probably could've asked it better, to be honest.	
$ \begin{bmatrix} 1 rather, ken I will some to the lawy warit a service serve serve set is the intervent of the server serve set is the I service server set is the service is the service being taken I service server set is the I service server set is service is the I service service service service service service service is the service servi$	 a fanta. Mu T atili don't to this day. But there could be solution of the solution of	6	Patrick of happened or not. And outside of the blackmail	6 A I know what you're trying to ask. And it	
 9 virtules here that Nancy wan't alerting is a enforcement is with the state of the sta	9 that every single thing kany does — every action, every 11 — so I don't know the or answer that question. I just 11 more that we are still of the set that or additional 12 is prevered as a single measure being taken if she cruly billered in what 14 more that y we are still 14 more that we are still 14 more that we are still 14 more that y we are still 14 more t	7	issue, there may be or I don't know. I don't know the	7 wasn't that your question was worded wrong, it's just that	
 10 and, instead, using victims for her own personal gain. 11 Add that was an official faste that I couldn't overone. 12 never as any proof of anything. I are pictures. 13 theop pictures. there was no proof of anything. I are pictures. 14 that are was alleging. Nowwar, I didn't are covrything. 15 isol measures being taken if at the trib bilewed in water. 16 isol measures being taken if at the trib bilewed in water. 17 one. do you have Manoy. I know, has ead 19 one. do you have Manoy. I know, has ead 10 one, do you have Manoy. I know, has ead 10 one, do you have Manoy. I know, has ead 10 one, do you have Manoy. I know, has ead 10 one, do you have Manoy. I know, has ead 10 one, do you have Manoy. I know, has ead 10 one, do you have Manoy. I know, has ead 11 an of don't know, has do not on the touloup of the trib. 12 you have any howledge or indication when if i, in fait. 13 the over did what you though was right and want to 14 attribut on the contacted and you to have read 15 that is black from the contacted and tou' for inf inf and water. 16 on the would for her contacted and you have never did the tou'. 17 A free only thing 1 know about is that for inf inf one trib. 18 that we solv for the contacted and tou' of trib. 19 on hyou remediate when you and any the tou'. 10 one have never that the set infine and water infine and water infine and water infine. 10 one have any trib. The tou's how any the set infine and water infine. 10 one have any trib. The tou's how and the tou'. 10 attrib. The tou's how and the contacted any is an off-correline. 11 attrib. 12 attrib. 13 the set infine and water at the set infine and water. 14 attrib. 15 attrib. 15 attrib. 16 attrib. 16 attr	 10 and, instead, using victime for her own percent gain. 11 add that was an athical issue that I couldr't overcome. 12 never saw any proof of anything. I can be just that when how to answer that question. I just is how percent is held that on proof of anything. 11 add that was an estical issue that I couldr't overcome. 12 never saw any proof of anything. I can be just that when how to answer that question. I just is how percent is held that on the percent is held that was an estical issue that there was an additional is how percent is held that was an estical issue that there was an additional is how percent is held that was any proof of anything. I can be added in the there was an esticated that there was an additional issue that there was any proof of anything. I can be added in the there is held that was anything. I can be added in the there is held that was anything. I can be added in the there is held that was any monoledge or the issue is held. 20 we have any monoledge or in the carbinear there is here is the percent is the there is here is the added. 21 after the came hack from the Carbinear with percent is in how. 22 after the came hack from the Carbinear with percent is a how. 23 after the came hack from the Carbinear with percent is a throw. 24 ather the came hack from the Carbinear with percent is a throw. 25 after the came hack from the Carbinear with percent is a throw. 3 accortat. While we're taiting. I'll yest text and one. 3 accortat. While we're taiting. I'll yest text answer and is that unit. 3 accortat. While we're taiting. I'll yest text answer and is the is a static text and the carbinear add that the is a hording. I'll yest text answer and the taits? 3 accortat. While we're taiting. I'll yest text answer and that there? 4 a fan after a the carbon the carbinear add that unit. 3 accortat. While we're taiting. I'll yest text answer and that t	8	facts. And I still don't to this day. But there could be	8 I don't know the answer to it. Because it's my belief	
 11 And that was an ethical issue that I couldn't overcose. 1 12 arear eaw any peoof of anythins. I caw pictures. In 13 those pictures, there was in poor of some of the thinsis 14 that the was alledns. However, I didn't see everythinsis 15 fo I was deeply concerned that there was no additional 16 legal measurane bring taken if she truly baleword in that 17 arear eaw any heaved being taken if she truly baleword in that 18 one, if a see sequend on that for a minute. 19 one, do you have hancy, I know, has add 19 public versatity that the seque to an attruly baleword in the secue. 10 public versatity that the seque to an attruly the seque that at that 19 one to Alan Wilson, SLD, whatever it is she says. 0 20 public secuently that the seque to an attruly the seque taw at the 21 that if stall? 21 A The only thing I know shout is that shout? 23 area that and not contracted any law enfortance it is barrent if a shout in the seque taw and the partial shout is that shout? 24 attra eak came back from the Caribbean with Partina and 25 that if stalls 2 area readed with you baleful to Toits. Dia at a shout yo far a far a struny. 24 attra eak came back that would was a record of that and the 25 contrast. Mill we're takking, i'll just text concessentities in a support seque taw would have a record of that and the 2 contrast. Will we're takking, i'll just text concessentities in the far?. 3 A Yea. 3 Consolid and pictures are good of fart of a part of her and material picture and you and be an at fair. 3 consolid and pictures area and you to any that because the fair were you could reasen. All is a shout y a fart in the stall at that inter 3 consolid and pictures area and you to any that because the fair of a single. 3 consolid and pictures area preprodue taw that that and the stall in th	 11 and that was an ethical issue that 1 couldn't overcome. 11 are of 4 mit haw way people of anything. I saw pletures. In this betwee away people of anything. I saw pletures a high of the thing is a second of the thing is a seco	9	victims here that Nancy wasn't alerting law enforcement	9 that every single thing Nancy does every action, every	
 12 here sew any proof of anything. I saw pictures. In 13 these pictures, there was no proof of eace of the thing 14 that here was a pictures, there was no proof of eace of the thing 14 that here was alleging. However, I didn't see vere verything. 15 so I was deply concerned that there was no additional 16 legal assumes being taken if the truly believed in what 17 the was ease legal. 16 legal assumes being taken if the truly believed in what 17 the was ease legal. 17 de the segond on that for a situte. 19 one, doy on the energond on that for a situte. 10 device truly that able has gone to autorities has a sever did what you thought was right and went to the seven that the seven additional 20 will be a see way knowledge or indication when - (f, in fact. 21 the seven take to the picture and videos real quick. 21 a A the only thing I know about is that samply? 2 affer abs came back from the combined welfs and 30 the picture and videos real quick. 22 a the take set allo the picture and videos real quick. 23 as cores, she told a she contacted capital seven core the seven take the before I as will be the seven use the seven tak this before I as will be the seven use the seven tak the before I as will be the seven use the seven take the seven tak the before I as will be the seven use the seven tak the before I as will be the seven use the seven tak the before I as will be the seven take the seven take	 12 hever aav any proof of anything. I aav plotures. In 13 hove plotures, there was no proof of one of the things 14 that ale was alieging. Noweer, I dight eace everything. 15 fo I was deeply concerned that there was no additional 16 legal measures beling taken if a bet truly pellevel in wat. 17 ene was asyln. 18 e. 16 the equoding of that for a minuts. 19 one, do you have Nancy, I mow, has add 20 publicly recently that also has gone to alcohoritis. And 21 gene to An Wilson, StEV, materer it is the ase, so, to 21 a. A the only thing i have should ge on indication when i f, in fact. 21 a. A the only thing i have should ge on indication when i f, in fact. 21 a. A the only thing i have should ge on indication when i f, in fact. 21 a. A the only thing i have should ge on indication when i f, in fact. 21 a. A the only thing i have should ge on indication when i f, in fact. 21 a. A the only thing i have should ge on indication when i f, in fact. 21 a. A the only thing i have should ge on indication when i f, in fact. 22 a far allo cares back froat the caribbana with bart should and contacted dipitol voltarion and indication and proceeding. 22 a far allo cares back froat the caribbana with bart should and contacted dipitol voltarion. 23 de post left, she had not contacted dipitol voltarion and i publichy excerding with you and stat would 'we be en in fune of diata'. 24 a. A the diata was contract. We would have a record of that and the intervitient of the prevent you was a should we be entimated and the intervitient of the prevent you was a should we be entimated and the intervition and proceeding was and the was able to far any have. 34 a the intervitient was able to far any have. 34 a the intervitient was able to far any have. 34 a the intervitient was able to far any have. <	10	and, instead, using victims for her own personal gain.	10 single action is all for personal gain. So I've never	
