

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRETT O'DONNELL,

Defendant.

CRIMINAL NO. 5:15-CR-34(MTT)

INFORMATION

18 U.S.C. § 1001(a)(2) & (c)(2)  
(False Statements: Count 1)

Filed at

3:15 P M  
9/3 2015

*[Signature]*  
Deputy Clerk U.S. District Court  
Middle District of Georgia

INFORMATION

The United States of America charges that:

GENERAL ALLEGATIONS

1. At all times material to this Information:
2. Defendant BRETT O'DONNELL served as a consultant who assisted legislators and politicians, including members of the United States Congress, among others, with their public speaking, debate performances, messaging, interactions with media, and communications strategies.
3. "Congressman A" was a member of the United States House of Representatives.
4. "Person A" was the Chief of Staff for Congressman A.
5. The Office of Congressional Ethics ("OCE") was an independent, non-partisan office established by the House to aid it in maintaining high ethical standards. OCE reviewed and investigated allegations of misconduct against House Members, officers, and staff, and reported its findings to the OCE Board, which, in turn, referred matters to the House Committee on Ethics.

6. In or about March 2014, OCE commenced an investigation into whether Congressman A's office had improperly used congressionally appropriated funds to pay O'DONNELL to provide campaign-related services to Congressman A.

7. On or about June 23, 2014, OCE interviewed O'DONNELL in connection to the above-referenced investigation.

8. During his interview, O'DONNELL knowingly and intentionally made several false statements to OCE in an effort to minimize, and conceal the true nature and scope of, his role as it related to Congressman A's campaigns, and to conceal interactions he had with Person A regarding O'DONNELL's role with the campaigns.

**COUNT ONE**

18 U.S.C. § 1001(a)(2) & (c)(2)  
False Statements

9. Paragraphs 1 to 8 of this Information are incorporated herein by reference.

10. In or about June 2014, in the District of Columbia and elsewhere, defendant

**BRETT O'DONNELL**

did make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the legislative branch of the Government of the United States, that is, O'DONNELL made material false statements to OCE regarding the work he performed for Congressman A's campaigns and regarding his conversations with Person A about the amount of his work for the campaigns and his desire to be paid for that work.

All in violation of Title 18, United States Code, Section 1001(a)(2) and (c)(2).

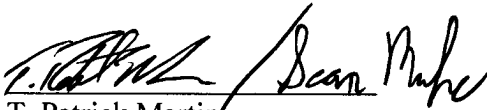
//

//

//

RAYMOND HULSER  
Chief, Public Integrity Section

DATE: 9/3/15

By:   
T. Patrick Martin  
Sean F. Mulryne  
Trial Attorneys  
United States Department of Justice  
Criminal Division  
Public Integrity Section