

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

SENATE JUDICIARY COMMITTEE
U.S. SENATE
WASHINGTON, D.C.

INTERVIEW OF: GLENN SIMPSON

TUESDAY, AUGUST 22, 2017
WASHINGTON, D.C.

The interview in this matter was held at the
Hart Senate Office Building, commencing at 9:34 a.m.

1 APPEARANCES:
2 SENATE JUDICIARY COMMITTEE:
3 Patrick Davis, Deputy Chief Investigative Counsel,
4 Chairman Grassley
5 Jason Foster, Chief Investigative Counsel,
6 Chairman Grassley
7 Samantha Brennan, Investigative Counsel,
8 Chairman Grassley
9 Daniel Parker, Investigative Assistant,
10 Chairman Grassley
11 Joshua Flynn-Brown, Investigative Counsel,
12 Chairman Grassley
13 Scott Graber, Legislative Assistant/Counsel,
14 Senator Graham
15 Heather Sawyer, Chief Oversight Counsel,
16 Senator Feinstein
17 Jennifer Duck, Staff Director,
18 Senator Feinstein
19 Molly Claflin, Counsel,
20 Senator Feinstein
21 Lara Quint, Chief Counsel,
22 Senator Whitehouse
23
24
25

1 APPEARANCES: (Cont'd)
2 FOR THE WITNESS:
3 Joshua Levy, Cunningham Levy Muse
4 Robert Muse, Cunningham Levy Muse
5 Rachel Clattenburg, Cunningham Levy Muse
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1	I N D E X	
2	EXAMINATION	
3		PAGE
4	By Mr. Davis	11
5	By Ms. Sawyer	52
6	By Mr. Davis	95
7	By Ms. Sawyer	138
8	By Mr. Davis	180
9	By Ms. Sawyer	227
10	By Mr. Davis	260
11	By Ms. Sawyer	290
12	EXHIBITS	
13	EXHIBIT	PAGE
14	Exhibit 1 8/3/17 letter agreement	11
15	Exhibit 2	30
16	Privilege log	
17	Exhibit 3 BuzzFeed memos	138
18	Exhibit 4	196
19	Filing in UK litigation	
20	Exhibit 5 (Not described)	205
21	Exhibit 6	261
22	Meeting notes	
23		
24		
25		

1 MR. DAVIS: Good morning. This is the
2 transcribed interview of Glenn Simpson. Chairman
3 Grassley and Ranking Member Feinstein requested
4 this interview as part of the Senate Judiciary
5 Committee's investigation of Fusion GPS's
6 activities related to the dossier compiled by
7 Christopher Steele, the Prevezon case, and the
8 Magnitsky Act.

9 Would the witness please state your name for
10 the record.

11 MR. SIMPSON: Glenn Simpson.

12 MR. DAVIS: On behalf of the Chairman I want
13 to thank Mr. Simpson for appearing here today. My
14 name is Patrick Davis. I'm the Deputy Chief
15 Investigative Counsel with the committee's majority
16 staff.

17 I'll ask everyone else from the committee who
18 is here to introduce themselves as well.

19 MR. FOSTER: Jason Foster, I'm the Chief
20 Investigative Counsel for Chairman Grassley.

21 MS. BRENNAN: Samantha Brennan, Investigative
22 Counsel, Chairman Grassley.

23 MR. GRABER: Scott Graber, Senator Graham.

24 MR. PARKER: Daniel Parker, Investigative
25 Assistant for Senator Grassley.

1 MR. BROWN: Joshua Flynn-Brown, Investigative
2 Counsel for Senator Grassley.

3 MS. DUCK: Jennifer Duck, Staff Director for
4 Senator Feinstein.

5 MS. QUINT: Lara Quint, Chief Counsel,
6 Senator Whitehouse.

7 MS. SAWYER: Heather Sawyer, Chief Oversight
8 Counsel, Senator Feinstein.

9 MS. CLAFLIN: Molly Claflin, Counsel, Senator
10 Feinstein.

11 MR. DAVIS: The Federal Rules of Civil
12 Procedure do not apply to any of the committee's
13 investigative activities, including transcribed
14 interviews. There are some guidelines we follow,
15 and I'll go over those now.

16 Our questioning will proceed in rounds. The
17 majority staff will ask questions first for one
18 hour, then the minority staff will have an
19 opportunity to ask questions for an equal amount of
20 time. We will go back and forth until there are no
21 more questions and the interview is over.

22 We typically take a short break at the end of
23 each hour, but should you need a break at any other
24 time, please just let us know. And we can discuss
25 taking a break for lunch whenever you're ready to

1 do so.

2 We have an official reporter taking down
3 everything we say to make a written record. So we
4 ask that you give verbal responses to all
5 questions. Do you understand?

6 MR. SIMPSON: Yes.

7 MR. DAVIS: So that the court reporter can
8 take down a clear record, we'll do our best to
9 limit the number of people directing questions at
10 you during any given hour to those whose turn it
11 is. It's also important that we don't talk over
12 one another or interrupt each other to the extent
13 we can help it. That goes for everybody present at
14 today's interview.

15 We encourage witnesses who appear before the
16 committee to freely consult with counsel if they
17 should choose. You are appearing here today with
18 counsel. Counsel, could you please state your name
19 for the record.

20 MR. LEVY: Josh levy.

21 MR. MUSE: I'm Bob Muse and I represent Glenn
22 Simpson.

23 MS. CLATTENBURG: I'm Rachel Clattenburg.

24 MR. DAVIS: We want you to answer our
25 questions in the most complete and truthful manner

1 possible. So we will take our time. If you have
2 any questions or if you don't understand any of our
3 questions, please let us know. If you honestly
4 don't know the answer to a question or don't
5 remember, it's best not to guess. Just give us
6 your best recollection.

7 It's okay to tell us if you learned
8 information from somewhere else if you indicate how
9 you came to know the information. If there are
10 things that you don't know or can't remember, we
11 ask that you inform us to the best of your
12 knowledge who might be able to provide a more
13 complete answer to the question.

14 This interview is unclassified. So if any
15 question calls for information that you know to be
16 classified, please state that for the record as
17 well as the reason for the classification. Then
18 once you've clarified that to the extent possible,
19 please respond with as much unclassified
20 information as you can. If we need to have a
21 classified session later, that can be arranged.

22 It is this committee's practice to honor
23 valid common law privilege claims as an
24 accommodation to a witness or party when those
25 claims are made in good faith and accompanied by

1 sufficient explanation so that the committee can
2 evaluate the claim. When deciding whether to honor
3 a privilege the committee weighs its need for the
4 information against any legitimate basis for
5 withholding it. The committee typically does not
6 honor contractual confidentiality agreements.

7 The committee and Mr. Simpson have agreed
8 that this interview is occurring without prejudice
9 to any future discussions with the committee and we
10 reserve the right to request Mr. Simpson's
11 participation in future interviews or to compel his
12 testimony. The committee and Mr. Simpson have also
13 agreed that participation in this interview does
14 not constitute a waiver of his ability to assert
15 any privileges in response to future appearances
16 before this committee.

17 Mr. Simpson, you should understand that
18 although the interview is not under oath, by law
19 you are required to answer questions from Congress
20 truthfully. Do you understand that?

21 MR. SIMPSON: Yes.

22 MR. DAVIS: Specifically 18 U.S.C. Section
23 1001 makes it a crime to make any materially false,
24 fictitious, or fraudulent statement or
25 representation in the course of a congressional

1 investigation. That statute applies to your
2 statements in this interview. Do you understand
3 that?

4 MR. SIMPSON: Yes, I do.

5 MR. DAVIS: Witnesses who knowingly provide
6 false statements could be subject to criminal
7 prosecution and imprisonment for up to five years.
8 Do you understand this?

9 MR. SIMPSON: Yes, I do.

10 MR. DAVIS: Is there any reason you're unable
11 to provide truthful answers to today's questions?

12 MR. SIMPSON: No.

13 MR. DAVIS: Finally, we ask that you not
14 speak about what we discuss in this interview with
15 anyone else outside of who's here in the room today
16 in order to preserve the integrity of our
17 investigation. We also ask that you not remove any
18 exhibits or other committee documents from the
19 interview.

20 Once again, the Chairman and Ranking Member
21 withdrew their subpoena of you due to your
22 willingness to provide information in this
23 voluntary interview and document production.
24 However, the extent to which the committee deems
25 further compulsory process necessary will likely

1 depend on your level of cooperation and candor.

2 Is there anything else that my colleagues
3 from the minority would like to add?

4 MS. SAWYER: Thank you. We appreciate it.
5 And we appreciate you being here as part of the
6 investigation into the Russian interference into
7 the 2016 election.

8 I did want to, with agreement of my
9 colleagues, just enter into the record the letter
10 agreement regarding the interview that was sent to
11 your counsel on August 3, 2017. I think my
12 colleague has gone over a number of the parameters
13 that we agreed to, but I think it would be helpful
14 to have this in the record. So we'll go ahead and
15 mark it as Interview Exhibit No. 1 just for
16 identification purposes.

17 (Interview Exhibit 1 was
18 marked for identification.)

19 MS. SAWYER: With that, again, thank you for
20 being here.

21 MR. DAVIS: The time is now 9:40 and we will
22 get started with the first hour of questions.

23 EXAMINATION

24 BY MR. DAVIS:

25 Q. Mr. Simpson, what is your professional

1 background?

2 A. I have a degree in journalism from George
3 Washington University and I've spent most of my
4 working adult life as a journalist, much of it as
5 an investigative reporter for the Wall Street
6 Journal. Prior to that I worked as an
7 investigative reporter at Roll Call Newspaper
8 writing about political corruption, financial
9 crime, terrorism, tax evasion, stock fraud,
10 financial scandals, congressional investigations,
11 government prosecutions, money laundering,
12 organized crime.

13 Q. And when did you leave the Wall Street
14 Journal?

15 A. In 2009.

16 Q. And did you found SNS Global after leaving
17 the Wall Street Journal?

18 A. That's right.

19 Q. And how many employees and associates did
20 SNS Global have?

21 A. There were two partners and in the first
22 part of the time I think we had one employee. No,
23 I'm sorry. We had two employees.

24 Q. And who were they?

25 A. We had a research assistant named Margot

1 Williams, M-A-R-G-O-T Williams, and another
2 administrative assistant whose name I don't recall
3 right now.

4 Q. And who was the other partner?

5 A. Susan Schmidt was my other partner, former
6 colleague from the Wall Street Journal, and prior
7 to that was an investigative reporter at the
8 Washington Post.

9 Q. And what was the nature of SNS Global's
10 business?

11 A. Research, business intelligence.

12 Q. And what types of clients did SNS Global
13 have?

14 A. It's a while ago, so it's not fresh in my
15 mind. Other consulting firms, lawyers. I don't
16 specifically remember a lot of them.

17 Q. And is SNS Global still in business?

18 A. No.

19 Q. When did it cease operations?

20 A. I believe at the end of 2010.

21 Q. And why did it -- why did SNS Global cease
22 operations?

23 A. Basically my partner and I had different
24 ambitions for what we wanted to do. I wanted to
25 have a brick and mortar office with more resources

1 and staff. Basically I concluded that the work
2 that we were doing required more infrastructure and
3 resources. Basically in modern research you need
4 to have access to a lot of different databases and
5 there's a lot of aspects of the work that are
6 administrative in nature that require things that I
7 wasn't able to do. I prefer to spend my time doing
8 the research. So I wanted to have more of an
9 infrastructure where I could focus on that.

10 Q. What is Bean, LLC?

11 A. That's the LLC that is my current
12 company.

13 Q. And what is your role in Bean, LLC?

14 A. I'm the majority owner. I guess, you
15 know, we don't have official titles, but I'm
16 generally referred to as the CEO.

17 Q. Bean, LLC registered Fusion GPS as a trade
18 name in the District of Columbia; is that correct?

19 A. Yes, it's a DBA.

20 Q. Why did you choose to use a trade name for
21 Bean, LLC rather than directly name the company
22 Fusion GPS?

23 A. Because at the time that I was deciding
24 what I wanted to do I was recruiting a new partner
25 and I just needed to set up a holding company while

1 I organized my new business. So I just picked a
2 name. You know, a bean is a seed, a new thing. So
3 I picked that name to begin the process of
4 organizing a new business and didn't want to select
5 an actual DBA, you know, a brand name until I
6 consulted with my new partner. We wanted to
7 mutually -- I actually had two partners in the
8 beginning, so there were three of us, and I wanted
9 to make it a group decision.

10 Q. Is Bean, LLC currently registered in D.C.
11 to conduct business under the trade name Fusion
12 GPS?

13 A. To my knowledge it is. It should be.

14 Q. Have any other LLC's or business entities
15 conducted business as Fusion GPS?

16 A. I don't think so.

17 Q. Have any other LLC's or business entities
18 received payments for work conducted by Fusion GPS,
19 its employees, or its associates?

20 MR. LEVY: Are you asking to include
21 subcontractors or are you --

22 MR. DAVIS: Sure.

23 MR. LEVY: Does Fusion GPS have
24 subcontractors?

25 MR. DAVIS: Right. I think that would be

1 part of it, but the other part is: are there other
2 LLC's associated with Bean direct- -- with Bean or
3 Fusion directly, not just subcontractors?

4 BY THE WITNESS:

5 A. Yes. I mean, the one I think that has
6 come up in some of the correspondence or somewhere,
7 I can't remember where, is another one called
8 Kernel, K-E-R-N-E-L, and that was an LLC that was
9 set up for a book project that never -- we never
10 finished -- we never did the book. So it's
11 inactive with the current time. Then there's
12 another one that one of my partners manages that's
13 for different types of work, technology, policy,
14 and that type of thing.

15 Q. What's the name of that one?

16 A. I think it's Caudex, C-A-U-D-E-X.

17 Q. And are any other LLC's or types of
18 business entities otherwise associated with Fusion
19 GPS?

20 A. Those are the only ones I can think of.

21 Q. And have you been a registered agent,
22 owner, or beneficial owner of any other LLC's or
23 business entities?

24 A. I own an LLC in Maryland that holds some
25 property that I own.

1 Q. And what's the name of that LLC?

2 A. As we sit here, I wasn't prepared for this
3 question, I don't remember the name of it. It was
4 registered fairly recently. Obviously we can get
5 that to you.

6 Q. So is it correct that Fusion has at times
7 worked with different LLC's based on by project?

8 A. For most of the history of the company
9 Bean, LLC was the primary entity through which we
10 did business. I'm not sure I totally understand
11 your question. There's this other LLC I mentioned
12 that's fairly recent and there may be other
13 entities, but nothing that I, myself set up, at
14 least not that I can think of.

15 Q. Anything that your partners would have set
16 up?

17 A. Not that I can think of.

18 Q. Does Fusion GPS, Bean, LLC, Kernel, LLC,
19 or any of these other related business entities
20 have any bank accounts outside of the United
21 States?

22 A. No.

23 Q. Domestically does Bean, LLC have an
24 account at [REDACTED]?

25 A. Yes.

1 MR. LEVY: I don't know that we need to get
2 into bank accounts.

3 MR. DAVIS: Are you offering a basis for that
4 objection?

5 MR. LEVY: It's outside the scope of the
6 interview.

7 MR. DAVIS: Part of the questions we've asked
8 are actions Fusion has taken -- interactions Fusion
9 has had and we're trying to define the scope of
10 what Fusion is as a predicate to understanding
11 those answers.

12 MR. LEVY: Yeah, and he's answering those
13 questions.

14 MR. FOSTER: He answered yes to the question.

15 BY MR. DAVIS:

16 Q. Where is Fusion GPS's physical office, if
17 any?

18 A. DuPont Circle.

19 Q. Is it, if I recall correctly, 1700
20 Connecticut Avenue, Northwest?

21 A. That's the address, yes.

22 Q. Is it Suite 400?

23 A. It is.

24 Q. How many employees and associates does
25 Fusion GPS currently have?

1 A. Roughly a dozen.

2 Q. Who are they?

3 A. Do you want their names?

4 Q. Yes, their names.

5 A. [REDACTED] is a partner in the
6 business; [REDACTED] is a partner in the
7 business; [REDACTED], [REDACTED], is a partner in
8 the business. [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED] Another one of our managers is

12 [REDACTED], and he is a [REDACTED]

13 [REDACTED] 1. We have several analysts whose

14 names are [REDACTED];

15 [REDACTED]; [REDACTED]

16 whose previous position I don't recall; [REDACTED]

17 [REDACTED] whose former position I don't recall;

18 [REDACTED] who previously was with I think

19 [REDACTED]; [REDACTED] who's our administrative

20 person. There may be one or two others whose names

21 I don't recall.

22 Q. Is anyone who was an employee or associate
23 of Fusion GPS in 2015 or 2016 no longer with the
24 company? And if so, who?

25 A. Not that I can think of.

1 Q. In general, what is Fusion GPS's business?

2 A. We primarily are a research, strategy,
3 consulting firm.

4 Q. And what types of clients has Fusion GPS
5 had?

6 A. It runs the gamut from corporations to law
7 firms, various investment funds, people involved in
8 litigation.

9 Q. And roughly how many active clients --

10 MR. LEVY: Did you finish? I don't know if
11 he finished.

12 MR. DAVIS: I'm sorry.

13 BY THE WITNESS:

14 A. It's hard to categorize them all. Those
15 are some of the main types of clients we have.

16 Q. And roughly how many active clients did
17 Fusion GPS have in 2016?

18 A. That's difficult for me to answer. You
19 know, over ten I would say, but it's hard for me --
20 beyond that I would be guessing.

21 Q. Does part of Fusion GPS's business involve
22 attempting to have media outlets publish articles
23 that further the interests of your clients?

24 A. Yeah, you could -- I mean, generally
25 speaking, we are -- generally we tend to respond to

1 inquiries more than try to push things, but, you
2 know, we work with the press frequently.

3 Q. And has Fusion GPS ever provided
4 information to journalists in order to encourage
5 them to publish articles or air stories that
6 further your client's interests?

7 A. Yes.

8 Q. And has Fusion GPS provided information to
9 journalists or editors in order to discourage them
10 from publishing or airing stories that are contrary
11 to your client's interests?

12 A. Well, what we -- we're a research company.
13 So generally what we do is provide people with
14 factual information. Our specialty is public
15 record information. So if we get an inquiry about
16 a story and some of the information that a
17 reporter's presuming is incorrect and we give them
18 correct information, that may cause them to not
19 write the story.

20 Q. Has Fusion GPS ever had arrangements with
21 clients in which the amount of Fusion's
22 compensation was dependent on getting articles
23 published or stories aired?

24 A. Not that I can recall.

25 Q. Has Fusion GPS ever had arrangements with

1 clients in which the amount of Fusion's
2 compensation was dependent upon preventing articles
3 from being published or stories from being aired?

4 A. No, I don't think so, not to my
5 recollection.

6 Q. To the best of your knowledge, has anyone
7 associated with Fusion GPS ever told clients or
8 prospective clients that the company could find and
9 distribute information or take other actions in
10 order to encourage government agencies to initiate
11 an investigation?

12 A. Could you restate that?

13 Q. To the best of your knowledge, has anyone
14 associated with Fusion GPS ever told clients or
15 prospective clients that the company could find and
16 distribute information or take other actions in
17 order to encourage government agencies to initiate
18 an investigation?

19 MR. LEVY: Within the scope of this
20 interview?

21 MR. DAVIS: In general. I'm not asking about
22 any particular case.

23 MR. LEVY: Hold on. Let's -- let me just
24 talk to my client about that and get back to you on
25 that. I just want to understand the facts so we

1 can evaluate whether it's appropriate to discuss
2 that here if such a predicate for the answer
3 exists.

4 MR. FOSTER: Do you want to take a break?

5 MR. LEVY: Sure.

6 MR. FOSTER: Let's go off the record. It's
7 9:55.

8 (A short break was had.)

9 MR. DAVIS: We'll go back on the record.
10 It's 10:02.

11 BY MR. DAVIS:

12 Q. After conferring with your counsel, are
13 you able to answer the question?

14 A. Yes. Could you just state it one more
15 time.

16 Q. Sure. To the best of your knowledge, has
17 anyone associated with Fusion GPS ever told clients
18 or prospective clients that the company could find
19 and distribute information or take other actions in
20 order to encourage government agencies to initiate
21 an investigation?

22 A. The word "associated" is really vague.
23 I'm not sure I know what you mean by that. I can
24 speak to my own practices and the practices of the
25 people who work at my company.

1 Generally speaking, when we do a research
2 project for a new client and they ask us -- you
3 know, they explain, you know, what situation
4 they're involved in, if it's a lawsuit, for
5 example, or some other dispute, a lot of what we do
6 is related to disputes, they say -- you know, we
7 say we will conduct an open-ended inquiry that's
8 not goal directed and the results of the research
9 will guide whatever decision you want to make about
10 how to use it.

11 So the range of possibilities with, you know,
12 research are you could file a lawsuit, you could
13 put it in a court filing, you could take it to a
14 government agency, you could give it to Congress,
15 you could give it to the press, but you don't
16 really prejudge, you know, how you're going to use
17 information until you know what you've got.

18 So we generally don't let our clients dictate
19 sort of the -- you know, the end result of things
20 because we don't think that's an intelligent way of
21 trying to do research and, you know, a lot of what
22 we do is decision support. Your clients are
23 frequently trying to make a decision about how they
24 want to proceed, whether they want to -- you know,
25 if someone thinks they've been defrauded, you can

1 file a lawsuit, you can go to the police. You
2 would decide that based on what you find out about
3 the, you know, evidence of a fraud. So that's
4 generally the way we do it.

5 Q. To the best of your knowledge, has Fusion
6 GPS ever had an arrangement with a client in which
7 the company was specifically tasked with getting
8 government agencies to initiate an investigation?

9 A. I would -- to the best of my recollection,
10 we don't have any agreements like that we would put
11 into writing generally for the reasons I stated in
12 answer to the previous question. In the course of,
13 you know, dealing with a client we might talk about
14 whether, you know, something was worthy of a
15 government investigation and talk about how that
16 could be done. There's any number of scenarios
17 there that might come under discussion, but, as I
18 say, that's generally not how we frame a project.

19 Q. Has Fusion GPS ever had arrangements with
20 clients in which the amount of Fusion's
21 compensation was dependent on government agencies
22 initiating an investigation?

23 A. We've been in business since 2010, so
24 seven years is a fairly long time, but as I say,
25 not to my recollection. I just can't be

1 categorical because we've done a lot of work over
2 the last seven years.

3 Q. So I'm going to move on now to some
4 questions about Prevezon Holdings and the Magnitsky
5 Act. I want to sort of generally make it clear
6 when I refer to you or to Fusion, I mean not just
7 you personally, but all employees and associates of
8 Fusion GPS and its component LLC's and legal
9 entities as well as any contractors or
10 subcontractors. If it's not clear to you who I'm
11 referring to in the question, please just ask and
12 I'll clarify.

13 Similarly, I'm going to refer to Prevezon and
14 Magnitsky, M-A-G-N-I-T-S-K-Y. When I refer to
15 those together, I mean all matters related to the
16 Justice Department's lawsuit against Prevezon
17 Holdings Limited, as well as all matters related to
18 efforts with the media, government officials, and
19 campaigns to overturn the Magnitsky Act, prevent
20 the passage of the global Magnitsky Act, remove the
21 word Magnitsky from either law, the Russian ban on
22 U.S. adoptions of Russian children, research on Mr.
23 Magnitsky himself or Mr. Browder, Hermitage Capital
24 Management and its affiliated companies. So I'm
25 generally putting those under that umbrella. If

1 you need me to clarify for any specific question,
2 just ask.

3 MR. LEVY: You obviously said a lot there.

4 MR. DAVIS: I did.

5 MR. LEVY: And so on a question-by-question
6 basis out of fairness to the witness, I just want
7 to make sure that he has the ability to ask
8 clarification, of course, as questions arise.

9 MR. DAVIS: Right. That's what I would be
10 asking you to do.

11 MR. LEVY: Even now, quite frankly, I'm not
12 sure I can recall everything that you baked into
13 the term that you're going to use.

14 MR. DAVIS: Feel free to raise questions
15 about any particular question we ask.

16 MR. LEVY: Okay.

17 BY MR. DAVIS:

18 Q. Mr. Simpson, what was Fusion GPS's role in
19 the Justice Departments's litigation against
20 Prevezon Holdings?

21 A. We were retained by Baker Hostetler in the
22 spring of 2014 to do litigation support, and under
23 the heading of litigation support was things
24 related to discovery, locating witnesses, answer
25 questions from the press, gathering documents,

1 pretty much, you know, a conventional understanding
2 of litigation support.

3 Q. And to whom did Fusion GPS report in the
4 course of this work?

5 A. Baker Hostetler. The partner in charge
6 was Mark Cymrot, C-Y-M-R-O-T, who's a partner in
7 the Washington office and former Justice Department
8 prosecutor.

9 Q. Did Mr. Cymrot provide instructions to
10 Fusion GPS during the course of the work?

11 A. Mr. Cymrot regularly instructed us in how
12 we were to go about doing discovery and various
13 other tasks, yes.

14 Q. And for a portion of that case at least
15 Mr. Cymrot was the attorney of record for Prevezon
16 Holdings; is that correct?

17 A. For the entirety of the time that I worked
18 on the case he was -- I believe he was the attorney
19 of record.

20 Q. And did you understand the instructions
21 you received from him to be originating from his
22 client, from Prevezon Holdings?

23 A. The ultimate direction, of course, would
24 have been from the ultimate client, but the client
25 was outside the United States for most of its time.

1 So, you know, a lot of instruction came from him
2 and he was the person who formulated the legal
3 strategy, undertook all of the legal efforts to
4 work the case.

5 Q. And when did Fusion GPS cease working on
6 the Prevezon Holdings case?

7 A. I can't say exactly. It was mid to late
8 2016.

9 Q. Which of Fusion's associates and employees
10 have worked on the Prevezon or Magnitsky issues?

11 A. For the most part it was myself and one of
12 my analysts, [REDACTED]. There may have -- from
13 time to time issues may have come up about trying
14 to find records or other issues where I conferred
15 with or enlisted someone else in the office, but I
16 don't specifically recall.

17 MR. FOSTER: To follow up on the previous
18 answer, you said mid to late 2016 is when the
19 investigation ended, generally speaking. Do you
20 have any records that could refresh your
21 recollection about the exact date at a later time?

22 MR. SIMPSON: I'm sure we do, yes. I am --
23 we have a division of labor and I don't do a lot of
24 things like invoicing. So this is not going to be
25 my strong suit.

1 MR. FOSTER: But you could figure it out
2 later for us?

3 MR. SIMPSON: We maintain books and records.

4 MR. FOSTER: Could you maybe just describe
5 quickly what kind of record would constitute the
6 end of the engagement?

7 MR. SIMPSON: That's a good question. You
8 know, in some cases there's no specific termination
9 letter. So I don't know whether there's a
10 termination agreement or termination letter in this
11 case. I mean, generally speaking, you know, when
12 we stop billing the case is over.

13 (Exhibit 2 was marked for
14 identification.)

15 BY MR. DAVIS:

16 Q. I'd like to introduce an exhibit. It's
17 one of two privilege logs that your attorneys
18 provided us. This will be Exhibit 2.

19 Mr. Simpson, on the third page of this
20 document, the last two entries appear to be e-mails
21 sent on October 27, 2016 from Peter Fritsch to Mark
22 Cymrot CC'g you. To the best of your recollection,
23 was Fusion GPS still working for Mr. Cymrot on --
24 still working for Baker Hostetler on the Prevezon
25 case as of the date of this e-mail?

1 A. I don't know.

2 Q. The privilege asserted was attorney work
3 product. Do you know what the basis of that was?

4 A. Well, it was a legal --

5 MR. LEVY: This is a judgment that his
6 lawyers made and any knowledge he would have about
7 whether it was attorney work product or not likely
8 would come from communications with counsel, which
9 obviously are privileged.

10 BY MR. DAVIS:

11 Q. Did Fusion ever work with subcontractors
12 on its Prevezon or Magnitsky efforts?

13 A. Yes.

14 Q. Who were they?

15 MR. LEVY: Just to clarify that, your
16 question was -- can you repeat the question,
17 please?

18 MR. DAVIS: Sure. Did Fusion ever work with
19 subcontractors on its Prevezon or Magnitsky
20 efforts?

21 MR. LEVY: What do you mean by "Magnitsky
22 efforts"?

23 MR. DAVIS: I mean all matters related to the
24 efforts with the media, government officials, and
25 campaigns -- or campaigns to overturn the Magnitsky

1 Act, prevent the passage of the global Magnitsky
2 Act, remove the word Magnitsky from the law -- from
3 either law, as well as the Russian ban on U.S.
4 adoptions of Russian children.

5 MR. LEVY: And you were also asking about
6 subcontractors for Prevezon as well?

7 MR. DAVIS: I'm asking whether Fusion ever
8 worked with subcontractors on those issues.

9 BY THE WITNESS:

10 A. Well, I object to the question the way the
11 question is framed. You've sort of built into the
12 question the sort of inference that we were doing
13 something other than working on a legal case, and
14 there's extensive public record, documentation in
15 Pacer of the work that we did and it was a legal
16 case. So I don't -- it's going to be difficult
17 because it's really hard for me to answer questions
18 where you lump in all these things that other
19 people were doing and impute them to me.

20 Q. Let's break them down by category.

21 A. Let's do that.

22 Q. Did Fusion ever work with
23 subcontractors -- did Fusion ever hire
24 subcontractors as part of its legal work on the
25 Prevezon case?

1 A. Yes.

2 Q. And whom did you hire?

3 A. I think the primary, possibly only one was
4 a guy named Edward Baumgartner. There may have
5 been others. I just don't recall.

6 Q. And what type of work did Mr. Baumgartner
7 undertake for Fusion?

8 A. Discovery mostly, helping locate
9 witnesses. He speaks Russian. So he would work
10 with the lawyers on gathering Russian language
11 documents, gathering Russian language media
12 reports, talking to witnesses who speak Russian,
13 that sort of thing. He may have dealt with the
14 press. I just don't remember.

15 MR. FOSTER: What is his professional
16 background?

17 MR. SIMPSON: He has a degree in Russian.

18 MR. FOSTER: So his primary role was as a
19 Russian speaker? Is he a private investigator?
20 What does he do?

21 MR. SIMPSON: He runs a consulting firm like
22 me and deals with issues more in Ukraine than
23 Russia, but in both. Yeah, he was doing Russian
24 language things. The case revolved around,
25 centered on events in Russia. So a lot of what we

1 needed to find out were things that were in Russia
2 or there were documents in the Russian language. I
3 don't speak Russian, I've never been to Russia. So
4 it would be ordinary course of business for me to
5 identify a specialist who could supply me with that
6 kind of specialized expertise.

7 BY MR. DAVIS:

8 Q. And how did you come to hire him for this
9 engagement?

10 A. I met him on a previous engagement and I
11 was impressed by his knowledge of the region and
12 his general abilities.

13 MR. FOSTER: What was the previous
14 engagement?

15 MR. LEVY: We're not going to get into prior
16 engagements. It's outside the scope.

17 MR. FOSTER: Generally speaking, what was it?

18 MR. SIMPSON: It was something involving
19 Russia.

20 MR. FOSTER: A little more specifically
21 speaking.

22 MR. SIMPSON: It's my understanding that I
23 was not required to talk about my other cases at
24 this interview.

25 MR. DAVIS: Again, it's a voluntary interview

1 and you are not under compulsion to answer any
2 questions, but, again, the extent to which you
3 cooperate will help the committee members evaluate
4 whether further compulsory process is necessary.

5 MR. LEVY: He's been answering questions and
6 we're here all day for you.

7 MR. SIMPSON: I'm here to cooperate.

8 BY MR. DAVIS:

9 Q. Did anyone from Fusion ever work with
10 other subcontractors hired by Baker Hostetler for
11 the Prevezon case?

12 A. That would have been ordinary. I don't
13 specifically remember doing that, but it wouldn't
14 have been out of the ordinary. It's not
15 particularly noteworthy. I've worked with Baker
16 Hostetler since 2009 on a number of legal cases.
17 This is the only one that involved Russia. And in
18 the course of any legal case, you know, various
19 people are retained by a law firm to perform
20 various services. So you would meet other
21 subcontractors in the course of doing legal work.
22 That's common.

23 Q. What types of services would they tend to
24 be providing?

25 A. Translators would be common, in this case

1 particularly. Forensic people, accountants, PR
2 people, all those services are facets of modern
3 litigation.

4 Q. And to the best of your knowledge, did
5 Fusion ever work with any other contractors hired
6 by Prevezon Holdings?

7 A. I'm sorry. Could you repeat that?

8 Q. Sure. I asked if Fusion had hired any
9 subcontractors that you worked with on the Prevezon
10 matter, whether Baker hired anyone that you worked
11 with. Now I'm wondering did you work with anyone
12 hired directly through Prevezon on this as opposed
13 to Baker Hostetler?

14 A. It's difficult to give a yes or no answer
15 to that. I would have to say I think so, but when
16 you're a subcontractor to a law firm, you know,
17 you're sort of in a lane and, you know, my lane was
18 research, discovery, William Browder's business
19 practices, his activities in Russia, his history of
20 avoiding taxes.

21 So people -- other people, you know, in a big
22 case come and go and it's not really my position to
23 ask, you know, who hired them and why. Generally
24 if I'm introduced to somebody they'll explain, you
25 know, why there were other lawyers who worked for

1 Prevezon who were part of the case. Other people
2 were brought in -- you know, were brought in either
3 by Prevezon or by the lawyers and I didn't always
4 try to pin that down.

5 Q. In general would the decision whether you
6 would share Fusion's information with them be
7 dependent then upon the attorneys introducing you
8 to them?

9 A. It would be dependent on the direction of
10 the attorneys. I basically -- you know, in all
11 these cases for reasons of privilege and simply
12 just professionalism you work at the direction of
13 the lawyers and you do what they instruct you to
14 do.

15 Q. Did anyone from Fusion ever help arrange
16 for other entities to be hired by Prevezon or Baker
17 Hostetler for the Prevezon case?

18 A. I don't think you could say we arranged
19 for others to be hired. If you're asking me if we
20 made referrals, we would refer -- you know, we made
21 quite extensive -- fairly extensive efforts to get
22 a PR firm hired for the trial that we were
23 expecting and we made a number of referrals in that
24 case, in that matter.

25 Q. What was the name of that PR firm?

1 A. There were several. We actually, you
2 know, had a series of screening sessions. I think
3 Weber Shandwick was the one we ended up with.

4 Q. You mentioned that Fusion was conducting
5 litigation support in regard to the Prevezon case.
6 Could you expand a little more about what type of
7 litigation support activities you undertook?

8 MR. LEVY: Beyond what he's already told you?

9 MR. DAVIS: With a little more detail.

10 BY THE WITNESS:

11 A. Yes. In the original period of the case
12 the question -- the client's explanation for or
13 response to the government's allegations was that
14 they originated with an organized crime figure in
15 Russia who had been extorting them and who they had
16 reported to the police and who had been jailed and
17 convicted for blackmailing them, and they claimed
18 that that was where these allegations originated,
19 which, you know, seemed remarkable because it was
20 in a Justice Department complaint.