 13 those pictures, there was no proof of some of the thing 14 the abw was alleging. However, I didn't are everything. 15 for 1 was decay to concerned that there was no additional 16 legal measures being taken if she truty believed in what. 17 she was avging. 18 C. A. Let me sequend on that for a minute. 10 was any knowledge or indication when - if, if a fast. 10 you have any knowledge or indication when - if, if a fast. 11 you was any knowledge or indication when - if, if a fast. 12 you have any knowledge or indication when - if, if a fast. 13 have any knowledge or indication when - if, if a fast. 14 have any knowledge or indication when - if, if a fast. 15 the set. 16 a the set on the truty being it was right and wat to the set. 16 a the set on the fast bleam if the truty. 17 A The only thing I know shout is that metry? 28 a fast fast a all? 29 A The only thing I know shout is that metry? 21 A The only thing I know shout is that metry? 21 A The only thing I know shout is that metry? 23 A The only thing I know shout is that metry? 24 A The only thing I know shout is that metry? 25 0 That was thin befare I as you 26 0 That was thin was the davids on the truty being? 27 A King I data was all for the row should be the contacted and the truty. 28 A The was havely differ the primary than has bears 29 A trut was barely differ the primary when has bears 20 A true was abarely after the primary when has bears 21 A true should have a vereaf of that that the true shout the true that is kind of a thing the true of the true that the true is the true that is kind of a thing the true true that the true th	 13 those pictures, there we no proof of some of the things 14 the har was alleging. Kowewer, i dim't see everything. 15 to twas deeply concerned that there was no additional 16 least measures being taken if the truly pelleded in what 17 che was saying. 18 of the twas expand on that for a minute. 19 of the twas expand on that for a minute. 10 one, doy up wave 'Namo', f how, hard on a minute. 10 one, doy up wave 'Namo', f how, hard on a minute. 10 one, doy up wave 'Namo', f how, hard on a minute. 10 one doy up wave 'Namo', f how, hard on a minute. 10 one doy up wave any knowledge ware near ware that the 'Namo', '	11	And that was an ethical issue that I couldn't overcome. I	11 so I don't know how to answer that question. I just	
14 that she was alleging. Nowever, f didn't ase everything.15 So I was deeply concerned that there was no additional16 legal measures being taken if ab truly believed in what17 she was anying.18 C Lat me expound on that for a minute.19 O no, do you have Narry, I know, has add10 publicly recently that als has gone to automities, hat11 she was thisen, SED, whatever it is she save. Do12 you have any knowledge or indication when if, in fact.13 that, if at all?10 automities, do you have any knowledge or indication when if, in fact.11 A meanly thing I know about is that materiat12 data for any for her gone affect, A far as I know.13 that if at all?14 the same only thing I know about is that materiat15 Catherias feenylated have a recently that is the do contacted agricul Soluto.14 that was only for her gone affect, A far as I know.15 Catherias feenylated have a recently that is the doct?16 Catherias feenylated have a recently at the share affect.17 A me only thing I know about is that materiat18 appendix the share on the contacted agricul Soluto.19 alter share and by core affect, A far as I know.19 alter is the sade have a recently at the share affect.19 alter is the share of that and the state at the same affect on the contacted agricul Soluto.19 alter is the sade have a recent of that and the19 alter is the sade have a recent of that and the10 appendix the same bare of that and the11 A meanly the sade have a recent of that and the12 alter she cane baw from the varially more affect at the same that	14 that she was alleging. Revever, 1 dight tese everything.15 to I was deeply concerned that there was no additional16 legin measures being taken if she truly believed in what17 about as adyns.18 0 Let me expond on that for a minute.19 0 Delicy recently that he has gone to automicine, has19 ope to Alan Wilson, SLED, whatever it is about anything.11 generated what you boars any knowledge or indication when - if, in fact12 subortities, do you have any knowledge when abe ever did14 autorities, do you have any knowledge when abe ever did15 that, if at all?10 a A The only thing I know about for that hortive?11 A The only thing I know about for that hortive?12 det sake and if of the two and true the ever use that her the sake and in the corrite of a far sake suborting the ever did did.12 action is the same that and the corrite of a far sake the bears?13 action is the same that and the corrite of a far sake subort in the same that and the same that was only for bor own as forty. As far as 1 know14 a D you meassher when you left?15 information and plotures are account of that and the16 opentratt. While we're taiking, 1'll just text someon and16 information and plotures are account of that that17 a A The only concepted what you to asy that because19 actuart. While we're taiking, 1'll just text someon and19 actuart. While we're taiking, 1'll just text someon and19 actuart. While we're taiking, 1'll just text someon and19 actuart. While we're taiking, 1'll just text someon and19 actuart. While we're taiking, 1'll just text someon and19 actuart we'	12	never saw any proof of anything. I saw pictures. In	12 have certain beliefs about Nancy that kinda cloud you	
 15 So I was deeply concerned that there was no additional 16 Jeal measures being taken if she truly believed in what 17 she was eaving. 18 0 Let me expound on that for a minute. 19 One, do you have Nancy, I know, has eaid 10 publicly recently that abe has gone to authorities, had 11 gone to Alan Wilaon, SUDD, whatever it is abe asys. To 12 you have any knowledge or indication when if, in fact. 12 you have any knowledge or indication when if, in fact. 12 you have any knowledge or indication when if, in fact. 12 was have any knowledge or indication when if, in fact. 13 the earth of the only thing I know about is that there is a solution. 14 a the only thing I know about is that there is sone others, she told we she contacted depicto loide, hot 2 after she came back from the Caribbean with Patrika and 3 conso others, she told we she contacted depicto loide, hot 4 that was only for her you sariety. As far as I know, 5 before I fet, she had not contacted any law enforcement 6 recarding the other potential victims. 7 Q Do you reember when you left? 8 A I I we schortly fater the primary when the back 9 A I I we schortly fully or early August. I can go back and 11 puil that cos. We would have a record of that und the 12 contract. Mille we're taiking, 'll just text concentent 13 find out. 14 A Yes. 15 becore I ally out to caray and you and you as that would we back into that using in 'li with the database, she programs labotsho bots and Twitter 16 that 's blackailing, that 's certainly not part of her 17 da is all at arted because she found that, he stared thinking that he was 18 hack into a we with an eacount on a dating app. And 19 back from the Caribban, she hacked into other 	 15 So I was deeply concerned that there was no additional [6 leash measures beins taken if she truly believed in what 17 she was saying. 16 leash measures beins taken if she truly believed in what 17 she was saying. 18 0 Let me expound an that for a minute. 19 One, do you have Nancy, I know, has said 20 publicly recently that she has gone to authorities, has 21 gone to Alas Wilson, ELED, whatever it is able says. De 29 you have any knowledge of inflexiton when fit, in fact, 23 she ever did what you thought was right and went to 24 authorities, do you have any knowledge of inflexiton when fit, in fact, 23 she ever did what you thought was right and went to 24 authorities, do you have any knowledge them she war did 25 that, if at all? 1 A The only thing I know about is that abortly 24 a fars the case hack from the Caribbean with Patrick and 3 some others, che told me the contacted bapical Palew. Not a degue and the truth and the 2 mereating the other potential victims. 1 A The only thing I know about is that abortly 24 a fars the case hack from the Caribbean with Patrick and 3 some others, che told me the contacted lapical Palew. Not a degue and the same that well was abortly after the primary when she bat 10 year. Probably July or early Augutt. I can go back and 11 puil that one. We would have a record of that and the 12 contract. While we're taiking, I'll just text someone and 13 find out. 14 O Ouriously, some of what you said is that using 15 information and pictures and got of FAstrick's phone, i'l a shead shead for the is kind of a thing abe 12 contract. While we're taiking, I'll just text someone and 14 our voter distabase, the programs bots, and the same that be done for Im. And yeah, the told me 17 that she found stuff on his phone and then was -he had a 20 daing agg. And -had an account on a dain gap, and 1 sho understand you to say that heats for the dain when exists to write taiking of thing with the was 2 to ensame after or rights	13	those pictures, there was no proof of some of the things	13 know, I'd rather just stick to the facts that I know,	
