

“Tell the Truth”

18. The following LOR responses establish that even if there was a conspiracy, it was completely abandoned. Abandonment is a complete and total defense.

a. **Cadet #3:** “As a team, we met up a week or two before most of the freshmen started getting called in for questioning to determine that we were each going to tell the truth as best as everyone knew it. We had also met as a team right before most freshmen were called for questioning to reiterate...to tell the truth as best as they knew it. The entire team, including the upperclassmen, were encouraging us and each other to tell the truth so as to avoid punishment.”

b. **Cadet Derek Brecht:** “As a senior class we met and decided that we would tell the truth to AFOSI when questioned about anything. We met with the whole team and told each and every one of them to tell the truth. Our meeting prior to the AFOSI investigation were specifically to guide the freshman on the process of how the whole thing worked...none of my past teammates had any intention to obstruct justice or prevent AFOSI from finding out the truth about the events that transpired on our team. Our unanimous decision among the seniors was to tell the whole truth to anyone permitted to hear our side of the story.”

c. **Cadet #1:** “We had another meeting mainly led by our team captain (Cadet Hannigan) and seniors where we agreed that if we elected to waive our right to remain silent, the best course of action was to tell the complete truth because it was the right thing to do and if we did not tell the truth it would create a bigger issue.”

d. **Cadet #7:** “A second meeting was called, and the same upper-classmen who held the first meeting changed their guidance and stated we should not lie and instead we should be forthcoming and truthful with our answers...The directive for truthfulness was reiterated time and time again including in the third meeting, which also happened before my initial questioning on 18 January 2018.”

e. **Cadet #4:** “The very next day we had another meeting and were instructed to tell the complete truth because things would only become worse if we lied.”

f. **Cadet Garrett Gladini:** “We made the decision to tell the truth and be forthcoming. I attended this meeting and personally heard the Captain (Michael Hannigan) state that no one should lie to the OSI Agents and just tell them what actually happened.”

g. **Cadet #13:** “Once we found out that an investigation was opening up for the team, Michael called multiple meetings for the entire team to discuss our steps moving forward. At every meeting held, one thing was stressed above all else: Tell the entire truth. We all agreed that the smartest decision was to bring everything out in the open, regardless of how it might affect us and our careers.”

h. **Cadet #5:** “Our swim team captain Michael Hannigan came to my room to discuss our personal convictions as he was torn between his beliefs and his desire to keep his teammates safe.

After a long discussion we came to the consensus that even if telling the truth meant the end of an

Air Force career, it was not the end to anyone's life...Michael communicated this information to the entire team, and although it took some convincing, everyone as eventually on board before anyone was interviewed...because of my conversations with Michael, and our team meetings, I was going to tell the truth and I had no intention of being deceitful...Both Michael and I wanted all the swimmers to live with integrity and do the right thing."

i. **Cadet #6:** "We had a second meeting during which we agreed that obstruction of justice was not a good idea and that everyone was to tell the truth...It was the directive from the second meeting that I carried out during my AFOSI interrogation of me. I never intended to create any conspiracy which could have hindered the investigation that was conducted against the parties involved. I told the truth as accurately as I could remember it, which was entirely my intention from the beginning."

19. Hence, this evidence shows beyond a reasonable doubt that Cadet Hannigan disavowed any conspiracy to obstruct justice. Further, this evidence establishes again beyond a reasonable doubt that the members of the swim team were not purposefully vague and told the truth to the best of their recollection, concerning an event that took place almost six months before being interrogated.