21 So the first thing, you know, in any case
22 really is to sort of try and figure out whether
23 your own client's story can be supported or whether
24 it's not true, and the lawyers -- you know, we work
25 with a lot of prominent law firms and in many cases

1 the first thing the lawyers need to know is whether
2 their client's story is real, whether it can be
3 supported, you know, because in any new case you
4 don't know whether your own client is telling you
5 the truth.

6 So originally one of the first things we were
7 hired to do was to check out whether this was, in
8 fact, the case. So they claimed that the
9 allegations originated with a mobster named Demetri
10 Baranovsky, B-A-R-A-N-O-V-S-K-Y, who was, in fact,
11 jailed for running a shake-down operation in which
12 he posed as an anticorruption campaigner for the
13 purpose of extorting money from people by
14 threatening to accuse them of some kind of corrupt
15 activities. As you know, Russia is rife with
16 corruption and there's a lot of anger over
17 corruption.

18 We were able to ascertain that Mr. Baranovsky
19 was, in fact, associated with Russia's biggest
20 organized crime family, the Solntsevo Brotherhood,
21 S-O-L-N-T-S-E-V-O brotherhood, which is the major
22 dominant mafia clan in Moscow. So as far as it
23 went, the client seemed to be telling the truth.
24 You know, there was extensive record of these
25 events and we found some indications from western

1 law enforcement that western law enforcement did
2 consider Baranovsky to be a lieutenant in this
3 organized crime family. So we did that for a
4 while. Edward Baumgartner helped a lot with that
5 because of his Russian language skills and his
6 ability to interface with the court system in
7 Russia.

8 And, you know, around the -- similarly, there
9 was a deposition of a customs agent by one of the
10 lawyers who -- you know, in this initial effort to
11 trace the origin of these allegations, where they
12 came from, how they could have ended up with the
13 Justice Department, the first thing we did was
14 interview the client, got their story, and
15 interviewed the agent who worked on the case for
16 the DOJ and that agent said he got all his
17 information from William Browder.

18 So at that point I was asked to help see if
19 we could get an interview with William Browder.
20 They wrote a letter to Browder and asked him to
21 answer questions and he refused. Then the lawyers
22 wanted to know, you know, whether he could be
23 subpoenaed. So a lot of what I did in 2014 was
24 help them figure out whether he could be subpoenaed
25 in the United States to give a deposition, and the

1 first thing that we did was we researched the
2 ownership and registration of his hedge fund, which
3 was registered in Delaware and filed documents with
4 the Securities and Exchange Commission.

5 So we subpoenaed his hedge fund. A lot of
6 the early work I did was just documenting that his
7 hedge fund had presence in the United States. So
8 we subpoenaed his hedge fund. He then changed the
9 hedge fund registration, took his name off, said it
10 was on there by accident, it was a mistake, and
11 said that he had no presence in the United States
12 and that, you know -- as you may know, he
13 surrendered his citizenship in 1998 and moved
14 outside the United States. That was around the
15 time he started making all the money in Russia. So
16 he's never had to pay U.S. taxes on his profits
17 from his time in Russia, which became important in
18 the case later.

19 In any case, he said he never came to the
20 United States, didn't own any property here, didn't
21 do any business here, and therefore he was not
22 required to participate in the U.S. court system
23 even though he admitted that he brought the case to
24 the U.S. Justice Department. So we found this to
25 be a frustrating and somewhat curious situation.

1 He was willing to, you know, hand stuff off to the
2 DOJ anonymously in the beginning and cause them to
3 launch a court case against somebody, but he wasn't
4 interesting in speaking under oath about, you know,
5 why he did that, his own activities in Russia.

6 So looking at the public record we determined
7 that he did come to the United States frequently,
8 and I discovered through public records that he
9 seemed to own a house in Aspen, Colorado, a very
10 expensive mansion, over \$10 million, which he had
11 registered in the name of a shell company in a
12 clear attempt to disguise the ownership of the
13 property. We were able to ascertain that he does
14 use that property because he registered cars to
15 that property with the Colorado DMV in the name of
16 William Browder.

17 So we began looking for public information
18 about when he might be in Aspen, Colorado, and I
19 found a listing on the Aspen Institute Website
20 about an appearance he was going to make there in
21 the summer of 2014. So we -- I served him a
22 subpoena in the parking lot of the Aspen Institute
23 in the summer of 2014 using two people -- two
24 subcontractors. Actually, those other
25 subcontractors were -- their names escape me, but I

1 forgot about those. We can get you that. This is
2 all in the Pacer court record, the public court
3 record.

4 In any event, the three of us served -- there
5 was another subcontractor working for the law firm
6 whose name I also forget. I did not retain him,
7 but I was asked to work with him on this. He is a
8 private investigator and we can get you his name.
9 In any event, we served him the subpoena and he ran
10 away. He dropped it on the ground and he ran away.
11 He jumped in his car and went back to his mansion.

12 At that point he tried to suppress -- tried
13 to quash the subpoena on the grounds it hadn't been
14 properly served. We didn't get a video, but there
15 are sworn affidavits from my servers in the court
16 record about the service. But he objected to it on
17 a number of grounds. A, he continued to insist he
18 had nothing to do with the United States and didn't
19 come here very often even, though we caught him
20 here, clearly has cars in Colorado. He also said
21 that you can't serve a subpoena for a case in
22 New York in the state of Colorado, it's outside the
23 primary jurisdiction. He also began to raise
24 questions about whether Baker Hostetler had a
25 conflict of interest because of some previous work

1 he did with one of the Baker lawyers.

2 This led to a long, drawn-out discovery
3 battle that I was in the center of because I served
4 the subpoenas and I helped find the information for
5 the first set of subpoenas that lasted, you know,
6 through 2014. This was, you know, a lot of what I
7 did. This was -- the main focus was on trying to
8 get William Browder to testify under oath about his
9 role in this case and his activities in Russia.

10 All of this -- his determined effort to avoid
11 testifying under oath, including running away from
12 subpoenas and changing -- frequently changing
13 lawyers and making lurid allegations against us,
14 including that, you know, he thought we were KGB
15 assassins in the parking lot of Aspen, Colorado
16 when we served the subpoena, all raised questions
17 in my mind about why he was so determined to not
18 have to answer questions under oath about things
19 that happened in Russia.

20 I'll add that, you know, I've done a lot of
21 Russia reporting over the years. I originally met
22 William Browder back when I was a journalist at the
23 Wall Street Journal when I was doing stories about
24 corruption in Russia. I think the first time I met
25 him he lectured me about -- I was working on a

1 story about Vladimir Putin corruption and he
2 lectured me about how have Vladimir Putin was not
3 corrupt and how he was the best thing that ever
4 happened to Russia. There are numerous documents
5 that he published himself, interviews he gave
6 singing the praises of Vladimir Putin. At that
7 time I was already investigating corruption in
8 Putin's Russia.

9 So this made me more curious about the
10 history of his activities in Russia and what that
11 might tell me about corruption in Russia, and as
12 part of the case we became curious about whether
13 there was something that he was hiding about his
14 activities in Russia. So through this period while
15 we were attempting to get him under oath we were
16 also investigating his business practices in Russia
17 and that research -- and I should add when I say
18 "we," I mean the lawyers were doing a lot of this
19 work and it wasn't -- I can't take responsibility
20 or pride of place on having done all this work. We
21 were doing it all together. It was a -- you know,
22 there were a number of lawyers involved, other
23 people.

24 In the course of doing this research into
25 what he might not want to be asked about from his

1 history in Russia we began to learn about the
2 history of his tax avoidance in Russia and we began
3 to deconstruct the way that his hedge fund
4 structured its investments in Russia and, you know,
5 we gradually accumulated through public records,
6 not all from Russia, that he set up dozens of shell
7 companies in Cyprus and other tax havens around the
8 world to funnel money into Russia and to hold
9 Russian securities.

10 He also set up shell companies inside of
11 Russia in order to avoid paying taxes in Russia and
12 he set up shell companies in a remote republic
13 called Kalmykia, K-A-L-M-Y-K-I-A, which is next to
14 Mongolia. It's the only Buddhist republic in
15 Russia and there's nothing much there, but if you
16 put your companies there you can lower your taxes.
17 They were putting their companies in Kalmykia that
18 were holding investments from western investors and
19 they were staffing these companies -- they were
20 using Afghan war veterans because there's a tax
21 preference for Afghan war veterans, and what we
22 learned is that they got in trouble for this
23 eventually because one of Putin's primary rules for
24 business was you can do a lot of things, but you've
25 got to pay your taxes.

1 In fact, William Browder famously said in
2 2005 at Davos everybody knows under Putin you have
3 to pay your taxes, which is ironic because at the
4 time he was being investigated for not paying
5 taxes. Ultimately they were caught, some of these
6 companies were prosecuted, and he was forced to
7 make an enormous tax payment to the government of
8 Russia in 2006.

9 I will add that Sergei Magnitsky was working
10 for him at this time and all of this happened prior
11 to the events that you are interested in involving
12 the Russian treasury fraud and his jailing. This
13 precedes all that.

14 But returning to the detailed discussion of
15 my work, we investigated William Browder's business
16 practices in Russia, we began to understand maybe
17 what it was he didn't want to talk about, and as we
18 looked at that we then began to look at his
19 decision to surrender his American citizenship in
20 1998. At that point somewhere in there the Panama
21 papers came out and we discovered that he had
22 incorporated shell companies offshore in the mid
23 1990s, in 1995 I believe it was in the British
24 Virgin Islands, and that at some point his hedge
25 fund's shares had been transferred to this offshore

1 company.

2 This offshore company was managed -- several
3 of his offshore companies were managed by the
4 Panamanian law firm called Mossack Fonseca,
5 M-O-S-S-A-C-K, Fonseca, F-O-N-S-E-C-A, which is
6 known now for setting up offshore companies for
7 drug kingpins, narcos, kleptos, you name it. They
8 were servicing every bad guy around. And I'm
9 familiar with them from other money laundering and
10 corruption and tax evasion investigations that I've
11 done.

12 I'll note parenthetically that William
13 Browder talks a lot about the Panama papers and the
14 Russians who are in the Panama papers without ever
15 mentioning that he's in the Panama papers. This
16 is, again, a public fact that you can check
17 on-line.

18 So that's an overview of the sort of work I
19 was doing on this case. In the course of that I
20 also began reaching back, I read his book Red
21 Notice to understand his story and the story of his
22 activities in Russia. I'll add also that I was
23 extremely sympathetic for what happened to Sergei
24 Magnitsky and I told him that myself and I tried to
25 help him. It was only later from this other case

1 that I began to be curious and skeptical about
2 William Browder's activities and history in Russia.

3 MR. FOSTER: Can I ask you a follow-up
4 question. I appreciate the narrative answer, but
5 at the very beginning of the narrative you talked
6 about beginning this journey by interviewing --
7 conducting an interview of the case agent who said
8 he'd gotten all of his information -- the case
9 agent or the attorney, the primary person at the
10 DOJ, you said they got all their information from
11 Bill Browder. Can you tell us who that was and who
12 conducted the interview?

13 MR. LEVY: Mr. Simpson should definitely
14 answer that question. I just want to make sure for
15 the record that he hadn't finished his answer. He
16 can talk more extensively about the litigation
17 support that he provided for Baker --

18 MR. FOSTER: We're happy to get into that if
19 he wants to do that. We're just coming up at the
20 end of our hour.

21 MR. LEVY: No problem.

22 MR. FOSTER: and I wanted to get that
23 follow-up in before --

24 MR. LEVY: No problem. No problem at all.

25 BY THE WITNESS:

1 A. I'll just finish with one last thing and
2 I'm happy to answer that question.

3 So in the course of this, you know -- I mean,
4 one of my interests or even obsessions over the
5 last decade has been corruption in Russia and
6 Russian kleptocracy and the police state that was
7 there. I was stationed in Europe from 2005 to 2007
8 or '8. So I was there when Putin was consolidating
9 power and all this wave of power was coming. So
10 it's been a subject that I've read very widely on
11 and I'm very interested in the history of Putin's
12 rise.

13 You know, in the course of all this I'll tell
14 you I became personally interested in where Bill
15 Browder came from, how he made so much money under
16 Vladimir Putin without getting involved in anything
17 illicit. So I read his book and I began doing
18 other research and I found filings at the SEC
19 linking him quite directly and his company, Salomon
20 Brothers at the time, to a company in Russia called
21 Peter Star, and I had, as it happens, vetted Peter
22 Star and I knew that Peter Star was, you know, at
23 the center of a corruption case that I covered as a
24 reporter at the Wall Street Journal. When I went
25 back into the history of Peter Star I realized that

1 Bill Browder did business with the mayor's office
2 in Saint Petersburg when Vladimir Putin was the
3 deputy mayor and was responsible for dealing with
4 western businessmen and corporations.

5 I then went and looked in Red Notice, this
6 was a large deal, it was the biggest deal ever for
7 Salomon at that time, they sold \$98 million worth
8 of stock on NASDAQ. There's no mention of William
9 Browder's deal with Peter Star in Red Notice. I
10 can't tell you why, but I can tell you that Peter
11 Star later became the subject of a massive
12 corruption investigation, Pan-European, that I
13 exposed a lot of and that led to the resignation of
14 Putin's telecoms minister. So I assume he might
15 not have -- this is kind of a pattern with Browder,
16 which is he tends to omit things that aren't
17 helpful to him, and I think we've seen a good bit
18 of that lately in his allegations against me, which
19 I'm sure you're going to ask me about.

20 So your question about the ICE agent, he was
21 deposed by John Moscow of the New York office of
22 Baker Hostetler. John is an old associate of mine
23 from my days as a journalist. John's an expert on
24 tax evasion and money laundering. He was the head
25 of the rackets bureau for the district attorney's

1 office in New York.

2 MR. FOSTER: You're talking about a formal
3 deposition in the litigation?

4 MR. SIMPSON: Yeah.

5 MR. FOSTER: I just wanted to clarify that.

6 MR. SIMPSON: Again, it's in the court
7 record. One of the frustrating things about this
8 whole issue for me is everything I'm talking about
9 or most of it is in the court record. You know, I
10 don't take a lot of credit for my work. So you
11 won't see my name scattered through the court
12 record, but a lot of this is what I did.

13 MR. DAVIS: I think that's concludes our
14 first hour. Let's take a short break before we
15 begin a new one.

16 MR. FOSTER: Let's go off the record.

17 MR. DAVIS: We'll go off the record at
18 10:45.

19 (A short break was had.)

20 MS. SAWYER: It's about 10:55.

21 EXAMINATION

22 BY MS. SAWYER:

23 Q. Mr. Simpson, again, I'm Heather Sawyer, I
24 work as counsel for Senator Feinstein, and I have
25 with me two of my colleagues. I will primarily be

1 asking the questions. They may have some
2 follow-up.

3 We want to make sure we're clear. So
4 certainly if I ask you a question, anything that's
5 unclear, let me know and I will clarify it. Again,
6 we appreciate you being here today to answer our
7 questions.

8 You had talked with my colleagues a bit about
9 the work that Fusion GPS does in general and I
10 wanted to ask you some follow-up on that. What
11 would you describe as kind of the key expertise of
12 your firm, Fusion GPS?

13 A. Public information is our specialty. We
14 generally are all ex-journalists and specific type
15 of journalists, investigative reporters, and, you
16 know, being a journalist is all about finding
17 public information. At least, you know, the kind
18 of journalism I practiced was based on documents.
19 I'm a document hound and so are my colleagues.

20 So essentially we gather up large quantities
21 of public information and we process that. We've
22 sort of more recently branched into data science
23 and, you know, digital data, obtaining databases
24 through FOIA. We do a lot of Freedom of
25 Information Act work. We work with court records

1 a lot, corporate records a lot. Some of my
2 employees do a lot of financial crime and money
3 laundering and fraud investigations, tax evasion,
4 that sort of thing. Those are my specialties.

5 I was also a political reporter and covered
6 campaigns and elections. I know a lot about how
7 campaigns work and how, you know, Washington works
8 generally. So we do things like policy disputes,
9 one industry versus another, one company versus
10 another. We don't do a lot of campaign consulting,
11 but every four years for the last couple of cycles
12 we've done some presidential work.

13 Generally speaking, the way our business is
14 structured most campaigns don't have the budget for
15 the kind of services that we provide. So we only
16 would do things where people have the resources to
17 pay for a serious piece of research. So we do
18 things like a California initiative or
19 presidential.

20 Q. And how would you describe like how would
21 you pitch and why would a client need your
22 services?

23 A. Generally speaking, people tend to get
24 referred to us when they have a sort of undefined
25 need, like they feel like they don't know what

1 happened or they don't know what happened, they
2 don't know what's going on. So I think that's what
3 I referred to earlier as the decision support part
4 of our work.

5 You know, a client will come to us and
6 they'll say I'm being sued and they're accusing me
7 of X and, you know, not only did I not do it, but I
8 don't even understand why they're suing me. I
9 mean, that's a kind of typical thing. Also another
10 example would be I think I've been defrauded, but I
11 can't figure out how or why. Or I keep -- you
12 know, I run the best company in my industry and,
13 you know, we make the best widgets and we keep
14 losing out on the Pentagon contract to this other
15 guy and we think something fishy's going on and we
16 want you to help us figure it out.

17 Q. So in some ways it's fact gathering and
18 due diligence for clients?

19 A. Well, it is certainly fact gathering and I
20 certainly am around the due diligence industry and
21 I am essentially part of it, but we don't really do
22 a lot of classic due diligence, which has become a
23 commoditized product in the business intelligence
24 field that is conducted, you know, at a fairly sort
25 of low level. it's become sort of a mass product

1 like a McDonald's cheeseburger.

2 Q. I think when you were speaking with my
3 colleagues you described your work as open ended
4 and not results directed. Can you explain a little
5 more what you mean by that?

6 A. Sure. Another thing we say about our work
7 is it's custom information, it's a customized
8 product. You tell us what your problem is and we
9 customize a research solution. In general when
10 people come to us and they tell us what their
11 challenge is, we stipulate that they retain us for
12 30 days, they agree to pay our fee, they don't tell
13 us what to do, they don't tell us, you know, what
14 result to get. I like to call it a holistic
15 methodology.

16 The reason we do it that way, you know, A, we
17 are professionals and we feel like it's not helpful
18 to have someone dictating how you do things, but,
19 B, if you predetermine the result that you're
20 looking for you tend to miss things. So it's
21 better -- you know, it's pure versus applied
22 science, right? You're looking to understand how
23 things work before you understand what you might
24 need to address a particular problem.

25 What happens after you've done open-ended

1 research is then, of course, you try to apply it to
2 the specific issues at hand. So if you're not able
3 to get a government contract and you think the
4 other guy is up to something and we find out, you
5 know, indeed he's been making, you know, payments
6 to somebody, you know, then we would, you know,
7 advise them on how to address that.

8 Q. So the way it's structured you are
9 certainly free to follow the facts wherever they
10 may lead you in the course of research?

11 A. That's right. You know, it's a little
12 different in litigation where you're working for an
13 attorney and he's got specific things he needs,
14 like serving a witness or something like that, but
15 on the research side of it it's -- I have the
16 professional -- basically I reserve for myself the
17 professional freedom to find out the answers.

18 Q. A January 11, 2017 New York Times article
19 described your firm, Fusion GPS, as a firm that
20 "Most often works for business clients, but in
21 presidential elections the firm is sometimes hired
22 by candidates, party organizations, or donors to do
23 political oppo work, short for opposition research
24 on the side."

25 Is that an accurate description of the firm?

1 A. In a shorthand way, yeah. I mean, it's
2 consistent with the description I think I gave you.
3 We don't do a lot of campaign work, but, you know,
4 every few years we do. And most of our clients are
5 not trying to win an election. They're trying to
6 win a lawsuit or, you know, find out who ripped
7 them off.

8 Q. With regard to the political or campaign
9 work that you do, the same principles you've talked
10 about in terms of how the relationship is
11 structured, how the research is done, do those same
12 principles apply to that political or campaign
13 research as well?

14 A. Yes. There's a limited number of examples
15 because we don't do a lot of it, but, again, my
16 specialty is really sort of financial
17 investigations and business practices. In the
18 last -- you know, in a current example we have a
19 businessman who had a far-flung business empire all
20 around the world. So, you know, that was a natural
21 subject for me. So we do, we investigate
22 multinational enterprises on a frequent basis.

23 Q. Just to be clear, when you say "in the
24 current example," what are you referring to?

25 A. 2016 presidential election.

1 Q. And then, by extension, when you're
2 talking about an international businessman, I
3 presume you're talking about then candidate now
4 President Trump?

5 A. Yes.

6 Q. I do want to ask you more about that, but
7 before we get to that, in general, when you do the
8 political or campaign work you're equally free to
9 follow the facts wherever they lead you and the
10 firm Fusion GPS?

11 A. Yes, that's right.

12 Q. Now, certainly it sounds like you handle
13 business for multiple clients, not just one client
14 at one time. How do you handle the fact that you
15 have work for more than one client in terms of
16 protecting confidentiality in general and
17 ensuring -- well, first of all, I presume that you
18 take steps so that work for one client is not
19 shared with another client?

20 MR. LEVY: What's the question?

21 MS. SAWYER: Do you take steps to ensure that
22 work that you're doing for one client is not shared
23 with another client?

24 BY THE WITNESS:

25 A. Yes. My partners and I don't talk

1 about -- it's like a lawyer wouldn't talk about one
2 client to another client. You know, there's some
3 exceptions when things become public. If we're
4 working on a public matter and someone else asks us
5 about it, I mean, obviously if it's public it's not
6 -- it doesn't need to be protected. But we have
7 systems to segregate our cases and clients and, you
8 know, we deal with them individually and we operate
9 in that sense, you know, like a lawyer would.

10 As the business has grown, you know, we've
11 taken on more and more matters. So I don't -- you
12 know, I generally do about a half a dozen cases at
13 a time on all range of subjects in all parts of the
14 world, and the same is true of my partners and we
15 divide them up. So sometimes we work together, but
16 frequently each of them will be doing three, four,
17 five cases at a time.

18 Q. With regard to subcontractors who work
19 with the firm, do you have a policy that is shared
20 with them about how they are to treat the
21 information that they're doing on behalf of one of
22 your clients vis-a-vis some of your other clients?

23 A. Well, our subcontractors are governed by
24 NDA's to start with. In most cases that I can
25 think of we don't have one subcontractor working on

1 more than one matter, but to the extent that would
2 happen, we don't really -- when you're dealing with
3 subcontractors you're giving them generally very
4 specific assignments, find out what you can about
5 this company or this businessman or this court
6 case, whatever, and a lot of that you never get
7 into who the client is. It's irrelevant.

8 I'd say more often than not the
9 subcontractors don't know who the client is. We
10 would not volunteer that information to them unless
11 they were what we would call a super sub, which is
12 someone who, you know, has worked with us for a
13 long time and has enough trust and confidence to be
14 involved. Again, it would also be on a kind of
15 need-to-know basis. There's no need for a
16 subcontractor to know who a client is unless it's
17 for, you know, KYC, know your customer kind of due
18 diligence purposes. Sometimes we identify clients
19 to prevent conflicts. So unless there's a reason
20 like that or because they need to meet with the
21 client, you know, we generally wouldn't tell them
22 who the client is.

23 Q. So you had mentioned a few minutes ago
24 that you had done some political or campaign
25 research in the course of the 2016 presidential

1 election and you clarified that that was work
2 related to then Candidate and now President Trump.
3 What can you tell us about that work? Can you just
4 describe it first generally and then I'll ask you
5 some follow-up.

6 A. It was, broadly speaking, a kind of
7 holistic examination of Donald Trump's business
8 record and his associations, his bankruptcies, his
9 suppliers, you know, offshore or third-world
10 suppliers of products that he was selling. You
11 know, it evolved somewhat quickly into issues of
12 his relationships to organized crime figures but,
13 you know, really the gamut of Donald Trump.

14 What we generally do at the beginning of a
15 case if it's possible is to order all the books
16 about the subject from Amazon so we're not
17 reinventing the wheel and we know what's been
18 written and said before. So this was typical. We
19 ordered every Donald Trump book and, to my
20 surprise, that's a lot of books. I was never very
21 interested in Donald Trump. He was not a serious
22 political figure that I'd ever had any exposure to.
23 He's a New York figure really.

24 So anyway, we read everything we could read
25 about Donald Trump. Those books cover his

1 divorces, his casinos, his early years dealings
2 with labor unions and mafia figures. I'm trying to
3 think what else. His taxes certainly have always
4 been a big issue. Again, it was sort of an
5 unlimited look at his -- you know, his business and
6 finances and that sort of thing.

7 Q. And when did this work begin?

8 A. It was either September or October of
9 2015. I recall being in London on other business
10 and hearing somebody wanted for us to take a look
11 at it.

12 Q. And what can you tell us about who engaged
13 you initially to do that work?

14 MR. LEVY: The answer to that question might
15 implicate privilege.

16 BY MS. SAWYER:

17 Q. So it has been publicly reported that the
18 initial engagement of September to October 2015 was
19 by someone with ties -- with Republican ties. Can
20 you confirm whether that is accurate or not?

21 MR. LEVY: We're not going to talk about the
22 identity of clients.

23 BY MS. SAWYER:

24 Q. So with regard to this engagement in
25 September -- that began initially in September or

1 October 2015, what were you asked specifically to
2 do by the client?

3 A. I don't have specific recollection of
4 there being a specific tasking. I believe it was
5 why don't you take a look at Donald Trump, it looks
6 like he may, you know, be more successful than
7 people think, something -- there was some level of
8 insight that he had a better shot than people were
9 giving him at the time, but it was on open-ended
10 request like most of the things that we get.

11 Q. And, again, on that one was the work
12 directed at all by the client? Did they ask you to
13 look at any particular aspects of Candidate Trump's
14 background?

15 A. I don't -- I know there was --

16 MR. LEVY: We're not going to get into client
17 communications. It's privileged.

18 BY MS. SAWYER:

19 Q. Were you in any way limited in the
20 research that you did or the facts that you wanted
21 to pursue?

22 A. Can I talk generally about my practices
23 and the history?

24 Q. Sure.

25 A. I mean, in general it's very rare for

1 someone to tell me look here, don't look there.
2 For the most part we are looking at -- you know,
3 we're trying to understand something big. So it's
4 really counterproductive for somebody to tell you
5 look here, don't look there, I'm interested in X
6 but not Y. So we generally sort of push back when
7 that happens, but I have to say we sort of set the
8 rules at the beginning and people, you know,
9 accepted those terms. So generally that's what we
10 explain to people in the beginning of our
11 engagements, you know, let us do our jobs and
12 that's the way it works best.

13 Q. And did that -- can you tell us whether
14 that general practice and rule applied to the
15 engagement that you took on in September or October
16 2015 with regard to Candidate Trump?

17 MR. LEVY: You can answer that without
18 getting into client communications.

19 BY THE WITNESS:

20 A. I mean, we were -- it was regular order.
21 As, you know, various people will tell you, I'm --
22 you know, it would be like herding a cat, right?
23 We're going to do what we do. So it was regular
24 order.

25 Q. And then when you spoke with my colleagues

1 earlier you had indicated that sometimes when facts
2 are gathered you present options to a client and
3 you articulated kind of four options, a potential
4 lawsuit, take it to a government agency, give it to
5 Congress, give it to the press. Did you -- were
6 those the general options on the table with regard
7 to this engagement as well?

8 MR. LEVY: If you can discuss it without
9 talking about client communications. If you can't,
10 you can't.

11 BY THE WITNESS:

12 A. I'm just trying to -- because it evolved
13 it's a little bit hard to -- I mean, in the
14 beginning of this case like pretty much every case
15 there was no -- there was no range of options --
16 there weren't -- it was a request to see what we
17 could find out about Donald Trump and the, you
18 know, goal or sort of reason, there wasn't really
19 one. It was tell me what we need to know about
20 this guy. So later on, you know, we started
21 getting press inquiries and at that point, you
22 know, the sort of press element enters the
23 equation, but I can't really get into what they
24 told me or didn't tell me to do.

25 Q. And are you free today to talk to us about

1 any of the actual findings from that research and
2 that engagement?

3 A. Yes.

4 Q. Okay. So with regard to that initial
5 engagement because you had talked a bit about some
6 of the research you had done -- I think you said it
7 was holistic, financials, potential ties to
8 organized crime. With regard to this initial
9 engagement that started in October, September, can
10 you just explain for us what your findings were.

11 A. I guess I'll just give you the caveat
12 that, you know, it's a group effort. So I can tell
13 you, you know, as the person that was, you know,
14 running the project, you know, I had my fingers in
15 various things, but there were also the things that
16 I was directly focused on.

17 In the early -- the very first weekend that I
18 started boning up on Donald Trump, you know, I
19 found various references to him having connections
20 to Italian organized crime and later to a Russian
21 organized crime figure named Felix Sater,
22 S-A-T-E-R. It wasn't hard to find, it wasn't any
23 great achievement, it was in the New York Times,
24 but as someone who has done a lot of Russian
25 organized crime investigations as a journalist

1 originally that caught my attention and became
2 something that, you know, I focused on while other
3 people looked at other things.

4 So from the very beginning of this organized
5 crime was -- Russian organized crime was a focus of
6 interest. I guess I should just repeat, you know,
7 this is a subject that I covered extensively at the
8 Wall Street Journal. I wrote a series of front-
9 page articles about various corrupt politicians
10 from Russia, oligarchs, and one of the things that
11 I wrote about was the connections between western
12 politicians and Russian business figures. So, you
13 know, I was sort of an amateur student of the
14 subject and I had written about some of these same
15 Russian crime figures, you know, years earlier in
16 the U.S. and various frauds and things they were
17 involved in.

18 As it happens, Felix Sater was, you know,
19 connected to the same Russian crime family that was
20 at issue in the Prevezon case, which is the
21 dominant Russian crime family in Russia and has a
22 robust U.S. presence and is involved in a lot of
23 crime and criminal activity in the United States
24 and for many years was the -- the leader of this
25 family was on the FBI most wanted list and lives

1 openly in Moscow as a fugitive from U.S. law for a
2 very elaborate stock fraud.

3 Q. Who is that individual and family?

4 A. The first name is Semyon, S-E-M-Y-O-N, the
5 last name is Mogilevich, M-O-G-I-L-E-V-I-C-H.
6 Mogilevich is sometimes referred to as the brainy
7 Don because he runs very sophisticated schemes
8 including, according to the FBI, involving natural
9 gas pipelines in Europe, and he's wanted in
10 connection with an elaborate stock fraud called YBM
11 Magnex that was took place in the Philadelphia
12 area.

13 You know, Russian organized crime is very
14 different from Italian organized crime. It's much
15 more sort of a hybrid kind of thing where they're
16 involved in politics and banking and there's even a
17 lot of connections between the mafia and the KGB or
18 the FSB and cyber crime, things that the Italians
19 sort of never figured out. Stock fraud in
20 particular was the big thing in the U.S. In any
21 event, all of that entered into my thinking when I
22 saw that Donald Trump was in business with Felix
23 Sater in the Trump Soho project and a number of
24 other controversial condo projects.

25 Q. And what, if anything, did you conclude

1 about the connection between and in the business
2 dealings that then Candidate Trump had had with
3 Mr. Sater?

4 A. Well, somewhat analogous to the Browder
5 situation I found it notable this was something he
6 didn't want to talk about and testified under oath
7 he wouldn't know Felix if he ran into him in the
8 street. That was not true. He knew him well and,
9 in fact, continued to associate with him long after
10 he learned of Felix's organized crime ties. So,
11 you know, that tells you something about somebody.
12 So I concluded that he was okay with that and that
13 was a troubling thing. I also, you know, began
14 to -- I keep saying I, but we as a company began to
15 look at where his money came from and, you know,
16 that raised a lot of questions. We saw indications
17 that some of the money came from Kazakhstan, among
18 other places, and that some of it you just couldn't
19 account for.

20 You know, we also conducted a much broader
21 sort of look at his entire career and his overseas
22 investments in places like Europe and Latin
23 America. You know, it wasn't really a Russia
24 focused investigation for the first half of it.
25 That was just one component of a broader look at

1 his business career, his finances. We spent a lot
2 of time trying to figure out whether he's really as
3 rich as he says he is because that was the subject
4 of a libel case that he filed against a journalist
5 named Tim O'Brien for which there was quite a lot
6 of discovery and litigation filings detailing
7 O'Brien's allegation that he was worth, you know,
8 maybe a fifth to a third of what he claims and
9 Trump's angry retort that he was worth far more
10 than that.

11 So we did things like we looked at the golf
12 courses and whether they actually ever made any
13 money and how much debt they had. We looked at the
14 bankruptcies, how could somebody go through so many
15 bankruptcies, you know, and still have a billion
16 dollars in personal assets. So those are the kinds
17 of things. We looked at a lot of things like his
18 tax bills. Tax bills are useful because you can
19 figure out how much money someone is making or how
20 much they're worth or how much their properties are
21 worth based on how much they have to pay in taxes.

22 One of the things we found out was that, you
23 know, when it comes to paying taxes, Donald Trump
24 claims to not have much stuff. At least the Trump
25 organization. So they would make filings with

1 various state and local authorities saying that
2 their buildings weren't worth much.

3 Q. And this information that you gathered,
4 was it shared with the client that you had for that
5 September, October engagement?

6 A. I can't answer that.

7 MS. QUINT: When you said you looked at the
8 golf courses and bankruptcies, just to clarify,
9 everything you're talking about was for that 2015
10 engagement? When you say it wasn't Russia focused
11 at first, I'm unclear of the time.

12 MS. SAWYER: Yeah. Can you tell us when that
13 engagement ended?

14 MR. LEVY: Which question is pending? Can
15 you repeat the question?

16 MS. QUINT: I think they're related. I lost
17 track when you said you looked at golf courses,
18 bankruptcies, tax bills and it was not initially
19 Russia centric. I'm wondering the time frame to
20 make sure we're all on the same page.

21 MR. SIMPSON: It's difficult to specifically
22 recall when we did exactly what. For example, the
23 specific issue of the golf courses I think did come
24 up later, much later, but these things run in
25 stages. For instance, in the early stage of an

1 investigation, you know, particularly of Donald
2 Trump you want to get every lawsuit the guy's ever
3 been in. So, you know, we collected lawsuits from
4 around the country and the world. And I do
5 remember one of the earlier things we did was we
6 collected a lot of documents from Scotland because
7 he'd been in a big controversy there about land
8 use. There had been another one in Ireland. There
9 was a lot of Freedom of Information Act requests
10 and that sort of thing.

11 So in the early phases of something you're
12 collecting lots of paper on every subject
13 imaginable. So in the course of reading that
14 litigation we would follow up on things that were
15 interesting, such as a libel case against a
16 journalist that he settled, which, in other words,
17 he didn't prevail in his attempts to prove that he
18 was a billionaire.

