

EXHIBIT A

NO. 2014-55319

HOUSTON COMMUNITY COLLEGE,

Plaintiff and
Counter-Defendant

v.

RENEE BYAS,

Defendant and
Counter-Plaintiff.

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IN THE DISTRICT OF

HARRIS COUNTY, TEXAS

55th JUDICIAL DISTRICT

**DEFENDANT RENEE BYAS' SUPPLEMENTAL RESPONSES TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES**

TO: Plaintiff and Counter-Defendant Houston Community College ("HCC") by and through its attorney of record, Ayesha Najam, Gibbs & Bruns LLP, 1100 Louisiana, Suite 5300, Houston, Texas 77002, Telephone (713) 751-5213, Facsimile: (713) 750-0903, and email: HCCTeam@gibbsbruns.com.

Defendant Renee Byas serves the following supplemental responses to Plaintiff's First Set of Interrogatories.

Respectfully submitted,

RUSTY HARDIN & ASSOCIATES, LLP

/s/ Jennifer Brevorka

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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing instrument has been served upon the following counsel of record by electronic service on this the 11th day of March 2015, pursuant to Rule 21a:

Ayesha Najam
Ross MacDonald
Gibbs & Bruns LLP
1100 Louisiana, Suite 5300
Houston, Texas 77002

/s/ Jennifer Brevorka

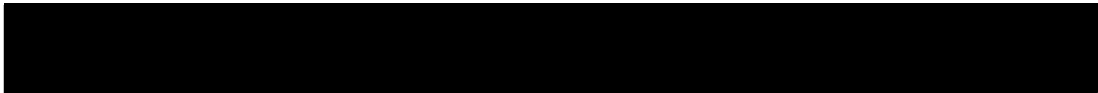
Jennifer Brevorka

RESPONSE TO INTERROGATORIES

INTERROGATORY NO. 1:

Please provide all email addresses utilized by you from June 2008 through August 2014.

ANSWER:



INTERROGATORY NO. 2:

Please describe your conduct that you allege forms the basis of your Texas Whistleblower Act claim, including:

- a. the date(s) of your reports to an appropriate law enforcement authority;
- b. to whom you made such report(s), including the name of individual(s), their positions within the law enforcement authority, and the name(s) of the law enforcement authority or authorities in question;
- c. a description of the conduct about which you were reporting; and
- d. the specific laws you were reporting to have been violated and the names of any individuals or entities you reported to have violated each of those laws.

ANSWER

Between January 2011 and summer 2012, I spoke with an attorney in the U.S. Attorney's Office for the Northern District of Texas. I, and another attorney in my office, provided documents to the assistant U.S. attorney who had obtained a subpoena for documents from HCC. I no longer have access to the subpoena, but I believe the attorney subpoenaed HCC's documents regarding the issuance of bonds, vendors, bond counsel, co-bond counsel, disclosure counsel, financial advisors, requests for proposals, and requests for qualifications that the HCC Board of Trustees issued pertaining to bonds. I do not immediately recall the name of the assistant U.S. attorney.

In 2011 and 2012, my office was contacted by a special investigator with the federal government. Without access to my HCC files, I do not recall the agency for which the investigator worked. The investigator requested, and we provided, information regarding the Veselka investigation, Abe Davila, Diane Olmos Guzman, Yolanda Flores, Neeta Sane, Chris Oliver, Gloria Walker, and various vendors doing business with HCC. This investigator informed me he was working with the FBI and was sharing with the FBI the information that HCC had provided.

In October, November, and December 2013, I provided information to the FBI via Fred Zeidman, who worked as a vice chancellor at HCC. I met with FBI special agents in

Houston on January 31, 2014. I spoke on the phone with these FBI special agents in February, March, May, and June 2014. In July 2014, a FBI special agent called me, but I did not return his call.

I talked on the phone at least three to four times with two Assistant District Attorneys in the public integrity unit of the Harris County District Attorney's Office regarding the Veselka investigation. I also met with a female Harris County Assistant District Attorney in person. I do not recall these individuals' names.

I spoke to Greg Harris, Assistant U.S. Attorney in Illinois, via phone regarding Abe Davila and Yolanda Flores in 2011.

