

Meeting w/ Ryan Vassar
November 16, 2020 @ 8:30 a.m.

When you were put on investigative leave, leave ends tomorrow (Nov 17), I want to give you an opportunity to provide some responses, I have some questions.

The goal of investigative leave was to determine whether your employment was viable moving forward.

At any time have you released any confidential info to any outside person

- R: Not to anyone of the general public
- B: Interesting. Clarify. Have you released to *any* OAG employee.
- R: Absolutely not.
- B: How about grand jury information?
- R: No.

What about your email memo you sent me re. outside counsel contracts (sent to me Oct 5)

- Ryan remembers it, yes.
- B: We've looked at the legal research you did, at it seems misleading.
- R: Not understanding how it's misleading. Please clarify.
- B: The info he provides does not support the assertion that the AG cannot sign an outside counsel contract.
- R: What's misleading? The AG was asking a different question than what you're saying.
- B: Reads directly from the letter.
- R: Even assuming he had the right to sign the contract, the first assistant stepped in as he could and canceled it.
- B: Do you think the AG is bound by the policy manual?
- R: He can change it as he pleases.
- B: Shouldn't you research whether the policy manual applies to the AG?
- R: Can't recall exactly what authority I cited to support.
- B: Did you ever research whether the policy manual applied to the AG?
- R: Yes. The policy manual doesn't apply to the AG, that's as best as I can recall.
- B: You were put on leave in part because of your work product deficiencies.
- R: What work product?
- B: The email memo and a lot of other work product.

Anything you want to share about your employment before I arrived? It's fair to give you a chance to share some things if you want.

- R: I'm not sure what you want me to share here. Why again did you put me on investigative leave?
- B: I told you: your possibly leaking info and also your work product. We're deciding whether your ongoing employment here is viable.
- R: I don't know what you're referring to here, so I don't know what exactly I can share.
- B: Okay, that's fine, feel free to follow up anytime today.

Do you trust me?

- R: I haven't had a chance to work with you, but sure.

Do you trust the AG?

- Sure.
- B: In light of all you've said about him, you still trust him?
- R: Sure.

Are you committed to the AG's vision for the Agency?

- R: I am.

My vision?

- R: We haven't worked together, so I don't know.
- B: What if we disagree?
- R: Yes.
- B: You don't think your contemptuous emails undermining me contradicts that?
- R: That doesn't undermine you.

You are in a position that requires a confidential relationship with me as the first assistant. Agree or disagree?

- R: I don't follow. I have a duty of confidentiality within the Agency. I can't think of any other reasons.
- B: [re-states the question]
- R: I don't understand the question.
- B: [restates question with respect to AG]
- R: Within the agency or something else? My work within the agency is confidential under attorney-client privilege, so...
- B: Do you like that?
- R: That's the position of the job.

Who is your employer?

- R: Both the AG and the Agency.
- B: What does the constitution say?
- R: It creates the office of the attorney general, the position of AG.
- B: Do any statutes or the const ever use the word "office"?
- R: No.
- B: Going back to the question, you are in a confidential relationship with *the man* Ken Paxton—agree or disagree?
- R: Disagree, not privately.

Can we, the two of us, have a confidential relationship moving forward?

- R: Yes.

An elected official is going to want to fill top posts in their organization with persons committed to the official's vision for the future. Do you agree or disagree?

- R: Probably right. I'm just speaking generally, but when an officeholder comes in, he decides the policies and direction of the agency, so I assume that's what happens.

An elected official may want to change key lieutenants because of ideological or other differences. Do you agree or disagree?

- R: There's a lot of discretion, so I don't know, but maybe.

The ability to pick and choose among key advisers and high-level posts in a public organization has long been a traditional element of politics. Do you agree or disagree?

- R: Not sure what these policy-type questions have anything to do with my work product.
- B: It has a lot to do with it because it has to do generally with matters that affect your job.
- R: Again, not sure what this has to do with the investigation. The core question is whether I'm going to keep my job as Deputy.
- B: I understand that's what you care most about. But I have to determine whether this agency can keep running with you as Deputy, and these questions cut directly to that.

I spoke with Lauren Downey about your PIC requests, but we only got one text. Is that it?

- R: I've provided everything.
- B: Have you deleted anything?
- R: No, not to my knowledge.

Anything else I need to know?

- R: You have my personnel file.
- B: Anything else before we need to wrap it up?
- R: Not that I can think of.
- B: Okay your leave ends tomorrow.
- R: I haven't received any notice to report.
- B: Well your leave ends tomorrow.

Meeting ends at 9:12 a.m.