 16 legal meanures being taken if she truly believed in what 17 she was saying. 18 0 Let me sexpound on that for a minute. 19 conclusions based on facts, but I'm out gomma ask you to 18 gene to Alam Wilson, SikD, whatever it is she says. No 29 you have any knowledge or indication when if, in fact. 29 un have any knowledge or indication when if, in fact. 29 to thirt is, do you have any knowledge when she ever did 29 to thirt of at all? 1 A The only thing I know about is that whort? 29 dates she came back from the Garibban with Partick and 3 sees ofthes, she toid as the constacted oightol Polity 24 fates she came back from the Garibban with Partick and 3 sees ofthes, she toid as the constacted Gaitol Polity 2 fater she came back from the Garibban with Partick and 3 sees ofthes, she toid as the constacted Gaitol Polity 3 fate she she constacted Gaitol Polity 4 that was only for her own andrey. As far as I know, 5 befort I left, she had not contacted any law enforcement 1 pull that one. We wull alwas a record of that and the 1 pull that one. We wull have a record of that and the 2 contract. While we're talking, 1'll just text someons and 1 pull that one. We wull have a record of that and the 2 contract. While we're talking, 1'll just text someons and 1 pull that one. We wull she ben in the targen in the total for a light on the couch and programs bots, and to a site programs betward with the fatter in the fatter in the fatter in the fatter in the faund struct is programs facebook bots and Insignme bots and the was are be got in the targen betward with the struct is third of a thing at the faunt some work with the serial is that fatter is the fatter in the faunt some work with the serial is that fatter is the faunt some work with the serial is that fatter is the fatter is the faunt some tha	 16 legal measures being taken if she truly believed in value 17 she was saying. 18 o Let me sequend on that for a minute. 19 one, do you have	14	that she was alleging. However, I didn't see everything.	14 because my professional opinion of her is beyond the	
 17 she was avyin? 18 0 Let me expound on that for a minute. 19 one to kian Wilson, ShD, wharver - Namy, I know, has ead 20 publichy recently that abe has gone to authorities, has 21 gone to kian Wilson, ShD, wharver i is and say to to 22 you have any knowledge or indication when - if, in fact. 23 she ever did whar you bought was risht and went to 24 to har if at all? 1 A me only thing I know about is that fact if and 25 that. if at all? 26 atter she came back from the Caribbean with Partich and 28 one others, she to id as alle contacted digited Polites, hat 29 on you remember when you left? 2 A that was only for her own safety. As far as I know, 25 before there betends to the potential victure. 2 0 to you remember when you left? 3 A it was shortly after the primary who a photocont fact and the 20 on that would you early August. I can go back and 21 pull that case. We wuid have a record of that and the 20 on that backmailing, hat's certainly not part of her 21 fair char. 20 on And I also understainly to tar to fair. 21 on You course and to the route the tar that and the 21 contract. While we're talking, r'll just text souce, if you you reque the tar you to the dual programs her owns bate, she programs her owns bate, she set and programs bot, she programs her owns bate, she programs her owns bate, she programs her owns bate, she programs bot, she set and the tradie in	 17 onclusions based on facts, but I's not gonna ask you to 18 0 Extreme expound on that for a minute. 19 onclusions based on facts, but I's not gonna ask you to 18 generalate about anything. I'll get back into that in a 19 minute. 10 monological processity that we have one catheorizes, have any knowledges or indication when - 1f, in fact. 21 dualties, do you have any knowledges when ehe ever did 25 that, if at all? 1 A the only thing I know about is that mhorizes. 2 for a case back from the Caribbeam with Partick and 2 some others, she told as abe contacted dapid Police, back 2 for a life one back from the Caribbeam with Partick and 3 case others, she told as abe contacted dapid Police, back 3 for any semester when you latter the primary when ahe back and 11 pultations. We would have a secord of that motifies 2 fortaris mengleton, so that would we been in June of latting 2 fortaris mengleton, so that would we been in June of latting 3 find out. 14 A vac. 15 find out. 16 that's blackmailing, that's certainly nor part of har 16 that's blackmailing, that's certainly nor part of har 17 official congressional responsibilities or her campaing 18 find out. 19 A we. 20 And I also understand you to easy that becomes 21 Kancy seemed to he more concerned with how the could are 21 kancy as after or rights of vicins, that the tore 22 that information for her prosmis lift that that we could are 23 to canse after or rights of vicins, that the tore 24 A vac. 25 O Tell me what you remember her asying 25 object I left, she had not contacted any law any constance that we application and picture about of fatrick's phone? 34 A Vest. 35 Cansen about you and of that ton the prime about her tore and that the site of the tore	15	So I was deeply concerned that there was no additional	15 facts.	
 18 c L te expond on that for a minute. 19 C L te expond on that for a minute. 19 C L te expond on that for a minute. 19 C L te expond on that the has gone to authorities, has 19 gone to Ale mileon, StD, whatever it is abe asy. build y are any hnowledge or indication when	 18 0 Let me expound on that for a minute. 19 One, do you have Nanoy, I know, has said 20 publicly recently that he has gone to authorities, has 21 gone to Alam Wilcon, SiGO, whatever it is the age, bo 22 you have any knowledge or indication shen if, in fact. 23 she ever did what you thought was right and went to 24 authorities, do you have any knowledge when the ever did 25 that, if at all? 1 A The only thing I know about is that obortly? 2 after she came back from the Caribbean with bartick and 3 some others, she told me after. As far as I know, 5 befors I left, she had not contacted anglato Police, but 4 that was only for her own aaftery. As far as I know, 5 befors I left, she had not contacted anglato Police, but 9 charter the poletion of the oribbean with bartick and 9 contract. While we reatily out if the police, but is that observe is the there than a state of the origination and pictures and you later as a lange to a the origination and pictures and got of that roke and the second of that and the 9 contract. While we're talking, t'll yust text someone at 16 information and pictures and got of fatrick's phone; 17 of build that one. We wuld have a record of that and the 18 information and pictures and got of fatrick's phone; 19 contract. While we're talking, t'll yust text someone at 19 contract. While we're talking, t'll yust text someone at 10 contract. While we're talking, t'll yust text someone at 11 we're bardwalling, that's certainly not part of her 13 fand out. 14 a Yes. 15 bears all night on the couch and programs bets, all the to the town website, is that a fair. 15 bears all sign that is a certainly not part of her 16 that 's blackmalling, that's certainly not part of her 16 that 's blackmalling, that's certainly not part of	16	legal measures being taken if she truly believed in what	16 Q Well in some ways, I may ask you to draw some	
 9 One, do you have Nancy. I know, has said 20 publicly recently that she has gone to authorities, has 21 gone to Alam Bilson, SURD, whatever it is she says. Do 22 you have any knowledge or indication when if, in fact, 23 she ever did what you thought was right and went to 24 authorities, do you have any knowledge when she ever did 25 that, if at all? 1 A The only thing I know about it that shortly 23 after ahe came back from the Garibbean with Patrich and 3 some others, she told me she contacted Capitol Police, but 4 that was only for her own safety. A far as I know, 5 before I left, she had not contacted any law enforcement 6 regarding the other potential victims. 7 0 Do you remember when you left? 8 A I it was shortly after the primary when she beat 9 caherine Templeton, so that would ve been in June of lati 10 year. Probably July or early August. I can go back and 11 pult that one. We wuld have a record of that and the 12 contract. While we're talking, I'll just text someona 13 findraut. 14 Q Obviously, some of what you said is that using 15 information and pictures ahe got off Fatrich's phone; 14 can yoa: disclemant diptores and you to say that because 13 hank into as we're talking, it's jogging memory. 14 that for an ingrama bate to dim as ble to 18 hank into as we're talking, it's jogging memory. 19 that all actued because ahe found that was he had a 20 dating app. And had an account on a dating app. And 21 hearuse she found that, whe started thinking that hew sei 21 hank into as we're talking, it's jogging memory. 22 that information for her personal gins rather than trypical and an account on a dating app. And 23 hearuse she found that, whe started thinking that hew sei 24 hat yos that becau	 19 One, do you have Namoy, I know, has said 20 publicly recently that she has gone to authorities, has 21 gene to Alam Wilcon, SLD, whatever it is she says. Do 22 you have any knowledge or indication when if, in fact, 23 she wer did what you throught was right and went to 24 authorities, do you have any knowledge when she ever did 25 that, if at all? 26 that point the Caribbean with Patrick and 3 and others, she told are able contracted Appice Points 3 and others, she told are able contracted Appice Points 3 and others, and told contracted any law enforcement 6 regarding the other potential victims. 7 0 Do you reember when you left? 8 A It was abortly after the primary when able beat 9 Coherine Templeton, so that would've been in June of law 10 year. Probably July or early August. I can go back and 11 Fulter burca accounts. This is kind of a throw about is a that using 15 information and pictures ake got of Patrick's phone, if 16 that's blackmailing, that's certainly not part of her 16 that's blackmailing, that's certainly not part of her 17 of fielial congressional reeponsibilities is that fair? 19 A Yea. 10 A Yea. 10 Will for background, you need to know that 11 Fulter burca caccounts. This is kind of a throig she 12 does. She sits all night on the couch and programs bots, all seerus 12 does. She sits all night on the couch and Paviters 13 hancy acceed to the that fair? 14 A Yea. 15 benore a we're talking, it'll just text someone and 15 information and pictures also got of fast ruck is 16 that's blackmailing, that's certainly not part of her 16 that's blackmailing, that's certainly not part of her 16 back. Into' and we're talking, it'll gust the compositites? 16 back into' - as we're talking, i	17	she was saying.	17 conclusions based on facts, but I'm not gonna ask you to	
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1	Page 41 Q When she used the term "hacked" with you, was	1	Page she was telling you at that time consistent with the story	43
2	she clearly expressing to you that she gained access to	-	that she has been giving in her congressional floor	
	his own phone without authorization or credentials?	-	speech?	
