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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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IN RE: POSSIBLE VIOLATIONS :
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18 USC 2511 and :
18 USC 2512 :
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United States District Courthouse
3rd & Constitution Avenue, N. W.
Washington, D. C.

January 24, 1974

The testimony of PAUL L. O'BRIEN was taken in the presence of a full quorum of the Grand Jury.

BEFORE:

RICHARD BEN-VENISTE, ESQ.
Assistant Special Prosecutor
United States Department of Justice

GEORGE T. FRAMPTON, JR., ESQ.
Assistant Special Prosecutor
United States Department of Justice

KAREN S. SCHEINBERG
14 Wade Court
Gaithersburg, Maryland 20760
(301) 340-2119

1 Q In substance did he say that he wasn't going to
2 assume responsibility for it or did not regard himself as having
3 responsibility?

4 A Yes, he did.

5 Q What did he say about having talked with Mr. Moore
6 that gave you the impression that Mr. Moore had brought up
7 the subject with Mr. Mitchell?

8 A I was under the impression that Mr. Moore could
9 have even possibly been in Mr. Mitchell's office when I called
10 him, although I'm not certain, but he indicated specifically
11 that Mr. Moore had been there and that he had talked with him
12 and that this subject had been brought up and he had made his
13 position clear to Mr. Moore.

14 Q Now on or about March 16th, 1973, did you have a
15 meeting with Mr. Hunt?

16 A I did.

17 Q Can you tell the Grand Jury how that came about?

18 A I received a telephone call from Mr. Bittman who
19 indicated that his client was extremely upset, that he had
20 received word that he was going to be sentenced on the 23rd
21 of March, if that's a Friday, and that he was attempting to
22 put his affairs in order and to take care of such matters as
23 have to be taken care of regarding his children and his so-
24 called commitments had not been met and that it was imperative
25 that I come to his office and discuss the matter with Mr. Hunt

1 who was at that time there.

2 Q Did you go over to Mr. Bittman's office?

3 A Reluctantly, yes.

4 Q Did you thereafter meet alone with Mr. Hunt?

5 A I did.

6 Q How did it happen that you met with Mr. Hunt alone?

7 A I went to Mr. Bittman's office and Mr. Bittman was
8 on the telephone at the time. I suggested that Mr. Bittman
9 accompany me. He was busy and said, "Go talk to him. He's
10 going to tell you the same thing I've told you."

11 I do not recall whether it was at the end of the
12 hall that Mr. Bittman was on, but it was either in Mr. Mittler's
13 office -- he was out of the office that day -- or in a small
14 conference room, but it was in another room that I met with
15 Mr. Hunt.

16 BY MR. BEN-VENISTE:

17 Q What did Mr. Hunt tell you?

18 A Mr. Hunt went over essentially the same ground; that
19 his commitments hadn't been met, that he was going to be sen-
20 tenced. He seemed particularly disturbed and agitated.

21 I told him that I didn't have anything to do with
22 his commitments, that I was sorry but I didn't think that I
23 could help him.

24 He had no intention of letting me out on that basis.
25 He went on and stated that he had \$60,000 in legal fees out-

1 standing, and he made a demand for \$130,000. It is my
2 recollection that it was sixty and seventy thousand total.

3 During the course of the conversation he indicated
4 that he had done -- the word he used was "seemy" things --
5 for the White House. He instructed me to pass this information
6 on to Mr. Dean and he indicated that these things didn't happen
7 -- if these things didn't happen he would have to review his
8 options.

9 In addition, during the course of the conversation
10 I indicated to him again, as I said, that I was powerless in
11 this situation, that I thought he had best contact his friend
12 Mr. Colson or someone else who could assist him.

13 Q What was his reaction to that?

14 A There was some indication that he had been in con-
15 tact with Mr. Colson and he really didn't give a damn about my
16 suggestion. He was just telling me what to do at that stage.

17 Q Was there any other inference from his statement
18 that he would have to review his options, made in conjunction
19 with his statement about having done seemy things, which led
20 you other than to the conclusion that he was threatening to
21 publicly make some sort of statement unless his demands were
22 met?

23 A I've got to be frank and tell you at the time that
24 the peripheral aspects of his conversations, such as the seemy
25 things and "review his option", didn't hit me with that

1 particular impact. I had never had anyone make a personal
2 demand on me for over a hundred thousand dollars. I mean it
3 wasn't just that somebody approached me a dime for a cup of
4 coffee.

5 Frankly it sort of sent me right up the wall. I
6 just wanted out of there.

7 Q Did Mr. Hunt indicate that you ought to convey this
8 message to Mr. Dean?

9 A He did.

10 Q Now after you left the office what did you do?

11 A I stopped back past Mr. Bittman's office and I
12 reiterated the essence of the conversation.

13 Q What did Mr. Bittman say?

14 A He said, "I indicated to you that Mr. Hunt was
15 extremely agitated and upset and he was going to do this."
16 That was about it. I then departed.

17 Q Did you then repeat what Mr. Hunt had told you to
18 Mr. Dean?

19 A I did.

20 Q When was that?

21 A As far as I recall, immediately following the meet-
22 ing.

23 BY MR. FRAMPTON:

24 Q Now Mr. O'Brien, you mentioned before a meeting
25 which you had on about November 28th or 29th with Mr. Bittman