19 BY MS. SAWYER:

20 Q. So one way to help clarify this is just
21 to -- you know, we had been talking about an
22 engagement that began in September or October of
23 2015. Can you tell us when that particular
24 engagement ended?

25 A. I can only estimate it.

1 Q. And in general when do you think that
2 ended?

3 A. Spring of 2016.

4 MR. LEVY: Don't guess.

5 MR. SIMPSON: I'm sorry.

6 BY MS. SAWYER:

7 Q. Okay. But that engagement did come to an
8 end and it came to an end before November 8th, the
9 election, November 8, 2016?

10 A. It did end before the election, yes.

11 Q. And then did you continue doing opposition
12 work on Candidate Trump -- then Candidate Trump,
13 now President Trump for a different client?

14 A. Yes.

15 Q. And can you tell us generally when that
16 engagement began?

17 A. It was in the first half of 2016.

18 Q. And what, if anything, can you tell us
19 about that client?

20 A. Nothing.

21 MR. LEVY: Not nothing as a factual matter,
22 but he's going to decline to answer that question.

23 MS. SAWYER: And the basis again for
24 declining that question?

25 MR. LEVY: Privilege.

1 MS. SAWYER: Okay.

2 MR. LEVY: And other obligations of
3 confidentiality.

4 MS. SAWYER: Just to be clear for the record,
5 specifically what privilege?

6 MR. LEVY: The privileges that we previously
7 asserted with the committee. They're in our
8 April 7 and June 23 letters.

9 MS. SAWYER: Okay.

10 BY MS. SAWYER:

11 Q. With regard to the engagements, both of
12 these engagements to do opposition research on
13 Candidate Trump, were you paid directly by each of
14 the clients or was there an intermediary paying
15 you?

16 A. I think I'd like to confer with my lawyer
17 about this.

18 MR. LEVY: Sure.

19 (Whereupon a discussion was had
20 sotto voce.)

21 MR. SIMPSON: I'm going to decline to answer
22 that question.

23 MS. SAWYER: And, again, the grounds for
24 declining?

25 MR. LEVY: It's a voluntary interview and it

1 would implicate privileges and obligations that
2 we've set forth with the committee potentially.

3 MS. SAWYER: Sure.

4 BY MS. SAWYER:

5 Q. At a news briefing on August 1, 2017 White
6 House Press Secretary Sarah Huckabee Sanders
7 described Fusion GPS as a democratic linked firm.
8 Is that an accurate description?

9 A. I would not agree with that description.
10 I was a journalist for most of my adult life and a
11 professional at not taking sides, and I'm happy and
12 proud to say I have lots of Republican clients and
13 friends and I have lots of Democratic clients and
14 friends. I've lived in this city for 30 years or
15 so and I know a lot of people on both sides and we
16 have a long proud history of not being partisan.
17 And the same is true for my colleagues. We
18 intentionally don't hire people who have strong
19 partisan affiliations. We prefer journalists who
20 don't see things through ideological prisms and
21 ideological prisms are not helpful for doing
22 research.

23 Q. So it has been widely reported that you
24 engaged Christopher Steele to do part of the
25 research, the opposition research on Candidate

1 Trump. Is that accurate?

2 A. Yes.

3 Q. And he was working in that capacity as a
4 subcontractor for you? And when I say "you" here I
5 mean Fusion GPS.

6 A. Yes.

7 Q. And when did you engage Mr. Steele to
8 conduct opposition research on Candidate Trump?

9 A. I don't specifically recall, but it would
10 have been in the -- it would have been May or June
11 of 2016.

12 Q. And why did you engage Mr. Steele in May
13 or June of 2016?

14 A. That calls for a somewhat long answer. We
15 had done an enormous amount of work on Donald Trump
16 generally at this point in the project and we began
17 to drill down on specific areas. He was not the
18 only subcontractor that we engaged. Other parts of
19 the world required other people. For example, we
20 were interested in the fact that the Trump family
21 was selling merchandise under the Trump brand in
22 the United States that was made in sweat shops in
23 Asia and South America -- or Latin America. So we
24 needed someone else for that. So there were other
25 things. We were not totally focused on Russia at

1 that time, but we were at a point where we were --
2 you know, we'd done a lot of reading and research
3 and we were drilling down on specific areas.
4 Scotland was another one.

5 So that's the answer. What happens when you
6 get to this point in an investigation when you've
7 gathered all of the public record information and
8 you've begun to exhaust your open source, you know,
9 resources is that you tend to find specialists who
10 can take you further into a subject and I had known
11 Chris since I left the Wall Street Journal. He was
12 the lead Russianist at MI6 prior to leaving the
13 government and an extremely well-regarded
14 investigator, researcher, and, as I say, we're
15 friends and share interest in Russian kleptocracy
16 and organized crime issues. I would say that's
17 broadly why I asked him to see what he could find
18 out about Donald Trump's business activities in
19 Russia.

20 Q. So in May or June 2016 you hired
21 Christopher Steele to, as you've just indicated,
22 find out what he could about Donald Trump's
23 business activities in Russia. Did something in
24 particular trigger that assignment?

25 A. No, I don't think I could point to

1 something in particular as a trigger. I mean, the
2 basis for the request was he had made a number of
3 trips to Russia and talked about doing a number of
4 business deals but never did one, and that struck
5 me as a little bit odd and calling for an
6 explanation.

7 You know, in the background of all
8 international business is questions about
9 corruption. The Trump organization had branched
10 out all over the world in like the four to eight
11 years prior to 2016. So in any kind of
12 investigation you would naturally want to know
13 whether there was some issue with improper business
14 relationships.

15 I'll just stress that we weren't looking
16 for -- at least it wasn't at the forefront of my
17 mind there was going to be anything involving the
18 Russian government per se, at least not that I
19 recall.

20 Q. So at the time you first hired him had it
21 been publicly reported that there had been a cyber
22 intrusion into the Democratic National Convention
23 computer system?

24 A. I don't specifically remember. What I
25 know was that there was chatter around Washington

1 about hacking of the Democrats and Democratic think
2 tanks and other things like that and there was a
3 site that had sprung up called D.C. Leaks that
4 seemed to suggest that somebody was up to
5 something. I don't think at the time at least that
6 we were particularly focused on -- well, I don't
7 specifically remember.

8 Q. So you hired Mr. Steele. Had you worked
9 with him before?

10 A. Yes.

11 Q. And can you generally describe what he had
12 done in the capacity of working with you and your
13 firm, what kind of projects?

14 A. Generally speaking, like me, Chris tends
15 to work for lawyers who are attempting to assist
16 clients in litigation or an asset recovery-type
17 situation. And so, you know, the former Soviet
18 Union throws off an enormous number of disputes
19 about who owns what because of the history of state
20 ownership of everything and the transfers of
21 property into private hands following the collapse
22 of the Soviet Union was a murky process. So
23 particularly in Europe there's a lot of disputes
24 over who really owns what.

25 And so we would collaborate on those kinds of

1 investigations. Sometimes a controversy would
2 spill over into the United States and, you know, I
3 would be asked to see if I could find a company
4 here or there or run director searches on
5 individuals who might be associated with people we
6 were interested in, that sort of thing. It's
7 interesting work, but it's kind of plain vanilla
8 business intelligence, litigation support stuff.

9 Q. And roughly how many years -- over how
10 many years, like when do you first recall working
11 with him?

12 A. I believe we met in 2009. We've worked
13 together since 2009.

14 Q. And how did you find the quality of his
15 work over that period of time?

16 A. Quality is a really important issue in the
17 business intelligence industry. There's a lot of
18 poor quality work and a lot of people make a lot of
19 promises about what they can do and who they know
20 and what they can find out and then there's just a
21 lot of people who operate in sort of improper
22 questionable ways. Chris was, you know, a person
23 who delivered quality work in very appropriate
24 ways.

25 So -- I mean, I hope you won't be insulted,

1 but he's basically a Boy Scout. You know, he
2 worked for the government for a very long time. He
3 lives a very modest, quiet life, and, you know,
4 this is his specialty. We got along very well
5 because my speciality is public information. So he
6 was comfortable working with me and I was
7 comfortable working with him and, you know, we've
8 both been around a lot of criminal investigations
9 and national security stuff.

10 When I was at the Journal I spent many years
11 investigating the financing of Al-Qaeda. So I did
12 get introduced to sort of national security law and
13 national security operations and wrote a lot about
14 that and was dragged into court over that a few
15 times for things I wrote about people suspected of
16 funding terrorism. So we had a lot of common
17 interests and background.

18 Q. And specific to the engagement with regard
19 to the research on Candidate Trump, why did you
20 specifically ask Mr. Steele to do that work?

21 A. The way our firm runs we pursue things,
22 you know, somewhat out of curiosity. So we didn't
23 know -- it was opaque what Donald Trump had been
24 doing on these business trips to Russia. We didn't
25 know what he was doing there. So I gave Chris --

1 we gave Chris a sort of assignment that would be
2 typical for us which was pretty open ended. We
3 said see if you can find out what Donald Trump's
4 been doing on these trips to Russia. Since Chris
5 and I worked together over the years there's a lot
6 that didn't need to be said. That would include
7 who is he doing business with, which hotels does he
8 like to stay at, you know, did anyone ever offer
9 him anything, you know, the standard sort of things
10 you would look at. I don't think I gave him any
11 specific instructions beyond the general find out
12 what he was up to.

13 Q. And was anyone else -- did you engage
14 anyone else to do that particular research?

15 A. In Russia?

16 Q. Yes.

17 A. So we had other people like Ed Baumgartner
18 who, you know, by this time -- I guess Prevezon was
19 still winding down, but who would do Russian
20 language research which didn't involve going to
21 Russia. It just involves reading Russian newspaper
22 accounts and that sort of thing.

23 Q. So was Mr. Baumgartner also working on
24 opposition research for Candidate Trump?

25 A. At some point, I think probably after the

1 end of the Prevezon case we asked him to help with
2 I think -- my specific recollection is he worked on
3 specific issues involving Paul Manafort and
4 Ukraine.

5 Q. With regard to the presidential election
6 of 2016?

7 A. Yes.

8 Q. We had talked about work for multiple
9 clients. What steps were taken, if any, to make
10 sure that the work that Mr. Baumgartner was doing
11 for Prevezon was not shared across to the clients
12 you were working for with regard to the
13 presidential election?

14 A. He didn't deal with them. He didn't deal
15 with the clients. There wouldn't have been any
16 reason to -- he operates under the same rules that
17 I do.

18 Q. And with regard to Mr. Steele, did he ever
19 do any work for Fusion GPS on the Prevezon
20 litigation matter?

21 A. No.

22 Q. It's my understanding that Mr. Steele
23 works with a company called Orbis & Associates.
24 Did anyone else at Orbis, to the best of your
25 knowledge, work with Mr. Steele on the engagement

1 that you had with him related to Candidate Trump?

2 A. I mean, I don't know their names.

3 Q. So do you know whether anyone else worked
4 with him?

5 A. Yes. I mean, do you mean as
6 subcontractors or within his company?

7 Q. First within his company.

8 MR. LEVY: If you know.

9 BY THE WITNESS:

10 A. I mean, I just don't remember their names.
11 I remember meeting somebody in London who I think
12 worked on it, but I just don't remember.

13 Q. Somebody else associated with Orbis?

14 A. Yes.

15 Q. With regard to the assignment that you
16 gave to Mr. Steele to do Russia-related research
17 for Candidate Trump, is that an accurate way to
18 describe it? I said Russia-related research with
19 regard to Candidate Trump. Would that be a fair
20 way to describe the assignment?

21 A. Yes.

22 Q. Did you have any input into the actual
23 work that he did? Did you give him directions as
24 to what to research specifically?

25 A. I don't recall giving him specific

1 instructions. We spoke on the phone about various
2 areas of interest. For example, when Paul Manafort
3 was elevated to running the campaign, we talked
4 about Paul Manafort and his long history of
5 dealings with Russian oligarchs. So it's more of a
6 collaboration than, you know, sort of manager-
7 employee kind of relationship. You know, we would
8 talk about things that were interesting to us and
9 that seemed to be -- you know, needed to be
10 (indecipherable).

11 Q. So is it fair to describe it as you would
12 collaboratively discuss potential topics to
13 explore?

14 A. Yes, I think that's fair.

15 Q. And did you conduct any of the actual
16 research yourself?

17 A. Well, I think it's important to understand
18 we were doing in my company, you know, all kinds of
19 research, including lots of Russia research, and
20 part of what you do when you get information from
21 someone outside the company who's specifically
22 looking at a discrete set of questions or issues is
23 you add it to the stuff you've already gathered.
24 So we did all kinds of stuff on public information
25 about Donald Trump's business trips to Russia and

1 business dealings with Russians. I mean, Chris's
2 role was specifically to do the thing that we
3 couldn't do, which was to arrange to talk to
4 people. Generally speaking, we don't do a lot of
5 interviewing. Our research is very document
6 focused.

7 Q. So to the extent you can describe, when
8 you say he was doing something you could not do and
9 that was he was arranging to talk to people, can
10 you describe who it was he was reaching out to,
11 what you knew about that?

12 A. I don't think for security reasons, among
13 other things, it's an area I'm not going to be able
14 to go into in terms of sources and things like
15 that. I think speaking broadly, you know, there's
16 a large diaspora of Russians around the world and
17 people in Moscow that, you know, are talking to
18 each other all the time. The thing that people
19 forget about what was going on in June of 2016 was
20 that no one was really focused on sort of this
21 question of whether Donald Trump had a relationship
22 with the Kremlin.

23 So, you know, when Chris started asking
24 around in Moscow about this the information was
25 sitting there. It wasn't a giant secret. People

1 were talking about it freely. It was only, you
2 know, later that it became a subject of great
3 controversy and people clammed up, and at that time
4 the whole issue of the hacking was also, you know,
5 not really focused on Russia. So these things
6 eventually converged into, you know, a major issue,
7 but at the time it wasn't one.

8 Q. I have five or so more minutes and I know
9 that I have a lot more questions just about some of
10 that work, but I do want to just pin down a couple
11 things about the engagement in particular before we
12 end this hour.

13 So with regard to selecting Mr. Steele
14 specifically to do the Russia -- to do work on
15 Candidate Trump's ties to Russia, do you believe
16 based on his experience and background that
17 Mr. Steele would have been aware of the potential
18 in his discussions with these people that he could
19 be fed this information?

20 A. When Chris -- I don't believe it, I know
21 it. When Chris briefs in a sort of more formal
22 setting, which I've seen, you know, when he
23 introduces himself -- you know, he was the lead
24 Russianist for MI6. So the first sort of beginning
25 of that is he says, you know, I've worked on this

1 issue all my life and when you're trained in
2 Russian intelligence matters the fundamental
3 problem of your profession is disinformation. It's
4 the number one issue.

5 In any collection of field -- you know,
6 information from the field you should assume that
7 there will be possibly some disinformation and
8 that, you know, as a professional who has dedicated
9 my life to this, you know, I am trained to spot
10 possible or likely disinformation. So it's front
11 and center when you gather information in Russia.

12 Q. And when you hired him to do the work, did
13 the client -- were you still working for -- at any
14 time did you work for two clients on this
15 opposition research? Did they overlap, the two
16 clients?

17 A. I just don't know. I can just tell you
18 that it was -- I mean, things follow the political
19 cycle. So there was a point at which the
20 Republican primaries were fundamentally over and
21 the Democrats hadn't really begun yet. So there
22 was some transition period. That's all I can say.
23 I don't keep the books at my place. So I would
24 feel -- I'm afraid to give you a wrong answer that.
25 I just don't know.

1 Q. Did either client know that you had hired
2 Mr. Steele specifically?

3 A. I don't think I can answer that.

4 Q. And on what basis can you not answer that?

5 MR. LEVY: The answer to that question
6 would -- could require the disclosure of client
7 communications which might implicate privileges and
8 obligations that we've previously set forth to the
9 committee.

10 BY MS. SAWYER:

11 Q. Okay. Maybe you can answer this question,
12 then. Did either client ever direct Mr. Steele
13 themselves, directly engage and have conversations
14 with Mr. Steele?

15 A. I don't think I can answer that.

16 MR. LEVY: Do you want to take a break?

17 MR. SIMPSON: Sure.

18 MR. LEVY: Let's take a break and confer.

19 MR. SIMPSON: That's fine.

20 MS. SAWYER: Sure. We'll go off the record
21 for a few minutes.

22 MR. FOSTER: It's 11:51.

23 (A short break was had.)

24 MR. FOSTER: It's 11:53.

25 MS. SAWYER: I think the question pending was

1 just whether or not the clients specifically spoke
2 with or directed Mr. Steele's work?

3 MR. LEVY: So he can't talk about client
4 communications, directions to the client --
5 directions to Mr. Steele as those communications
6 might implicate privilege or obligations, but if
7 you want to ask him whether the clients directed
8 Mr. Steele to go to the FBI, that's a question he
9 can answer. That's in the scope of the interview
10 today.

11 BY MS. SAWYER:

12 Q. All right. So we'll get to that. We'll
13 talk about that a little bit later. Let me just
14 follow up on a couple other things that came up and
15 then we'll conclude for our hour and turn it back
16 to our colleagues.

17 So one of the things that came up in the
18 course of our conversation and when I had asked you
19 specifically about work being done for one client
20 and rules and procedures in place to ensure that
21 that work is not shared with another, can you just
22 specifically describe those rules. I think at one
23 point you indicated that you and Mr. Baumgartner
24 had operated under the same rules?

25 A. Right. We're both professionals and we

1 both deal with multiple clients. So we don't talk
2 about a case with one client with another client.

3 I think since you raised this I should be
4 clear, Mr. Baumgartner did not know about
5 Mr. Steele, the work I was doing with Mr. Steele
6 or, you know, the memos he was writing.

7 MR. FOSTER: Can you speak up a little bit.

8 BY THE WITNESS:

9 A. Mr. Baumgartner did not know about the
10 work that we were doing with Mr. Steele. One of
11 the ways that we avoid bleeding between one case
12 and another is compartmentalization. We don't tell
13 people -- we don't tell one subcontractor what
14 we're doing with another subcontractor. We don't
15 even tell them, you know, that they exist.

16 Q. What about Mr. Steele, what rules was he
17 operating under when he was doing the work on
18 Candidate Trump?

19 A. Every subcontractor signs an NDA at the
20 beginning of the discussion before even there's an
21 engagement. So he was operating under an NDA.

22 Q. And in general what does that NDA provide?
23 And by NDA I assume you mean nondisclosure
24 agreement?

25 A. Right. Again, the paperwork side of the

1 business is not my strong suit, but it's a general
2 strict prohibition on sharing information about the
3 nature of the work you're doing, your findings with
4 anyone outside of, you know -- we're the client in
5 this case. So they're not allowed to share
6 information with anyone outside the case.

7 Q. And you had talked a bit about prior work
8 and Mr. Steele's performance in prior work and
9 being satisfied by that work. Did you do anything
10 to kind of test and make sure that information he
11 was giving you was accurate?

12 A. So in the sort of -- I know I'm repeating
13 myself, but generally we do public records work.
14 So we deal in documents and things that are very
15 hard and that are useful in court or, you know,
16 other kinds of proceedings.

17 Chris deals in a very different kind of
18 information, which is human intelligence, human
19 information. So by its very nature the question of
20 whether something is accurate isn't really asked.
21 The question that is asked generally is whether
22 it's credible. Human intelligence isn't good for,
23 you know, filing lawsuits. It's good for making
24 decisions and trying to understand what's going on
25 and that's a really valuable thing, but it's not

1 the same thing.

2 So when you evaluate human intelligence,
3 human reporting, field reporting, source reporting,
4 you know, it's sort of like when you're a
5 journalist and you're trying to figure out who's
6 telling the truth, right. You don't really decide
7 who's telling the truth. You decide whether the
8 person is credible, right, whether they know what
9 they're talking about, whether there's other
10 reasons to believe what they're saying, whether
11 anything they've said factually matches up with
12 something in the public record.

13 So, you know, we would evaluate his memos
14 based on whether he told us something we didn't
15 know from somewhere else that we were then able to
16 run down. So, you know, for example, he, you know,
17 wrote a memo about a Trump campaign advisor named
18 Carter Page and his mysterious trip to Moscow.

19 Q. I'm just going to stop you for a moment
20 because I hadn't yet gotten to the specific stuff
21 of the Trump assignment. I was just trying to get
22 a sense of the specific ways in which you assessed
23 his performance in determining to hire him.

24 A. That's how we did it. We would assess it
25 based on the content and the credibility of -- we'd

1 try to determine the credibility of what we were
2 reading.

3 MR. MUSE: His reference was to give you an
4 example. I think that's where he was going.

5 MR. SIMPSON: Yeah.

6 MS. SAWYER: I understand and I appreciate
7 that and we'll get to that. I just didn't want
8 to -- in light of the time I didn't want to get you
9 started down that road. If I could just have a
10 second because I want to make sure we finish our
11 questions on this topic and we'll resume our next
12 hour with some of the others.

13 MR. SIMPSON: Okay.

14 MS. SAWYER: So we'll go off the record.
15 It's high noon, 12:00. So let's go off the record.

16 (A short break was had.)

17 MR. DAVIS: We're back on the record. It's
18 12:06 p.m.

19 EXAMINATION

20 BY MR. DAVIS:

21 Q. All right. Mr. Simpson, I'm going to
22 return to the topic of Prevezon. Let me know if
23 I'm accurately summarizing the scope of work you're
24 describing. I think you've described three main
25 areas so far. First is that you were investigating

1 Prevezon's side of the story to see if it was
2 credible; the second is you were investigating Bill
3 Browder's ties to the U.S. and related subpoena
4 issues; and the third is that you were
5 investigating Bill Browder's Russian businesses.
6 Is that correct?

7 MR. LEVY: I think he said a lot more than
8 that, but go ahead.

9 MR. DAVIS: I listed the main topics. That's
10 where we left off.

11 MR. LEVY: I don't think that's the main
12 topics either, but go ahead.

13 BY THE WITNESS:

14 A. Is that a yes-or-no question? I think
15 those are three things I covered, but I covered a
16 lot of stuff.

17 Q. With the information that you gathered in
18 those and related efforts, what did you do with the
19 information once you obtained it?

20 A. Well, the first thing you do is you give
21 it to the lawyers and, you know, when appropriate
22 you give it to reporters, you know, put it in court
23 filings.

24 Q. So is it correct, then, people associated
25 with Fusion did communicate with journalists about

1 the Prevezon case and the information you found out
2 about Mr. Browder?

3 A. Yes.

4 Q. And did Fusion engage in these
5 communications with the media on its own accord or
6 were you directed or authorized to do so?

7 A. In litigation support, you know, basically
8 the cases that we work on frequently get some media
9 attention. So it's always part of a litigation
10 engagement that if you're the guy that does the
11 research, you're going to end up talking to
12 reporters because they're going to ask questions
13 about, you know, information from the case.

14 MR. LEVY: Just make sure you answer his
15 question. Was it done?

16 BY THE WITNESS:

17 A. That's part of what the lawyers hire you
18 to do and that's what they instruct you to do. The
19 way it generally happens is the lawyer gets a call
20 from a reporter who wants to write a story about
21 the case and he answers the questions or gives them
22 a quote and then he instructs me to give him
23 background information.

24 Q. So then was it typically done on a
25 case-by-case basis or did you have blanket

1 authorization regardless of specific interactions
2 with the attorneys?

3 A. These things evolved over time. So in the
4 beginning of the case when you're new to a subject
5 you're generally fielding -- you generally get
6 requests from the lawyers to answer a specific
7 question that a reporter has. So the reporter will
8 call and they'll want to know whatever, where the
9 house was in Colorado, and he'll say somewhere in
10 Aspen, ask Glenn. Then he'll send him to me or
11 he'll send me to them. Later on when you get where
12 you've gathered a mass of information that covers a
13 whole wide range of topics and, you know, if
14 there's more coverage, you know, they will direct
15 you to answer questions for the reporters covering
16 the case. They won't tell you on an individual
17 basis talk to so-and-so. It's a little of both.

18 Q. Was Fusion then paid for these
19 communications with the media?

20 A. We were compensated for our litigation
21 support and as part of that we were directed to
22 talk to the media. So in the fundamental sense
23 yes, we were. Specifically paid for individual
24 conversations, I don't think so.

25 MR. FOSTER: Do you bill hourly?

1 MR. SIMPSON: It depends on the case.

2 MR. FOSTER: On this case?

3 MR. SIMPSON: I think we did on this case.

4 MR. FOSTER: So did you bill for
5 conversations with the press on this case?

6 MR. SIMPSON: I'm sorry to say I don't know.
7 I probably did not. Generally speaking, what I
8 would bill for would be to attend events where
9 there would be press. So if I was at a court
10 hearing -- most of the press was around court
11 hearings. So I would go to a court hearing with
12 the lawyers and there would be reporters there. So
13 part of what I was billing for was answering their
14 questions.

15 BY MR. DAVIS:

16 Q. And with which news organizations did
17 Fusion communicate in relation to the Prevezon
18 case?

19 A. I will try to remember them. It was the
20 major news organizations that were covering the
21 litigation. Usually it was their courthouse or
22 legal reporters. So it was Bloomberg, New York
23 Times, Wall Street Journal, probably Reuters, Legal
24 360. I'm sure there were a handful of others.

25 Q. Was the Financial Times possibly one of

1 them?

2 A. Yes.

3 Q. Politico?

4 A. They approached us with -- they had been
5 getting information from Bill Browder. He had
6 alleged to them that we were part of a big campaign
7 on Capitol Hill and that we were engaged in
8 lobbying and that it was all designed to affect
9 legislation or smear him or Sergei Magnitsky. So
10 eventually we did end up dealing with that, but I
11 don't remember whether we dealt with them prior to
12 that. I don't think they covered the case prior to
13 that.

14 Q. What about NBC?

15 A. We would have -- I'm sorry. Yes.

16 Q. And the New Republic?

17 A. I think so.

18 Q. And do you recall what information you
19 provided to each or is that too into the weeds?

20 A. I don't know if it's in the weeds, but
21 generally speaking, the work -- we provided
22 information about the work that I had done about
23 William Browder's credibility. The whole case
24 ended up -- when I said when he declined to appear
25 voluntarily as I am here and explain things, you

1 know, it ended up being an issue of why he didn't
2 want to talk. So a lot of it was about his
3 credibility, about his account of his activities in
4 Russia, about his history of tax avoidance, all
5 these things.

6 Q. Did Fusion provide the media information
7 alleging that Browder had illicitly engineered the
8 purchase of 133 million shares of Gazprom?

9 A. I don't know for sure, but we certainly
10 did research on that issue.

11 Q. And you described investigating these
12 series of issues. How did you acquire the
13 information in the course of this investigate?

14 A. We used the methods that I've described
15 here today. We pulled court records, we pulled
16 corporate records, we, you know, pulled real estate
17 records, SEC securities filings, that sort of
18 thing.

19 Q. And was any of the information you
20 provided to the media information that wasn't the
21 result of your own research but that had been
22 passed along to you by Baker Hostetler or Prevezon?

23 A. I think the answer to that is yes, but I'm
24 struggling to think of a specific example. As I
25 was saying earlier, the lawyers did a lot of the

1 research too. So there was obviously a sharing of
2 research where, you know, we were feeding research
3 to them and they were housing a central repository
4 of research and then the research would become
5 memoranda and given in court filings. In a lot of
6 these cases we were giving people court filings.
7 So the information was mixed together from various
8 sources.

9 Q. Did Fusion independently verify the
10 information provided by Baker Hostetler or Prevezon
11 or in this circumstance was it assumed to be
12 reliable given your work with them?

13 A. We certainly did not independently verify
14 everything that the lawyers generated in the case.
15 That would have been an enormous task and it would
16 have made no sense.

17 I just want to stress that I've worked with
18 Baker Hostetler for -- you know, since 2009, so I
19 guess going on over eight years, and they're very
20 good lawyers and very conservative. So if they
21 provided me with information that they had
22 gathered, I would have been confident -- I was
23 confident in the quality of their work.

24 Q. And did Prevezon or Baker Hostetler ever
25 direct Fusion to relay to the media information

1 that they had provided to Fusion?

2 A. I'm sorry. Can you say that again.

3 Q. Did Baker Hostetler or Prevezon direct
4 Fusion to relay to the media information that they
5 had provided to you?

6 A. I don't specifically recall an example of
7 that, but I think as a general sort of operating
8 principle we were working at their direction and
9 they were providing us with, you know, case
10 information. So I think so, but I just don't have
11 an idea.

12 Q. And did anyone at Fusion or perhaps
13 Mr. Baumgartner review Russian documents related to
14 the Prevezon matter?

15 A. Yes.

16 Q. Do any --

17 A. Most of them were Russian court
18 documents.

19 Q. Do any Fusion employees or associates
20 speak Russian?

21 A. No. I'll qualify that. Depends on how
22 you define associate. Edward isn't an employee of
23 the company, but he speaks Russian. He's a
24 subcontractor.

25 Q. Aside from Mr. Baumgartner, do you have

1 any other support from Russian-speaking individuals
2 in reviewing the Russian documents?

3 A. Not in my company, at least not that I can
4 recall. There was other Russian speakers I think
5 that were engaged by Baker Hostetler in various
6 situations, like translators, Russian bilingual
7 lawyers, that sort of thing.

8 Q. Do you remember the names of any of those
9 people?

10 A. Anatoli, whose last name I can't really
11 pronounce, was a New York-based English-Russian
12 court translator. He was mostly a courtroom
13 translator. So I don't know whether he -- I really
14 don't know the extent of their other involvement
15 with other people in these things.

16 MR. FOSTER: Can I just back up before we get
17 too far afield of this. I want to follow up on an
18 answer that you gave earlier. You described your
19 interactions with the press as primarily being
20 directed to answer questions, in other words, the
21 contact as being initiated by the press. That's my
22 understanding of how you described it.

23 MR. LEVY: I don't think that's a complete
24 summary of what he said.

25 MR. FOSTER: Feel free to correct me if I'm

1 wrong. My question is were there instances where
2 you were initiating contact with the press or
3 pitching stories to the press?

4 MR. SIMPSON: Sure. I mean, the range of
5 things that you would do, you know, again, it would
6 evolve. In the beginning you were going to a lot
7 of hearings and a lot of legal reporters are
8 showing up and you're mostly answering their
9 questions. Depending on the setting, you know, you
10 might get a question for the lawyers like is anyone
11 from Reuters going to be there and you would reach
12 out to Reuters and say are you guys sending someone
13 to this hearing. So there was definitely some
14 reach out like that. Then we would also talk to
15 reporters, you know, generally covering issues of
16 corruption or law or Russia or whatever and say,
17 you know, we're involved in a really weird court
18 case, you might be interested in this.

19 MR. FOSTER: So is it fair to say that part
20 of your job, then, was to locate reporters who
21 would write about these matters from a point of
22 view that was advantageous to your client?

23 MR. SIMPSON: Yes, but I think we should note
24 here that William Browder is an especially
25 aggressive media self-promoter and promoter of his

1 story. So for much of this case it was reactive
2 and we were constantly besieged with reporters
3 pursuing negative stories about Prevezon, the
4 events of the Prevezon case that had been given to
5 them by William Browder. So, you know, unhappily,
6 I would say, you know, a lot of what we were doing
7 was simply responding to his wild allegations,
8 unsupported wild allegations.

9 There were certainly moments, particularly
10 concerning his unwillingness to appear for a
11 deposition, where we said to some reporters, hey,
12 guy, you know, he's just dodged his third subpoena,
13 you might want to write about this, it's pretty
14 funny. In fact, you know, the third one he ran
15 down a street in Manhattan in the middle of a
16 blizzard to get away from our process servers, but
17 that one we actually had them film it.

18 So, you know, did we want to get that
19 covered, did we think it was important that people
20 know that this guy was unwilling to appear in court
21 in public under oath to talk about the story that
22 he'd been selling for years about his activities in
23 Russia? Yeah, we wanted people to know that.

24 BY MR. DAVIS:

25 Q. Other than the media and Baker Hostetler,

1 did Fusion provide any information regarding the
2 Prevezon matter to any other third parties?

3 A. I don't have a specific recollection of
4 doing so. If there's a specific incident that
5 you'd like to ask about I'd be happy to try and
6 answer that. I don't remember.

7 Q. We'll get into that a little bit more.

8 Also to go back to the translator you
9 mentioned, you said Anatoli and that you didn't
10 know how to pronounce --

11 A. Samochornov I think is his --

12 Q. Okay.

13 A. I'm massacring it. Again, it's something
14 that's in the public record.

15 Q. Do you know Rinat Akhmetshin?

16 A. Yes, I do.

17 MR. MUSE: Spell it.

18 MR. DAVIS: Sure. R-I-N-A-T,

19 A-K-H-M-E-T-S-H-I-N.

20 BY MR. DAVIS:

21 Q. When did you first meet Mr. Akhmetshin?

22 A. When I was a reporter at the Wall Street
23 Journal.

24 Q. And as far as you know, what is his
25 business?

1 A. Some kind of PR consulting lobbyist. I
2 think he's a registered lobbyist.

3 Q. Have you ever worked with Mr. Akhmetshin?

4 A. I've been -- in the Prevezon case I
5 interacted with him. I think -- again, this has
6 unhelpfully been distorted by William Browder into
7 some sort of economic relationship or conspiracy or
8 something. I don't have any economic relations
9 with him. You know, I've bumped into him over the
10 years around town. So, you know, the only thing
11 that I specifically recall having done with him was
12 interacting for a brief period on the Prevezon
13 case.

14 Q. You don't recall working with him for any
15 other clients or cases?

16 A. Let's be clear, I'm sure we did not do
17 business together, but I do work on areas of the
18 world where he's from, Central Asia, former Soviet
19 Union, and he is, as I'm sure you've seen, a guy
20 around town who knows lots of people who cover this
21 stuff. I met him in connection with some stories I
22 was doing on Kazakhstan at the Wall Street Journal.
23 That's the kind of context I've bumped into him
24 over the years. He's told me various things and I
25 think I even met one of his clients at one point,

1 but it wasn't a business thing. I don't think I
2 was doing any work. I was just networking.

3 Q. You said he told you various things. Do
4 you mean he would pass along information to you?

5 A. The information that I remember was about
6 his Kyrgyzstan stuff. There was a congressional
7 investigation into Kyrgyzstan that he claimed
8 credit for having started and he told me about it
9 for some reason, but it wasn't because we were
10 doing business together. It was coffee or
11 something.

12 Q. You said he claimed credit for having
13 started the congressional investigation?

14 A. That's my recollection, but this was some
15 years ago.

16 Q. And you said you met one of his clients.
17 Do you remember which client?

18 A. A former Kazakh politician whose name
19 escapes me.

20 Q. Do you remember when you met that client?

21 A. Years ago in London.

22 Q. Has Mr. Akhmetshin ever been paid by
23 Fusion GPS?

24 A. Not to my knowledge.

25 Q. Has he ever provided information to Fusion

1 GPS for use in your work?

2 A. I don't have a specific recollection of
3 him having done so. I would hesitate to say so
4 categorically because I've been running this
5 business now for a number of years and I would have
6 interacted with him at various times and ways that
7 I probably don't remember, but not that I
8 specifically recall.