1	A Yeah. I would be careful on the word "hack,"	4	A No.	
-	because people use the word "hack" in different ways. It	5	Q So start there.	
	doesn't mean that they're a computer hacker. It could	6	What was the distinction between what she was	
7	· ·		telling you in November '23 versus the story she's telling	
	able to access it. I wouldn't label it as hacking, but I		in the congressional floor speech?	
	do remember she used the word "hack" and I do remember	9	A The only allocation was accusation, sorry,	
	that somehow she was able to access his phone and other		was that Patrick was in possession of pictures of naked	
	items.		women taken without their consent and without them knowing	
12	Q Did she give you any indication at that time		he still had them. There was never any discussion of rape	
	that Patrick Bryant had voluntarily given her his		or sex trafficking or anything beyond the fact that he had	
14	passwords or otherwise given her voluntary access to his	14	pictures of naked women taken without their consent.	
15	phone or devices?	15	Q Did Nancy, even when she showed you did	
16	A In fact, just the opposite. She got really	16	Nancy ever report to you any story where she alleged she	
17	upset once because he hid his phone not hid. He locked	17	was somehow a rape or sexual assault victim?	
18	his phone away in a safe and, you know, she got into a big	18	A Not through Patrick. Only through her previous	
19	fight about why would he lock it in a safe if there was	19	rape, which I think happened at The Citadel. Yeah; but no	
20	nothing to hide.	20	new rape.	
21	Q All right.	21	Q And did Nancy I guess I'm still going back	
22	So let's go to give me one quick second.	22	to November '23, or up to that time, had she in any way	
23	I asked you a question earlier where I asked	23	ever expressed to you that she thought she had been	
24	you if the photos that Nancy did show you I guess at	24	roofied or drugged in any way?	
25	Shiki and maybe at other times that she got from	25	A No.	
1	Page 42 Patrick Bryant's phone, if she demonstrated or showed what	1	Page Q And did she ever express to you that Patrick	44
2	she was alleging those photos showed. So let me I'm	2	Bryant physically assaulted her or abused her in some way,	
3	prefacing what I'm gonna ask you about based on what you	3	even if nonsexually?	
4	said there. You said that Nancy said "Hey, Patrick's	4	A Yes.	
5	taking videos of women or pictures of women without their	5	Q Okay.	
6	consent, blah, blah, blah." I guess I'm trying to figure	6	Tell me about that.	
7	out what was the story she was telling you that she was	7	A She had a number of bruises on her arm. I	
8	proposing those pictures showed and what did you not	8	would call them like what would you call the end of	
9	believe synced up about the photos that you saw and the	9	your fingers? Fingertips. I would call them	
10	story she was trying to tell?	10	fingertip-size bruises on her forearm, about four of	
11	A If by by "the story she's trying to tell,"	11	which above her elbow, little bruises on her arm about	
12	do you mean her congressional testimony, her congressional	12	right here, and said that he grabbed her.	
13	tirade?	13	Q Okay.	
14	Q Let's go back to that. I'm gonna separate	14	All right; let me ask a different question real	
15	those two. That's a excellent question you asked. Let me	15	quick.	
16	ask a different question to help with that and baby-step	16	Remember I was asking you about the photographs	
17	that.	17	that Nancy showed you, and then you indicated that her	
18	Nancy told a story in her congressional speech		complaint was they were photographs of women without their	
	about her version of the history of all this. You, in		consent. Did any of the photographs Nancy showed you	
	some way, lived a portion of it.		support in any way that women who were being photographed	
20	··· · · · · · · · · · · · · · · · · ·		were in the process of being sexually assaulted or raped	
	A Yeah.	121		
21	A Yeah. O So when Nancy first spoke to you about what she		while being photographed?	
21 22	$\ensuremath{\mathtt{Q}}$ $% \ensuremath{\mathtt{S}}$ So when Nancy first spoke to you about what she	22	while being photographed? A No.	
21 22 23	Q So when Nancy first spoke to you about what she found in November of was it November of 2023?	22 23	A No.	
21 22	$\ensuremath{\mathtt{Q}}$ $% \ensuremath{\mathtt{S}}$ So when Nancy first spoke to you about what she	22 23 24		

	Page 45		Page 47
	who were being raped, about to be raped, in the process of	_	bring up Eric a good bit. She didn't like Eric at all.
2	being raped, or anything like that?	2	Q Okay.
3	A No.	3	And what would she like to Eric Bowman, what
4	Q Did Nancy mention anything at that time	4	would she say about him?
5	still going back to this November '23 when she showed you	5	A Well just that he was a sleazeball and a bad
б	this pictures about John Osborne or Eric Bowman or	6	influence on Patrick and that, you know, all Patrick's bad
7	Brian Musgrave?	7	faults come from Eric. You know, after that Shiki
8	A She discussed Eric Bowman a number of times.	8	incident I remember he was going to the Caribbean with
9	Especially as it relates to the picture of a passed-out	9	Eric and with Zucker, Jonathan Zucker. She was going to
10	girl on a couch, which I did see, with a blanket over her.	10	the Caribbean and Eric was gonna be there, Jonathan
11	Q Yeah.	11	Zucker; they had a boat. And I simply asked her "If you
12	A That this had occurred at Eric Bowman's house.	12	think Patrick's dangerous, you think Eric's dangerous, why
13	Q So in that picture, by the way just so I can	13	are you going to the Caribbean with them?" Like she never
14	be clear it's literally just a picture of a girl on a	14	once talked about Eric.
15	couch with a blanket on her?	15	Q Did she ever show you anything that would
16	A Yes.	16	support Eric Bowman committing some type of sexual assault
17	Q Can you tell from the photo, is the girl	17	or rape or anything like that against a woman?
18	clothed, nude, or can you tell?	18	A No.
19	A She said she was nude. And I remember thinking	19	Q Did she ever show you any well did she ever
20	like I can't see that.	20	discuss with you the allegation that Patrick Bryant and
21	Q Okay.	21	Eric Bowman broke into a woman's residence, house, or
22	Are there any other men in the photograph?	22	apartment, and took turns filming her while the other one
23	A No. Let me go back. I don't recall. I don't	23	raped her?
24	think so. I remember her saying it was at Eric Bowman's	24	A No. Let me just state clearly and I know
25	house, but I don't remember Eric Bowman being in the	25	you're gonna ask these all individually, and that's
1	Page 46 picture, nor do I remember Patrick, but that's not to say	1	Page 48 fine she never once took the leap from he's taking
2	they weren't. I just don't remember that.	2	creepy pictures of women without their consent to any kind
3	Q Let me state it a different way.	3	of violence or rape.
4	You didn't see any men in the picture engaged	4	Q Okay.
5	in any sexual acts.	5	A Ever. Patrick, Eric, or anyone else, ever.
б	A Definitely not. No.	6	Q Maybe this is a good way to ask that question:
7	Q Okay.	7	When is the first time that you ever heard the allegation
8	A I had never heard Brian Musgrave's name until	8	that Patrick Bryant or Eric Bowman were somehow engaged in
9	her speech in Congress. He was never mentioned before.	9	sexually assaulting or raping or sexually being violent to
10	John Osborne, I don't think she actually, I'm having a	10	women?
11	hard time remembering. Because SLED contacted me and	11	A In her congressional floor speech.
