

Caleb Hayes in reference to the Rule 27 complaint against Rep. Brad Witt.

My name is Caleb Hayes and I am Chief of Staff for Representative Brad Witt. I have worked with Rep. Witt for 9 years, first as a lobbyist, later as a consultant and now as a staff member. I was surprised when I learned a Rule 27 complaint was filed against my boss Rep. Brad Witt for alleged sexual harassment. When I read the Complainant's filing, I noticed that it lacked a great deal of context that is necessary to interpret the intent of the text message at issue. Here are a few ways that I view the surrounding context as essential to determining the meaning of Rep. Witt's offer of a beer or dinner:

- 1. The complaint suggests that the offer to get together came out of nowhere and ignores the fact that both Representatives along with one or two others had, during the previous two months, gone out for drinks in a social context one evening after a late floor session.** I recall hearing about that directly from Rep. Witt and him expressing that he hoped that would help to improve the functionality of the committee, particularly as it related to our attempts to get some priority bills passed. Similarly, Complainant had included Rep. Witt in a meeting in her office with a group known as Real Oregon. Based on my knowledge of the surrounding circumstances and prior, voluntary social and professional interactions, it seems unreasonable for Complainant to have interpreted the text message as somehow sexual in nature. (I should also note that Rep. Witt typically invites colleagues for a meal or a beer as he does not drink coffee.)
- 2. It was well known among staffers that, around the time he sent the text message, Rep. Witt was actively planning to meet with Complainant offsite to have a difficult discussion about her conduct on the committee and efforts to undermine him.** Rep. Witt told me specifically several times around April 12, 2021 that he was trying to get a meeting with Complainant offsite in the hopes that they could resolve some troubling interactions relating to committee business. He made clear to me that he thought a private meeting was likely best because, as committee chair, he needed to have a difficult conversation with her about some of her previous votes and policy positions. He made clear that he viewed some of her behavior as flying in the face of committee norms, which is normally more collaborative. Rep. Witt told me several times over the course of April 12 that he was trying to meet with Complainant in person to share his frustration over why,

on the one hand, she was requesting his vote on her legislation when, on the other hand, she was consistently opposing his legislative agenda and priorities. I had previously seen Rep. Witt take a similar approach with other representatives: using a private, more social meeting to resolve differences and strengthen a legislative working relationship.

3. **I noticed that, after she had received the text message that she said caused her emotional harm, Complainant continued outreach to our offices, via cell phone and text messages.** That was hard for me to square with various media reports about how upset she was with Rep. Witt or the claims about her emotional distress.