9 Q. Has Mr. Akhmetshin ever paid Fusion GPS
10 for work?

11 A. Not to my knowledge.

12 Q. You mentioned interacting with him in the
13 Prevezon matter. What did you understand his role
14 to be in the Prevezon work?

15 A. I did not have a clear understanding of
16 his role initially. He started attending meetings
17 sometime in 2016, just a handful of things, and
18 it's -- you know what? I don't recall anyone ever
19 saying to me you're not doing X, Y, or Z. They may
20 have. I just don't recall. The lane that I was in
21 was the court case and this fight over whether
22 Browder would have to testify, which morphed then
23 into this fight over whether -- you know, his
24 allegations that John Moscow had a conflict of
25 interest. So I was very focused on that. These

1 other issues came up two plus years into the case
2 and he was clearly dealing with them, but I don't
3 recall anyone sort of giving me a specific
4 explanation, you know, of what he was doing.

5 MR. FOSTER: What other issues?

6 MR. SIMPSON: The issues of the -- what do
7 you call it, HRAGI, the foundation and the
8 congressional stuff.

9 BY MR. DAVIS:

10 Q. You mentioned he started showing up at
11 meetings in 2016. Who else attended these
12 meetings?

13 A. I don't specifically remember. I mean, Ed
14 Lieberman I think was at a meeting. Again, I don't
15 think it was -- it wasn't a lot of meetings, just
16 one or two, but it was at Baker Hostetler.

17 MR. FOSTER: Can you explain briefly who Ed
18 Lieberman is.

19 MR. SIMPSON: Ed Lieberman is a lawyer in
20 Washington who has a specialty in international tax
21 who worked for Baker Hostetler on some of the
22 analysis of the alleged tax evasion by Hermitage
23 Capital and William Browder. And then subsequently
24 also he knows Rinat from I guess, I don't know,
25 college or something and subsequently the two of

1 them were working on the -- I don't know what to
2 call it, the congressional stuff.

3 MR. FOSTER: Lobbying Congress?

4 MR. SIMPSON: I believe they registered to
5 lobby Congress.

6 BY MR. DAVIS:

7 Q. Did Fusion provide any of its research to
8 Mr. Akhmetshin whether directly or through an
9 intermediary such as Baker Hostetler?

10 A. Yes. We were directed to do so by Baker
11 Hostetler.

12 Q. And do you know or have reason to believe
13 whether Mr. Akhmetshin used that information when
14 he spoke with people on the Hill?

15 A. I have reason to believe that. I don't
16 have specific knowledge of his discussions with
17 people on the Hill. I don't remember. He may have
18 told me what he did. As I say, it was not the
19 focus of my work.

20 Q. Has Mr. Akhmetshin ever said anything to
21 you indicating or implying that he had worked with
22 the Russian government?

23 A. Well, I knew he had been a soldier, I knew
24 he had been in the Soviet military, and I also knew
25 that he went to Moscow a fair bit because he said

1 on several occasions I'm in Moscow or I'm going to
2 Moscow. He may have -- I don't recall whether he
3 mentioned having worked with the Russian
4 government.

5 Q. Has he ever said anything to you
6 indicating or implying that he had worked for
7 Russian intelligence more specifically?

8 A. Well, as I said, I'm sure that he had
9 mentioned to me maybe back in, you know, the time
10 when I was at the Wall Street Journal that he was
11 in the Soviet military and he had some kind of
12 low-level intelligence position, but I don't
13 remember anything beyond that. He certainly didn't
14 say anything in recent years about having any
15 current connections with Russian intelligence.

16 Q. Has he ever said anything to you
17 indicating or implying that he has contacts or
18 connections with Russian government officials?

19 A. Not that I specifically recall.

20 Q. Do you have reason to believe that he has
21 ties to the Russian government?

22 A. I have reason to wonder whether he has
23 ties to the Russian government, but, you know, in
24 the course of my work for Baker Hostetler the
25 question of whether he had some connection to the

1 Russian government wasn't germane really. It just
2 didn't come up. Obviously with the news of this
3 meeting at Trump Tower and the allegations in the
4 media that there's some relationship there I share
5 everyone's interest in the answer to that
6 question.

7 Q. Do you know Natalia Veselnitskaya?

8 A. Yes.

9 Q. When did you first interact with
10 Ms. Veselnitskaya?

11 A. I believe it was sometime in 2014.

12 Q. Has Fusion ever worked with
13 Ms. Veselnitskaya?

14 A. Didn't I just answer that? Yes. I mean,
15 she was the lawyer, the Russian lawyer who retained
16 Baker Hostetler who retained us. So when you say
17 "worked with," I don't know that as a technical
18 meaning, but we interacted with her as part of the
19 Prevezon litigation.

20 Q. Has Fusion ever been paid by her?

21 A. Well, she arranged -- as the lawyer for
22 Prevezon she would have arranged for Prevezon to
23 pay Baker Hostetler which paid us. So if that's
24 what your question is, then the answer is yes, but
25 I mean, I don't think the money came from her. It

1 came from Prevezon.

2 Q. Were there any direct payments that didn't
3 go through Baker Hostetler?

4 A. No.

5 Q. So what did you understand her role to be
6 in the litigation? You said she was the attorney
7 for Prevezon. Was she managing the case for
8 Prevezon?

9 A. I was not introduced to her originally.
10 The original way that she was -- it came up in my
11 conversations with Mark Cymrot and other Baker
12 lawyers was as the person who had hired them who
13 had the information about the extortion case
14 against Demetri Baranovsky. It was represented to
15 me by Mark Cymrot that she handled that matter and
16 was familiar with the prosecution of Demetri
17 Baranovsky and very well versed in the events of
18 the extortion. So, you know, that's how I learned
19 of her and I think that's probably -- our first
20 interactions were probably about that subject.

21 Q. Did she provide Fusion with the
22 information about that extortion case?

23 A. Well, I certainly discussed it with her at
24 some point, but it was all in Russian. You know,
25 the bulk of the Russian-English translating just

1 for, you know, chain of evidence reasons went from
2 her to Baker Hostetler. They would have materials
3 analyzed and translated and then they would -- I
4 don't read a word of Russian. So I would get the
5 certified translations of stuff from Baker.

6 Q. And beyond your interactions with her
7 about the extortion issue, what type of interaction
8 did you have with her in the course of the Prevezon
9 work?

10 A. In the early period it was I believe
11 largely about this extortion case. Later on when
12 we would appear in court it would -- you know, she
13 would come to some of the Court hearings and the
14 issue of Browder's efforts to avoid having to
15 testify were front and center, sort of the main
16 issue for quite a while. So I don't remember
17 specific conversations with her about that, but
18 that's what we would have discussed.

19 Q. Have you met in person with her on other
20 occasions besides court hearings?

21 A. I attended a couple client dinners and I
22 think that's about it.

23 Q. Do you recall when and where those would
24 have been?

25 A. I recall some of the when and the where.

1 There were a couple of dinners in New York and a
2 couple of dinners in D.C. I don't remember when
3 they started. I think probably 2015. And there
4 was some in 2016 in both cities.

5 Q. Were any in June 2016?

6 A. Yes. Two.

7 Q. Were those in New York or in D.C.?

8 A. I believe that one was in New York and one
9 was in D.C.

10 Q. Do you recall the specific date of either?

11 A. I didn't until we tried to piece these
12 things together, but June 8th I think was the
13 dinner in New York and I think the 10th was the
14 dinner in D.C., something like that.

15 Q. And what were the purposes of these
16 dinners?

17 A. Well, the first one was just an obligatory
18 client dinner which, you know, when you work on a
19 legal case you get invited to dinner with the
20 clients. The one in D.C. was more of a social
21 thing. It wasn't -- she was at it, but it wasn't
22 really about the case. It was just a bunch of Mark
23 Cymrot's friends. You know, the editor of the
24 Washington Post book section was there and his wife
25 who's a well-known author were also there. I can't

1 remember who else was there. But anyway, she sat
2 at the other end of the table from me and, you
3 know, as I said, she doesn't really speak English
4 and I don't speak Russian. So not a lot of
5 chit-chat.

6 Q. Was it your understanding that the
7 research you provided to Baker Hostetler would then
8 be passed on to Ms. Veselnitskaya?

9 A. To the extent that it was useful and
10 interesting to her I'm sure they did, yes.

11 Q. Has she ever said anything to you,
12 presumably via a translator, indicating or implying
13 she had worked with the Russian government?

14 A. No, but Mark Cymrot told me when he told
15 me of her existence that she was a former
16 prosecutor.

17 Q. And has she ever said anything to you more
18 specifically indicating or implying that she had
19 worked for Russian intelligence?

20 A. No.

21 Q. Do you have any reasons to believe that
22 Ms. Veselnitskaya has ties to the Russian
23 government?

24 A. I know what I've read in the newspaper.

25 Q. Beyond that?

1 A. Beyond that my impression of her was of
2 someone who, you know, was a very smart and
3 ambitious lawyer, but not like a big political
4 player in the Kremlin. Of course given to wonder
5 given all the recent events and disclosures that I
6 was unaware of whether my assessment of her was
7 right or wrong. As we sit here today, the jury's
8 kind of out. I honestly can tell you all I knew is
9 she didn't seem to be a heavy hitter in the Kremlin
10 world.

11 Q. This might be a little repetitive, but
12 when did you first meet Ed Lieberman?

13 A. I don't remember specifically, but it was
14 years ago.

15 Q. I believe you described his business.
16 Have you ever worked with Mr. Lieberman?

17 A. I don't think so.

18 Q. Or Fusion more broadly?

19 A. Not that I can recall.

20 Q. Have you ever paid him or been paid by
21 him?

22 A. No.

23 Q. And what exactly did you understand his
24 role to be in the Prevezon issue?

25 A. Well, the initial issue that we worked on

1 together was the issues about alleged tax evasion
2 by Hermitage Capital in Russia and William
3 Browder's decision to surrender his citizenship
4 shortly before the tax rules on surrendering your
5 citizenship changed, which tended to make us
6 suspect that it was motivated by tax
7 considerations. At that time we didn't know about
8 the offshore companies in BVI.

9 Q. And what type of interactions did you have
10 with Mr. Lieberman in the course of the Prevezon
11 work?

12 A. Collegial, I guess professional I would
13 say. Ed's, you know, got a background in tax. So
14 we talked about tax stuff. Later on, much later on
15 after a couple years had gone by, you know, he and
16 Rinat embarked on this other project, but I don't
17 have a specific recollection of whether I dealt
18 with him directly on any of that.

19 Q. Did Fusion provide its research to
20 Mr. Lieberman either directly or through an
21 intermediary such as Baker Hostetler?

22 A. Not that I recall, but if the lawyers
23 asked me to send them something, I would send them
24 something.

25 Q. Do you have any reason to believe that

1 Mr. Lieberman has ties to the Russian government?

2 A. No.

3 Q. Do you know Mr. Robert Arakelian,
4 A-R-A-K-E-L-I-A-N?

5 A. There was a guy at a lunch or dinner or
6 something named Robert and he was introduced to me
7 as Robert. Again, when you're going to like these
8 client meals or things like that, you know, we
9 didn't get into a lot of details of who he was. I
10 just remember he was introduced as a friend Denis
11 Katsyv, K-A-T-S-Y-V. That's my recollection. It
12 may be that he's a friend of Rinat's. I don't
13 really know.

14 Q. As far as you know, what is Mr. -- what is
15 Robert's business?

16 A. I don't know.

17 Q. So presumably, then, has Fusion ever
18 worked with him?

19 A. Not to my knowledge.

20 Q. What did you understand Mr. Arakelian's
21 role to be in the Prevezon work?

22 A. I didn't know he had a role. If someone
23 told me I've forgotten, but, again, I was pretty
24 narrowly focused on a few things and he wasn't
25 involved in those things.

1 Q. Were you aware that he was a registered
2 lobbyist for HRAGI?

3 A. No.

4 Q. Other than meeting him at that dinner, did
5 you have any other interactions with him in the
6 course of the Prevezon work?

7 A. Not that I can recall.

8 Q. Did Fusion provide any research to him
9 directly or through an intermediary such as Baker
10 Hostetler?

11 A. I don't know. I mean, if Baker Hostetler
12 gave him information from my research or my
13 company's research, they didn't tell me.

14 Q. Do you have any reason to believe he has
15 ties to the Russian government?

16 A. No.

17 Q. But you said he is friends with the
18 Katsyvs?

19 A. I shouldn't speculate. I recall he was
20 introduced to me as a friend of someone and I don't
21 remember whether it was Rinat or Denis Katsyv, but
22 it was one or the other.

23 Q. Do you know Howard Schweitzer?

24 A. I don't, not that I can recall.

25 Q. So you've never done any business with

1 him; is that correct?

2 A. I don't think so.

3 Q. Do you know if he had any role in the
4 Prevezon work?

5 A. I've read that his firm was involved in
6 the lobbying, but it's just something I read. I
7 don't believe I had any personal interactions.

8 Q. Do you know who Denis Katsyv is?

9 A. He's the owner of Prevezon.

10 Q. Did you have any interactions with him?

11 A. Again, I sat in a few meetings, a couple
12 of client meals, but it was limited by his limited
13 English and my limited Russian.

14 Q. In your interactions with
15 Ms. Veselnitskaya did she claim to be acting as the
16 attorney for Prevezon Holdings and the Katsyv
17 family or just for Prevezon Holdings?

18 A. She was introduced to me as the lawyer for
19 Prevezon. I never --

20 MR. LEVY: When you say "the Katsyv family,"
21 Denis Katsyv is the only person named in the
22 lawsuit. I'm just wondering what you mean by that.

23 MR. DAVIS: Denis or Pyotr.

24 MR. SIMPSON: As I said, she was introduced
25 to me as the lawyer for Prevezon. So -- and I

1 think the lawyer for Denis. So beyond that I
2 don't know.

3 BY MR. DAVIS:

4 Q. Do you know who Pyotr Katsyv is?

5 A. I do now. I mean, I knew a little bit
6 about him at the time, but now that it's become an
7 issue, at least in the mind of William Browder,
8 obviously I know who he is.

9 Q. Did you have any interactions with him?

10 A. No.

11 Q. Do you know Chris Cooper?

12 A. Yes.

13 Q. How long have you known Mr. Cooper?

14 A. Probably ten years, maybe longer.

15 Q. As far as you know, what is his

16 business?

17 A. Public relations.

18 Q. Is he associated with the Potomac Square
19 Group?

20 A. I believe he is the Potomac Square Group.

21 Q. Has Fusion ever worked with Mr. Cooper or
22 the Potomac Square Group?

23 A. Yes.

24 Q. Have you paid him or been paid by him?

25 A. I believe we've paid him. I don't know if

1 he's paid us.

2 Q. What did you understand his role to be in
3 the Prevezon work?

4 A. He worked on his movie doing --
5 essentially as I understand it and recall it, he
6 was asked to help find a place where they could
7 show this movie. William Browder likes to use the
8 press, but he doesn't like anyone talking freely
9 about him or raising questions about the story of
10 his activities in Russia. So when this movie came
11 together they were going to screen it in Europe and
12 he hired the meanest libel firm in London which has
13 previously sued me on behalf of Saudi billionaires
14 and -- unsuccessfully I might add, and he
15 threatened to file libel cases against the people
16 who were daring to offer to host a showing of this
17 film.

18 So, as you know, they don't have the First
19 Amendment in Europe. So he was able to
20 successfully suppress the showings of this film
21 which questioned his credibility and whether -- the
22 truth of his story and his activities in Russia.
23 So Chris came up with the idea of showing it at the
24 Newseum which is dedicated to the First Amendment
25 and where they don't have much time for libel

1 lawyers and people trying to suppress free speech

2 Q. And was the showing arranged for Prevezon,
3 for HRAGI? Who was arranging this?

4 A. I don't know.

5 Q. Did Fusion have any role in that showing?

6 A. We supplied some names of people. They
7 wanted to round up people who would be interested
8 in coming, journalists, friends, people interested
9 in Russia, and we supplied names for them.

10 Q. Did Fusion contact any journalists to
11 inform them about the film or the showing or to
12 encourage them to write about it?

13 A. I believe that I mentioned it to some
14 journalists in terms of showing up. I don't
15 believe I -- I just don't remember whether I tried
16 to get anyone to write anything about it, but if I
17 did I would have had good reason to because it was
18 all about William Browder's credibility which was
19 the subject that we were hotly litigating in
20 New York and I had been on this -- you know, we had
21 been on this, you know, multi-year effort to get
22 him to answer questions about his activities in
23 Russia. So it was the central issue in the
24 Prevezon case.

25 Q. So you mentioned Mr. Cooper was involved

1 in establishing this screening. Do you know how he
2 came to be hired by Prevezon or HRAGI or whoever?

3 A. I know a little. As I was saying earlier,
4 I've known Chris from Wall Street Journal days and
5 I refer business to him. I know this doesn't fit
6 with the Browder theory of the case, but I don't do
7 a lot of public relations work and I refer, you
8 know, public relations jobs to other people,
9 friends.

10 So when the trial was approaching in the
11 Prevezon case I kept telling the lawyers you guys
12 have to hire a PR guy, I'm not going to do this,
13 it's just too much work. So we were trying to find
14 PR people and he was one of the people that I
15 recommended as a trial PR guy. From there I don't
16 have a clear sense of how he ended up working on
17 the movie, but it wouldn't be surprising if they
18 had his name from the previous referral.

19 Q. Do you know who came up with the idea of
20 creating HRAGI?

21 A. I would be guessing. I just don't
22 remember. Someone may have told me. I don't
23 remember.

24 Q. What kind of interaction did Fusion have
25 directly or indirectly with HRAGI?

1 A. I remember hearing about it. I remember
2 Rinat talking about it and maybe others. We were
3 very peripheral to this stuff and I don't remember
4 if I had any specific interactions with it. I
5 don't know if they had an office, I don't know if
6 they had a bank account. I just don't know. I do
7 know they registered to lobby.

8 Q. Do you know Lanny Wiles, L-A-N-N-Y,
9 W-I-L-E-S?

10 A. I know him a little bit. I met him
11 originally when I was a journalist. He was
12 introduced to me as a well-connected Republican
13 consultant type and I bumped into him once or twice
14 over the years.

15 Q. Has Fusion ever worked with him?

16 A. I don't think so, no.

17 Q. What did you understand his role to be in
18 the Prevezon-HRAGI work?

19 A. Again, my understanding of people's
20 roles on -- he was involved in the lobbying. He's
21 a lobbyist. He was involved in the lobbying.
22 Beyond that I really couldn't say.

23 Q. Did you have any involvement with him in
24 the course of your work on the Prevezon?

25 A. I think we had lunch once.

1 Q. Do you have any reason to believe that
2 Mr. Wiles has ties to the Russian government?

3 A. No.

4 Q. So as you mentioned, in 2016 people
5 associated with HRAGI met and attempted to meet
6 with people in a number of congressional offices.
7 Were you aware of any of these meetings?

8 A. The meeting that I was aware of that I
9 remember hearing about was a meeting that actually
10 didn't happen which was some meeting that Mark
11 Cymrot was supposed to have. It's possible that he
12 was going to meet some Congressman. It's possible
13 that I was told about other meetings by some of
14 these people that we're discussing, but I don't
15 specifically remember hearing about other meetings.
16 I was generally aware that there was stuff going on
17 on the Hill.

18 Q. If I could refer back to Exhibit 2, the
19 partial privilege log. The first page of that
20 document lists a 5/13/16 e-mail from Rinat
21 Akhmetshin to Mark Cymrot with the subject/
22 description "Appointment with Cong. Hill." Do you
23 believe that to be a reference Congressman French
24 Hill?

25 A. I don't know. I believe it was a

1 Congressman named Hill. I don't know if it was a
2 Congressman named French Hill.

3 Q. And do you recall any other mentions of
4 meetings with any particular congressional offices
5 or committees?

6 A. I'm sure -- I'm sorry. I believe I recall
7 Rinat telling me that he was talking to Paul
8 Behrends, B-E-H-R-E-N-D-S. It was either Rinat or
9 Mark Cymrot or maybe both about some of these
10 issues, but, again, I don't have a great
11 recollection for the specifics.

12 Q. Did Fusion have any role in these
13 meetings?

14 A. I mean, I think we were asked for
15 information, and to the extent that the lawyers
16 wanted me to give somebody information I would hand
17 it over to them. It's their information.

18 Q. To the best of your knowledge, was that
19 information referenced in the meetings with
20 congressional staff members?

21 A. I don't know.

22 Q. You mentioned you had dinner with
23 Ms. Veselnitskaya on June 8th and 10th of 2016.
24 Were you generally aware of her trip to the United
25 States in June?

1 A. I was. She had trouble getting a visa and
2 the lawyers -- there was some drama over whether
3 she could get a visa. This would have been a
4 recurring issue in the case. You know, our lawyers
5 believed that the Justice Department was
6 interfering with her visas because they wanted to
7 inhibit her from collaborating with us on the case,
8 but I don't have any independent knowledge of her
9 visa issues. I just remember that was an issue.

10 I remember that at the last minute she got a
11 visa to come to this Appellate Court hearing on
12 June 9th in New York, and that was the way that she
13 persuaded them to give her a visa was that she
14 needed to attend a hearing which was on an appeal
15 of a District Court ruling related to the
16 disqualification motion that had been filed by
17 William Browder against Baker Hostetler after he
18 was ordered to give testimony.

19 So that's the history of that court hearing,
20 which was after the Court said he couldn't get out
21 of the subpoena and he had to give testimony, he
22 then triggered a new delay in his testimony by
23 filing a disqualification motion.

24 Q. And that hearing was on June 8th; is that
25 correct?

1 A. I believe it was June 9th.

2 Q. Did you have any other information about
3 Ms. Veselnitskaya's itinerary or intended
4 activities on this trip?

5 A. No. I mean, I can tell you what I knew.
6 I knew she was coming in I guess on the 8th. I
7 don't have a clear recollection of the dinner, but
8 I know -- I believe we had a dinner. The problem
9 is I had more than one. So I don't have a clear
10 recollection of it.

11 Anyway, I saw her the next day in court at
12 this hearing and I'm sure we exchanged greetings,
13 but, as I say, she speaks Russian and I speak
14 English. I think she was with Anatoli and she left
15 afterwards. I know she didn't tell me any other
16 plans she had.

17 Q. So you had dinner the 8th, saw her in
18 court on the 9th; is that correct?

19 A. Yes.

20 Q. And dinner again on the 10th?

21 A. In D.C.

22 Q. Did you see her any other time?

23 A. Not that I recall.

24 Q. Did Fusion play any role assisting
25 Ms. Veselnitskaya during that trip?

1 A. Not that I recall.

2 Q. It has widely been reported

3 Ms. Veselnitskaya and Mr. Akhmetshin and others met
4 with Donald Trump, Junior, Paul Manafort, and Jared
5 Kushner on June 9th, 2016. Were you aware of this
6 meeting beforehand?

7 A. No.

8 Q. It didn't come up at the dinner the night
9 before?

10 A. No.

11 Q. When did you first become aware of the
12 meeting?

13 A. Around the time it broke in the New York
14 Times. I was stunned.

15 Q. Is it correct that that means it wasn't
16 discussed at the dinner on the 10th?

17 A. No, but, again, you know, the dinner on
18 the 10th was I was at one end of the table talking
19 to a woman about her biography on Simon Bolivar and
20 she was at the other end with Rinat and she doesn't
21 really speak much English. So, you know,
22 fortunately I was not going to do a lot of
23 entertaining.

24 Q. I should clarify, discussed with you.

25 A. Yeah. So if she discussed with somebody

1 else, I wouldn't --

2 Q. Right.

3 Do you have any knowledge of the purpose of
4 the meeting other than what you read in the media?

5 A. No. No. Well, I mean, I read she wanted
6 to give them some information and I wondered
7 whether it was information from the Prevezon case
8 and I've seen speculation to that effect, but I
9 don't have any knowledge.

10 Q. If we had the specifics of the
11 information, would you be able to clarify whether
12 it had come from Fusion?

13 A. I think so. If it's, you know, stuff I
14 worked on I obviously will recognize it, yes.

15 Q. As far as you know, how was this meeting
16 arranged or do you have any information beyond
17 what's in the public --

18 A. I don't.

19 Q. Other than recent media reports, do you
20 have any reason to believe that the meeting was an
21 attempt by the Russian government to make contact
22 with the Trump campaign?

23 A. I mean, that's kind of an analytical
24 question. I don't have any factual reason to
25 believe that. I don't have possession of any

1 information about this that would allow me to say
2 one way or the other. You know, as a sort of
3 question of counterintelligence and just general
4 investigation of Russian methods and that sort of
5 thing, I think that's a reasonable interpretation.

6 Q. Have you had any communications about the
7 meeting at any time with Rinat Akhmetshin?

8 A. No. No.

9 Q. Have you had any communications about the
10 meeting, again, at any time with Ms. Veselnitskaya?

11 A. No.

12 Q. Have you had any communications about the
13 meeting with anyone you worked with on the Prevezon
14 matter?

15 A. Probably. I think we all exchanged mutual
16 expressions of surprise. I think I talked to Paul
17 Levine, a lawyer at Baker Hostetler. I'm sure I
18 discussed it with Ed Baumgartner, Mark Cymrot. You
19 know, if anyone knew about it they certainly didn't
20 confess it to me.

21 Q. Do you know -- I'm going to butcher this
22 name -- Irakle Kaveladze?

23 A. I know who he is.

24 Q. I'll spell it. I-R-A-K-L-E, last name
25 K-A-V-E-L-A-D-Z-E.

1 A. No, I don't know.

2 Q. Has Fusion ever worked with him?

3 A. No, not to my knowledge.

4 Q. To the best of your knowledge, did he have
5 any role in the Prevezon or Magnitsky work?

6 A. My knowledge is primarily of the Prevezon
7 case and, to my knowledge, he was not involved in
8 the Prevezon case in any way.

9 Q. Do you have any reason to believe beyond
10 public reporting that he has ties to the Russian
11 government?

12 A. I've been told by a source that --
13 actually, I was told by a source that there was
14 some reason to believe he had ties to the Russian
15 government, and he directed me to a newspaper
16 article which said that he had connections to a guy
17 on the West Coast named Boris Goldstein who has
18 been linked historically to Soviet Russian
19 intelligence. Beyond that I don't have any -- I
20 don't have any information.

21 Q. And who was the source that told you that?

22 A. I'm not going to talk about my source.

23 Q. I think you've already addressed this a
24 little bit, but do you know Anatoli Samochornov?

25 A-N-A-T-O-L-I, S-A-M-O-C-H-O-R-N-O-V.

1 A. I met him in connection with this case.
2 We've never had any kind of social or other
3 relations beyond chatting in courthouses and that
4 sort of thing, sitting in restaurants waiting for a
5 hearing to start.

6 Q. Has Fusion ever worked with him other than
7 on the Prevezon case?

8 A. No.

9 Q. And to the best of your knowledge, what
10 was his role in the Prevezon case?

11 A. As I understood it, he was recruited off
12 the rack basically as a certified -- a translator
13 who had courtroom experience in New York who was
14 qualified to do sort of technical-legal type
15 translation work. He, to my knowledge, didn't have
16 a pre-existing relationship with Ms. Veselnitskaya
17 or Prevezon. That's my understanding to this day.

18 MR. DAVIS: I think that's the end of our
19 hour. It is 1:04. Let's go off the record.

20 (Whereupon, at 1:05 p.m., the
21 interview was recessed, to
22 reconvene at 1:45 p.m., this
23 same day.)

24 AFTERNOON SESSION

25 MS. SAWYER: We'll go back on the record.

1 It's 1:55.

2 EXAMINATION

3 BY MS. SAWYER:

4 Q. I'm going to return you back to discussing
5 the work at Fusion that Christopher Steele had done
6 during the Presidential election of 2016. It has
7 been widely reported and Mr. Steele has
8 acknowledged that he created 16 memos before the
9 election between the time period of June of 2016
10 and October of 2016. Is that accurate?

11 A. To the best of my knowledge, that's
12 accurate.

13 Q. And then he also has acknowledged --
14 Mr. Steele also has acknowledged and it's been
15 reported that there was one additional memo that
16 came after the election in December of 2016. Is
17 that also accurate?

18 A. I think what he has said is that -- yeah,
19 that's basically accurate. What he said was that
20 the series of memos that were published by
21 BuzzFeed, that's the package that you're talking
22 about.

23 (Exhibit 3 was marked for
24 identification.)

25 BY MS. SAWYER:

1 Q. And so I'm going to show you what we will
2 just mark as Exhibit 3 for identification purposes.
3 So Exhibit 3 that I've just given you is a document
4 that was produced to the committee by your lawyers,
5 and they had explained to us that this was a
6 document originally posted by BuzzFeed in January
7 of 2017 and it has Bates numbers down in the
8 right-hand corner. The first one is
9 CLMS-JC-00041391 and then the last one is number
10 41425. If you could just take a look at that. Is
11 that what we were just discussing as the series of
12 memos posted by BuzzFeed and created by Mr. Steele?

13 A. Yes, it is.

14 Q. Can you explain for us just what -- does
15 this represent the 16 memos that would have
16 occurred between June and October of 2016 that
17 Mr. Steele created?

18 A. These are the memos that he created under
19 the engagement and then this extra one that is
20 appended. I never actually numbered -- totaled
21 them up, but these are the ones I'm familiar
22 with.

23 Q. And does this represent the entire
24 universe of memos that Mr. Steele created as part
25 of this particular engagement for you?

1 A. To the best of the my knowledge as part of
2 this engagement, this is it.

3 Q. And can you just explain to us so that we
4 understand the document, it has a heading "Company
5 Intelligence Report." I'm just looking at the
6 first page. That one says "Company Intelligence
7 Report 2016/080." What would that have signified?

8 A. Company Intelligence Report is just a way
9 of saying it's not a government document. In the
10 event that, you know, someone stole it or it leaked
11 or there was some sort of breach, you know, they're
12 not going to have their own name on it, but they
13 want to make sure that no one mistakes it for a
14 government document. That's my understanding.

15 080 is their internal numbering system for,
16 you know, their production of memoranda, and the
17 reason it jumps from 80 to 86 is -- I never
18 actually asked him, but there aren't five memos in
19 between this. So the interpretation is that it's
20 an internal numbering system for maybe Russia stuff
21 or maybe it's just -- I'm sorry. I don't know what
22 the internal numbering system is, but there isn't
23 five memos in this project between these two.

24 Q. So the company referenced in Company
25 Intelligence Report, your understanding is that

1 would be Orbis, not Fusion GPS?

2 A. I can't answer that. I think it's, as I
3 said, meant to denote that it's not a government
4 report.

5 Q. Were they producing -- as you noted, the
6 next apparent report 086 would be five, presumably,
7 reports later. Were those other five reports
8 reports that were being generated for Fusion GPS
9 or --

10 A. No.

11 MR. LEVY: I don't think he said that. Go
12 ahead.

13 BY THE WITNESS:

14 A. I mean, there aren't five reports that he
15 did for us between these two. This is the first
16 and second.

17 Q. So, again, when we look at that first one
18 that we discussed briefly, 2016/080, it appears to
19 be a three-page memorandum and it's dated 20 June
20 2016 and that shows up on the last page. Would you
21 have received it around that time that it's dated,
22 June 20, 2016?

23 A. Within a couple days, yeah. Yes.

24 Q. And not every single discrete memo has a
25 date, but a number of them do. To the extent they

1 had dates, would you have been receiving them
2 around the time they were dated?

3 A. Yeah. I believe so, yes. There might be
4 some lag, transition lag.

5 Q. And what was -- what use did you make of
6 these memos?

7 A. These memos -- I mean, I guess I'd like to
8 back up a little bit and explain, you know, what
9 led to the memos, which was -- as I said, I mean,
10 you know, we started looking at -- first we started
11 looking at Trump's business affairs generally with
12 some of the emphasis on associations with organized
13 crime and in particular Russian organized crime.
14 As the project progressed towards the end of 2015
15 and into 2016 we became interested in his overseas
16 business dealings particularly because they were so
17 opaque and seemed to involve, you know, to say the
18 least, colorful characters.

19 So as we got into 2016 we were looking
20 broadly at -- one of the things we were looking at,
21 broadly speaking, was Donald Trump's international
22 business dealings and, you know, through the spring
23 of 2016, as I mentioned, we were -- you know, we
24 looked in various places, Latin America. He has
25 worked on projects all over the world, but in

1 particular, you know, several in the former Soviet
2 Union, Georgia, Azerbaijan, both former Soviet
3 republics. So over the course of the spring I'd
4 say -- and Russia -- we gradually began to exhaust
5 the public record, the open source about these
6 topics in various places. As you, you know, sort
7 of run short on public record or open source
8 information, you know, you need to get -- if you
9 still want to go deeper you need to get human
10 source.

11 So the purpose of this was to see if we could
12 learn more, generally speaking, about his business
13 dealings in Russia. What came back was something,
14 you know, very different and obviously more
15 alarming, which had to do with -- you know, which
16 outlined a political conspiracy and a much broader
17 set of issues than the ones that we basically went
18 looking for. You know, initially we didn't know
19 what do with this.

20 The main thing we did with it, the use we
21 made of it was as intelligence, which is to
22 understand what's happening. So when this arrived
23 the first indicators were starting to float around
24 that there was something bigger going on, the
25 government of Russia or someone was doing some

1 hacking. I don't really remember the precise
2 details. I just remember there were rumblings at
3 that time about whether there had been lot of
4 hacking and there was going to be -- political
5 digital espionage was going to be a component of
6 the campaign.

7 So when this arrived it was also right around
8 the time I think -- Trump had said weird things
9 about the Russians and Putin and things that are
10 very atypical for a Republican and that people
11 found to be odd. So when this arrived, you know,
12 we made no immediate use of it at all in terms of,
13 you know, giving it to anybody. It was essentially
14 used to inform our other researcher, but because it
15 was -- and because it was human source intelligence
16 and some of it was of a personal nature, it was not
17 particularly useful for the kind of things that
18 are, you know, useful in politics, which are things
19 that you can prove, things that you can say, things
20 that people will believe.

21 So we used it as intelligence to try and
22 understand what was going on and, you know,
23 obviously, as we talked about earlier, we tried to
24 analyze this to see if it was credible. You know,
25 I did -- you know, in the initial round of this

1 that was the big question, was this credible.

2 Q. Okay. So let me stop you there for a
3 second before we get too far because you've
4 referred a number of times to "this" and you have a
5 35-page document in front of you. So I want to
6 clarify when you said "this," in the context of
7 answering that I assumed you were talking about the
8 first --

9 A. The first memo.

10 Q. That's the report 2016/080?

11 A. Correct.

12 Q. And that's the one that has the date of 20
13 June 2016?

14 A. Correct. To be totally clear, you know,
15 what people call the dossier is not really a
16 dossier. It's a collection of field memoranda, of
17 field interviews, a collection that accumulates
18 over a period of months. You know, they came in
19 intermittently, there was no schedule. You know,
20 he'd reach a point in the reporting where he had
21 enough to send a new memo; so he'd send one. So
22 you won't find any real rhythm or chronological
23 sort of system to the way they came in.