12	questioned me. And I remember them telling me that the	12	Q While you were still meeting with Nancy and
13	girl was John Osborne's girlfriend, but I don't remember	13	working with her, did she mention anything about Airbnbs
14	Nancy saying that that was John Osborne's girlfriend. I'm	14	and Patrick Bryant?
15	a little cloudy there because yeah; I don't remember if	15	A Only that they were Airbnb'ing the D.C. place
16	she did or if SLED did, but I don't remember so I've	16	and the IOP place. I mean, I rented the D.C. place from
17	known John for a long time. I've known John as long as	17	'em I think twice on Airbnb. Like only those discussions.
18	I've known Patrick. I don't recall any accusations about	18	Q Did she ever reference video cameras at any
19	John or Brian ever. It was always about Patrick and Eric.	19	Airbnbs associated with Patrick Bryant?
20	Q To the extent that she was talking about Eric,	20	A No.
21	was she talking about Eric in regards to any of the other	21	Q Did Nancy talk to you about her relationship
22	photos or just the one with the girl covered up by the	22	with at all?
23	blanket?	23	A No.
24	A She talked about Eric a lot. Not only as it	24	And by the way, your previous question about
25	relates to the photos, but, you know, she she would	25	when did we quit working with Nancy, we notified her on

	Deposition of v	13 (4) - 32
1	August 8th that we were Page 49	Page 51
2	Q Okay; gotcha.	2 Q Would she acknowledge that she would take
3	A Yeah.	3 kernels of truth and embellish them? Like was she aware
4	Q Thank you.	4 that she was doing it or do you think it was more like a
5	So did Nancy ever show you any videos that she	5 compulsive-liar type thing where she doesn't know she's
б	allegedly hacked or obtained off Bryant's phone without	6 doing it?
7	permission?	7 A I believe look, I can't say for truth. I
8	A No; just some photos.	8 can only tell you what I believe, and I believe that Nancy
9	Q Did you ever have knowledge of Nancy working	9 Mace has a hard time telling what's reality and what's
10	with any authorities about the photos or videos she	10 not. I believe that Nancy Mace is a chronic liar who
11	obtained off Patrick's phone? SLED? Any other law	11 constantly plays the victim card for her own benefit, and
12	enforcement agency.	12 I would catch her in lies all the time.
13	A No. In fact, just the opposite. I think she	13 Q And if you caught her in lies, would you
14	was not talking to them about it. She told me she had	14 confront her about those lies?
15	talked to Capitol Police.	15 A No; because she sees black helicopters
16	Q That's the last you ever heard about that.	16 everywhere. Everybody's out to get her. Her campaign
17	A Yes.	17 managers. You know, she she she'd just talk bad
18	Q So if I understand that correctly, from the	18 about everybody, hates everybody, everybody's out to get
19	time you first heard about the photos or videos in	19 her. She's she's just not stable. I don't know how
20	November of '23 to when you terminated your campaign	20 else to say it.
21	relationship on August 8th of 2024, the only thing you	21 Q Has that been the case throughout your dealings
22	ever heard from Nancy Mace regarding her going to law	22 with her from the very beginning of her campaign or did
23	enforcement regarding Patrick Bryant, Eric Bowman, photos	23 she increasingly become unstable over time or how or
24	and videos that she got off Patrick's phone, that would've	24 tell me about that.
25	only been relating to her going to Capitol Police to try	25 A I mean, it went from no, she was always a
1	Page 50 to arrange for some kind of security for herself?	0 1 little bit like that. She would hand me polling with like
2	A Yes.	2 parts of the polls blacked out, like a CIA top-secret
3	Q And what was the security she was seeking for	3 document you see on movies; right? So she's always had
4	herself from Capitol Police?	4 that kinda like everybody's-out-to-get-me-black-helicopter
5	A I don't recall. Just security. I mean, she	5 mentality, but it got progressively worse. Like her last
6	was afraid for her safety.	6 campaign manager, she would accuse of stealing data. The
7	Q Was she insinuating or alleging that Patrick	7 previous one before that, often she was accusing of
8	might come see her in D.C.?	8 stealing stuff. And over the years, she devolved. And it
9	A If I remember specifically, she would tell me	9 got really bad during the primary against Catherine where,
10	"Don't ever tell Patrick where I'm staying." So I think	10 you know, she would call and say "Well I just got another
11	she was fearful of retribution, or at least, you know,	11 stress tattoo," and then she was also crying.
12	acting like she was fearful of it.	12 Q I've heard you mention a stress tattoo. What
13	Q Did you have experiences with Nancy I wanna	13 is a stress tattoo? I've never heard that term.
14	be careful how I'm gonna ask you this question because ${\tt I}$	14 A Well, it's just a tattoo. She would say it
15	wanna give you the leeway to answer it as you see fit;	15 helps her with her stress. I never heard that term,
16	right? But did you ever have experiences with Nancy where	16 either. That's what she called 'em.
17	she would tell you things that the facts and records that	17 Q Huh.
18	you were experiencing did not support?	18 Do you know what she would get stress tattoos
19	I see your face. Let me scratch that and ask	19 of?
20	something else.	20 A No. I think words.
21	A Nancy's a chronic liar.	21 Q Gotcha. Like?
	Q That's what I was gonna ask.	22 A I don't know. I always found it to be weird,
22		22 go I didn't ask a lot of quantions. But she was and I
22 23	Did Nancy make up facts?	23 so I didn't ask a lot of questions. But she was and I
	Did Nancy make up facts? A All the time. Her car was keyed, her tires	23 so I dian't ask a lot of questions. But she was and I 24 wanna be careful the way I say this, because I don't think

	Deposition of v	vesi	iey Donenue 14 (55 - 50)
1	Page 53 was like on purpose. I think she believed Patrick was	1	Page 55 spoken, e-mailed, or published to anyone that Patrick
2	cheating on her. I believe that she believed that he had	2	Bryant and Eric Bowman were sexually assaulting women or
3	a bunch of creepy pictures, and I believe that that pushed	3	were breaking in to their apartment to film the sexual
4	her over the edge to start making very emotional and	4	assaults of women, that was in no way related to her
5	erratic decisions; and I believe that it started impacting	5	campaign or her congressional office as of August 2024 to
6	her health, such as not eating, drinking too much, and	6	your knowledge.
7	losing a ton of weight. And I think that she has	7	A Yes.
8	consistently devolved emotionally since then. And	8	Q To go through the names you just gave me, Lorie
9	which was one of the reasons I terminated my relationship	9	Khatod was her chief of staff?
10	with her, because it started getting too bad.	10	A Yes.
11	Q Gotcha.	11	Q Is that still her chief of staff, or has that
12	So this is another question I had.		changed?
13	Do you remember if you are familiar with	13	A I've heard that they parted ways.
	Nancy's floor speech from January of 2025?	14	Q Do you know when Lorie parted ways with her?
15	A Yeah.	15	
16	Q She rehearsed a series of political bills that	16	Q Do you have contact information for Lorie
	she was planning to introduce into Congress or had		Khatod?
	introduced into Congress. Do you remember that part of	18	A I don't think I do. I think I got a phone
	her speech where she referenced those?		number. Yes; her e-mail address looks like it was a Nancy
20	A Yes.		Mace e-mail address, but I do have her phone number if
21	0 And I have marked that as an exhibit. We can		it's still the same. And that phone number is
	pull it up if we need to, but I wanna ask a generalized	22	
	question without getting into weeds.	23	Q
24	I'm assuming, based on what you do, if Nancy,	24	A Yes.
	as part of her congressional function, was introducing	25	Q Are you aware, did Nancy ever speak with Lorie
	Page 54	23	Page 56
1	bills that she wanted to mention in a floor speech, what	1	about Patrick Bryant and Eric Bowman related to the issues
	she would've done is made both her congressional office	2	we're hearing in her floor speech now?
3	and such campaign aware of it so that you guys could	3	A I do not recall.
4	contribute with the digital strategy of marketing these	4	Q Was Doug Stafford, was that her what was his
5	plans, marketing it to her constituents as "Look what a	5	position again?
б	good job I'm doing." Is that fair?	6	A He was the general consultant.
7		7	
	of staff, Lorie Khatod L-o-r-i-e, K-h-a-t-o-d called	8	Do you know, is Doug Stafford still with her
-	the pineapple call. Never understood that one. It was	9	office or campaign?
10	always on the calendar "weekly pineapple call." But I	10	
11		11	Q And what about John Mason Long? What was his
	weekly pineapple call with her chief of staff, her		position again?
	consultant, Doug Stafford; her campaign manager, John	13	
14	Mason Long; and Nancy, and we would discuss everything	14	Q Is he still with her?
15	going on with the official office and everything going on	15	A No.
