

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF COLUMBIA

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4 SENATOR MITCH MC CONNELL, :
5 et al., :
6 Plaintiffs, : Civil No. 02-582
7 v. : (CKK, KLH, RJL)
8 FEDERAL ELECTION COMMISSION, :
9 et al., :
10 Defendants. :

ORIGINAL

11 - - - - -x
12 REPUBLICAN NATIONAL COMMITTEE, :
13 et al., :
14 Plaintiffs, : Civil No. 02-874
15 v. : (CKK, KLH, RJL)
16 FEDERAL ELECTION COMMISSION, :
17 et al., :
18 Defendants. :

19 - - - - -x
20 CONFIDENTIAL DEPOSITION OF BEVERLY ANN SHEA

22 REPORTED BY: VICKY STALLSWORTH

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1 Deposition of BEVERLY ANN SHEA, called for
2 examination pursuant to notice of deposition, on
3 Tuesday, September 24, 2002, in Washington, D.C., at
4 the offices of Covington & Burling, 1201
5 Pennsylvania Avenue NW, at 8:00 a.m., before VICKY
6 STALLSWORTH, a Notary Public within and for the
7 District of Columbia, when were present on behalf of
8 the respective parties:

9

10 BOBBY R. BURCHFIELD, ESQ.
11 RICHARD W. SMITH, ESQ.
12 Covington & Burling
13 1201 Pennsylvania Avenue NW
14 Washington, DC 20044-7566
15 202-662-5350
16 On behalf of RNC Plaintiffs

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--continued--

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1 APPEARANCES (CONTINUED):

2

3 THOMAS J. JOSEFIAK, ESQ.

4 Republican National Committee

5 310 First Street SE

6 Washington, DC 20003

7 202-863-8638

8 On behalf of RNC Plaintiffs

9

10 ANJA MANUEL, ESQ.

11 JERROD PATTERSON, ESQ.

12 KRISAN PATTERSON, ESQ.

13 Wilmer, Cutler & Pickering

14 2445 M Street NW

15 Washington, DC 20037-1420

16 202-663-6705

17 On behalf of Defendant Intervenors

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19

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1 Q So when you were there between 1989 and
2 1991, would you say one of the functions of the RNC
3 was to promote the election of federal, state and
4 local candidates?

5 A Yes.

6 Q And do you think that it was effective in
7 doing this?

8 A Yes.

9 Q Very effective?

10 A I feel so, yes.

11 Q Okay. And did the RNC also promote
12 Republican positions on various issues?

13 A Honestly, I don't -- I don't know.

14 Q Okay.

15 A I wouldn't know how to answer that.

16 Q From your perspective its major purpose at
17 the time was electing candidates to Republicans --

18 A Correct.

19 Q -- to office. And you thought the party
20 was functioning well at the time?

21 A As far as I know yes.

22 Q I'm not sure if this would have

1 And just -- you've worked at the
2 Republican Party in various capacities --

3 A Uh-huh.

4 Q -- state parties and the national party
5 for many years now; is that correct?

6 A Correct.

7 Q Do you believe that political parties are
8 important?

9 A Yes, very.

10 Q You do?

11 A (No verbal response.)

12 Q And do you believe that they occupy a
13 special place in American society?

14 A Yes, I do.

15 Q Do you think they really fulfill a unique
16 role?

17 A Yes, I do.

18 Q Very much?

19 A Uh-huh. Very much so.

20 Q Okay. Do you think they occupy a place
21 that no other organization really does?

22 A Yes.

1 more interested in all.

2 Q So you think they could never take a role
3 of a political party?

4 A No.

5 Q They could never replace a political party
6 in your mind?

7 A No.

8 Q Let me confer with my colleagues for one
9 second.

10 A Okay.

11 (Counsel conferred.)

12 MS. MANUEL: I think we're all done.

13 THE WITNESS: Great.

14 MR. BURCHFIELD: Great.

15 THE WITNESS: Great.

16 (Whereupon, at 9:46 a.m., the deposition
17 was concluded.)

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SUBJECT TO PROTECTIVE ORDER

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SENATOR MITCH McCONNELL, :
et al., :

Plaintiffs, : Civ. No. 02-582

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Defendants. :

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REPUBLICAN NATIONAL COMMITTEE, :

et al., :

Plaintiffs, :

v. : Civ. No. 02-874

FEDERAL ELECTION COMMISSION, : (CKK, KLH, RJL)

et al., :

Defendants. :

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DEPOSITION OF BEVERLY SHEA

Washington, D. C.
Friday, October 18, 2002

REPORTED BY:

KAREN HINNENKAMP

Deposition of BEVERLY SHEA, called for examination pursuant to notice of deposition, on Friday, October 18, 2002, in Washington, D.C., at the offices of Covington & Burling, 1201 Pennsylvania Avenue, N.W., Washington, D.C., at 10:00 a.m., before KAREN HINNENKAMP, a Notary Public within and for the District of Columbia, when were present on behalf of the respective parties:

1

APPEARANCES

2

3

ANJA MANUEL, ESQ.

4

KRISAN PATTERSON, ESQ.

5

Wilmer, Cutler & Pickering

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2445 M Street, N.W.

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On Behalf of Defendant Intervenors.

10

11

JASON A. LEVINE, ESQ.

12

Covington & Burling

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14

Washington, D. C. 20004-2401

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(202) 662-5369

16

On Behalf of RNC and Witness.

17

18

ALSO PRESENT: Thomas J. Josefiak, Esq., RNC

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1 on page 19, I think you said, this is a quote, "As a
2 matter of policy, the RNC Finance Division does not
3 offer to arrange personal meetings between donors --
4 no matter how large -- and federal officeholders or
5 candidates for office." Is that right?

6 A Right. Correct.

7 Q It says it is a matter of policy. Is
8 this a written policy?

9 A No. It's just a known policy.

10 Q A known policy.

11 A Right.

12 Q What would happen if someone violated the
13 policy?

14 A Well, if I found out, they would be
15 fired.

16 Q They would be fired if they violated this
17 policy.

18 A Yes.

19 Q Okay. Last time we talked I think we
20 discussed a particular occasion on which this
21 happened --

22 A Right.

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1 A No.

2 Q You try not to force federal
3 officeholders to meet with donors.

4 A We do not, right. Correct.

5 Q However, if a donor called and asked you
6 if you would pass it on to the scheduler, as you
7 just said, you would pass that on to the scheduler.

8 A Sure. Definitely.

9 Q And you would say, I think you said this
10 last time as well, but you would say this is a Team
11 100 member, could you see if you could fit them in,
12 that kind of thing?

13 A Correct.

14 Q Okay, thanks. Could I now turn your
15 attention to paragraph 48a, where you reference a
16 memorandum that I think we may have talked about
17 last time that talks about Team 100 members that had
18 been nominated for presidential appointments?

19 A Correct. Actually, we did not talk about
20 that last time. But I have seen it.

21 Q Okay, we did not. Now the people that
22 are mentioned in the memorandum, were those -- I'm

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