24 MR. MUSE: Just for clarification of "this,"
25 there are bates numbers I think that could be

1 identified here.

2 MS. SAWYER: Right. So that first document,
3 the one that we've just been talking about, has
4 Bates Nos. 49391 to 41393. Do we need to go off
5 the record for a moment? Let's go off the record
6 for a moment.

7 (A short break was had.)

8 BY MS. SAWYER:

9 Q. With regard to this document, you
10 characterized this document as representing field
11 interviews, I think you talked about it as human
12 source information. So was Mr. Steele's kind of
13 role with regard to the project primarily
14 conducting these types of interviews, gathering
15 this type of what I think you referred to as human
16 intelligence for Fusion?

17 A. Yes. I mean, in other cases we did other
18 things.

19 MR. LEVY: Don't get into other cases.

20 BY THE WITNESS:

21 A. I can't remember specifically what I had
22 in mind to get from him. This form of reporting
23 was, in fact, the form that the rest of the project
24 took, which was, you know -- I've done other kinds
25 of research in Russia, but something this sensitive

1 I don't think I've ever been involved in. So in an
2 ordinary case you would try to gather public
3 records and you would conduct yourself in a much
4 more open fashion.

5 You know, Russia is a dangerous place, it's a
6 kleptocracy and a police state, but it's also a
7 giant bureaucracy and in some ways it's a much more
8 open society, much more open than the Soviet Union
9 ever was. You can pull records for companies and
10 that sort of thing.

11 Anyway, so this was unusual in what we were
12 doing here and it's not what I had in mind when I
13 asked him to begin collecting information on this.
14 My expectation was of something a lot less
15 interesting than this, more along the lines of a
16 typical corruption investigation.

17 Q. You had indicated that when you received
18 it you found it unusual, it was sensitive
19 information. Did you take steps to verify any of
20 the information?

21 A. We assessed it for credibility, whether it
22 was credible. The question of the credibility of
23 the information is obviously a big question here,
24 can this be believed. There's other secondary
25 questions that would follow on from that, can it

1 somehow be used, does it have any use and that sort
2 of thing, but the threshold question is is it
3 credible information.

4 You know, there were two background factors
5 to that. One was who is it coming from. It's
6 coming from Chris Steele who's a guy that I've
7 worked with for, you know, about eight or nine
8 years and Chris, as I say, has a Sterling
9 reputation as a person who doesn't exaggerate,
10 doesn't make things up, doesn't sell baloney. In
11 my business, I mean, there are a lot of people who
12 make stuff up and sell baloney. So the one thing
13 that you get good at if you do this for a while is
14 finding reliable sources, finding reliable people
15 who have a record of giving it to you straight and
16 not making stuff up and not making mistakes. So
17 from that perspective, you know, this was alarming
18 because Chris is a credible person, he's well
19 respected in his field, and, as I say, everyone I
20 know who's ever dealt with him thinks he's quite
21 good. That would include people from the U.S.
22 government.

23 So the issue is where is it coming from and
24 then the other issue is does it make sense or are
25 there events in there that can be externally, you

1 know, reviewed or backed up. On the question of
2 whether it makes sense -- well, let me stay on the
3 question of some of the events that are described.
4 We were aware of some of these trips and we were
5 obviously aware of the hostility toward Hillary
6 Clinton and, you know, there was a lot of general
7 knowledge that we had that fit with this just in
8 terms of dates and places and roles of people in
9 the Kremlin. So on a surface level, you know, it
10 was credible too, but the thing that, you know,
11 most concerned me at this point was my own
12 familiarity with foreign meddling in American
13 elections, which is a subject that I've dealt with
14 for a long time.

15 In the 1990s I was working at the Wall Street
16 Journal and I wrote some of the very first stories
17 about the Chinese government's interference in the
18 1996 presidential election which triggered a
19 massive national security investigation, numerous
20 prosecutions, lots of business for Bob Muse, and a
21 lot of congressional hearings, congressional
22 inquiries. And in that episode it was eventually
23 dug out by congressional investigations that the
24 fundraisers, the Asian fundraisers were Chinese
25 intelligence assets. So there's ample recent

1 historical precedent for a foreign government to
2 interfere in American elections in a really big way
3 and for it to be an intelligence operation. So I
4 knew all of that while reading this and digesting
5 it for the first time.

6 I also knew because I've done a lot of
7 reporting on Russia about the Kremlin's interest in
8 American politics, European politics, disrupting
9 the politics of other countries, and, in fact, one
10 of the last things I did when I was a reporter at
11 the Wall Street Journal was report on several
12 stories of government investigations, FBI
13 investigations into American politicians who had
14 been corrupted allegedly by the Russians.

15 Sort of my departure point from journalism
16 was a series of stories and conferences I attended
17 where a lot of American and European intelligence
18 officials were expressing great alarm at the
19 resurfacing of Russian intelligence operations in
20 western capitals and the new twist on it which
21 seemed to be that these guys seemed to be getting
22 involved in politics in ways that they hadn't
23 previously. So I knew all that when I read this.

24 Q. Okay. So if I can stop you there. It
25 sounds like the components -- you can tell me if

1 there were more -- that you considered in assessing
2 the credibility of this was Mr. Steele, his
3 background, his reputation, overall the fact that
4 you had information and knowledge of Russia
5 meddling in other countries' elections, and then
6 the broader work of Russia to disrupt political
7 systems of other countries?

8 A. I covered that. I also would add that the
9 China case was for me in my journalistic career a
10 formative event that took -- you know, consumed
11 years of my reporting and was about, you know, a
12 Chinese intelligence operation to swing the '96
13 election to the Democrats.

14 The only other thing I'd add to all that is,
15 again, in the mid 2000s one of the stories I
16 wrote -- actually, I wrote a couple different
17 stories about a Russian oligarch having a meeting
18 with Senator John McCain shortly before the 2008
19 presidential election and another story or set of
20 stories about Paul Manafort and his involvement
21 with some Russian and Ukrainian oligarchs who were
22 considered to be suspicious or corrupt.

23 So I also knew -- or I formed an opinion or
24 impression that the Russians were interested in
25 making friends with the Republicans and that Paul

1 Manafort, you know, there was this previous episode
2 involving Paul Manafort, John McCain. So all of
3 that was in my head when this came in which, as I
4 say, tended to support the credibility -- the
5 possibility that this information was credible.

6 Q. You mentioned a Russian oligarch who had
7 met with Senator McCain. Who specifically was
8 that?

9 A. Oleg Deripaska, O-L-E-G,
10 D-E-R-I-P-A-S-K-A. He's not able to travel to the
11 United States because he's banned for suspicion of
12 ties to organized crime. He's extremely close to
13 the Kremlin, or at least he was, and is -- I broke
14 the story of him being banned from the United
15 States which caused him a lot of embarrassment and
16 trouble with his business and led to him hiring a
17 lobbyist and trying to get involved with getting a
18 visa to the U.S.

19 Q. And you had also mentioned your background
20 knowledge of Paul Manafort and his involvement with
21 Russian oligarchs. Can you identify who those
22 individuals were and the basis of that knowledge?

23 A. The issue I specifically wrote about I
24 believe was his work for the Party of Regions and
25 Victor Yanukovich, Y-A-N-U-K-O-V-Y-C-H, I think,

1 and that's the Pro-Russia party or was the
2 Pro-Russia party in Ukraine, and all that work sort
3 of grew out of work I had done about the Kremlin
4 working with the Russian mafia to siphon money off
5 the gas trade between Russia and Ukraine.

6 Q. Was that work you had done while still a
7 reporter with the Wall Street Journal?

8 A. Yes.

9 Q. So any conclusions you had reached from
10 that, would that be material that we would be able
11 to obtain and may already have in your public
12 reporting?

13 MR. LEVY: We'd have to talk to the Wall
14 Street Journal about that probably.

15 BY THE WITNESS:

16 A. My articles about this are available on
17 the Internet.

18 MR. LEVY: Some of them we've produced to you
19 already because it was responsive to your request.

20 MS. SAWYER: Understood.

21 BY MS. SAWYER:

22 Q. And there's potentially additional work
23 product related to the work that you had done on
24 Mr. Manafort?

25 A. For the Wall Street Journal or later?

1 Q. Let's start with the Wall Street
2 Journal?

3 A. I collected lots of information on
4 Mr. Manafort during my years at the Journal.

5 Q. And then we'll get into the work on
6 Mr. Manafort more recently.

7 So this particular memo that we've been
8 talking about, this first one doesn't specifically
9 mention, as far as I can see, any efforts to
10 interfere by Russia. It does talk about
11 potential -- as it's called in here, a dossier of
12 compromising material on Hillary Clinton. Did you
13 take any steps to verify whether that dossier of
14 compromising material existed on Hillary Clinton?

15 A. I will answer that, but can I just back
16 you up a little bit. I think your observation it
17 doesn't mention anything about interfering I
18 wouldn't agree with.

19 Q. Okay.

20 A. I mean, one of the key lines here in the
21 second paragraph says "However, he and his inner
22 circle have accepted a regular flow of intelligence
23 from the Kremlin, including on his democratic and
24 other political rivals."

25 So the issue with the Trump Tower meeting, as

1 I understand it, is that the Trump people were
2 eager to accept intelligence from a foreign
3 government about their political rivals and that
4 is, you know, I would say, a form of interference.
5 If you're getting help from a foreign government
6 and your help is intelligence, then the foreign
7 government's interfering. I mean, you know, I
8 think that also -- of course, in retrospect we now
9 know this was pretty right on target in terms on
10 what it says. So anyway --

11 Q. In reference to you think that particular
12 sentence?

13 A. I mean, it clearly refers to, you know,
14 them being interested in and willing to -- it
15 depicts them as accepting information. What we
16 have seen to date with the disclosures this year is
17 they were at a minimum super interested in getting
18 information.

19 Q. And when you're referencing the
20 "disclosures this year," could you just be specific
21 about that.

22 A. The Trump Tower meeting.

23 Q. So with reference to the June 9th Trump
24 Tower meeting?

25 A. Yes. Yes.

1 Q. Okay.

2 A. I will go back to your question, but,
3 again, it says "Source B asserted the Trump
4 operating was both supported and directed by Putin
5 aimed to sew discord within the U.S.," and, you
6 know, basically -- you know, there's a number of
7 different ways that it seems they're trying to
8 intervene in our politics in this memo.

9 What was your question?

10 Q. I appreciate that clarification. You were
11 actually clarifying a statement I made, which I
12 appreciate.

13 So you had testified a little earlier that at
14 the point in time in which you received this first
15 memo you used it a little more as background to
16 inform your thinking on it, but you didn't take
17 discrete steps. Had you -- were you involved in
18 editing this memo in any way?

19 A. No.

20 Q. Did you give Mr. Steele any specific
21 direction on, you know, next steps based on this
22 memo?

23 A. Not that I can recall, no.

24 Q. So at this point in time was he still
25 operating with the understanding that he was just

1 to engage in an open-ended research project?

2 A. Actually it wasn't really an open-ended
3 research project -- well, it was open-ended in
4 scope, it wasn't open-ended in time. It was take a
5 few weeks, see if there's anything there that's
6 interesting, notable, important, and if we think
7 there's reason to go on we'll make that decision at
8 that time. So it was a short-term engagement in
9 the beginning.

10 Q. And to the best you can explain to us, did
11 the client that you were working for know that he
12 was engaged in this particular research or what his
13 findings were at that point in time?

14 MR. LEVY: The answer to that question might
15 implicate privilege or obligations.

16 BY MS. SAWYER:

17 Q. Did you interfere in any way with
18 Mr. Steele's research, tell him not to pursue any
19 particular avenues?

20 A. No.

21 Q. To the best of your knowledge, did anyone
22 else give him that direction, either directly or
23 through you, and tell him not to --

24 A. No.

25 Q. If I could just finish.

1 A. I'm sorry.

2 Q. -- and tell him not to pursue any
3 particular avenues of research?

4 A. No.

5 Q. Do you know -- if we could just move on to
6 kind of the next memo, which begins with Bates
7 No. 41394 and it ends with 41396. It appears to
8 be -- it's three pages and it has a date of 26 July
9 2015 and it has "Company Intelligence Report
10 2016/086." To the best of your recollection, was
11 this the second memo you had received from
12 Mr. Steele?

13 A. To the best of my recollection, this is
14 the second memo.

15 Q. And how did you kind of use this
16 information?

17 A. Well, I think the context of external
18 events is important here. I believe -- it's my
19 recollection that what prompted this memo was, in
20 fact, the beginning of public reporting on the
21 hack. I think -- what is the date again? Yeah,
22 it's 26 July. So by this time Debbie Wasserman
23 Schultz has been the subject of a very aggressive
24 hacking campaign, weaponized hack, the likes of
25 which, you know, have never really been seen.

1 We've seen hacking in politics before, but this
2 kind of, you know, mass theft of e-mail and then to
3 dump it all into, you know, the public sphere was
4 extraordinary and it was criminal.

5 So the question by now of whether this was
6 Russia and whether this might have something to do
7 with the other information that we'd received was,
8 you know, the immediate question, and I think this
9 is also -- by the time this memo was written Chris
10 had already met with the FBI about the first memo.
11 So he's -- if I can interpret a little bit here.
12 In his mind this is already a criminal matter,
13 there's already a potential national security
14 matter here.

15 I mean, this is basically about a month later
16 and there's a lot of events that occurred in
17 between. You know, after the first memo, you know,
18 Chris said he was very concerned about whether this
19 represented a national security threat and said he
20 wanted to -- he said he thought we were obligated
21 to tell someone in government, in our government
22 about this information. He thought from his
23 perspective there was an issue -- a security issue
24 about whether a presidential candidate was being
25 blackmailed. From my perspective there was a law

1 enforcement issue about whether there was an
2 illegal conspiracy to violate the campaign laws,
3 and then somewhere in this time the whole issue of
4 hacking has also surfaced.

5 So he proposed to -- he said we should tell
6 the FBI, it's a national security issue. I didn't
7 originally agree or disagree, I just put it off and
8 said I needed to think about it. Then he raised it
9 again with me. I don't remember the exact sequence
10 of these events, but my recollection is that I
11 questioned how we would do that because I don't
12 know anyone there that I could report something
13 like this to and be believed and I didn't really
14 think it was necessarily appropriate for me to do
15 that. In any event, he said don't worry about
16 that, I know the perfect person, I have a contact
17 there, they'll listen to me, they know who I am,
18 I'll take care of it. I said okay. You know, I
19 agreed, it's potentially a crime in progress. So,
20 you know, if we can do that in the most appropriate
21 way, I said it was okay for him to do that.

22 Q. Okay. So let me just stop you there and
23 let's just make sure we get the sequencing
24 accurate.

25 A. Sure.

1 Q. So after Mr. Steele had found out the
2 information that he put in the very first of these
3 memos, the one dated June 20, 2016, he approached
4 you about taking this information to specifically
5 the FBI, the Federal Bureau of Investigation?

6 A. That's my recollection.

7 Q. So to the best of your recollection, that
8 request or idea came directly from Mr. Steele, not
9 anyone else?

10 A. That's right.

11 Q. And who was involved in discussions about
12 whether it was appropriate to take either the memo
13 or the information in the memo to the FBI?

14 A. It was Chris and me. I mean, that's the
15 only ones I remember, the two of us. The only ones
16 I know of.

17 Q. You said you had asked for some time to
18 think it over. What in particular did he
19 articulate to you was of significant national
20 security concern to indicate that it should be
21 taken to the FBI?

22 A. His concern, which is something that
23 counterintelligence people deal with a lot, is
24 whether or not there was blackmail going on,
25 whether a political candidate was being blackmailed

1 or had been compromised. And the whole problem of
2 compromise of western businessmen and politicians
3 by the Russians is an essential part of -- it's
4 like disinformation, it's something they worry
5 about a lot and deal with a lot and are trained to
6 respond to. So, you know, a trained intelligence
7 officer can spot disinformation that you or I might
8 not recognize, certainly that was Chris's skill,
9 and he honed in on this issue of blackmail as being
10 a significant national security issue.

11 Chris is the professional and I'm not. So I
12 didn't agree with that -- it wasn't that I
13 disagreed with it. It was that I didn't feel
14 qualified to be the arbitrar of whether this is a
15 national security expert. He's the pro and I'm the
16 ex-journalist.

17 Q. In that regard when you say he's a
18 professional and you're not, I take that to mean
19 that he was the intelligence expert?

20 A. He was -- yes, he was the national
21 security guy. I know a lot about politics, I know
22 a good bit about financial crime, but, you know, my
23 specialty was journalism and his was security.

24 Q. And with specific regard to the issue of
25 blackmail, what was the -- what were the facts that

1 he had gathered that made him concerned about the
2 possibility of blackmail and who did he think was
3 going to be blackmailed?

4 A. Well, the facts are -- beyond what's here
5 I don't have any additional facts. The alleged
6 incident that's described here is the one that he
7 was referring to. As I say, I don't have really
8 any additional information beyond this except
9 that -- I mean, it's probably in here somewhere
10 actually, but it's well known in intelligence
11 circles that the Russians have cameras in all the
12 luxury hotel rooms and there are memoirs written
13 about this by former Russian intelligence agents I
14 could quote you. So the problem of kompromat and
15 kompromating is just endemic to east-west
16 intelligence work. So that's what I'm referring
17 to. That's what he's referring to.

18 Q. Got it. So that would be in the summary
19 the kind of third dash point down where it
20 mentions --

21 A. Yes, that's right.

22 Q. -- that FSB -- what is your understanding
23 of who or what FSB is?

24 A. It's a successor to the KGB. I mean,
25 nominally it's the domestic intelligence agency on

1 the domestic side of what was the KGB. In practice
2 it's sort of the preeminent intelligence organ of
3 the Russian state, government.

4 Q. And do you recall when you -- when you and
5 Mr. Steele decided kind of that he could or should
6 take this to the FBI, approximately the time frame
7 of that?

8 A. I believe it was sometime around the turn
9 of the month. It would have been in late June or
10 at latest early July. That's my recollection.

11 Q. And Mr. Steele was the one who was then
12 responsible for doing the initial outreach to them
13 and making that contact?

14 A. Yes. Well, I mean, let's be clear, this
15 was not considered by me to be part of the work
16 that we were doing. This was -- to me this was
17 like, you know, you're driving to work and you see
18 something happen and you call 911, right. It
19 wasn't part of the -- it wasn't like we were trying
20 to figure out who should do it. He said he was
21 professionally obligated to do it. Like if you're
22 a lawyer and, you know, you find out about a crime,
23 in a lot of countries you must report that. So it
24 was like that. So I just said if that's your
25 obligation, then you should fulfill your

1 obligation.

2 Q. And were you a part of those conversations
3 with -- that Mr. Steele had with whoever his
4 contact was at the FBI?

5 A. No.

6 Q. Do you have any knowledge of when that
7 first conversation actually then took place?

8 A. Over the last several months that this has
9 become a public controversy I've learned the
10 general date and I believe it was if first week of
11 July, but I don't believe he told me -- if he told
12 me the time, I don't remember when he told me.

13 Q. And that information about that time, that
14 first week of July, where does that come from?

15 A. It comes from news accounts of these
16 events and conversations between Chris and I and
17 some of my -- presumably my business partners too.
18 Generally speaking, we have, as you know, not been
19 eager to discuss any of this in public and there's
20 been a lot of speculation and guessing and stories,
21 many of which are wrong. So when an incorrect
22 story comes out we would, you know, talk about it.
23 So, you know, in the course of those kinds of
24 things I generally obtained a sense of when things
25 occurred that I might otherwise not be able to

1 provide you.

2 Q. And do you know who it is that Mr. Steele
3 contacted and talked with at the FBI?

4 A. I did not know at the time. I believe I
5 know now, but I don't have authoritative
6 information on that. I didn't -- yeah. I didn't
7 know who it was in July.

8 Q. And do you now know who that was?

9 A. I think I know, but Chris never told me.
10 I figured it out eventually based on other sources
11 and other information, but that was not until
12 December or November.

13 Q. December of -- November or December 2016?

14 A. November, December 2016. It was after the
15 election.

16 Q. And what is your understanding from what
17 you've been able to put together of who that would
18 have been?

19 A. My understanding of?

20 Q. Of who Mr. Steele would have talked to at
21 the FBI.

22 A. I believe it was a [REDACTED]
[REDACTED], an official named
24 [REDACTED].

25 Q. And we had talked about that discussion

1 that you had with Mr. Steele about potentially
2 going to the FBI. You had indicated that it was
3 just the two of you having those conversations and
4 coming to that decision. Once the decision was
5 made, did you share that decision with anyone, that
6 he was going to go to the FBI with this
7 information?

8 A. I think we're not able to answer that.

9 MR. LEVY: He's going to decline to answer
10 that question.

11 BY MS. SAWYER:

12 Q. Did you seek anyone else's approval for
13 him to go to the FBI?

14 A. No.

15 Q. Did anyone ever encourage you to ask him
16 on to go to the FBI?

17 A. No.

18 Q. Did anyone discourage you from having him
19 go to the FBI?

20 A. No.

21 Q. Do you know whether Mr. Steele when he had
22 that first meeting, which you said occurred in the
23 first week of July, do you know whether Mr. Steele
24 actually gave the FBI this document that we've been
25 talking about, the intelligence report 2016/080?

1 A. I don't know.

2 Q. With regard to providing -- what was the
3 goal -- as you understood it, what was the purpose
4 of the kind of goal in taking this to the FBI from
5 Mr. Steele's perspective?

6 MR. LEVY: Beyond what he's said already?

7 MS. SAWYER: Yes.

8 BY THE WITNESS:

9 A. I mean, for him it was professional
10 obligations. I mean, for both of us it was
11 citizenship. You know, people report crimes all
12 the time.

13 Q. So beyond reporting -- certainly if I'm
14 mischaracterizing please let me know, but beyond
15 reporting what he believed was an issue of national
16 security and a potential crime, I think you had
17 said kind of a potential crime in progress, do you
18 know whether he requested that the FBI open an
19 investigation?

20 A. I don't know that. I mean, all he told me
21 in the immediate aftermath was that he filled him
22 in. I can talk generally about the FBI and what
23 happens when you give them information because I
24 know that from years of experience, but generally,
25 you know, you don't ask them to do it. There's no

1 ask.

2 Q. But you don't know what concrete steps
3 they may have taken once they got the information
4 from him?

5 A. I do not. Of course we know now that
6 shortly thereafter they got a vice award on one of
7 the people who's dealt with in here. He's not
8 dealt with in this memo, but he's dealt with in the
9 later memos. I don't know there's any connection
10 between these events. I do know in Director
11 Comey's testimony he said -- I'm sorry. Maybe I'm
12 skipping ahead. As far as I know, they didn't -- I
13 don't know what they did.

14 Q. So then with regard to Mr. Steele's
15 ongoing work, I presume that his work then
16 continued after you got this first memo because we
17 have additional memos between June?

18 A. Yes.

19 Q. Was there a discussion about whether and
20 when he would take information to the FBI?

21 A. Not that I recall. After the initial memo
22 he told me that he had briefed him. I don't
23 remember anything specific about the issue arising
24 again other than to say generally that as the
25 summer progressed the situation with the hacking of

1 the Democrats and the efforts by the Russians to
2 influence the election and the possibility that the
3 Trump organization was, in fact, doing things to
4 curry favor with the Russians became more and more
5 serious as external developments occurred.

6 So, for instance, they changed the Republican
7 platform, which is addressed in here. Carter Page
8 shows up in Moscow and gives a speech. He's a
9 campaign advisor and he gives a speech about
10 dropping sanctions. Trump continues to say
11 mysterious things about what a great guy Putin is.
12 So I vaguely recall that these external events
13 prompted us to say I wonder what the FBI did,
14 whoops, haven't heard from them. So that was
15 basically the state of things through September

16 Q. So do you know whether or not Mr. Steele
17 did have any subsequent conversations with the FBI
18 after that initial conversation in the first week
19 of July 2016?

20 A. Yes, I do. He did.

21 Q. So can you explain the next incident where
22 you know that Mr. Steele met with the FBI?

23 A. Yes. I guess what I'd like to explain is
24 what I knew at the time and what I know now. It
25 was September and obviously the controversy was

1 really front and center now in the election. I
2 can't remember whether the intelligence community
3 had come out with their statement, but, you know,
4 there was a lot of concern in Washington and in the
5 U.S. about whether there was a Kremlin operation to
6 interfere with our election and there was a lot of
7 debate throughout this period about whether they
8 were trying to help Trump or just trying to cause
9 trouble. But there wasn't much debate that they
10 were up to something.

11 So, you know, I'm dealing with Chris on the
12 underlying reporting and by this time my concern,
13 you know, was -- I was very concerned because Chris
14 had delivered a lot of information and by this time
15 we had, you know, stood up a good bit of it.
16 Various things he had written about in his memos
17 corresponded quite closely with other events and I
18 began, you know, to view his reporting in this case
19 as, you know, really serious and really credible.

20 So anyway, we were working on all of that and
21 then he said, hey, I heard back from the FBI and
22 they want me to come talk to them and they said
23 they want everything I have, to which I said okay.
24 He said he had to go to Rome, I said okay. He went
25 to Rome. Then afterwards he came back and said,

1 you know, I gave them a full briefing.

2 I'll add because I didn't consider this to
3 be -- you know, there was no objective here
4 politically because you can't -- in an ordinary
5 election I know from my decades of dealing with
6 U.S. elections that you can't expect the government
7 or the FBI to be of any use in a campaign because
8 the DOJ has rules against law enforcement getting
9 involved in investigations in the middle of a
10 campaign and this was obviously -- you know, this
11 obviously became a huge issue.

12 Anyway, because it wasn't really part of the
13 project in my mind I didn't really ask a lot of
14 questions about these meetings. I didn't ask who
15 he met with, I didn't ask, you know, much of
16 anything, but he did tell me that he gave --

17 Q. Before we get to that, which I do want to
18 hear, I just want to get a sense of the chronology.

19 A. Sure.

20 Q. So when did that -- you had said the FBI
21 then came back and contacted Mr. Steele?

22 A. That's my understanding.

23 Q. When did that, to the best of your
24 knowledge, take place?

25 A. Mid to late September.

1 Q. So in that intervening time period
2 Mr. Steele continues his research, he also
3 continues to provide you with memos?

4 A. Yes.

5 Q. And at no point in that time between
6 July -- the first week of July when he first met
7 with the FBI and then mid to late September did you
8 suggest to him that he should go back to the FBI?

9 A. Not that I recall. What I would -- what I
10 believe I may have said was have you heard anything
11 from the FBI because by then it was obvious there
12 was a crime in progress. So I just was curious
13 whether he'd heard back.

14 Q. And when you say it was obvious that there
15 was a crime in progress, what specifically are you
16 referencing?

17 A. Espionage. They were hacking into the
18 computers of Democrats and think tanks. That's a
19 computer crime.

20 Q. So the thing that was apparent was Russia
21 or somebody had engaged in cyber intrusion and
22 computer crimes?

23 A. Yes.

24 Q. So do you know whether or not Mr. Steele
25 was directed -- you said you did not direct him or

1 ask him to go back to the FBI -- whether anyone
2 else either directly or indirectly asked him to go
3 to the FBI after his July 5th --

4 A. To my knowledge, no one else told him to
5 report this. He may have conferred with his
6 business associates, but I don't know.

7 Q. And you said that meeting with the FBI,
8 you said Mr. Steele said he had to go to Rome for
9 this meeting. Do you otherwise know who he met
10 with?

11 A. This gets into the chronology of what I
12 learned when. At some point I learned that he was
13 meeting with the lead FBI guy from Rome. I don't
14 remember when he told me that.

15 Q. And did you have a name associated with
16 who that was?

17 A. Not at that time.

18 Q. You said that he told you of the meeting
19 with the FBI in Rome in mid or late September, that
20 he "gave them a full briefing"?

21 A. A debrief I think is what he probably
22 said, they had debriefed him. I don't remember him
23 articulating the specifics of that. You know, my
24 understanding was that they would have gotten into
25 who his sources were, how he knew certain things,

1 and, you know, other details based on their own
2 intelligence. Essentially what he told me was they
3 had other intelligence about this matter from an
4 internal Trump campaign source and that -- that
5 they -- my understanding was that they believed
6 Chris at this point -- that they believed Chris's
7 information might be credible because they had
8 other intelligence that indicated the same thing
9 and one of those pieces of intelligence was a human
10 source from inside the Trump organization.

11 Q. And did you have any understanding then or
12 now as to who that human intelligence source from
13 inside the Trump campaign might have been?

14 MR. LEVY: He's going to decline to answer
15 that question.

16 MS. SAWYER: On what basis?

17 MR. SIMPSON: Security.

18 MR. LEVY: Security.

19 BY THE WITNESS:

20 A. We had been really careful -- I was really
21 careful throughout this process to not ask a lot of
22 specific sourcing questions. There are some things
23 I know that I just don't feel comfortable sharing
24 because obviously it's been in the news a lot
25 lately that people who get in the way of the

1 Russians tend to get hurt.

2 MR. LEVY: And I would just add that there
3 are privileges and obligations that might be
4 implicated in the disclosure of any source related
5 to this matter.

6 BY MS. SAWYER:

7 Q. Was this individual also a person who had
8 been a source for Mr. Steele, without identifying
9 who that was?

10 A. No.

11 Q. So this was someone independent of
12 Mr. Steele's sources who potentially had
13 information also on the same topics?

14 A. Yes. I mean, I don't think this
15 implicates any of the issues to say I think it was
16 a voluntary source, someone who was concerned about
17 the same concerns we had.

18 MR. DAVIS: I'm having a hard time hearing
19 you. Please speak up.

20 BY THE WITNESS:

21 A. It was someone like us who decided to pick
22 up the phone and report something.

23 Q. And your understanding of this, does that
24 come from Mr. Steele or from a different source?

25 A. That comes from Chris, yes.

1 Q. And when did he share that information
2 with you?

3 A. I don't remember exactly.

4 Q. Do you think it was around the same time
5 that he had met with the FBI, so mid to late
6 September of 2016?

7 A. I think more likely early October.

8 Q. Do you know whether when Mr. Steele met
9 with the FBI he provided them with the memos that
10 he would have had at that point in time, which
11 would have been mid to late September of 2016?

12 A. I don't know that. He didn't tell me
13 that. He did say they asked him for -- they wanted
14 to know everything he had, but whether that would
15 include getting paper I don't know.

16 Q. And did he indicate that he had cooperated
17 fully and given them whatever information he had
18 available?

19 A. Yes. In the course of these, you know,
20 discussions, you know, he indicated to me this was
21 someone he had worked with previously who knew him
22 and that they had a -- they worked together.

23 Q. By that person you're referring to
24 [REDACTED] in Rome?

25 A. Yes.

1 Q. Now, with regard to -- just to finish up
2 on the interactions with FBI, do you know were
3 there any additional interactions between
4 Mr. Steele and the FBI?

5 A. There was some sort of interaction, I
6 think it was probably telephonic that occurred
7 after Director Comey sent his letter to Congress
8 reopening the investigation into Hillary Clinton's
9 e-mails. That episode, you know, obviously created
10 some concern that the FBI was intervening in a
11 political campaign in contravention of
12 long-standing Justice Department regulation.

13 So it made a lot of people, including us,
14 concerned about what the heck was going on at the
15 FBI. So, you know, we began getting questions from
16 the press about, you know, whether they were also
17 investigating Trump and, you know, we encouraged
18 them to ask the FBI that question. You know, I
19 think -- I'm not sure we've covered this fully,
20 but, you know, we just encouraged them to ask the
21 FBI that question.

22 On October 31st the New York Times posed a
23 story saying that the FBI is investigating Trump
24 and found no connections to Russia and, you know,
25 it was a real Halloween special.

1 Sometime thereafter the FBI -- I understand
2 Chris severed his relationship with the FBI out of
3 concern that he didn't know what was happening
4 inside the FBI and there was a concern that the FBI
5 was being manipulated for political ends by the
6 Trump people and that we didn't really understand
7 what was going on. So he stopped dealing with
8 them.

9 Q. Okay. So I do want to get to the timing
10 on that. I know that I'm getting close to the end
11 of my hour. Can I just ask you a general question
12 on the memos that we were talking about. I had
13 asked you specifically about the first one, if you
14 had in any way -- first of all, with regard to the
15 packet on whole, did you have any input or
16 involvement in the drafting of these or input for
17 the research?

18 A. No.

19 Q. And did you edit any of them in any way?

20 A. No.

21 Q. So these were documents that you were just
22 receiving from Mr. Steele?

23 A. Yes. I mean, the only qualifier I'd add
24 is I'm sure I said things like Paul Manafort was
25 just named campaign manager, what do you know about

1 him, that kind of thing.

2 Q. I do want to get into some more specifics
3 about kind of what steps and what items you may
4 also clarify, but I do want to make sure, if I
5 could have your indulgence, just that we -- well,
6 we can finish up the FBI part on our next hour
7 because it sounds like there's a little more to
8 finishing that. So our hour is up. If you'll just
9 give me a moment.

10 Okay. So we'll go ahead and go off the
11 record. It is 2:58.

12 (A short break was had.)

13 MR. DAVIS: We'll go back on the record.
14 It's now 3:09.

15 EXAMINATION

16 BY MR. DAVIS:

17 Q. Mr. Simpson, do you know Emin Agalarov,
18 E-M-I-N, A-G-A-L-A-R-O-V?

19 MR. LEVY: Personally or just does he know
20 about him?

21 MR. DAVIS: Personally.

22 BY THE WITNESS:

23 A. No.

24 Q. Do you know Aras, A-R-A-S, Agalarov?

25 A. No.

1 Q. Has Fusion ever worked with either of
2 them?

3 A. No.

4 Q. To the best of your knowledge, have
5 either of them had any role in the Prevezon work?

6 A. Not to my knowledge.

7 Q. Do you know Rob Goldstone?

8 A. No.

9 Q. Has Fusion ever worked with him?

10 A. No.

11 Q. Paid him or been paid by him?

12 A. No.

13 Q. To the best of your knowledge, has
14 Mr. Goldstone had any work in the Prevezon or
15 Magnitsky work?

16 A. Not to my knowledge.

17 Q. When you had these dinners in June of 2006
18 with Ms. Veselnitskaya, who else attended those
19 dinners?

20 MR. FOSTER: 2016.

21 MR. DAVIS: 2016. Excuse me.

22 BY THE WITNESS:

23 A. The Baker lawyers would have attended, did
24 attend.

25 Q. Was Rinat Akhmetshin there?

1 A. I specifically remember he was at the
2 second dinner on I think it was the 10th. I don't
3 specifically remember if he was at the other
4 dinner. I don't have many memory of the other
5 dinner.