16	with the campaign so that both could be coordinated the	16	Q Do you have contact information for John Mason
17	way it needed to be coordinated.	17	Long?
18	Q As of August 2024, had you ever understood or	18	A I do. In fact, I just saw him on Friday. His
	heard any reference to Patrick Bryant, Eric Bowman, sexual		phone number is
20		20	
21	part of her campaign strategy at that time?	21	Do you know, did Nancy discuss Patrick Bryant
22	A No.		and any of these allegations that we've been discussing
23	Q If Nancy Mace was so now let me ask a	23	with Doug Stafford in any way?
	slightly different question, but you'll understand it.	24	
25	If prior to August of 2024, Nancy Mace had	25	if she did not.

1	Q Okay. Page 5	Page 59
2	What about Dan Hamlin? Do you know if Nancy	2 that she was going through all these different attorneys
3	Mace discussed Patrick Bryant and Eric Bowman and these	3 and some of them wouldn't wouldn't work with her. But
4	allegations with Dan Hamlin?	4 I don't remember a specific mediation.
5	A I believe you would have to go check the	5 Q Is the reason that she was telling you that
6	dates, but I believe Dan was already gone by the time this	6 these lawyers wouldn't work with her is because she was
7	all came up.	7 potentially asking them to do something illicit in terms
8	Q Okay.	8 of
9	A I don't remember when Dan left and Lorie came	9 A I don't think she ever said that, but that was
10	on. But if my memory's correct, Dan was already gone.	10 what I was taking away from it.
11	Q Okay.	11 Q Do you know, in any way did Nancy ever use any
12	A But I could be wrong there.	12 congressional or campaign funds to pay for these lawyers
13	Q Did any other consultants or campaign staff or	13 to handle her personal business?
14	political professional express any concern to you about	14 A I don't know.
15	Nancy's behavior or stability before you left the	15 Q Okay.
16	campaign?	16 Do you know in any way this is a slightly
17	A Oh, yeah. John Mason Long, she thought they	17 different question. You probably still won't know.
18	had it out. Doug Stafford and I talked about it all the	18 Do you know in any way how these lawyers were
19	time. Everybody in my office that she had to work with.	19 getting compensated?
20	Q Generally, what were the conversations coming	20 A I do not know. I was under the assumption she
21	from other people? What were they saying?	21 was paying them, but Nancy doesn't have a lot of personal
22	A That she is losing her mind, that she's	22 money so I do not know.
23	erratic. That what was already a little erratic has gone	23 Q So let me ask a different question: Do you
24	off you know, gone off a cliff. I mean, there was even	24 recall Nancy Mace settling the real property dispute with
25	a lot of conversation about us being concerned for her	25 Patrick Bryant?
1	Page 58 safety. Like I was concerned about it. I mean, I was	Page 60 1 A Only from what I read in newspapers.
	very concerned about it. To this day, I'm still concerned	2 Q Oh. Gotcha.
	about it.	3 A That happened well after I was gone.
4	Q When you say "concerned for her safety," you	4 Q Okay.
5	mean within terms of like self-harm or something like	5 A Isn't it true that she settled those about a
6	that?	6 week before her congressional
7	A 100 percent; yeah.	7 Q No. I think what you're confusing, if I'm
8	Q Are you aware of anyone else that Nancy Mace	8 right, there was a settlement agreement in or around May
9	privately communicated with about her allegations of	9 of 2024. But the properties some of the properties
10	criminal conduct and Patrick Bryant? Her sister, her	10 sold at a later date, which is probably what you're
11	mother, other members of Congress?	11 thinking about, because that would've been public record.
12	A Not that I'm aware of. Nancy doesn't have a	12 You know, the settlement's like, hey, we're gonna sell
13	lot of friends. She's not close with a lot of people.	13 this property; here's how we're gonna split the proceeds.
14	Q Right.	14 Properties have to sell. So the property what you're
15	Has Nancy ever discussed let's do this. Let	15 referring to, I think, were some articles where the
16	me take a break for a minute.	16 properties did sell because the reporters are watching.
17	(Discussion held off the record.)	17 A Got it. Gotcha.
18	BY MR. BREWER:	18 I was under the assumption when I left in
19	Q Wes, do you recall I showed you a lawsuit	19 August that those properties were still still being
20	earlier where Nancy Mace sued Patrick Bryant over real	20 mediated, but I did not know that.
21	estate. Do you remember her attending a mediation in May	21 Q That's why I'll ask this prophylactic
22	of 2024 related to that suit?	22 question, then: Did Nancy ever express any unhappiness or
23	A I don't remember that's a good question. I	23 any personal dissatisfaction with the way the real estate
24	don't remember a mediation. I remember her talking to	24 properties that she and Patrick shared were being divided?
25	numerous lawyers about it because she kept talking about	25 A All the time. She wanted 100 percent

1	Page 61 ownership. And she would say it all the time. And that	1	Page 63 believe. So that has been an issue that she was
	she was going to if she did not get 100 percent	-	passionate about, but I never heard of the voyeurism and
-	ownership, then she was going to ruin him and Eric. She		these other issues.
	never mentioned John or Brian, but that she would	4	Q When you met with Nancy in November 2023 at
	absolutely ruin them with the information that she got		Shiki, was there any discussion about her writing any kind
	about 'em.		of bills or legislation in any way related to the
7	Q Why was she insistent on ruining Eric's life		photographs she was showing you from Patrick Bryant's
	with information she had if Patrick didn't agree to give		phone?
	her 100 percent of the properties she and Patrick shared?	9	A No. She specifically stated that she was going
9 10	A I don't know. I was just always under the	-	to use the information she found for to gain ownership
	impression that she hated Eric, but I don't know.		of the two properties.
	0 Got it.	12	Q Did Nancy ever tell you did she ever express
12	Q GOLIL. Okay. Let me I'm gonna frame a time frame		that she had a legitimate ownership interest in 100
13	here. From November 2023 which is the meeting at Shiki		percent of those properties or just that she wanted them
	we discussed earlier to your departure on August 8th,		and, therefore, was gonna use this information to obtain
	2024, was there ever any discussion of a political		that result?
	campaign, Nancy Mace For Congress political campaign or for office itself for Congress, was there ever any	17	A That she owned half of each and that she was
	discussion about Nancy campaigning on Patrick Bryant, Eric		going to take 100 percent ownership of them using the materials she found on Patrick's phone and computer.
	Bowman, John Osborne, or Brian Musgrave being sexual	20	
	predators in some way? A No.	21	Did she have any legitimate belief that she was
22			actually legally entitled to 100 percent of those
23	Q Between November 23, 2023, and August 8th,		properties?
	2024, if Nancy had published to anyone allegations that	24	A No. No; she was going to use and her words
25	Patrick Bryant, Eric Bowman, John Osborne or Brian	25	the materials as leverage. "He's gonna give 'em to me
1	Page 62 Musgraves in any way contributed to the sexual assault of	1	or I'm gonna ruin him." Page 64
		1 2	
2	Musgraves in any way contributed to the sexual assault of		or I'm gonna ruin him."
2	Musgraves in any way contributed to the sexual assault of women, would those comments in any way be related to her	2 3	or I'm gonna ruin him." Q Yeah.
2	Musgraves in any way contributed to the sexual assault of women, would those comments in any way be related to her congressional office and its responsibilities?	2 3 4	or I'm gonna ruin him." Q Yeah. In your experience, did Nancy ever discuss
2 3 4 5	Musgraves in any way contributed to the sexual assault of women, would those comments in any way be related to her congressional office and its responsibilities? A No.	2 3 4	or I'm gonna ruin him." Q Yeah. In your experience, did Nancy ever discuss using leverage, blackmail, reputational harm, or public
2 3 4 5 6	Musgraves in any way contributed to the sexual assault of women, would those comments in any way be related to her congressional office and its responsibilities? A No. Q And to make sure we're clear about what you	2 3 4 5	or I'm gonna ruin him." Q Yeah. In your experience, did Nancy ever discuss using leverage, blackmail, reputational harm, or public pressure against her political or personal adversaries?
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17 (65 - 68)

1	Page 65 A I've read parts of it, but I don't think I read	1	0 Gotcha. Page 67
2	the whole thing.	2	Did Nancy in any way discuss any conversations
3	Q Are the allegations Nancy made efforts in		she might've had with Sam Staley about Patrick Bryant in
4	that speech to tie what she was doing in that speech to		any way?
5	her congressional activities in office.	5	A No.