When I met with, or spoke on the phone with, federal or state investigators or attorneys I discussed:

- How various HCC trustees had tried to interfere with, or attempted to prematurely end, outside legal investigations into trustee conduct.
- How various HCC Trustees had asked me to circumvent the HCC procurement process and provide contracts to the Trustee's friends, supporters, or business contacts.
- How various HCC Trustees had shown me lists of individuals' or firms' names and how these Trustees had instructed me that those specific firms or individuals were to receive a contract despite the fact that another firm or individual had been awarded the contract by properly following the HCC procurement process. This occurred for both bond and non-bond related contracts.
- How HCC Trustees had asked me to get rid of vendor bids, or scoring of vendors, for bond-related contracts and, then give the contract(s) in question to firms that had either not bid on the contracts or that had not scored well during the bidding process.
- How HCC Trustees, while in office, had conducted personal business with HCC vendors.
- How an HCC Trustee had taken free trips to places such as the Caribbean with an HCC vendor on the vendor's plane.
- How a supporter of a Trustee had informed the Trustee that if this supporter did not receive more contracts, the supporter would not give any more money to the Trustee's campaign.
- How three HCC Trustees had entered into an agreement with an individual that the three Trustees would convince the HCC Board of Trustees to buy property from the individual and, in exchange, the three Trustees would receive 10% of the money that HCC paid to the seller.

- How during a closed session meeting an HCC Trustee had accused another Trustee of accepting bribes and kickbacks and how the accused Trustee started punching the accuser.
- How HCC Trustees had asked me to destroy, hide, not circulate, or get rid of legal opinions from outside counsel related to: 1) the bond procurement process for the \$425 million bond project; 2) acceptance of campaign donations from vendors who had contracts with HCC; 3) whether a vendor who had not properly bid on an engineering contract, or had not followed HCC procurement rules, could obtain the contract.
- How various Trustees told me they could help, or hinder, my career if I did, or did not, help them give HCC contracts to their supporters or change the bond procurement rules.
- How Trustees informed me that they had delayed voting on the approval of various bond-related projects, and they would continue to do so, because HCC had awarded contracts to firms via the procurement process and these Trustees wanted other firms to receive the business, even though these other firms did not bid on the project or were not qualified.
- How various Trustees had talked with vendors during black-out periods after the vendors had bid on HCC contracts, which was prohibited under HCC procurement rules.
- How various Trustees had voted on matters during closed session.
- How an HCC Trustee had used HCC monies to distribute an election flyer.
- How an HCC Trustee had asked me to change procurement rules so that Trustee could seek campaign support from HCC vendors during the blackout period for bond-related contracts. Under the procurement rules, Trustees were prohibited from speaking with potential bond-contract vendors during the blackout period.
- How various Trustees had developed a scheme in which they informed an HCC vendor that they would only approve his contract if, in return, he gave a certain percentage of the contract to a Hispanic-owned firm.
- How HCC vendors sat in the audience during HCC meetings in which their contracts were being considered. Then, these vendors would text HCC Trustees, who would then disappear into the hall, or other rooms, with the vendor for a discussion. Then, the Trustees would return to the meeting and vote on the contract.
- How an HCC vendor hosted election fundraisers for various HCC Trustees, who, in turn, voted to approve contracts for the vendor, or, sought to have HCC supply contracts to this vendor in violation of HCC's procurement rules.

- How an HCC Trustee informed a vendor that a \$5,000 political donation was insufficient and that the vendor needed to give more money if he wanted that Trustee's continued support.
- How an HCC vendor performed free remodeling work on the home of an HCC Trustee.

When I met with investigators, I discussed conduct that I believed violated, or attempted to violate, the Texas Open Meeting Act, Texas election statutes, and the Texas Penal Code's provisions on offenses against public administration prohibiting such things as bribery, acceptance of kickbacks or gifts, and abuse of office.

I discussed the conduct of various HCC Trustees including:

Neeta Sane
Carroll Robinson
Christopher Oliver
Yolanda Flores
Herlinda Garcia
Abel Davila
Eva Loreda
Dave Wilson

INTERROGATORY NO. 3:

Please provide the names, telephone numbers, and email addresses for all agents of the Federal Bureau of Investigation or any other employees of federal or state law enforcement authorities with whom you allege to have spoken regarding HCC matters between November 2013 and June 2014.