6 Q. Do you recall if he was at the court
7 hearing on the 9th?

8 A. I believe he was. I'm not certain of it.
9 The other person would have been a translator at
10 some of these dinners. I can't remember which
11 ones.

12 Q. Were there any other individuals there
13 involved with HRAGI or Prevezon work beyond the
14 people you've mentioned?

15 MR. LEVY: When you say "there," you're
16 talking about now?

17 MR. DAVIS: You're right. At the hearing.

18 BY THE WITNESS:

19 A. The hearing. Before you were asking about
20 the dinners, right?

21 Q. I was.

22 A. Now you're asking about the hearing. I
23 just want to be clear. Well, it was a crowded
24 hearing and there may have been other people
25 involved. I mean, I remember specifically pretty

1 much most of the Baker legal team was there,
2 Natalia was there, I believe she -- I believe
3 Anatoli was her translator for that. There was
4 some other people who I think were also from Baker
5 Hostetler who were there. Former Attorney General
6 Mukasey was arguing for Prevezon. So I just
7 remember that there were lawyers -- people who I
8 believed were lawyers who were there to watch the
9 argument and maybe had some connection to the case.
10 There was another associate I think from New York
11 who was there, usually came to some of the Court
12 hearings. That's all I remember.

13 Q. And the first dinner on the 8th were there
14 any other attendees?

15 A. I don't remember. I think John Moscow
16 might have been there.

17 Q. And the second dinner on the 10th, were
18 there any other attendees beyond the ones you've
19 already described?

20 A. I don't recall. My wife.

21 Q. You mentioned that information Fusion had
22 gathered may have been passed on to the HRAGI
23 people via Baker Hostetler or if they instructed
24 you to that you would have. Did you have any
25 expectation that that would reasonably result in

1 them influencing U.S. policy?

2 A. I can't say that I would have specifically
3 expected anything from that. I was acting --
4 lawyers hire me to do research for them, the
5 research is their property or their client's
6 property, it's not mine. So if they want me to
7 provide it to somebody else, it's their
8 information. So I would -- it's a fairly
9 ministerial thing. I'm not sure I would have an
10 expectation of any sort of specific result from
11 that.

12 Q. But you did understand HRAGI to be
13 lobbying on the Hill?

14 A. They were registered to lobby on the Hill.
15 So I believe that's what they were doing, yeah.

16 Q. And did you understand that your actions
17 on behalf of Prevezon or Baker Hostetler would
18 principally benefit the Russian government? Who
19 did you believe the principal beneficiary to be?

20 MR. LEVY: I'd like to note for the record
21 that Patrick is smiling as he's asking the
22 question. You can answer.

23 MR. MUSE: He's trying to contain his
24 laughter.

25 BY THE WITNESS:

1 A. We did not believe that was being done on
2 behalf of the Russian government.

3 Q. What do you understand Prevezon's
4 relationship, if any, to be with the Russian
5 government?

6 A. Prevezon was introduced to me as the
7 client and Denis Katsyv was the owner of Prevezon.
8 Generally speaking, when we take on a new case, you
9 know, from a respected law firm part of the, you
10 know, discussion is who's the client, and, you
11 know, Mark Cymrot said they've checked out Denis
12 Katsyv and he has -- he's a legitimate businessman.
13 He's got a real estate company, it's a successful
14 company, and he has an explanation for how he makes
15 his money and appears to be legit. To some extent
16 whenever you enter a new case that's part of what
17 you're being hired to determine is whether that
18 initial due diligence stands up, but in any event,
19 he was presented to me as a successful real estate
20 investor.

21 As I say, I worked with Baker Hostetler for a
22 number of years and it's a conservative midwestern
23 law firm with a lot of respected people in it, and
24 part of the obligations of lawyers in this country
25 and now in a lot of other countries is to determine

1 where their money comes from and who their clients
2 are and whether their clients are involved in
3 criminal activity. I don't remember the exact
4 specifics of our discussions of these matters, but
5 one of the issues was whether he's a legitimate
6 businessman.

7 Q. Did you ever receive a letter of inquiry
8 from the Department of Justice regarding the
9 applicability of the Foreign Agent Registration Act
10 to your work on the Prevezon case or Magnitsky
11 matter?

12 A. No, I have not.

13 Q. Did you charge any fees to any other
14 entities or people besides Baker Hostetler for work
15 on the Prevezon or Magnitsky matters?

16 A. I don't think so, no. I specifically can
17 tell you I wasn't compensated by this foundation or
18 anybody else involved in any of the lobbying.

19 Q. At the time of this June -- early June
20 trip to New York had you already engaged Mr. Steele
21 to do work on Mr. Trump's involvement with Russia?

22 A. I don't specifically remember. As I
23 mentioned, the actual agreements are handled by
24 other people on my staff.

25 Q. Which employees and associates of Fusion

1 worked on the project investigating then candidate
2 Donald Trump?

3 MR. LEVY: We can give you that information
4 at the end of the interview.

5 MR. DAVIS: Why at the end of the interview?

6 MR. LEVY: I just want to make sure that
7 employees involved in this matter are protected.
8 We've had death threats come to the company. We'll
9 be happy to cooperate with the committee and give
10 the names of those people. I just want to do it
11 outside of this transcript, unless you're going to
12 assure me the transcript is going to be kept
13 confidential.

14 MR. FOSTER: Let's go back to the previous
15 question. What was the previous question?

16 MR. DAVIS: Whether he'd already started
17 working with Mr. Steele during the time of the --

18 MR. FOSTER: During the time of the meetings
19 in early June, right? And your answer was?

20 MR. SIMPSON: I don't know.

21 MR. FOSTER: Do you have -- you said you
22 don't handle those issues at the company.

23 MR. SIMPSON: That's right.

24 MR. FOSTER: So your company does have
25 records that would establish that fact?

1 MR. SIMPSON: We keep books and records. We
2 should have records of agreements and things, yeah.

3 MR. FOSTER: So did you not review any of
4 those in preparation for today?

5 MR. LEVY: What he reviewed is privileged.

6 MR. FOSTER: Have you reviewed them -- I'm
7 not asking if you reviewed them with counsel. Have
8 you reviewed them recently?

9 MR. LEVY: If he reviewed anything to prepare
10 for this interview it would have been at the
11 direction of counsel and attorney work product.

12 MR. FOSTER: So you do or don't know whether
13 you have such records that would identify the
14 date -- the precise dates of the engagements?

15 MR. LEVY: We will --

16 MR. FOSTER: I'm just asking what he knows.

17 MR. LEVY: I think he's told you. Go ahead.

18 MR. SIMPSON: I'll just restate that we run
19 a -- it's a reasonably well-run company, we keep
20 books and records. So, you know, those kinds of
21 things are kept in our corporate files.

22 BY MR. DAVIS:

23 Q. Did Baker Hostetler or Prevezon pay for
24 your travel to New York for the meetings in June of
25 2016?

1 MR. LEVY: The meetings?

2 MR. DAVIS: The dinner after the hearing.

3 BY THE WITNESS:

4 A. The purpose of the trip was the hearing.
5 It was routine for me to attend hearings. So I
6 would bill them -- my office would bill them for my
7 train trips and hotels depending on whether there
8 was -- whether it was specifically for the Prevezon
9 case. I don't know if -- I don't know for a fact
10 that we billed them.

11 Q. Did you travel with any other members of
12 the Prevezon team either to or from New York?

13 A. I don't think so.

14 Q. So I think you've already stated that Ed
15 Baumgartner worked on both projects, on the
16 Prevezon project and another Trump investigation.
17 To the best of your knowledge, does Mr. Baumgartner
18 know Rinat Akhmetshin?

19 A. I don't know. I'd just like to clarify,
20 you know, my recollection is that Ed worked -- the
21 Prevezon thing wound down and I don't think I
22 brought Ed on until it was either ending or had
23 already ended.

24 Q. Can you clarify the time frame for when it
25 was winding down?

1 MR. LEVY: Talk about what the "it" was when
2 you say "it."

3 BY THE WITNESS:

4 A. The hearing was on June 9th, I guess we
5 said, and that was the culmination of a long
6 controversy over whether Browder was going to have
7 to testify and whether, you know, we had to be
8 disqualified and, you know, there was a whole
9 series of media attacks on us during that period
10 from Browder. Then nothing happened after that and
11 that was, you know, sort of the peak of that. It
12 was after that that a lot of the issues involving
13 Russia and the campaign started to heat up.

14 Q. Was there any overlap between the
15 employees from Fusion who were working on the Trump
16 investigation and the Prevezon case?

17 A. I think the primary employees did not
18 overlap, but I can't tell you that there was a
19 Chinese wall of separation. Various people
20 specialize in certain things and can contribute
21 ad hoc to something.

22 Q. And you worked on both, correct?

23 A. Yes, I did.

24 Q. You previously mentioned that Fusion had
25 hired subcontractors beyond Mr. Steele to work on

1 the Trump project. Was there any overlap of other
2 subcontractors between the Trump investigation and
3 the Prevezon work?

4 A. Not to my recollection.

5 Q. And had Fusion worked with Mr. Steele
6 prior to this project regarding Mr. Trump?

7 A. Yes.

8 Q. And had you previously paid him or Orbis?

9 A. I believe so, yeah.

10 Q. And had Fusion been paid by him or Orbis
11 as well?

12 A. Yes, I believe so.

13 Q. And are you aware of any interactions
14 Mr. Steele had with the FBI prior to his work on
15 the investigation of Mr. Trump and his associates?

16 MR. MUSE: Could you repeat that?

17 MR. DAVIS: Are you aware of any interactions
18 with Mr. Steele with the FBI prior to his work on
19 the investigation of Mr. Trump and his association?

20 BY THE WITNESS:

21 A. I was not at the time, but I am now.

22 Q. Did you have reason to believe that in his
23 prior position within British intelligence he would
24 have interacted with the FBI?

25 A. Yes, he's told me that.

1 Q. Do you believe that the FBI generally
2 considers sources more credible if they have
3 previously provided reliable information?

4 A. That's my understanding.

5 Q. Was Mr. Steele's reportedly successful
6 history in working with the FBI a factor in
7 deciding to hire Orbis for the Trump project?

8 A. No.

9 Q. Do you know Christopher Burrows?

10 A. Yes.

11 Q. Do you know if he worked on the Trump-
12 Russia project with Orbis?

13 A. I do not.

14 Q. Do you know Sir Andrew Wood?

15 A. No.

16 Q. Are you aware he's an associate of Orbis
17 Business Intelligence?

18 A. I am aware of that as of now. I didn't
19 know it -- I don't know when I learned of it, but I
20 didn't know it last year, much of last year.

21 Q. Did Fusion ask Orbis to undertake other
22 actions beyond preparing the memoranda containing
23 the allegations regarding Mr. Trump and his
24 associates?

25 A. Not that I specifically -- I'm sorry. In

1 connection with that engagement?

2 Q. In connection with that engagement.

3 A. Not that I specifically recall.

4 Q. Did you communicate with Mr. Steele other
5 than through these memos? Did you have phone calls
6 and e-mails with him?

7 A. Mostly we spoke by phone.

8 MR. FOSTER: You did also e-mail with him?

9 MR. SIMPSON: Nothing -- I don't believe I
10 had anything substantive. E-mail security is a
11 major problem. So, generally speaking, we would
12 try to communicate telephonically on an encrypted
13 line.

14 MR. FOSTER: Did you have another method of
15 communicating with him via text.

16 MR. SIMPSON: I mean, we used encrypted
17 methods of communicating. Part of the security
18 concern we have involve there's been a lot of
19 attempts to break into our systems. So I prefer
20 not to get into a lot of that, but suffice to say
21 we use secured encrypted systems.

22 MR. FOSTER: Regardless of the details of how
23 you did, do you retain copies of written
24 communications that you may have engaged with him
25 through some other secure method?

1 MR. SIMPSON: Generally not.

2 MR. FOSTER: You have not retained?

3 MR. SIMPSON: Generally we use things that
4 can't be stolen because they no longer exist.

5 MR. FOSTER: Disappearing messages, auto
6 deleting messages? Is that correct?

7 MR. SIMPSON: That sort of thing, yes, that's
8 correct.

9 MR. FOSTER: I just needed a verbal answer.

10 MR. SIMPSON: Yeah. Sorry.

11 BY MR. DAVIS:

12 Q. You previously mentioned the relationship
13 with Mr. Steele was more collaborative than a
14 manager-employee and I think you referenced
15 mentioning as an example Paul Manafort's been named
16 campaign chairman, what do you know about him. Did
17 you collaborate with Mr. Steele on the content of
18 the memos even if he did the drafting?

19 A. No, generally speaking. I was managing a
20 much bigger project and he's a reliable provider.
21 So I did very little tasking.

22 Q. You mentioned other subcontractors were
23 focusing on other regions in which the Trump
24 organization has business. Were those other
25 subcontractors retained until the election or how

1 long did their engagements last?

2 A. It was ad hoc. So as things came we said
3 can we find someone in Latin America, give them an
4 assignment, they'd complete the assignment. If
5 there's no more to do, stop. So it's hard to
6 generalize.

7 Q. One point I'd like to clarify from
8 Ms. Sawyer's questioning. I believe you said that
9 Mr. Steele had told you that the FBI had a source
10 from inside the Trump organization and I believe
11 she referred to a source from inside the Trump
12 campaign. Do you know which is the accurate --

13 MR. LEVY: He's not going to get into the
14 details of that source.

15 MR. DAVIS: I'm not asking for any particular
16 details. It was characterized differently by you
17 and by counsel. I just wanted to make sure.

18 BY THE WITNESS:

19 A. I don't know.

20 MR. FOSTER: So you don't know whether it was
21 the organization or the campaign, in other words?

22 MR. SIMPSON: That's correct.

23 MR. FOSTER: Meaning the business versus the
24 campaign.

25 BY MR. DAVIS:

1 Q. And did Mr. Steele tell you that the FBI
2 had relayed this information to him?

3 A. He didn't specifically say that.

4 Q. I'm going to have you take a look at one
5 of the filings --

6 MR. FOSTER: I thought you said earlier that
7 he did say the FBI told him.

8 MR. SIMPSON: I think I was saying we did not
9 have the detailed conversations where he would
10 debrief me on his discussions with the FBI. He
11 would say very generic things like I saw them, they
12 asked me a lot of questions, sounds like they have
13 another source or they have another source. He
14 wouldn't put words in their mouth.

15 (Exhibit 4 was marked for
16 identification.)

17 BY MR. DAVIS:

18 Q. I'm going to have you take a look at one
19 of the filings by Mr. Steele's attorneys in the
20 lawsuit against him and Orbis in the United
21 Kingdom. This will be Exhibit 4. If you could
22 please turn to page 2 and read paragraph No. 8.
23 That paragraph states "At all material times Fusion
24 was subject to an obligation not to disclose to
25 third parties confidential intelligence material

1 provided to it by the Defendants in the course of
2 that working relationship without the agreement of
3 the Defendants." Is that a correct description of
4 your understanding of how the material was to be
5 treated?

6 MR. MUSE: There's also a context to that who
7 the Defendants are in other such matters.

8 MR. DAVIS: Sure. The Defendants are Orbis
9 Business Intelligence Limited and Christopher
10 Steele.

11 BY THE WITNESS:

12 A. What's the question?

13 Q. Is that an accurate description of what
14 you understood the obligations to be with that
15 material?

16 A. I mean, that's hard for me to answer.
17 There's a mutual expectation of confidentiality,
18 and if that's what you read that as saying, then
19 yes, there's a mutual expectation of
20 confidentiality.

21 Q. Was that expectation established by
22 contract?

23 MR. LEVY: We're not going to talk about
24 contracts with clients.

25 BY MR. DAVIS:

1 Q. Was it established by practice?

2 A. I guess I'll just reiterate we do
3 confidential work together and we treat all matters
4 as confidential. He's pretty good at sticking to
5 that and so am I.

6 Q. Was any of the information included in the
7 memoranda Orbis prepared during the Trump
8 investigation not considered "confidential
9 intelligence" under this understanding such that
10 Fusion was not required to obtain Orbis's
11 permission in order to disclose it?

12 A. I don't really understand the question.

13 Q. I'm saying if the understanding is that
14 you weren't to disclose confidential intelligence
15 material, were the memos confidential intelligence
16 material, the dossier memos?

17 A. They're confidential, yes.

18 MR. MUSE: Hold on one second. Here's the
19 mischief that's created by that. Someone else is
20 sending this and you're asking what they mean.
21 There may be direct answers to those questions if
22 you ask direct questions, but to do it in the frame
23 of reference of someone else putting forth a piece
24 of evidence, which this is, it inevitably creates
25 confusion. The reference to the document adds

1 nothing to his knowledge. It's just simply a point
2 of reference by you, but it doesn't add anything to
3 what he might be saying. So I think the better way
4 to get at it is simply to ask direct questions.

5 MR. DAVIS: There are two parties to this, at
6 least, and we've got one's description. I'd like
7 to know if he agrees with that description.

8 MR. MUSE: But even within what do they mean
9 by this is the question. I mean, what do they mean
10 by this sort of paragraph. You're asking him for
11 an interpretation. He can answer questions about
12 the relationship.

13 MR. DAVIS: I'm asking him to give an
14 interpretation of their agreement in terms of what
15 he did.

16 MR. MUSE: And therein lies the problem.

17 MR. DAVIS: But if it's an agreement to which
18 he's a party, there's a basis for that
19 understanding.

20 MR. MUSE: I don't think that's the way the
21 rule works.

22 MR. FOSTER: Well, I think the bigger
23 mischief from my point of view is the fact that
24 we're trying to get an understanding of what the
25 contractual relationship was. You're telling us

1 you're not going to provide us with details about
2 that contractual relationship, you're not going to
3 provide us with copies of any nondisclosure
4 agreements, contracts we've asked for and we don't
5 have. So we're asking him for his understanding of
6 what obligations he had.

7 MR. LEVY: And that's outside the scope of
8 this interview. Go ahead.

9 MS. SAWYER: Can I in general ask that you
10 guys all speak up a little bit because we're right
11 under the blower.

12 MR. LEVY: Will do.

13 MR. FOSTER: The record will reflect we are
14 not raising our voices.

15 To be clear, you're instructing him not to
16 answer that question because you think it's outside
17 the scope of what he agreed to come here to talk
18 about voluntarily?

19 MR. LEVY: That's not what I said. You had
20 made a comment about contracts, and I just wanted
21 to make sure that obviously the Chair and the
22 Ranking Member have agreed those questions are not
23 part of the scope of this interview. That said,
24 I've now forgotten what the pending question was.
25 So if Patrick wants to restate it he can and we can

1 evaluate it.

2 MR. DAVIS: Sure. In general we're asking
3 questions about distribution of the material within
4 the dossier which was the scope of the agreement.
5 If you look at page 4 of that same exhibit,
6 paragraph 30, Steele's attorneys state "The
7 Defendants" -- and again, that's Orbis Business
8 Intelligence and Christopher Steele -- "did not
9 however provide any of the pre-election memoranda
10 to any of the media or journalists, nor did they
11 authorize anyone to do so, nor did they provide the
12 confidential December memorandum to media
13 organizations or journalists, nor did they
14 authorize anyone to do so."

15 To the best of your knowledge, did Orbis ever
16 authorize Fusion to make any disclosures of the
17 memoranda to the media?

18 MR. LEVY: Just before we get into this
19 question, this paragraph began with a sentence you
20 did not read and it says "In the first sentence of
21 subparagraph 8.2.5 as noted." I don't know what
22 they're referring to. Maybe you do. Can you show
23 us that?

24 MR. DAVIS: I don't have that with me at the
25 moment, but I'll see if we can find it. Regardless,

1 did Orbis ever authorize you to share the memoranda
2 with the media?

3 BY THE WITNESS:

4 A. I'm not sure I can answer this in -- I'm
5 not sure I know the answer to this.

6 MR. LEVY: If you don't know, then...

7 MR. SIMPSON: It's a little confusing.

8 MR. FOSTER: You don't know whether or not
9 Orbis or Mr. Steele authorized you to distribute
10 the memos to the media?

11 MR. SIMPSON: I think what I would like to
12 say is that we had discussions about, you know,
13 information as opposed to memos and, you know, at
14 various times in talking to reporters about the
15 Trump-Russia connection, you know, things -- those
16 discussions would be informed by what's in the
17 memos.

18 MR. FOSTER: So are you saying that you may
19 have provided information from the memos to the
20 media without discussing whether or not -- without
21 getting permission specifically from Mr. Steele or
22 Orbis?

23 MR. SIMPSON: What I'm saying is we discussed
24 that. No. I'm saying we discussed generally the
25 wisdom of answering questions from reporters about

1 different matters, what we could say and what we
2 couldn't say.

3 MR. FOSTER: And in those discussions did he
4 ever authorize you to discuss the information
5 contained in the memoranda with the media?

6 MR. SIMPSON: As I've stated before, this is
7 not a master-servant relationship. We worked
8 together. Sometimes he's working for my clients,
9 sometimes I'm working for his. So we might jointly
10 make a decision, but it's not a sort of can I do
11 this, yes you can do that kind of relationship. So
12 if they -- so I hope that's responsive.

13 MR. FOSTER: So did you ever share either the
14 memos or the content of the memos with the media
15 independently of him without having discussed it
16 with him?

17 MR. SIMPSON: I think what I said was I had
18 spoken with reporters over the course of the summer
19 and through the fall about the investigations by
20 the government and the controversy over connections
21 between -- alleged connections between the Trump
22 campaign and the Russians. Some of what we
23 discussed was informed by Chris's reporting. So
24 whether that was -- I don't think there's any sense
25 that that was an unauthorized thing to do.

1 MR. DAVIS: On page 5 --

2 MR. FOSTER: Is it something that you
3 discussed with him that you were doing?

4 MR. SIMPSON: We would discuss inquiries that
5 we had received from reporters, yes.

6 MR. FOSTER: And that you were answering?

7 MR. SIMPSON: To the best of our ability. I
8 mean, we obviously didn't tell people about the
9 existence of these things for a long time.

10 BY MR. DAVIS:

11 Q. On page 5 of that same exhibit, paragraph
12 32 there's a portion of the sentence -- and I'll
13 just read this for background before we move on to
14 another segment. I think this is relevant for
15 context. There's a portion here in which Steele's
16 attorneys state that he gave -- that the Defendants
17 gave "Off-the-record briefings to a small number of
18 journalists about the pre-election memoranda in
19 late summer/autumn 2016." I'd like to provide
20 Exhibit 5 which is the second filing by
21 Mr. Steele's attorneys.

22 MS. SAWYER: Patrick, you've represented this
23 one as the second filing. Are we sure these are --

24 MR. DAVIS: Second for the purpose of this
25 interview, second one we're referencing.

1 MS. SAWYER: Were these documents that were
2 requested or obtained from a third party in the
3 course of the investigation?

4 MR. DAVIS: These were documents that were
5 published in the media. I believe the second one
6 was published by McClatchy.

7 MS. SAWYER: And what about the first?

8 MR. DAVIS: That was the one published by the
9 Washington Times.

10 (Exhibit 5 was marked for
11 identification.)

12 BY MR. DAVIS:

13 Q. So with the second one on page 8 of
14 Exhibit 5, under the response to 18 Steele's
15 attorneys state "The journalists initially briefed
16 at the end of September 2016 by the second
17 Defendant and Fusion at Fusion's instruction were
18 from the New York Times, the Washington Post, Yahoo
19 News, the New Yorker, and CNN. The second
20 Defendant" -- that would be Mr. Steele --
21 "subsequently participated in further meetings at
22 Fusion's instruction with Fusion and the New York
23 Times, the Washington Post, and Yahoo News which
24 took place in mid-October 2016. In each of those
25 cases the briefing was conducted verbally in

1 person. In addition, and again at Fusion's
2 instruction, in late October 2016 the second
3 Defendant briefed the journalist from Mother Jones
4 by Skype. No copies of the pre-election memoranda
5 were ever shown or provided to any journalist by or
6 with the authorization of the Defendants. The
7 briefings involved the disclosure of limited
8 intelligence regarding indications of Russian
9 interference in the U.S. election process and the
10 possible coordination of members of Trump's
11 campaign team and Russian government officials."

12 To the best of your knowledge, is that a full
13 and accurate account of all the news organizations
14 with which Fusion and Mr. Steele shared information
15 from the memoranda.

16 A. I'd say it's largely right.

17 Q. Are there any that have been omitted?

18 A. Maybe, yeah.

19 MR. LEVY: Just say what you know or recall.

20 BY THE WITNESS:

21 A. Yeah. I think there's at least one thing
22 misidentified. There might have been another. I
23 can't specifically think of it, but I think this is
24 incomplete, that maybe one of the broadcast
25 networks is misidentified. I just don't have a

1 tally of this. It's mostly right.

2 Q. By broadcast network I assume you mean CNN
3 is incorrect, it was a different network?

4 A. I think so.

5 Q. Do you recall which network it was?

6 A. I think it was ABC.

7 Q. Did you attend these meetings with
8 Mr. Steele?

9 A. Yeah. Yes.

10 Q. Did any other Fusion associates attend?

11 A. Possibly, yes.

12 Q. Can you identify them?

13 MR. LEVY: We can give that to you
14 afterwards.

15 BY MR. DAVIS:

16 Q. Do you recall the specific dates of these
17 meetings?

18 A. No.

19 Q. I believe the filing says end of September
20 2016. Does that comport with your recollection?

21 A. Yes.

22 Q. Was this, as far as you know, before or
23 after Mr. Steele had had his second meeting with
24 the FBI?

25 A. I don't remember. Sorry.

1 Q. Did Mr. Steele ever indicate to you
2 whether the FBI had asked him not to speak with the
3 media?

4 A. I remember Chris saying at some point that
5 they were upset with media coverage of some of the
6 issues that he had discussed with him.

7 Q. Sorry. I didn't hear.

8 A. He never said they told him he couldn't
9 talk to them.

10 Q. Do you recall which journalists you spoke
11 to at each of these organizations and what
12 information from the memoranda was revealed to
13 each?

14 A. I remember some of them and I remember
15 some of the names, yeah, some of the people I
16 talked to and some of these discussions.

17 Q. Can you tell us what those were?

18 MR. LEVY: The answer to that question goes
19 to confidential conversations that's been declined
20 to answer.

21 MR. FOSTER: Sorry. Confidential what?

22 MR. LEVY: The answer to that question might
23 implicate privilege and other obligations we've
24 already set forth and he's not going to answer the
25 question.

1 MR. FOSTER: What's the privilege?

2 MR. LEVY: First amendment, confidentiality.

3 MR. FOSTER: Confidentiality agreement,
4 contractual obligation, is that what you're talking
5 about?

6 MR. LEVY: No. Just talking to confidential
7 sources, First Amendment issue. We can discuss it
8 later after the interview.

9 BY MR. DAVIS:

10 Q. Mr. Steele's filing indicates that these
11 meetings occurred at Fusion's instruction. Is that
12 correct, did you initiate these meetings and
13 instruct Mr. Steele to participate in them?

14 A. I'd just reiterate the nature of our
15 relationship was that we would -- I might propose
16 something and he might agree to do it, but it was
17 not a -- it was not a military style relationship
18 where I gave the orders and he carried them out.

19 Q. Was part of the purpose of your
20 investigation to share information with
21 journalists?

22 A. I think that's a fair statement. To the
23 extent -- I mean, I'm sorry. Could you be clear.
24 You mean the project overall?

25 Q. Yes, investigating Mr. Trump and his

1 associates.

2 A. As I said earlier, in any project, and
3 that would include this one, the objective is to
4 gather relevant information, and some of that
5 information was gathered for other purposes and
6 some of it was gathered for the possibility that it
7 might be useful to the press.

8 Q. Did your client instruct you to have these
9 meetings?

10 MR. LEVY: The answer to that question might
11 implicate privilege or obligations that we've set
12 forth.

13 BY MR. DAVIS:

14 Q. Do you have any reason to believe that
15 Mr. Steele passed any information on to journalists
16 without Fusion?

17 A. Without me -- you mean without me
18 participating, without me authorizing it? Can you
19 be more specific?

20 Q. Sure. Let's start without you
21 participating. The filing references meetings that
22 both you and Fusion jointly had with journalists.
23 Do you believe he had any meetings with journalists
24 without you present?

25 MR. LEVY: Without Mr. Simpson physically

1 present?

2 MR. DAVIS: For physical meetings or via
3 Skype, without him aware of them contemporaneously.

4 BY THE WITNESS:

5 A. That's a difficult question to answer
6 because I don't know what I don't know, but I don't
7 have any reason to believe that he did anything
8 that I didn't authorize or approve.

9 Q. Jason may have already touched on this,
10 but did Fusion disclose hard copies of the
11 memoranda to any journalists?

12 MR. LEVY: The answer to that question might
13 implicate privilege or obligations. So he's going
14 to decline to answer that question.

15 MR. FOSTER: Doesn't the filing say that they
16 did not?

17 MR. LEVY: While our letter to the committee
18 has said that neither Mr. Simpson nor Fusion GPS
19 provided the dossier to BuzzFeed, Mr. Simpson's
20 going to decline to answer your question
21 respectfully. He's given you a lot of information
22 today. He's not going to answer that question.

23 BY MR. DAVIS:

24 Q. Still with Exhibit 5 on page 2, the
25 responses to 4 and 6. Here the attorneys for Orbis

1 and Mr. Steele --

2 MR. LEVY: Where are you again?

3 BY MR. DAVIS:

4 Q. Page 2, the response to 4 and to 6. Here
5 the attorneys for Orbis and Mr. Steele state "The
6 duty not to disclose intelligence to third parties
7 without the prior agreement of the Defendants" --
8 again, that's Orbis and Mr. Steele -- "do not
9 extend to disclosure by Fusion to its clients,
10 although the Defendants understand that copies of
11 the memoranda were not disclosed by Fusion."

12 A. Where are you? You're on page 2 -- okay.
13 I see it now.

14 Q. -- "do not extend to disclosure by Fusion
15 to its clients, although the Defendants understand
16 that copies of the memoranda were not disclosed by
17 Fusion to its clients."

18 Further down on that same page in response to
19 a question about whether Fusion's clients, insofar
20 as disclosure to them, was permitted, could
21 themselves disclose the intelligence from Orbis,
22 the filing responds "Defendants understood that the
23 arrangement between Fusion and its clients was that
24 intelligence would not be disclosed."

25 Is that a correct statement of the

1 relationship between you and the client, did Fusion
2 not disclose the memoranda or information contained
3 there in to its clients?

4 MR. LEVY: He's not going to get into
5 discussion with the client because of privileges
6 and obligations that might be implicated by the
7 answer to that question.

8 BY MR. DAVIS:

9 Q. Do you believe this filing is accurate in
10 those paragraphs?

11 MR. LEVY: Again, to comment on that he would
12 have to talk about client communications that are
13 privileged and might implicate privilege or
14 obligation were he to answer your question.

15 BY MR. DAVIS:

16 Q. Mr. Simpson, do you believe that any
17 confidentiality obligations regarding the memos did
18 not extend to law enforcement and intelligence
19 services?

20 A. Yes. I mean, I -- well, in general I
21 think that in the course of any sort of
22 confidential business lawyers or other
23 professionals engage in if they come across
24 information about a possible terrorist attack or a
25 mafia operation they should report it, yes, and

1 that that is, in fact, not covered by ordinary
2 confidentiality.

3 Q. Was Fusion aware of the reports that the
4 FBI considered -- let me rephrase. Was Fusion
5 aware that the FBI considered paying Mr. Steele to
6 investigate Mr. Trump and his associates?

7 A. When?

8 Q. At any time.

9 MR. LEVY: When you say "paying," what do you
10 mean by that?

11 MR. DAVIS: Providing money.

12 MR. LEVY: For a fee? Are you talking about
13 reimbursements?

14 MR. DAVIS: Fees or reimbursements in this
15 context.

16 BY THE WITNESS:

17 A. We've learned that. We know that now. In
18 fact, it was --

19 MR. LEVY: Learned what?

20 BY THE WITNESS:

21 A. Well, we learned -- sometime after the
22 election we learned that Chris had discussed
23 working for the FBI on these matters after the
24 election and that that didn't happen.

25 Q. Did Mr. Steele discuss that with you at

1 the time?

2 A. He didn't discuss it -- I don't remember
3 exactly when he mentioned this to me, but he
4 mentioned to me at some point I think after the
5 election that he had discussed this with them.

6 MR. FOSTER: So prior to news reports to that
7 effect? In other words, you learned it from him
8 not from the news; is that right?

9 MR. LEVY: Wait. You asked two different
10 questions. I'm trying to figure out which one you
11 want him to answer.

12 MR. FOSTER: The last one.

13 MR. LEVY: What was the last one?

14 MR. FOSTER: You learned it from the news and
15 not from him? Are you saying you learned it from
16 him?

17 MR. LEVY: Learned what from him?

18 MR. FOSTER: That he discussed with the FBI
19 having the FBI pay Mr. Steele.

20 MR. SIMPSON: I don't remember.

21 MR. LEVY: The witness is yawning. Let's
22 take a break.

23 MR. MUSE: We will attribute that to fatigue
24 as opposed to the questions.

25 MR. FOSTER: Let's go off the record. It is

1 3:55.

2 (A short break was had.)

3 MR. DAVIS: We'll go back on the record.

4 It's now 4:05. We'll continue with the questions.

5 BY MR. DAVIS:

6 Q. Mr. Simpson, did anyone from Fusion ever
7 communicate with the FBI regarding information in
8 the memoranda or other allegations regarding
9 Mr. Trump and his associates?

10 A. From Fusion, did anyone from Fusion
11 communicate with the FBI? No, no one from Fusion
12 ever spoke with the FBI, to the best of my
13 knowledge.

14 Q. Did you ever exchange any e-mails with
15 them?

16 A. We did not communicate with them by e-mail
17 either.

18 Q. Do you know any current or former FBI
19 personnel?

20 MR. LEVY: As a general matter?

21 MR. DAVIS: Yeah, as a general matter.

22 BY THE WITNESS:

23 A. As a general matter I'm sure I do. I know
24 current and former law enforcement officials. I go
25 to a lot of crime conferences and things like

1 that.

2 Q. Were any of them consulted as part of this
3 investigation?

4 A. Not to my recollection.

5 Q. Was the amount of Fusion's compensation in
6 the Trump investigation dependent on the FBI
7 initiating an investigation of Mr. Trump or his
8 associates?

9 A. No.

10 Q. Was the amount of Orbis's compensation
11 dependent on the FBI initiating an investigation of
12 Mr. Trump and his associates?

13 A. No.

14 Q. Other than Senator McCain, who we'll
15 discuss later, did Fusion or Orbis disclose any of
16 the memoranda information contained therein or
17 related information from Mr. Steele with any
18 elected officials or staff in Congress?

19 A. I don't recall having done so, no.

20 Q. If we could turn briefly back to Exhibits
21 4 and 5. I just want to reference two things.

22 MR. LEVY: I also want to clarify in the
23 premise of that question there were factual
24 assertions made that may or may not be true to
25 which the witness did not respond.