6	A Uh-huh (witness indicated an affirmative	6	Q Let me ask now so I've got an exhibit I've
	response).		marked, which is Exhibit E, I wanna show you really quick.
8	Q Did you ever hear the issues she raised in this		I wanna get your understanding for how all this works.
	speech being related to her official role in Congress or	9	What I'm showing you that has been marked as
10	any responsibilities she was undertaking in Congress	-	Exhibit E this isn't mine, but I actually received the
11			same thing. I get inundated with these WinRed texts. I'm
	August of 2024?		thinking about changing my phone number, in fact. And one
13	- A No.		of them that came out was this.
14	Q Do you ever hear from anybody in Nancy's orbit	14	A It's not coming up. I see the PDF, but I don't
15	after you left from August 2024 through the present?		see what's in the PDF.
16	A No.	16	Q That's weird. Let me try again. Yeah; see it
17	Q Okay.	17	paused it, so it was blacking out the screen. Give me
18	Let me ask about these names and ask if you've	18	another second. Not sure why it was doing this.
19	heard anything from Nancy about these people.	19	A Doug, you sent those to me, didn't you?
20	Did Nancy ever mention anything to you about a	20	Q Can you see it now?
21	lady named or ? It's , she goes by	21	A Yes.
22	· · · · · · · · · · · · · · · · _ · · _ · · _ = ~ - ~ - ~ - ~ - ~ - ~ - ~ - ~ - ~ - ~	22	Q How do these text messages or these fundraising
23	A No. I mean, I know who she is, but no.	23	messages for the campaign work? Like who's responsible
24	Q How do you know who	24	for these? Who sends 'em out? Who drafts all this?
25	A Because I later found out that that was John	25	A The answer is it's dependent upon the day. In
1	Page 66 Osborne's girlfriend, supposedly the girl on the couch.	1	Page 68 other words, after we terminated our contract, then it was
2	Q How did you find that out?	2	a different firm; but this is the kind of work that my
3	A I don't recall. It could've been that SLED	3	company does. So prior, the answer would be us.
4	conversation.	4	Afterward, it'd be whoever she's using now that we no
5	Q Okay.	5	longer work with her.
б	A Yeah.	6	Q And how does this work, like when these texts
7	Q While we're on that topic, did SLED relay to	7	go out? Like do you guys buy phone numbers and send these
8	you what Nancy had told SLED?	8	texts out and you just link it back to these WinRed
9	A No.	9	platforms for fundraising? How does that all come
10	Q Did SLED ever show you anything? Pictures,	10	together?
11	videos, anything like that?	11	A Most of them are done through different kind of
12	A No.	12	list agreements. We don't buy numbers. Typically, if you
13	${\tt Q}$ $$ Is the conversation you had with SLED tracking	13	received it, you donated to a different Republican; and
14	with what we've discussed today or is there things in the	14	then we shop around those different lists. I told you
15	conversation with SLED that we haven't discussed yet?	15	that I have a fourth company called RCL. That's all that
16	A No, it tracks.	16	company does, is it rents data to different political
17	Q Did Nancy Mace ever mention a lady by the name	17	campaigns and organizations. So it's to answer how
18	of Katherine Cockman to you?	18	does this work would take me an hour in itself; but
19	A No; I've never heard that name.	19	basically, it's a a company such as ours comes up with
20	Q Did Nancy ever mention someone by the name of	20	a concept, sends 'em to a campaign, campaign approves, and
21	Sam Staley to you?	21	then we start sending it around to different lists.
22	A I don't recall, but I know Sam from other	22	Q Got it.
23	things; but I don't recall if she talked about Sam or not.	23	So if I wanted to find out like who the new
24	She probably talked about Sam, but I would've known Sam	24	Push Digital was basically, for this, I would need to ask
25	prior.	25	Nancy Mace who their campaign digital marketing team or

Page 69	Page 71
1 consultant is?	1 'em, and then she'll put 'em all in ChatGPT and then say
2 A I mean, you could; but you showed me an exhibit	2 "Hey, give me some more tweets that are like this."
3 earlier with some FEC information. You can go to that	3 Q Wow.
4 same FEC site and find out, you can look at her	4 A Definitely.
5 expenditures and find out who her vendors are.	5 If you see the Oxford comma being used a lot.
6 Q Okay; gotcha.	6 Q I'm a lit major, so you are boy, you're
7 Then I wanna show you I have a compilation	7 taking me back.
8 of tweets. Let me go to a different page here. And this	8 A So that em dash and the Oxford comma are the
9 is Exhibit F. I'll pull that up. It's taking a second	9 two biggest signs of ChatGPT.
10 because it's so large. This is a Word document, but I	10 Q That's so funny.
11 think we turned it into a PDF, but it's just a collection	11 A The things you learn.
12 of tweets just leading up to and then after the	12 Q I've learned a lot of things, but that is
13 congressional floor speech from May of 2024. Some of	13 probably the most-interesting thing I've learned all day.
14 these, I'm sure you've seen. You're welcome to flip	14 Okay; this account Rep Nancy Mace, is that
15 through 'em at your leisure. I can make 'em bigger for	15 associated with her congressional office or her campaign
16 you.	16 office?
17 Do you know, does Nancy write these tweets	17 A That's her congressional office.
18 herself or does someone on her staff do this for her?	18 Q And so the account associated with her
19 A Both. I'm trying to look up the girl's name	19 campaign, that just says Nancy Mace or Nancy R. Mace or
20 right now. I'm sorry. Give me two seconds. Okay; so	20 something like that?
21 I can't find her name. So Nancy has a new person that	21 A I think it's Nancy Mace, but that was the
22 works for her now. I can't find it. It's gonna take me a	22 account we used to control. We never had this one.
23 little bit of time, but I can find the name of it. She	23 Q When you were doing the campaign, it was just
24 has a young woman who is her new communications director	24 as Nancy Mace, basically.
25 in her official office who has been handling her Twitter	25 A Yeah.
1 account. Page 70	1 Q Okay. Gotcha; gotcha; gotcha. Page 72
2 Q Someone that goes by the name of Sydney, maybe?	2 So is there actually a division of labor that's
3 A I think that's correct. Is it Tiffany? She	3 kind of usually well respected in terms of what person
4 tweeted it the other day, "My new comms director."	4 being paid money from what accounts are using excuse
5 Q That would be since these tweets are like	5 me; let me rephrase that.
6 back in these are February '25	6 Is there usually a respected division of labor
7 A No, no, no. She was doing the campaign stuff.	7 about Nancy Mace's official congressional Twitter account
8 Now she's got an official comms director. She started	8 being populated or authored by Nancy or someone else being
9 working with her right before we left. I think her name	9 paid by the congressional office as opposed to there being
10 is Claire. Anyway, so Nancy writes a lot of 'em herself.	10 a cross-filtering where maybe someone from the campaign's
$\underline{11}$ This new girl writes <code>'em</code> , and then a lot of what she	11 also running her official account or do you understand
12 tweets out these days is from ChatGPT.	12 what I'm asking? Is it all hands on deck between the
13 Q Which one?	13 campaign and congressional office about which platforms
14 A Go down, go down, go down; that one.	14 are being used and who's authoring what?
15 Q "God placed a burden in my path. Not to crush	15 A Yes.
16 me, but to ignite"?	16 Q So it could be a mixup. You could have people
17 A Yeah; that one's ChatGPT.	17 from the campaign paid by the campaign using the official
18 Q How can you tell?	18 account like it's official.
19 A See that long dash? It's called a em dash, e-m	19 A Yes.
20 dash. Normally, people don't use that, but ChatGPT does.	20 Q Okay.
21 Q Interesting.	21 When you're in someone's office, is it typical
22 So does she ask ChatGPT to come up with the	22 for most candidates to respect the line between
23 tweets, and then she cuts and pastes them in the Twitter?	23 congressional mediums of communication versus campaign
24 A Yeah; a lot of 'em. Sometimes she writes 'em	24 mediums of communication?
25 herself. But what she'll do is she'll write a bunch of	25 A Yes. There's supposed to be. We demand it

	Page 73		Page 75
_	when we work with a candidate. We never touch their	-	without their consent. But that was the only thing that
2	official stuff.	-	she ever discussed with me; and as of August 23rd or
3	Q Right.		I'm sorry; August 3rd, or whatever that date was that we
4	A Which is why we have that whole separate		terminated the contract, that was the only thing that she
	company that does franking. We have a complete separation		had ever discussed.