ANSWER:

I met with two special agents of the FBI's Houston office and I spoke with a third special agent on the phone. The special agents have instructed me not to disclose their names or identities to others. Because of this instruction from the federal agents, I do not believe that I can disclose their identity unless ordered to do so by the Court.

INTERROGATORY NO. 4:

Please identify each law that you believe to have been violated by HCC or an agent of HCC in connection with your Whistleblower claim, and by whom you believe each law was violated.

ANSWER:

I believe that Neeta Sane was attempting to, or did, violate the Texas Open Meetings Act, Texas election statutes, and Texas Penal Code provisions related to offenses against public administration such as bribery, acceptance of kickbacks, and abuse of public office. Additionally, I believe Ms. Sane was attempting to, or did, conspire with others.

I believe that Carroll Robinson was attempting to or did violate the Texas Open Meetings Act, Texas election statutes, and Texas Penal Code provisions related to offenses against public administration such as bribery, acceptance of kickbacks, and abuse of public office. Additionally, I believe Mr. Robinson was attempting to, or did, conspire with others.

I believe Christopher Oliver was attempting to or did violate the Texas Open Meetings Act, and Texas Penal Code provisions related to offenses against public administration such as bribery, acceptance of kickbacks, and abuse of public office. Additionally, I believe Mr. Oliver was attempting to, or did, conspire with others.

I believe Yolanda Flores was attempting to, or did, violate the Texas Open Meetings Act, and Texas Penal Code provisions related to offenses against public administration such as bribery, acceptance of gifts or kickbacks, and abuse of public office. Additionally, I believe Ms. Flores was attempting to, or did, conspire with others.

I believe Abel Davila was attempting to, or did, violate the Texas Open Meetings Act, and Texas Penal Code provisions related to offenses against public administration such as bribery, acceptance of kickbacks and gifts, and abuse of public office. Additionally, I believe Mr. Davila was attempting to, or did, conspire with others.

I believe Herlinda Garcia was attempting to, or did, violate the Texas Open Meetings Act, and Texas Penal Code provisions related to offenses against public administration such as abuse of office. Additionally, I believe Ms. Garcia was attempting to, or did, conspire with others.

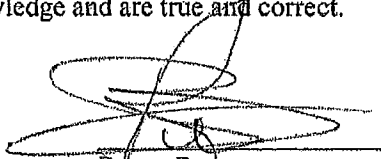
I believe Eva Loreda was attempting to or did violate the Texas Open Meetings Act, and Texas Penal Code provisions related to offenses against public administration such as abuse of public office. Additionally, I believe Ms. Loreda was attempting to, or did, conspire with others.

I believe Dave Wilson was attempting to, or did, violate the Texas Open Meetings Act, and Texas Penal Code provisions related to offenses against public administration such as abuse of public office. Additionally, I believe Mr. Wilson was attempting to, or did, conspire with others.

VERIFICATION

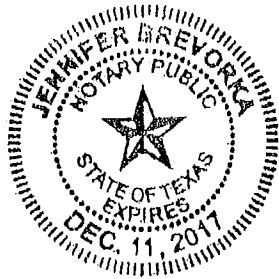
STATE OF TEXAS §
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COUNTY OF HARRIS §

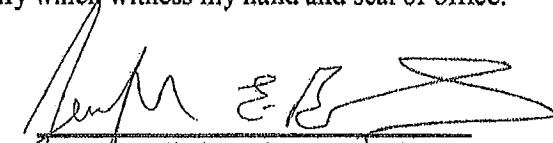
BEFORE ME, the undersigned authority, on this day personally appeared RENEE BYAS, who, having been duly sworn, deposes on oath and states that she has read the above and foregoing Supplement to Plaintiffs' First Set of Interrogatories and that the facts contained therein are within her personal knowledge and are true and correct.



Renee Byas

11 SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned authority, on this day of March, 2015, to certify which witness my hand and seal of office.





Notary Public in and for State of Texas