1 MR. DAVIS: Sure. Understood. To be clear,
2 we obviously were not referencing any disclosures
3 to this committee as part of the committee's
4 inquiry.

5 BY MR. DAVIS:

6 Q. So on Exhibit 4, page 3, paragraph 21A,
7 Mr. Steele's attorneys state that the post-election
8 dossier memoranda was provided to a senior United
9 Kingdom government national security official
10 acting in his official capacity. In Exhibit 5 on
11 page 2 -- I'm sorry -- page 5, the response to 13
12 similarly references disclosing that memoranda to
13 the UK national security official.

14 Mr. Simpson, to the best of your knowledge,
15 were the memoranda or information contained therein
16 disclosed to foreign governments?

17 A. I have no knowledge of this beyond what
18 you're showing me. I can tell you about, you know,
19 what I know about Chris's encounter with David
20 Kramer and how all that came about. If Chris
21 specifically said something to me about showing
22 this to one of his government officials I don't
23 remember it. So...

24 MR. LEVY: Why don't you walk them through.

25 BY THE WITNESS:

1 A. If you want to know the rest of the story,
2 I'm happy to walk you through it.

3 Q. Sure, we can do that.

4 A. So after the election obviously we were as
5 surprised as everyone else and Chris and I were
6 mutually concerned about whether the United States
7 had just elected someone who was compromised by a
8 hostile foreign power, more in my case whether the
9 election had been tainted by an intervention by the
10 Russian intelligence services, and we were, you
11 know, unsure what to do. Initially we didn't do
12 anything other than to discuss our concerns, but we
13 were gravely concerned.

14 At some point a few weeks after the election
15 Chris called me and said that he had received an
16 inquiry from David Kramer, who was a long-time
17 advisor to Senator McCain, and that according to --
18 Kramer told Chris that he had run into Sir Andrew
19 Wood at a security conference in Halifax,
20 Nova Scotia and that Kramer was accompanying
21 Senator McCain to this conference and that the
22 three of them had had an unscheduled or unplanned
23 encounter where the issue of this research was
24 discussed and the essence of it, I guess, was
25 conveyed to Senator McCain and to David Kramer from

1 Andrew Wood. I don't remember whether Andrew
2 Wood's name was specifically given to me by
3 Christopher Steele at that time. It was later
4 given to me. It later became an accepted fact that
5 Chris had mentioned him to me. I believe he
6 probably mentioned it.

7 But anyway, he did say someone that he worked
8 with in the past who was a former UK government
9 official with experience in Russia had had this
10 conversation with David Kramer and John McCain and
11 that Senator McCain had followed up on it as to
12 what more there was to know about these
13 allegations, this information.

14 So Chris asked me do you know David Kramer,
15 and I said yes, I've known David Kramer for a long
16 time. David Kramer is part of a small group of
17 people that I'm sort of loosely affiliated with.
18 We've all worked on Russia and are very concerned
19 about kleptocracy and human rights and the police
20 state that Russia has become, in particular the
21 efforts of the Russians to corrupt and mess with
22 our political system. So we shared this concern
23 going back to when I was at the Wall Street Journal
24 and that's how I met David. He was working at the
25 State Department as assistant secretary for human

1 rights, and I was reporting on human rights and
2 corruption in Russia.

3 So I told Chris he's legit. David is someone
4 I've known for a long time and he knows a lot about
5 these issues and he's very concerned about Putin
6 and the Kremlin and the rise of the new Russia and
7 criminality and kleptocracy. So he said, well, can
8 we trust him? And I said yes, I think we can trust
9 him. He says he wants information to give to
10 Senator McCain so that Senator McCain can ask
11 questions about it at the FBI, with the leadership
12 of the FBI. That was essentially -- all we sort of
13 wanted was for the government to do its job and we
14 were concerned about whether the information that
15 we provided previously had ever, you know, risen to
16 the leadership level of the FBI. We simply just
17 didn't know. It was our belief that Director Comey
18 if he was aware -- if he was made aware of this
19 information would treat it seriously.

20 Again, at this time, you know, while we
21 believed that we had very credible reporting here,
22 you know, what we really -- we just wanted people
23 in official positions to ascertain whether it was
24 accurate or not. You know, we just felt that was
25 our obligation. So I said to Chris I think we can

1 trust him, and he said okay. Well, he was here, I
2 met with him, and I told him what happened. Now
3 he's back in Washington and, you know, I'm going to
4 hand him to you.

5 I don't remember whether I called David or
6 David called me, I just don't remember, but we got
7 in touch and he, you know, asked me -- we met.

8 Q. And after you met how did he -- did you
9 provide the memoranda to --

10 MR. LEVY: Sorry. Finish your question.

11 BY MR. DAVIS:

12 Q. -- did you provide the memoranda to him?

13 MR. LEVY: The answer to that question might
14 implicate privilege and other obligations. So he's
15 going to decline to answer the question.

16 BY MR. DAVIS:

17 Q. Did Mr. Steele represent to you that Orbis
18 or Mr. Wood had initiated this contact with
19 Mr. Kramer and Mr. McCain to share the dossier
20 information?

21 A. Well, that has two parts on that question.
22 I think I can answer the first part which I think
23 answers the second. Anyway, he did not describe
24 this as having been initiated by Orbis. He
25 described this as a chance encounter at a security

1 conference where, you know, someone who had some
2 knowledge of these matters shared it with Senator
3 McCain and David Kramer and that caused David
4 Kramer to follow up with Chris and that it was
5 passive. In other words, it was initiated by
6 Mr. Kramer.

7 Q. Did Mr. Steele describe anyone else being
8 involved at the Halifax international security
9 conference in this discussion?

10 A. Not that I can recall.

11 Q. According to the official attendee list
12 for that conference, Mr. Akhmetshin was also there.
13 To the best of your knowledge, was he involved in
14 any capacity in the effort to discuss the dossier
15 information with Mr. Kramer and Mr. McCain?

16 A. That's the first time I've received that
17 information. So I don't have any knowledge.

18 Q. And you haven't spoken with Mr. Akhmetshin
19 about that, I assume?

20 A. No.

21 Q. In addition to the disclosures we have
22 already discussed, to whom did Fusion GPS provide
23 the memoranda, information contained therein, or
24 related information from Orbis?

25 MR. LEVY: Beyond what you've discussed?

1 MR. DAVIS: Anyone we've left out.

2 MR. LEVY: The answer to that might implicate
3 privilege or other obligations. So he's going to
4 decline to answer the question.

5 BY MR. DAVIS:

6 Q. To the extent there's any portion of the
7 answer to that question that would not implicate
8 those privileges, I would ask that you reveal
9 those.

10 A. I'm not sure I see how I could answer that
11 question without getting into privileged areas.

12 MR. FOSTER: Again, what privilege?

13 MR. LEVY: We can discuss it at the end.
14 It's a voluntary interview. He's declining to
15 answer that.

16 BY MR. DAVIS:

17 Q. Did any Fusion employees communicate with
18 any foreign governments or foreign intelligence
19 agencies about the memoranda or the information
20 contained therein?

21 A. I don't believe so, certainly not
22 knowingly.

23 Q. Did you and Mr. Steele ever discuss any
24 communications he had with foreign government
25 officials about the information in the memoranda?

1 A. It would be difficult -- nothing specific
2 that I recall. There are parts of the memos that
3 talk about information that foreign government
4 officials provided in the course of their research,
5 but beyond what's in the memos I don't really have
6 any recollection.

7 Q. Do you know who paid for Mr. Steele's trip
8 to Rome to meet with the FBI?

9 A. I have read recently that -- I think in a
10 letter from Senator Grassley that the FBI
11 reimbursed the expense, but to be clear, I mean,
12 that's it. He was, to my knowledge, not been
13 compensated for that work or any other work during
14 this time.

15 MR. FOSTER: I'm sorry. You're saying that
16 Fusion did not pay for the trip?

17 MR. LEVY: Go ahead and answer the question.

18 MR. SIMPSON: I don't think we did. I have
19 no information that we paid for it. Again, this
20 sort of emphasizes, you know, the point I was
21 making earlier which was this was something that I
22 considered to be something that Chris took on on
23 his own based on his professional obligations and
24 not something that was part of my project. So it
25 makes sense to me that he was reimbursed by them,

1 not us.

2 BY MR. DAVIS:

3 Q. To clarify, you were saying his
4 interactions with the FBI were not part of your
5 project?

6 A. They obviously grew out of the project,
7 but as he explained it to me, you know, when you
8 learn things in your daily life that raise national
9 security considerations you're obligated to report
10 them. So that wouldn't have anything to do with my
11 client's goals or project.

12 Q. But in your briefings with journalists you
13 did reference his interactions -- Mr. Steele's
14 interactions with the FBI, correct?

15 A. At some point that occurred, but I don't
16 believe it occurred until very late in the
17 process.

18 Q. Can you estimate when in the process?

19 A. It was probably the last few days before
20 the election or immediately thereafter.

21 Q. So the meetings in September that you
22 referenced, you didn't reveal Mr. Steele passing on
23 information to the FBI?

24 MR. LEVY: Can you repeat the question.

25 Sorry.

1 MR. DAVIS: So in your meetings with
2 journalists in September you didn't reference
3 Mr. Steele's interactions with the FBI or passing
4 on of information to them?

5 BY THE WITNESS:

6 A. I don't recall.

7 MR. DAVIS: I think my hour is up.

8 MR. FOSTER: Off the record at 4:21.

9 (A short break was had.)

10 MS. SAWYER: We'll go back on the record.

11 It's 4:30.

12 EXAMINATION

13 BY MS. SAWYER:

14 Q. I wanted to return to our conversation
15 about interactions that Mr. Steele had with the
16 FBI. We had been talking about a second time he
17 met in Rome. Besides that meeting and the first
18 meeting in early July, are you aware of any other
19 meetings or conversations that Mr. Steele had with
20 the FBI?

21 A. I think I was just recounting that he
22 vaguely said that he had broken off with them over
23 this concern that we didn't really know what was
24 going on. I'm sorry to be vague, but we just
25 didn't understand what was going on and he said he

1 had broken off with them.

2 Q. When you say "we" did not understand what
3 was going on, who are you referring to as the "we"?

4 A. Chris and I, mostly just the two of us.
5 There was a lot of public controversy over the
6 conduct of the FBI. I remember discussing it with
7 many people, but this conversation was between the
8 two of us.

9 Q. And what was the time frame of when Steele
10 said he had broken off with the FBI?

11 A. I can -- I don't know exactly, but it
12 would have been between October 31st and election
13 day.

14 MS. QUINT: October 31st was when you said
15 there was an article --

16 MR. SIMPSON: In the New York Times. There
17 was an article in the New York Times on
18 October 31st that created concern about what was
19 going on at the FBI.

20 MS. QUINT: Because it wasn't consistent with
21 your understanding of the investigation?

22 MR. SIMPSON: Exactly.

23 BY MS. SAWYER:

24 Q. And I think, just to be clear, this was an
25 article you had talked about that both revealed

1 that Director Comey had alerted Congress to
2 something about the Clinton e-mail investigation?

3 A. No. That happened a few days previous. I
4 don't know the exact date that he sent the letter
5 to Congress, but this was an article specifically
6 about -- it was disclosing the existence of an FBI
7 investigation of Trump's ties to Russia, which, to
8 my recollection, was the first time that anyone
9 reported that the FBI was looking at whether the
10 Trump campaign had ties to the Kremlin but at the
11 same time saying that they had investigated this
12 and not found anything, which threw cold water on
13 the whole question through the election.

14 Q. And was that -- just to tie it together
15 when you were talking previously, was that in
16 connection with your conversation with journalists
17 where you directed them to ask the FBI as to
18 whether there was an investigation going on?

19 A. I'm not going to get into specific news
20 organizations or reporters or stories, but I would
21 restate that this was during the period when we
22 were encouraging the media to ask questions about
23 whether the FBI was, in fact, investigating these
24 matters.

25 I'll add that, you know, a lot of what we

1 were talking to the media about were things in the
2 public record, specifically Carter Page, Paul
3 Manafort had resigned over allegations of illicit
4 relationships with Russian oligarchs and Ukrainian
5 oligarchs. So there was, you know, a lot of open
6 source public information pointing towards the
7 possibility that the Russians had infiltrated the
8 Trump campaign. So we spoke broadly to reporters
9 and encouraged them to look into this.

10 Q. And did you ever come to find out who the
11 journalists had spoken with at the FBI about the
12 existence of an investigation into Russian
13 interference and possible ties to the Trump
14 campaign?

15 A. No.

16 Q. So you had indicated that Mr. Steele said
17 he had -- I think your phrase was "broken off" with
18 the FBI. What did you understand that to mean?

19 A. That Chris was confused and somewhat
20 disturbed and didn't think he understood the
21 landscape and I think both of us felt like things
22 were happening that we didn't understand and that
23 we must not know everything about, and therefore,
24 you know, in a situation like that the smart thing
25 to do is stand down.

1 Q. And had he been reaching out affirmatively
2 to the FBI and providing them with information or
3 were they reaching out to him and he was simply
4 responding to their requests?

5 A. The first contact was initiated by Chris
6 to someone that he said he knew.

7 Q. And now you're just going back to the July
8 contact?

9 A. Yes. The September briefing or debriefing
10 in Rome I believe I understood -- to this day I
11 understand that to have been initiated by the FBI.
12 Subsequent contacts during this period I just don't
13 know.

14 Q. Do you know if there were any contacts
15 after that second meeting in Rome between then and
16 the point in time which occurred sometime between
17 October 31st and the election day when he stopped
18 communicating with the FBI, do you know if there
19 actually were any conversations or meetings between
20 Mr. Steele and the FBI?

21 A. He didn't literally tell me about specific
22 contacts. I just recall that there was -- that he
23 broke off, which implies that he told him he didn't
24 want to have anything more to do with them. I
25 believe he also mentioned that they didn't like

1 media coverage, that there was media coverage of,
2 you know, FBI interest in Donald Trump. I don't
3 know what it was that they didn't like.

4 Q. And I think you've already answered this
5 question, but to the best of your knowledge, did
6 Mr. Steele ever obtain payment from the FBI for
7 actual research that he was doing on Russian
8 interference or on possible ties between the Trump
9 campaign and Russia?

10 A. He told me he did not, and I have no
11 independent information other than what he told me.
12 I don't believe he ever received compensation for
13 working on anything related to Trump and Russia.

14 Q. I'm going to direct your attention back to
15 what we marked as Exhibit 3, which is the series of
16 memos that you had received from Mr. Steele in the
17 course of his work. We talked about the first memo
18 and we also talked about the second memo to some
19 degree. You were explaining to me why you believed
20 the second memo, which starts at page 41394, came
21 about, why he had generated that report or done
22 that research, and you had indicated that there was
23 much more public reporting on the hacking. I think
24 you had mentioned -- that's when you mentioned
25 Debbie Wasserman Schultz.

1 an American. And issues of Russian criminal
2 operations with names like Booktrap and Maddel
3 (phonetic) rings a bell to me or did ring a bell to
4 me at the time. There's been a great deal -- there
5 had been a great deal at this time even of U.S. law
6 enforcement activity against organized Russian
7 cyber crime operations.

8 Q. And this memo which is dated 26 July -- it
9 actually bears the date 2015.

10 A. I noticed that.

11 Q. Is that just, as far as you understand it,
12 a typo or mistake? Was it actually 2016?

13 A. Yes.

14 Q. Then similarly with what I have -- and I'm
15 just doing it in the order that it was Bates-
16 stamped and appeared on BuzzFeed -- there's a
17 two-page report and it bears the Bates Nos. 41397
18 and 41398 and it has a company report number
19 2016/095. This one has the title "Russia/U.S.
20 Presidential Election, Further Indications of
21 Extensive Conspiracy Between Trump's Campaign Team
22 and the Kremlin."

23 Did you do any independent verification of
24 these facts?

25 A. I did some work on aspects of this. We

1 were separately -- you know, my team and myself
2 were separately investigating various things in
3 here. So I can't talk about this as a
4 verification, but I was analyzing this.

5 MR. FOSTER: Speak up, please.

6 BY THE WITNESS:

7 A. I analyzed this information in the same
8 manner I analyzed the other stuff.

9 Q. So based on the work that you were doing,
10 did any of that independent work that you did alter
11 the content of this?

12 A. No.

13 Q. So it was in addition to whatever was
14 provided in this memo, this two-page memo?

15 A. Yes, that's right.

16 Q. And to the best that you can recall, can
17 you tell us what you were learning at the same time
18 about the topics covered in this memo?

19 A. Yes. Could I just clarify something? I
20 assume this is exactly how it was published and
21 someone mixed up the sequence of the memos. So the
22 next memo's numbered 94 and is dated July 19th and
23 this one is 95 and is not dated, I don't believe.
24 Maybe that's why they got mixed up.

25 But in any event, what I would loosely call

1 the Carter Page memo came before this conspiracy
2 memo. So with that caveat I can say we were
3 investigating just based on open sources and, you
4 know, other methods, more public information Carter
5 Page's trip to Russia. We watched tapes of it, we
6 did background work on Carter Page, I did research
7 on his business dealings, and in the course of
8 trying to analyze -- you know, this is some new
9 detail here about how the operation is working in
10 the Kremlin and how they are trying to use
11 influence and it comports with my knowledge and
12 Chris's knowledge of how the Kremlin does this,
13 which is they offer people business deals as a way
14 to compromise them. And, in fact, you know, to my
15 knowledge, this is a much bigger issue than
16 personal indiscretions when it comes to the way the
17 Kremlin operates and is something I know a fair bit
18 about.

19 So we looked into Carter Page and we also
20 looked into Igor Sechin and whether Sergei Ivanov
21 was in a position to be managing the election
22 operation, which is what 94 talks about, and we
23 determined that he was. I, you know, independently
24 verified he does have a deputy who's very obscure
25 named Igor Divyekin. It's spelled two different

1 ways here. I believe the correct spelling is
2 D-I-V-Y-E-K-I-N.

3 MR. MUSE: Can you give the Bates number of
4 the document you're looking at.

5 MR. SIMPSON: This one is 41399.

6 BY MS. SAWYER:

7 Q. And just for the record, it's a two-page
8 document, 41399 to 41400, and it has the date, I
9 think you indicated before, 19 July 2016. Is this
10 the memo that you said you referred to as the
11 Carter Page memo?

12 A. Yes.

13 Q. And you were explaining that in the
14 sequencing this one came before the document that
15 actually in terms of Bates numbers --

16 A. Right.

17 Q. -- comes before it which we had talked
18 about which had the company report No. 095. So 94
19 came to you before 095 -- report No. 095; is that
20 correct?

21 A. That's my recollection.

22 Q. So with regard to the research you were
23 also doing, is it also just true that whatever
24 independent research you were doing did not then
25 get incorporated into document company report

1 2016/94, the Carter Page memo?

2 A. That's correct. We essentially segregated
3 this reporting from other things we were doing for
4 reasons we discussed earlier. A lot of this is
5 human intelligence, it's not the kind of thing that
6 you would share with almost anyone basically. A
7 lot of the work that we do is public record
8 research. Generally speaking, most of this
9 information is useful for making decisions and
10 trying to understand what's going on, but it's
11 not -- doesn't have much use beyond that unless you
12 can independently verify it. So our reports are
13 full of footnotes and appendices and court records
14 and that sort of thing.

15 Q. So is it fair to characterize the research
16 that you were doing as kind of a separate track of
17 research on the same topic sometimes?

18 A. I think so. I wouldn't say it was
19 completely separate because, for instance, on some
20 subjects I knew more than Chris. So when it comes
21 to Paul Manafort, he's a long-time U.S. political
22 figure about whom I know a lot. But his
23 reporting -- you know, so there may have been some
24 bleed between things I told him about someone like
25 Manafort, but most of these characters neither of

1 us know much about and it's really just he's
2 faithfully reporting information to him that's
3 being reported to him by his network.

4 In British intelligence the methodology's a
5 little different from American intelligence.
6 There's a practice of being faithful to what people
7 are saying. So these are relatively
8 straightforward recitations of things that people
9 have said. Obviously as we talked about before,
10 you know, disinformation is an issue that Chris
11 wrestles with, has wrestled with his entire life.
12 So if he believed any of this was disinformation,
13 he would have told us.

14 Q. And did he ever tell you that information
15 in any of these memos, that he had concerns that
16 any of it was disinformation?

17 A. No. What he said was disinformation is an
18 issue in my profession, that is a central concern
19 and that we are trained to spot disinformation, and
20 if I believed this was disinformation or I had
21 concerns about that I would tell you that and I'm
22 not telling you that. I'm telling you that I don't
23 believe this is disinformation.

24 Q. And then on the memo, the Carter Page
25 memo, which is company report 2016/94, you said

1 that you had done -- you, Fusion -- you, Glenn
2 Simpson had done some research into Carter Page,
3 including Mr. Page's business dealings?

4 A. Yes.

5 Q. Is that information that you still have?

6 A. I don't know. I haven't looked for it. I
7 don't know.

8 Q. You also specifically mentioned Igor
9 Sechin and maybe work that you had done research
10 into Sechin. Is that work that you would also
11 still have?

12 A. I don't know if I have anything specific
13 on Sechin. Sechin is a well-known character. I
14 collect, you know, research on various people who
15 are oligarchs or mafia figures. I don't think I
16 have any specific reports on Sechin, but I know a
17 lot about him. He's, you know, sort of Putin's
18 No. 1 compadre in the kleptocracy.

19 Q. And with regard to Carter Page, did you
20 reach any findings, conclusions about his business
21 dealings, about him, about his connections in
22 particular to, you know, Russia?

23 A. Yes.

24 Q. And can you share what those were?

25 A. Carter Page seemed to us to be a typical

1 person who the Russians would attempt to co-opt or
2 compromise or manipulate. He was on the younger
3 side, a little bit -- considered to be a striver
4 who was ambitious and not terribly savvy, and those
5 are the kind of people that the Russians tend to
6 compromise. That was the general sense we had. He
7 was also, you know, from early on described as
8 somewhat eccentric.

9 There was a -- I remember quite clearly there
10 was a bit of a -- when we were talking to reporters
11 about him because he was all over the news for this
12 trip to Russia and we had done -- there was a fair
13 amount of open source on his consulting firm, his
14 complaint that he'd lost money on Russian
15 investments and he owned stock in Gazprom and he
16 was really mad about the sanctions and he went over
17 there in this hastily-arranged trip to speak to
18 this school and that was all pretty unusual, but
19 there's a lot of skepticism in the press about
20 whether he could be linked between the Kremlin and
21 the Trump campaign because he seemed like a zero, a
22 lightweight.

23 I remember sort of not being able to kind of
24 explain to people that's exactly why he would end
25 up as someone who they would try to co-opt. Of

1 course, you know, when we talk about things in the
2 dossier that are confirmed, this is one of the
3 things that I think really stands out as notable,
4 which is that Chris identified Carter Page as
5 someone who had -- seemed to be in the middle of
6 the campaign, between the Trump campaign and the
7 Kremlin, and he later turned out to be an espionage
8 suspect who was, in fact, someone that the FBI had
9 been investigating for years.

10 Q. So beyond what is in the dossier, did you
11 kind of find any evidence that he had actually been
12 compromised? Now I'm speaking of Carter Page.

13 A. Well, the definition of compromised is
14 someone who has been influenced sometimes without
15 even their knowledge. We had reason to believe
16 that he had, in fact, been offered business deals
17 that were -- that would tend to influence him,
18 business arrangements.

19 Q. And do you have the records of those
20 business deals that you had collected?

21 A. Yeah. I don't think so. Most of that
22 was, in fact, reporting that we did with other
23 people who knew him from the business world.

24 Q. And then just the next memo that we had
25 touched on, 2016/95, it has Bates numbers 41397 to

1 398, it does not bear a date on it. Do you recall
2 roughly when you received this particular report?

3 A. Sometime in midsummer.

4 Q. The next report, which is 2016/097 which
5 is two pages, has the date of 30 July 2016. Just
6 by the numbers it would appear to maybe have come
7 between those two. Does it seem logical that it
8 came sometime between July 19th and July 30th?

9 A. That seems logical.

10 Q. And then just in general, with regard to
11 this particular memo did you do any research to
12 verify this information that was in this memo?

13 MR. LEVY: Beyond what he said as a general
14 matter?

15 MR. MUSE: I'm sorry. You were going back
16 and forth. Which one in particular?

17 MS. SAWYER: This is memo No. -- it has
18 Company Intelligence Report 2016/095, it's Bates
19 numbers 41397 and 41398.

20 MR. MUSE: Thank you.

21 BY MS. SAWYER:

22 Q. Was there particular information in this
23 memo that you did verify?

24 A. One of the things I did, which is pretty
25 typical of how I would sort of analyze things, was

1 I looked at the Russian pension system to determine
2 if, in fact, the Russian government was
3 distributing lots of pension payments to Russian
4 immigrants in the United States, and I found some
5 reports from the Social Security Administration and
6 other places describing this system.

7 Basically because everyone in Russia, you
8 know, more or less works for the government,
9 there's a lot of -- there's a large number of
10 Russian emigres in the United States who receive
11 pension payments that are paid through the
12 embassies and various people, Russian lawyers and
13 others who we became interested in in the course of
14 this investigation seem to be involved in that
15 process. I'm not saying they did anything illegal.
16 I'm just saying, you know, we looked at this
17 system, and as someone who does a lot of money
18 laundering work this was an interesting thing that
19 I hadn't heard about.

20 There's all this money flowing in the United
21 States from Russia, it probably flows in under some
22 sort of diplomatic status. So if there's sanctions
23 on Russia and the Russians can't move money in the
24 United States for most things, this would, in fact,
25 be an ideal mechanism for moving money into the

1 United States for whatever purpose, for some kind
2 of illicit purpose. I think that's a pretty good
3 example of the kind of general work I would do to
4 determine whether there's some base level of
5 credibility to the things we're getting.

6 Q. And in answering that you said that some
7 of the officials that you had identified as
8 involved in this effort seemed to come up with
9 regard to the pension disbursements. Who
10 specifically are you referring to?

11 A. We identified a lawyer in Sunny Isles
12 Beach, Florida who said she previously worked for
13 Gazprom and just had on her professional Website or
14 someplace that she was -- she had some kind of
15 relationship with the Russian embassy in dealing
16 with these pension issues.

17 Q. And do you recall that lawyer's name?

18 A. I don't.

19 Q. Anyone else besides that individual?

20 A. If I could look at this for a second.

21 Q. Sure.

22 (Reviewing document.)

23 BY THE WITNESS:

24 A. I don't have a clear recollection of this.
25 I'm sorry. I thought there was another name in

1 here that we had looked at, but I don't see it in
2 this memo.

3 Q. To the extent you have records about this
4 and the individual in Sunny Isles, would you at
5 least look for them and let us know whether you
6 would be willing to provide them to the committee?

7 MR. LEVY: Counsel has the request.

8 BY MS. SAWYER:

9 Q. Just moving on to the next memo, which is
10 Company Intelligence Report 2016/097, it bears the
11 Bates Nos. 401 and 41402, it's a two-page memo
12 dated 30 July 2016. Again, when you take a look at
13 that, was there anything that you independently
14 verified that comes out of this memo?

15 (Reviewing document.)

16 BY THE WITNESS:

17 A. I don't think so.

18 Q. Okay. Then Company Intelligence Report
19 2016/100, was there any information there that you
20 either independently verified or had independent
21 research on any of the individuals mentioned in
22 there? It mentions Sergei Ivanov, Dmitry Peskov.

23 MR. MUSE: If I may, some clarification.

24 When you say is there anything that you
25 independently verified that comes out of the memo,

1 are you talking -- it's a little confusing because
2 the memo comes in, he already knows some
3 information, but I think he's generally said that
4 he's not doing a draft of the memo beforehand and
5 yet your question seems to permit that possibility.

6 MS. SAWYER: No. I appreciate the
7 clarification.

8 BY MS. SAWYER:

9 Q. Just to be clear, I'm not trying to --
10 what we're trying to determine is is there
11 information that either you had in your possession
12 that corroborated and verified this or even went
13 beyond what was in this and amplified information
14 on any of these individuals relevant to Russia's
15 interference or possible ties with the Trump
16 campaign?

17 A. Yes. I'm trying to be as helpful as I
18 can. The thing that we worked on with regard to
19 Sergei Ivanov, who was the head of what's called
20 the head of administration which we confirmed from
21 open sources is kind of an internal Kremlin
22 intelligence operation, and that Ivanov according
23 to experts on Russia, the Russian military, Russian
24 intelligence, does, in fact, run this internal
25 Kremlin intelligence operation that sort of sits

1 atop the FSB and the SVR, the GRU, which are the
2 other agencies specifically tasked with areas of
3 intelligence, military for the GRU, foreign for the
4 SVR, domestic for the FSB.

5 Before I got this memo I didn't know about
6 this internal Kremlin structure. It was either
7 this one or the previous one. So in the course of
8 saying who is this Ivanov guy, you know, we looked
9 at Ivanov and found journal articles and other
10 public information about his long history of
11 intelligence. He's a veteran of the FSB, his long
12 history with Vladimir Putin, and his role atop this
13 internal operation.

14 In particular I remember reading a paper by a
15 superb academic expert whose name is Mark Galeotti,
16 G-A-L-E-O-T-T-I, who's done a lot of work on the
17 Kremlin's black operations and written quite widely
18 on the subject and is very learned. So that would
19 have given me comfort that whoever Chris is talking
20 to they know what they're talking about.

21 Q. With regard to that just in general, I did
22 want to ask you not to identify based on the
23 particular sources, but did Mr. Steele ever share
24 with you who his sources were?

25 MR. LEVY: That conversation, if it occurred,

1 would implicate obligations and he's going to
2 decline to answer that question.

3 MS. SAWYER: And is that based just on the --
4 can you just articulate the obligations so we can
5 understand them.

6 MR. LEVY: It's a very sensitive security
7 issue and I just don't -- in a transcript where
8 there's no assurance of confidentiality it's not a
9 discussion we want to have here.

10 BY MS. SAWYER:

11 Q. And do you know whether he shared his
12 sources with the FBI?

13 A. I don't. I don't know.

14 MR. FOSTER: What was the answer?

15 MR. SIMPSON: Sorry. I don't know whether he
16 shared his sourcing with the FBI.

17 MS. SAWYER: Can we just take a minute. We
18 can go off the record for a minute.

19 (A short break was had.)

20 MS. SAWYER: Just with sensitivity toward the
21 lateness of the day and in the interest of time it
22 would just be helpful -- and I'll give you as much
23 time as you need to take a few minutes and, if you
24 could, look through the remaining memos and let us
25 know if anything kind of stood out to you, if there

1 were things that either did not ring true at the
2 time and that you were concerned about or things in
3 particular that in addition to what's in here you
4 had independent research about that you could share
5 with the committee in the context of our
6 investigation. Is that a clear request?

7 MR. MUSE: Heather, may I make a suggestion?

8 MS. SAWYER: Sure.

9 MR. MUSE: Why don't we break for a few
10 minutes so he can look at it, but here's a bigger
11 problem and I don't mean this as criticism
12 particularly with regard to the sensitivity as to
13 time. The difficulty is in summary questions
14 there's sometimes the problem that is created when
15 you try to sort of do a wholesale commentary,
16 particularly after it's been sort of more
17 focused --

18 MS. SAWYER: I understand where you're going.
19 So yeah. I don't want to put us in a position
20 where --

21 MR. LEVY: Let's just take some time for the
22 witness to review the document.

23 MS. SAWYER: Why don't you take a little bit
24 of time.

25 MR. MUSE: In that spirit maybe you could

1 look in case you have a more focused inquiry too.

2 MS. SAWYER: We can certainly do that. Why
3 don't we take a five-minute break and I'll ask
4 whatever remaining questions we have on the
5 dossier.

6 MR. FOSTER: We'll go off the record at 5:11.
7 (A short break was had.)

8 MS. SAWYER: We're back on the record at
9 5:20.

10 BY MS. SAWYER:

11 Q. We appreciate you are walking through some
12 of these and we understand your general practice
13 and I want to make sure I'm characterizing this
14 accurately. When you would get the memos you
15 would -- from Mr. Steele you would review them, you
16 would see if they resonated with information that
17 you already knew and other research you may already
18 have done. I think you already told me that you
19 don't recall at the time anything jumping out at
20 you as patently inaccurate; is that fair to say?

21 A. Yes, that's fair to say.

22 Q. And I had just asked you to review and I
23 appreciate you taking the time to review the
24 additional memos which would just run from Bates
25 No. 41405 to 41425 to just try to determine for the

1 committee if research that you had been doing on
2 the separate track on some of these topics in
3 particular amplified the work in the dossier.

4 MR. LEVY: When you say "amplified the work
5 in the dossier," what do you mean?

6 MS. SAWYER: Both kind of verified and maybe
7 gave you some additional information and insights
8 on either the factual allegations in them or
9 whether or not the key players identified had also
10 engaged in either similar or related behavior on
11 Russian -- you know, related to Russian
12 interference.

13 BY THE WITNESS:

14 A. I'd say that's generally right. I read a
15 lot of books and studies on Russia and organized
16 crime. So over the years I just have a lot of
17 residual knowledge of some of the people and
18 subjects that are covered in the memos.

19 Q. Okay. So nothing certainly jumped out at
20 you and then as --

21 A. Nothing jumped out at me --

22 Q. -- as inconsistent with information that
23 you had gained from other sources?

24 A. That's correct.

25 Q. And did you have any reason to believe

1 either then or now that Mr. Steele would have kind
2 of fabricated any of the information that he
3 included in any of these memos?

4 A. No.

5 Q. I do want to return to a few of the topics
6 and a few of the specifics, but I think I'll hold
7 that until the next round because I have a few
8 other just follow-up questions for you.

9 It had come up in the last round that there
10 was a meeting and some information was provided to
11 Mr. Kramer. Were you still -- at the time that
12 occurred were you, Fusion GPS, still working on
13 behalf of a client who had engaged you to do
14 research as part of the presidential election
15 campaign or did that occur after that engagement
16 ended?

17 A. It occurred after the engagement had
18 ended.

19 Q. And besides Mr. Steele, did you discuss
20 sharing information with Mr. Kramer with anyone
21 else?

22 A. Not that I recall.

23 Q. My colleagues had also asked you about
24 meetings and particularly that occurred between
25 June 8th and June 10th of 2016 and some of the

1 individuals involved in those meetings. As a
2 general matter, did you discuss the work you were
3 doing related to the presidential election campaign
4 with -- did you ever discuss that with Natalia
5 Veselnitskaya?

6 A. I don't believe I ever discussed it with
7 her. I'd just add that she doesn't speak much
8 English. So the possibilities are almost none. I
9 didn't discuss it with her.

10 Q. Do you have any reason to believe that she
11 knew that you were doing work -- opposition
12 research work on then Candidate Trump?

13 A. No.

14 Q. Do you have any reason to believe that she
15 knew that Christopher Steele was doing work for you
16 as part of that project, the opposition research on
17 Candidate Trump?