		6	Q Do you have prior experience of Nancy using the
7	Q Right.		powers of her congressional office as a pretext for
8	I have some notes here, so give me two seconds.		personal gain, personal financial gain, or personal
9	I've showed you this document with all these	-	motives?
	tweets, and I know that you are an active Twitter user. I	10	A Personal financial gain? I don't think so.
	don't use Twitter a ton; but in researching this case, I certainly know that you have an active presence on Twitter		But she used her power of office all the time for personal reasons. I mean, the other day she got pissed at a guy
	and that you did around the time that all these tweets in		
	Exhibit E or F were published. So you do recall seeing a		named Steven Ryan who worked with the communications director for the sheriff of Dorchester County and called
	lot of these; is that correct?		the sheriff demanding that he fire the guy a month before
	A Yes.		the guy's wedding for no reason saying that she demands it
16 17	Q Did the sentiments and positions being tweeted		as the congresswoman and that her congressional office
	from just leading up to and after the floor congressional		would never work with the sheriff again. That's the shit
	speech in January 2025, and then for about a month or so		she pulled.
	after, were these topics being discussed in your Friday	20	Q What was the personal objective, you think?
	pineapple meetings between November 2023 and August 2024?	20	A Ego.
21	A No.	21	Q Okay. Got it.
22	Q Okay.	22	But in like that instance, you can't think of
23	Let me check some of my notes here. We're		what the personal benefit to her is other than flexing.
	moving right along, so thank you so much. One minute, and	25	A Yeah.
		123	
	Page 74		Page 76
	I'll go ahead and check notes real quick. I might be	1	Q Got it. Got it. Page 76
1		1 2	
1 2 3	I'll go ahead and check notes real quick. I might be farther along. (The deposition took a short recess.)	2 3	Q Got it. Got it. A The answer is I don't know. I could only tell you what I've seen. And what I know is that she believed
1 2 3 4	I'll go ahead and check notes real quick. I might be farther along. (The deposition took a short recess.) BY MR. BREWER:	2 3 4	Q Got it. Got it. A The answer is I don't know. I could only tell you what I've seen. And what I know is that she believed and she did believe that Patrick cheated on her and
1 2 3	I'll go ahead and check notes real quick. I might be farther along. (The deposition took a short recess.) BY MR. BREWER: Q All right.	2 3 4 5	Q Got it. Got it. A The answer is I don't know. I could only tell you what I've seen. And what I know is that she believed and she did believe that Patrick cheated on her and had pictures of women without their consent; and she sat
1 2 3 4 5 6	I'll go ahead and check notes real quick. I might be farther along. (The deposition took a short recess.) BY MR. BREWER: Q All right. Based on the fact that you have had a history	2 3 4 5 6	Q Got it. Got it. A The answer is I don't know. I could only tell you what I've seen. And what I know is that she believed and she did believe that Patrick cheated on her and had pictures of women without their consent; and she sat on that information for well over a year, did not wanna
1 2 3 4 5 6 7	I'll go ahead and check notes real quick. I might be farther along. (The deposition took a short recess.) BY MR. BREWER: Q All right. Based on the fact that you have had a history of communications with Nancy Mace about some of the topics	2 3 4 5 6 7	Q Got it. Got it. A The answer is I don't know. I could only tell you what I've seen. And what I know is that she believed and she did believe that Patrick cheated on her and had pictures of women without their consent; and she sat on that information for well over a year, did not wanna contact authorities, and asked me to blackmail Patrick
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20 (77 - 80)

	Page 77	Page 79
_	Nancy. She's always the victim. She'll use anything to	1 in other words.
_	be able to say that she's the victim. That someone hurt	2 A Nancy Mace told me that she was going to use
	her, someone keyed her car, someone slashed her tire, someone vandalized her house, someone took a picture of	3 this information to gain 100 percent ownership of these 4 houses; and if that she didn't get them, she was going to
_	· *	
	her kid, someone harassed her at a makeup place. It's	5 absolutely ruin the reputations of Patrick Bryant and Eric
	every day there's someone else is doing something.	6 Bowman. She didn't ever mention John Osborne, she didn't
	She's always the victim of something. I've never met a	7 mention Brian Musgraves. I don't know how they got dipped
	human being that was always such a victim.	8 in this whole thing. But she told me she was going to do
9	Q Okay; give me one quick second. I'm almost	9 that to Patrick and Eric. And in my eyes, that's exactly
	done. I might have one more line.	10 what she did.
11	Wes, let me ask you a couple questions.	11 Q Was it your understanding that Nancy Mace had
12	Since your breakup professionally with Ms. Mace	12 gotten 100 percent ownership of the real property, that
13	in August of 2024, have you been under the impression or	13 she would've continued to sit on the information about
14	do you have information that Nancy is in any way trying to	14 what she quote hacked from Patrick's phone and the
15	target you or your businesses in retaliation for some	15 allegations and accusation she took from them?
16	perceived sleight or disagreement with your office?	16 A Yes.
17	A Not yet. But that's why I didn't wanna have to	17 Q All right. Give me one second; I think I'm
18	do this. In fact, that's why I didn't wanna have to talk	18 done.
19	to you, Barrett. I mean, you know, you had to subpoena me	19 So just in followup, we've now kinda come full
20	because I didn't want to have to do this. But my guess is	20 circle on several things. I don't wanna beat a dead
21	that she's going to seek retribution, which is what I	21 horse. Is there anything about these lines of
22	wanted to avoid.	22 conversation or topics that we've been over today that you
23	Q No one wants to be involved for that very	23 would either like to clarify for the record or I didn't
24	reason; right?	24 ask the right question that you think is relevant to these
25	A Yeah.	25 discussions that you think would help us understand the
1	Page 78	Page 80
	Q Have you, in the time that you dealt with	1 truth of what happened?
	Nancy, ever known her to get personally involved with any	
2		1 truth of what happened?
2 3	Nancy, ever known her to get personally involved with any	 truth of what happened? A You covered it pretty well.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Nancy, ever known her to get personally involved with any type of state-level law enforcement or SLED investigations as part of her role at Congress? A I don't think so. Or at least I don't recall. I mean, I worked with her for years, and every week it was something different; so it could've been, but I don't recall anything like that. Q To go back to something you said earlier, if the statements and allegations that Nancy Mace has levied against Patrick Bryant, John Osborne, and Eric Bowman, if they as I understand the history, those allegations started with Nancy saying "Because I didn't get the two houses, I'm gonna use the information about what I got off Patrick's phone" when she hacked his phone to ruin them. The endgame of that was the floor speech in Congress, based on what she told you? A That's what I believe; yes. Q And so the original undertaking was not a congressional office motive, it was a personal motive in relation to her retaliation for not getting the financial	<pre>1 truth of what happened? 2 A You covered it pretty well. 3 Q Thank you. I'll take that as a compliment. 4 All right. Well Wes, listen, you did this 5 while you don't feel good and I can't tell you how much 6 I'm appreciative of that and I hope you get to go back to 7 bed and pull the covers up. Feel better. 8 A Thank you. 9 Q Thank you so much. 10 A Of course. Thanks, guys. 11 MR. BREWER: All right; we'll be in 12 touch. 13 MR. MacKELCAN: Thank you. 14 MR. BARRETT: Thanks, Doug. 15 THE STENOGRAPHIC REPORTER: Doug, did 16 you want a copy? 17 MR. MacKELCAN: I don't need a copy of 18 it. 19 THE STENOGRAPHIC REPORTER: Okay. 20 How 'bout you, Barrett? 21 MR. BREWER: Yes. I'll take the</pre>
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COURT REPORTER'S CERTIFICATE

I DO HEREBY CERTIFY THAT THE TESTIMONY CONTAINED IN SAID DEPOSITION WAS, BY ME, REDUCED TO WRITING IN THE PRESENCE OF SAID WITNESS BY MEANS OF A COMPUTERIZED TRANSCRIPTION. THE SAID DEPOSITION IS A TRUE AND ACCURATE TRANSCRIPT OF THE WHOLE OF THE TESTIMONY GIVEN BY SAID WITNESS, AS AFORESAID.

I DO FURTHER CERTIFY THAT I AM NOT CONNECTED BY BLOOD OR MARRIAGE WITH ANY OF THE PARTIES OR THEIR ATTORNEYS OR AGENTS, AND THAT I AM NOT AN EMPLOYEE OF EITHER OF THEM, NOR INTERESTED DIRECTLY OR INDIRECTLY IN THE MATTER OF CONTROVERSY EITHER AS COUNSEL, ATTORNEY, AGENT, OR OTHERWISE.

SIGNED THIS 11th DAY OF MAY, 2025.

LORI WEBBER, NOTARY PUBLIC

My commission expires: April 7, 2027