18 A. No.

19 Q. What about Rinat Akhmetshin, did you ever
20 talk with Rinat Akhmetshin about the fact that you
21 were doing opposition research on Candidate Trump?

22 A. Not that I recall, no.

23 Q. Do you have any reason to believe that
24 Christopher Steele ever spoke with Rinat Akhmetshin
25 about the fact that Christopher Steele had been

1 engaged by you to do work -- related to the
2 opposition work on then Candidate Trump?

3 A. Do I have any reason to believe that he
4 spoke? No, I have no reason to believe he did.

5 Q. Do you know if he did or not?

6 A. It's never -- we've never discussed it,
7 but I have no reason to think he would have.

8 Q. And if he had discussed it, would that
9 have been consistent with the nondisclosure
10 agreement that you indicated you would have had
11 with Mr. Steele?

12 A. That would -- if he discussed it with
13 someone like that without my knowledge, it would
14 not have been consistent with our agreement.

15 Q. And then given that, would it surprise you
16 if Mr. Steele had talked with Rinat Akhmetshin
17 about the work he was doing related to then
18 Candidate Trump?

19 A. Yes, that would surprise me.

20 Q. Did you discuss the fact that you were
21 doing opposition research on Candidate Trump with
22 anyone at Prevezon Holdings?

23 A. Not that I recall, no.

24 Q. And if you had done so, would that have
25 been consistent with your confidentiality

1 obligations to that client?

2 A. No, it wouldn't have been consistent.

3 Q. Did you speak with anyone at Baker
4 Hostetler about the work that you had been engaged
5 to do on then Candidate Trump?

6 A. Not that I recall.

7 Q. So the point in time at which you were in
8 meetings that included -- the meetings that you had
9 related to the Court hearing at Prevezon that
10 you've already discussed, the dinner, the Court
11 hearing, and then a subsequent dinner, they occur
12 right around the same time that Natalia
13 Veselnitskaya and Rinat Akhmetshin and the
14 individual you described as a translator, Anatoli
15 Samochornov, met -- or it has been reported met
16 with individuals in the Trump campaign. Did that
17 topic just never come up during those three days?

18 A. It never came up. I don't know what else
19 to say. It never came up.

20 Q. So you at the time had no idea that they
21 were meeting with or met -- and actually, in fact,
22 met with members of the Trump campaign?

23 A. I didn't have any idea about that meeting
24 until quite recently.

25 Q. So in an August 1, 2017 news briefing

1 White House Press Secretary Sarah Huckabee Sanders
2 said "The Democrat linked firm Fusion GPS actually
3 took money from the Russian government while it
4 created the phoney dossier that's been the basis
5 for all of the Russia scandal fake news." What is
6 your response to that statement?

7 A. It's not true?

8 Q. And what in particular is not true about
9 it?

10 A. Well, it's a false allegation leveled by
11 William Browder before this committee and in other
12 places for the purpose of his advantage. She's
13 repeating an allegation that was aired before this
14 committee and in other places that we were working
15 for the Russian government and it's not true.

16 Most importantly the allegation that we were
17 working for the Russian government then or ever is
18 simply not true. I don't know what to say. It's
19 political rhetoric to call the dossier phoney. The
20 memos are field reports of real interviews that
21 Chris's network conducted and there's nothing
22 phoney about it. We can argue about what's prudent
23 and what's not, but it's not a fabrication.

24 Q. And I think you've already answered you
25 contend that you were not taking money from the

1 Russian government and that was in relation to the
2 litigation work you had done with Baker Hostetler,
3 correct?

4 A. Yes. They are a well-regarded law firm
5 that has obligations to determine the sources of
6 funds when they take a client and, to my knowledge,
7 they did so and the money was not coming from the
8 Russian government.

9 Q. So that was for the Prevezon work for
10 Baker Hostetler. Did you take money in any way,
11 shape, or form that could be attributed to the
12 Russian government for the work that you were
13 doing -- the opposition research work that you were
14 doing on then Candidate Trump?

15 A. No.

16 Q. Did, to the best of your knowledge,
17 Mr. Steele take money in any way, shape, or form
18 that could be attributed to the Russian government
19 for the work that he did on the memos as part of
20 the opposition research on Candidate Trump?

21 A. No.

22 I'll add one more thing to the response to
23 Sarah Huckabee Sanders, which is her assertion that
24 we are a Democrat linked opposition research firm.
25 I think I addressed this earlier, but to be clear,

1 we don't have a business of -- we're not an
2 appendage to the Democratic party. We run a
3 commercial business, we're all ex-journalists. We
4 take clients from both sides of the aisle. We have
5 a long history of that, I'm proud of that. I'm
6 happy to say I have lots of Republican clients and
7 friends.

8 Q. To the extent there have been allegations
9 or indications that the work that Mr. Steele did,
10 his research into Russian interference in the 2016
11 election, or your work could have been influenced
12 by Rinat Akhmetshin, do you believe that is true
13 and if -- do you believe it's true?

14 A. No.

15 Q. Do you believe that the work that
16 Mr. Steele did on Russian interference and possible
17 ties to the Trump campaign or your work could have
18 been influenced by Natalia Veselnitskaya?

19 A. No.

20 MS. SAWYER: I think my time is up for this
21 round. So I appreciate your patience and we'll
22 take a break.

23 MR. FOSTER: It's 5:34.

24 (A short break was had.)

25 MR. DAVIS: We'll go back on the record.

1 It's 5:43 p.m.

2 EXAMINATION

3 BY MR. DAVIS:

4 Q. Mr. Simpson, could you walk us through
5 your itinerary to the best you remember it from
6 June 8th through 10th of 2016, especially any
7 interactions you had with Prevezon team members
8 during those three days?

9 MR. LEVY: Beyond what he's discussed today?

10 MR. DAVIS: Yes.

11 BY THE WITNESS:

12 A. I took the train to New York. I don't
13 recall, but I may have had other business. I don't
14 remember. I think there was a dinner. I went back
15 to my hotel, went to bed. Got up the next morning.
16 I don't remember the sequence, but I remember
17 meeting with Weber Shandwick, the PR firm, about
18 preparations for -- I think we expected there was
19 going to be a trial. I think that's what it was
20 about. It might have been about the press coverage
21 of the hearing. I just don't remember. I went to
22 the hearing and I think -- if I remember the
23 sequence correctly, I went to the hearing, then I
24 had the meeting with those guys, the Weber
25 Shandwick guys, and then I hightailed it home. My

1 son's junior prom was that night or senior prom and
2 I was under some pressure to go home and be a dad.

3 Q. And then on the 10th, that first day back
4 in D.C.?

5 A. I don't think that was my first day back.
6 I was back the evening of the 9th.

7 Q. Sorry. The first full day.

8 A. I think it was a weekend. So I don't know
9 what I was doing. Probably just relaxing. I went
10 to the dinner, it was at a restaurant called
11 Barcelona up on Wisconsin Avenue, it was a social
12 occasion. I brought my wife, other people brought
13 their wives. We talked about books and other other
14 nongermane topics. It was just a social
15 occasion.

16 (Exhibit 6 was marked for
17 identification.)

18 BY MR. DAVIS:

19 Q. I'm going to show you an exhibit. I think
20 we're on 6. We understand these are meeting notes.
21 Do these phrases about -- including Mr. Browder
22 mean anything to you or relate to any of the
23 research that you conducted or otherwise aware of
24 regarding Mr. Browder?

25 MR. LEVY: When say "meetings notes," meeting

1 notes about what meeting?

2 MR. DAVIS: These are the meeting notes from
3 the June 9th meeting at Trump Tower. These are
4 Mr. Manafort's notes or they're contemporaneous.

5 BY THE WITNESS:

6 A. I could tell -- obviously you know who
7 Bill Browder is. Cyprus Offshore, Bill Browder's
8 structure, you know, investment -- Hermitage
9 Capital, his hedge fund, set up numerous companies
10 in Cyprus to engage in inward investment into
11 Russia, which is a common structure, both partially
12 for tax reasons but also to have entities outside
13 of Russia, you know, managing specific investments.
14 I can only tell you I assume that's what that
15 references. I don't know what the 133 million --

16 MR. FOSTER: Can I interrupt? And you know
17 that from research that you did and provided to --

18 MR. SIMPSON: Yes.

19 MR. LEVY: Let him finish.

20 MR. FOSTER: -- research that you did and
21 provided to Baker Hostetler and their client?

22 MR. SIMPSON: Yes. There was a -- I can
23 elaborate a little bit. As part of the research
24 into how Hermitage Capital worked we looked at
25 various things, their banking relationships, the

1 way they structured their investments in Russia. I
2 don't remember how many, but there was a large
3 number of shell companies in Cyprus that were used
4 to hold the investments of individual clients of
5 Hermitage. So one of the things we discovered from
6 that was the likely identities of some of
7 Hermitage's clients.

8 BY MR. DAVIS:

9 Q. Do any of the other entries in here mean
10 anything to you in light of the research you've
11 conducted or what you otherwise know about
12 Mr. Browder?

13 A. I'm going to -- I can only speculate about
14 some of these things. I mean, sometimes --

15 MR. LEVY: Don't speculate.

16 BY THE WITNESS:

17 A. Just would be guesses.

18 Q. Okay.

19 A. I can skip down a couple. So "Value in
20 Cyprus as inter," I don't know what that means.
21 "Illici," I don't know what that means. "Active
22 sponsors of RNC," I don't know what that means.
23 "Browder hired Joanna Glover" is a mistaken
24 reference to Juliana Glover, who was Dick Cheney's
25 press secretary during the Iraq war and associated

1 with another foreign policy controversy. "Russian
2 adoptions by American families" I assume is a
3 reference to the adoption issue.

4 Q. And by "adoption issue" do you mean Russia
5 prohibiting U.S. families from adopting Russian
6 babies as a measure in response to the Magnitsky
7 act?

8 A. I assume so.

9 Q. The information here, is this generally
10 consistent with the type of information you or
11 Baker Hostetler were providing about Mr. Browder
12 and his activities?

13 MR. LEVY: Can you repeat that question.

14 MR. DAVIS: Is the information here, to the
15 best you can decipher it, consistent with the
16 information that you and Baker Hostetler and HRAGI
17 were relaying to other parties about Mr. Browder's
18 activities?

19 MR. LEVY: He's just told you that a lot of
20 what's here he doesn't know what it means, he
21 doesn't have knowledge or recollection as to these
22 terms.

23 MR. DAVIS: The parts you do recognize.

24 BY THE WITNESS:

25 A. Couple of the items touch on things that I

1 worked on, Cyprus, Bill Browder.

2 Q. I'm going to jump back to the Russia
3 investigation. You'd mentioned before you've had
4 some subcontractors that you've worked with long
5 enough that you call them super subs; is that
6 correct?

7 A. Yes.

8 Q. Orbis or Mr. Steele, is that one such
9 super sub in your opinion?

10 A. It's a loose term. We don't have a list
11 of super subs.

12 MR. FOSTER: Is he one of them?

13 MR. SIMPSON: There is no list. So I can't
14 tell you if he's one of them. He's a reliable
15 subcontractor who's worked with us in the past and
16 we've been very satisfied with the quality of his
17 work.

18 MR. LEVY: Just to reiterate, I think as you
19 described these super subs earlier loosely, even
20 with some of these super subs Mr. Simpson said that
21 he would talk about clients only on a need-to-know
22 basis even with the super subs, so-called.

23 BY MR. DAVIS:

24 Q. Beyond the memoranda prepared by
25 Mr. Steele, did Fusion create any other work

1 product relating to this investigation?

2 MR. LEVY: Which investigation?

3 MR. DAVIS: The investigation into Mr. Trump
4 and his associates.

5 MR. LEVY: In addition to what?

6 MR. DAVIS: Sorry. The investigation into
7 Mr. Trump and his associates.

8 MR. LEVY: I'm sorry. Just repeat the whole
9 question.

10 MR. DAVIS: Sure. In addition to the
11 memoranda compiled by Mr. Steele, did Fusion itself
12 create any other work product as part of this
13 investigation?

14 MR. LEVY: I just want to make sure there's
15 no confusion. It wasn't Fusion that created the
16 memoranda.

17 MR. DAVIS: Right, but it was a subcontractor
18 giving it back to Fusion.

19 MR. LEVY: That's correct.

20 BY MR. DAVIS:

21 Q. With that understanding, did Fusion create
22 any work product of its own?

23 A. Yes.

24 Q. And can you describe what type of work
25 product that was?

1 A. I believe I described it before. We do a
2 lot of public records research, things that are in
3 the news, things that are in court documents. We
4 summarize those things and try to document, you
5 know, and attach them to the underlying source
6 material.

7 Q. So you create sort of summary memoranda of
8 those documents?

9 A. Yes.

10 Q. Okay. And to whom is that distributed?

11 MR. LEVY: As a general matter?

12 MR. DAVIS: Well, within the course of this
13 investigation.

14 MR. LEVY: Inasmuch as that answer calls for
15 client communications the answer might be
16 privileged, might touch on obligations Mr. Simpson
17 has. So he's not going to answer that question.

18 MR. FOSTER: Did you provide work product to
19 your client?

20 MR. LEVY: Again, the answer to that question
21 might implicate privilege or his obligations.

22 BY MR. DAVIS:

23 Q. Is the version of the Steele memoranda
24 that was published by BuzzFeed identical to the
25 version that Orbis provided Fusion?

1 A. To my knowledge, yes.

2 Q. The version published by BuzzFeed contains
3 several redactions, not merely the ones by
4 Mr. Gubarev, G-U-B-A-R-E-V, that were later added.
5 Were those redactions in the versions Mr. Steele
6 provided to you?

7 MR. LEVY: So wait. You're asking about the
8 version in Exhibit 3?

9 MR. DAVIS: Right.

10 MR. LEVY: And you're asking if the
11 redactions that appear here were delivered to
12 Fusion?

13 MR. DAVIS: Right.

14 BY THE WITNESS:

15 A. No.

16 Q. Do you know who added those redactions?

17 A. No.

18 Q. Did any version of the memoranda list
19 source and subsorce names rather than referring to
20 sources anonymously?

21 A. I'm not sure I understand the question.

22 Q. In the version that we have as an exhibit
23 obviously it doesn't give identifying information
24 for sources, it says source A, subsources, things
25 like that. Was there ever a version that listed

1 the actual source names rather than substituting
2 them?

3 A. These are the versions that we received.

4 Q. They're what?

5 A. These are the memos that we received.

6 Q. Those are the memos you received. Okay.

7 MR. FOSTER: But he's asking if you received
8 any other memos that listed the sources?

9 MR. LEVY: He did not -- what I think he said
10 is that he did not receive any versions of these
11 memos that listed the sources.

12 MR. FOSTER: Okay. Did you receive any other
13 documentation from Mr. Steele that listed the
14 sources?

15 MR. SIMPSON: I don't want to get into source
16 information.

17 BY MR. DAVIS:

18 Q. Again, I don't want to repeat questions
19 that have been asked, but I don't want to
20 unintentionally omit anything. Did the version
21 provided to the FBI include all source names?

22 A. I don't know that there was a version
23 provided to the FBI.

24 Q. When Mr. Steele first met with the FBI in
25 the summer of 2016 do you know if he provided the

1 first memoranda that he created?

2 MR. LEVY: He's already answered that
3 question.

4 BY THE WITNESS:

5 A. No, I don't know.

6 Q. Do you know if he provided any other
7 memoranda to the FBI on a rolling basis at all at
8 any point?

9 MR. LEVY: He's answered that question too.

10 BY THE WITNESS:

11 A. I don't know.

12 Q. So I'd like to go back to Exhibit 4, I
13 believe. On page 3, paragraph 18 Mr. Steele's
14 attorneys are describing the December memoranda and
15 they state "The Defendants" -- again, that's
16 Mr. Steele and Orbis -- "continued to receive
17 unsolicited intelligence on the matters covered by
18 the pre-election memoranda after the U.S.
19 presidential election and the conclusion of the
20 assignment for Fusion."

21 They reiterate this point on Exhibit 5 on
22 page 4. Request 11 asks "Please state whether such
23 intelligence was actively sought by the
24 Defendant" --

25 A. Where are you at?

1 Q. Page 4, request 11. It states "Please
2 state whether such intelligence was actively sought
3 by the second Defendant or merely received as
4 presently pleaded." The response they say is "Such
5 intelligence was not actively sought, it was merely
6 received."

7 Did anyone -- are you aware of who sent this
8 unsolicited intelligence to Mr. Steele?

9 A. No.

10 Q. Could you describe his methods of
11 compiling the dossier a little more? I think
12 before you described field interviews. He seems to
13 be talking about unsolicited information coming to
14 him rather than information he sought out?

15 A. I can try. When you're doing field
16 information gathering you have a network of people,
17 sources. It's not like a light switch that you
18 turn on and off, these are people you work with.
19 So they call you and tell you stuff. You know, you
20 don't close the window and stop answering phone
21 calls, you know, when the engagement ends. So I
22 assume this is stuff that came in straggle,
23 whatever you call it.

24 Q. To the best of your knowledge, did
25 Mr. Steele pay any of his sources or subsources in

1 the memoranda for information?

2 A. I don't know. I think there's been a
3 little bit of confusion I would like to clear up.
4 Some people were saying that he was paying people
5 for information. I don't know whether he does or
6 not, but that's not basically how I understand
7 field operations to work. You commission people to
8 gather information for you rather than sort of
9 paying someone for a document or to sit for an
10 interview or something like that. That's not how I
11 understand it works.

12 Q. To make sure I understand, are you saying
13 you don't pay for particular information, you would
14 have an established financial arrangement with
15 someone?

16 A. If he did at all, but I did not ask and he
17 did not share that information. He did not invoice
18 me for any such.

19 Q. Did Mr. Steele ever discuss his opinion of
20 Mr. Trump with you?

21 A. We didn't discuss our political views of
22 Mr. Trump, I don't think, at least not that I
23 specifically remember, if that's what you mean.

24 Q. That is.

25 If I recall correctly, you said earlier that

1 once Fusion had exhausted public documentary
2 sources you turned to Mr. Steele and some other
3 subcontractors for human intelligence; is that
4 correct?

5 A. Yeah, field intelligence.

6 Q. Would your engagement with your client
7 have ended had you not turned to human
8 intelligence?

9 A. I have no idea. I mean, I can't
10 speculate.

11 Q. Well, to clarify, when say you had
12 exhausted the public documentation, are you saying
13 you reached the end of your work or was there still
14 more?

15 A. No. It's a broad project, there's lots of
16 things going on. We're pulling legal filings and
17 bankruptcies and all sorts of other stuff on all
18 kinds of issues. I was talking about specific
19 lines of inquiry.

20 Q. To the best of your knowledge, do Rinat
21 Akhmetshin and Christopher Steele know each
22 other?

23 A. I don't know.

24 Q. To the best of your knowledge, has
25 Mr. Akhmetshin ever worked with Orbis?

1 A. Not to my knowledge.

2 MR. FOSTER: If Mr. Akhmetshin were one of
3 the sources in the dossier, would you know that?

4 MR. SIMPSON: I believe he would have told me
5 that by now given the public controversy over this
6 matter, but he hasn't.

7 BY MR. DAVIS:

8 Q. I'm sorry. Is the "he" --

9 A. Chris Steele.

10 Q. How often would you say you interacted
11 with Mr. Akhmetshin during the 2016 elections
12 season?

13 A. Infrequently, intermittently.

14 Q. When was the last time you spoke with him?

15 A. I don't remember, but I don't think it
16 was -- I just don't remember.

17 Q. To the best of your knowledge, was Ed
18 Lieberman aware of your Trump research project?

19 A. Not to the best of my knowledge.

20 MR. FOSTER: Could you just tell us generally
21 who else other than your client was aware of the
22 Trump research project as it was going on. So
23 excluding your client and excluding your
24 subcontractors, who else knew that you were doing
25 it?

1 MR. SIMPSON: Journalists.

2 MR. FOSTER: In the summer of 2016?

3 MR. SIMPSON: Yes.

4 MR. FOSTER: And they knew that because you
5 were telling them about it?

6 MR. SIMPSON: We get calls from journalists
7 who are working on stories about all kinds of
8 subjects and some things we can answer questions on
9 and others we don't. I'm a former journalist, as I
10 think you know, and we do lots of different kinds
11 of research and people who are working on a story
12 will call us and say what do you know about, you
13 know, Carter Page and we'll say, well, here's the
14 things that we know.

15 MR. FOSTER: And they're aware you're being
16 paid to do that research for a client?

17 MR. SIMPSON: I don't know. Generally that's
18 not an issue.

19 MR. FOSTER: So my question was who knew that
20 you were doing the research, the Trump-Russia
21 research at the time?

22 MR. LEVY: He answered the question. He told
23 you he spoke with journalists and told them what he
24 had found.

25 MR. FOSTER: Right. I was trying to clarify.

1 My question was whether or not they knew you were
2 being paid to do that research.

3 MR. LEVY: He answered that question too and
4 he said he did not explain that to the journalists.

5 MR. SIMPSON: It's hard to generalize. I run
6 a business, it's a research business. Reporters
7 know we have clients who pay us to do research.
8 So, you know, I don't remember any specific queries
9 about whether we were being paid or not, but I
10 think most journalists would assume that someone
11 had paid us to do research.

12 MR. FOSTER: They knew you were doing a Trump
13 oppo research project as opposed to a Hillary
14 Clinton oppo research project?

15 MR. LEVY: From 2015 through the end of the
16 election?

17 MR. FOSTER: Can you let the witness answer,
18 please.

19 MR. SIMPSON: The word "they" is extremely
20 broad. Journalists would call and ask questions
21 about specific things and from that they might
22 conclude that we were doing a Trump oppo project.

23 It's just worth pointing out that in a
24 political season all kinds of people are doing
25 research on all kinds of things. Some people are

1 interested in trade, other people are interested in
2 guns. So you wouldn't necessarily intuit exactly
3 what we were doing. Most people are interested in,
4 you know -- they're interested in the story they're
5 working on. So some people will say, hey, I'm
6 interested in whether Donald Trump gets his ties
7 from third-world countries and they wouldn't ask
8 about anything else.

9 BY MR. DAVIS:

10 Q. You mentioned before, if I recall
11 correctly, that Fusion was having issues with
12 persons attempting to hack it?

13 A. That's a current concern, yes.

14 Q. When did that concern -- when did you
15 first become aware of that concern?

16 A. Relatively recently.

17 Q. So after the election?

18 A. Yes.

19 MR. FOSTER: Did you tell journalists that
20 you had engaged Mr. Steele in the summer of 2016?

21 MR. SIMPSON: I don't specifically remember
22 doing that until the fall.

23 MR. FOSTER: After the election or before?

24 MR. SIMPSON: Before the election.

25 MR. FOSTER: Can you remember the context in

1 which you told them that?

2 MR. SIMPSON: Yes.

3 MR. FOSTER: Can you describe it for us,
4 please.

5 MR. SIMPSON: Sure. Essentially there was --
6 at some point the controversy over the Trump
7 campaign's possible relationship with the Kremlin
8 became, you know, one of the main -- major issues
9 in the campaign and there were things that Chris
10 knew and understood to be the case that only he
11 could really explain in a credible way, and I
12 thought that -- we thought that he should be the
13 one that explains them, you know. So we sat down
14 with a small group of reporters who were involved
15 in investigative journalism of national security
16 issues and we thought were in a position to make
17 use of him as a resource.

18 MR. FOSTER: Do you recall whether that was
19 before or after he ended his relationship with the
20 FBI?

21 MR. SIMPSON: Before.

22 BY MR. DAVIS:

23 Q. Do you recall what the first published
24 article -- when the first published article came
25 out that referenced material from the memoranda?

1 A. Not specifically.

2 MR. FOSTER: Earlier you talked about
3 evaluating the credibility of the information in
4 the memoranda that you were being provided by
5 Mr. Steele and, by way of summary, you talked about
6 your belief that he was credible and that you had
7 worked with him before and the information he had
8 provided you had been reliable in the past. Did
9 you take any steps to try to assess the credibility
10 of his sources, his unnamed sources in the material
11 that he was providing to you?

12 MR. SIMPSON: Yes, but I'm not going to get
13 into sourcing information.

14 MR. FOSTER: So without getting into naming
15 the sources or anything like that, what steps did
16 you take to try to verify their credibility?

17 MR. SIMPSON: I'm going to decline to answer
18 that.

19 MR. FOSTER: Why?

20 MR. LEVY: It's a voluntary interview, and in
21 addition to that he wants to be very careful to
22 protect his sources. Somebody's already been
23 killed as a result of the publication of this
24 dossier and no harm should come to anybody related
25 to this honest work.

1 MR. FOSTER: I'm not asking him to identify
2 the sources. I'm just asking what steps he took to
3 try to verify or validate the information.

4 MR. LEVY: He's given you --

5 MR. FOSTER: If he can answer generally
6 without identifying the sources, I'd ask him to
7 answer.

8 MR. LEVY: He's given you over nine hours of
9 information and he's going to decline to answer
10 this one question.

11 MR. FOSTER: And several others.

12 MR. LEVY: Not many.

13 BY MR. DAVIS:

14 Q. I think you mentioned that you were in
15 London when you first heard that someone was
16 interested in hiring Fusion to work on the Trump
17 research; is that correct?

18 MR. LEVY: Repeat the question.

19 MR. DAVIS: If I recall correctly,
20 Mr. Simpson said that he was in London when he
21 first heard that somebody was interested in hiring
22 Fusion to do Trump research?

23 BY THE WITNESS:

24 A. That's my recollection.

25 Q. Were either of the clients on this project

1 not American citizens?

2 A. Were either of the clients on this --

3 MR. LEVY: Clients on which project?

4 BY MR. DAVIS:

5 Q. Were any clients on the Trump research not
6 American citizens?

7 A. I don't mind answering that if that's
8 okay. They're domestic clients.

9 MR. FOSTER: You said earlier that the
10 information that you gather in your work is owned
11 by the client, it's not owned by you, and so
12 therefore you also referenced your nondisclosure
13 agreements and that you felt like if you had
14 information that related to national security or
15 law enforcement that the nondisclosure agreement
16 did not prevent you from disclosing that
17 information to third parties. Is that a fair
18 summary?

19 MR. LEVY: Wait. You said a lot there.
20 Which third parties are you talking about?

21 MR. FOSTER: Well, to law enforcement.

22 MR. LEVY: I think he's answered this
23 already. You're asking him whether it was
24 permissible under his contractual obligations to
25 report a crime to the national security community,

1 and he said yes, it's fine for him to do that.

2 MR. FOSTER: Right. I'm trying to summarize
3 the previous answer as a premise to my next
4 question. Is that an accurate summary of what you
5 said before?

6 MR. LEVY: Summarizing testimony is dangerous
7 after he's given nine hours of it. If you want to
8 ask him a question, ask him a question.

9 MR. FOSTER: Is there a specific provision in
10 your NDA that provides an exception for disclosure
11 to law enforcement or intelligence agencies?

12 MR. LEVY: I think he earlier didn't talk
13 about the contract, but if you want to talk about
14 it as a matter of practice what your understanding
15 is, go ahead.

16 MR. SIMPSON: I don't know.

17 MR. FOSTER: My colleague Ms. Sawyer asked
18 you earlier about public reports that the initial
19 client on the Trump work was a Republican and that
20 it's also been publicly reported that later there
21 was another client who was a supporter of Hillary
22 Clinton. Are you the source for any of those
23 public reports?

24 MR. LEVY: A hundred percent of what you were
25 saying was referring to news articles, right.

1 MR. SIMPSON: I've been asked about this by
2 various journals as to what I've heard, whether
3 they can report things that they've heard
4 elsewhere, and I have not -- I don't know if you'd
5 classify that as being a source, but I've been
6 asked those questions and I've avoiding getting
7 into specifics. But I have -- if people have
8 accurate information of a general nature like that,
9 I generally would not -- I would confirm things.

10 MR. FOSTER: Sorry. I didn't understand your
11 answer.

12 MR. MUSE: It's quite clear.

13 MR. SIMPSON: Depends on what you say a
14 source is. If someone calls me and say I hear
15 client No. 1 was a Republican, then I'd say I don't
16 have any problem with you writing that. That's not
17 quite the same thing.

18 MR. FOSTER: So you confirm the accuracy of
19 information?

20 MR. LEVY: He didn't say that.

21 MR. SIMPSON: There are certain things that
22 I've chosen not to deny. You know, generally
23 speaking, I deal with a lot of journalists. I'm
24 not going to mislead people.

25 BY MR. DAVIS:

1 Q. To the extent you can clarify, is it that
2 there were two sets of clients, one of whom was
3 Republican and one of which was a Clinton
4 supporter, or was it one person's whose views
5 changed?

6 MR. LEVY: We're not going to get into the
7 identity of clients. As you know, we've agreed to
8 an interview about questions 5 through 13 of the
9 March 24 request. Questions 1 through 4 talk about
10 the identities of the clients. The Chair and the
11 Ranking Member agreed with counsel for Mr. Simpson
12 about the scope of this interview and that question
13 is outside of it. In addition, the answer to that
14 question would implicate privilege and obligations.
15 He's talked to you for nine hours, he's given you a
16 lot of information, and he's not going to answer
17 questions about identities of clients.

18 MR. DAVIS: You've asserted attorney-client
19 work product privilege --

20 MR. LEVY: There is no such privilege. I've
21 asserted the attorney work product privilege, we've
22 asserted privileges under the First Amendment,
23 we've asserted the attorney-client privilege, and
24 we've asserted privileges of confidentiality. It's
25 a voluntary interview and he's declining to answer

1 the question.

2 MR. DAVIS: I understand that.

3 BY MR. DAVIS:

4 Q. So with the Prevezon matter, then, is it
5 correct the law firm involved was Baker Hostetler
6 and the ultimate client was Prevezon, is that
7 right, while you were working there?

8 A. Yes.

9 Q. So any attorney-client privileges within
10 the context of that information would be -- the
11 holder of that privilege is Prevezon; is that
12 correct?

13 MR. LEVY: That's a legal conclusion that
14 he's not qualified to draw.

15 MR. DAVIS: You don't feel that you can speak
16 to it without their permission?

17 MR. LEVY: Speak to what?

18 MR. DAVIS: To questions that would be
19 covered by attorney-client privilege.

20 MR. LEVY: I'm not sure he's qualified to
21 answer that question.

22 BY MR. DAVIS:

23 Q. Did you work with any law firms in
24 relation to the Trump investigation?

25 MR. LEVY: Again, we're not getting into the

1 identity of any clients --

2 MR. DAVIS: I didn't say client.

3 MR. LEVY: I understand. Or their lawyers.

4 MR. FOSTER: I think the issue we're trying
5 to deal with is in order to assess your claims of
6 privilege the committee needs to understand at
7 least as much about the context of the dossier work
8 as it does about the Prevezon work in terms of who
9 was involved. So if there's a law firm involved or
10 if he was reporting to a law firm or acting under
11 the direction of a law firm, then we need to be
12 able to assess whether or not that was in
13 anticipation of litigation, whether he was doing it
14 by the direction of a law firm in order to assess
15 your assertions of privilege.

16 MR. LEVY: I understand. We've identified
17 our position. We've been talking -- Mr. Simpson
18 has been answering your questions since 9:30 this
19 morning, it's now 6:15. He's been fully
20 cooperative and he's here because the Chair and the
21 Ranking Member agreed to a limited scope. The
22 questions you're asking are outside of that scope
23 and this is part of why appearing at a hearing was
24 going to be impossible. Through this agreement
25 we're here. He's given you a ton of information.

1 If you want to discuss the privilege with counsel
2 after the interview, you may do so. He's answered
3 a ton of questions today and he's going to decline
4 to answer this last one.

5 MR. FOSTER: The last one was did you work
6 with a law firm on the Trump matter?

7 MR. LEVY: He's declining to answer.

8 MR. FOSTER: There were several points in the
9 interview where you made a point of saying your
10 firm is not a Democratic linked firm in reference
11 to the Sarah Huckabee Sanders quote. It's been
12 publicly reported that you did opposition research
13 for a client targeting Mr. Romney in the 2012
14 election. Obviously we've been talking about the
15 Trump opposition research. Have you ever done
16 opposition research regarding Mr. Obama?

17 MR. LEVY: We're not going to get into
18 specific client matters that are outside the scope
19 of this interview. He's told you he's represented
20 clients on the right and left, but he's not going
21 to get into other matters beyond Prevezon and what
22 he did in the 2016 election.

23 MR. SIMPSON: I did investigate Senator
24 Obama's campaign in 2008 when I was working for the
25 Wall Street Journal and wrote an article that

1 caused his campaign chair to resign. The record is
2 replete -- or the public report of my work is
3 replete with examples of investigations I've done
4 of Democrats that resulted in them losing their
5 elections and being prosecuted.

6 MR. LEVY: At the Wall Street Journal?

7 MR. SIMPSON: Yes.

8 BY MR. DAVIS:

9 Q. Are you party to a joint defense agreement
10 related to your Prevezon work?

11 MR. LEVY: He's not going to talk about
12 privileged discussions or agreements, and he's
13 probably not qualified to answer anyway.

14 BY MR. DAVIS:

15 Q. Is Fusion GPS paying Cunningham Levy for
16 the firm's representation of you or as a third
17 party?

18 MR. LEVY: That's privileged also. He's not
19 getting into payments to his lawyers and it's
20 beyond the scope of this interview which has now
21 gone on for almost nine hours.

22 BY MR. DAVIS:

23 Q. Has Fusion GPS ever offered directly or
24 indirectly to pay journalists to publish
25 information?

1 A. No.

2 Q. Are you aware of any Fusion clients
3 offering directly or indirectly to pay journalists
4 to publish information from Fusion?

5 MR. LEVY: While working for Fusion on a
6 Fusion matter or as a general matter?

7 MR. FOSTER: Can you let the witness answer.

8 MR. LEVY: Well, if the question's clear he
9 can answer any question --

10 MR. FOSTER: I think the question was clear.

11 MR. LEVY: -- within the scope of the
12 interview --

13 MR. DAVIS: Are there any of Fusion's
14 clients offering --

15 THE REPORTER: Guys.

16 BY MR. DAVIS:

17 Q. I'll repeat the question. Are you aware
18 of any of Fusion's clients offering directly or
19 indirectly to pay journalists to publish
20 information from Fusion?

21 A. Not to my knowledge or recollection, no.

22 MR. FOSTER: What was the end date of the
23 Trump engagement?

24 MR. LEVY: He told you he didn't recall
25 exactly.

1 MR. SIMPSON: That's not correct. The
2 election was the end date. I assume you're asking
3 about the general election? The election date
4 would have been the end.

5 MR. FOSTER: So you didn't do any work on the
6 Trump matter after the election date, that was the
7 end of your work?

8 MR. SIMPSON: I had no client after the
9 election.

10 MR. FOSTER: It's 6:21. Let's go off the
11 record for a minute.

12 (A short break was had.)

13 MS. SAWYER: We'll go back on the record.
14 It's 6:30.

15 EXAMINATION

16 BY MS. SAWYER:

17 Q. We appreciate your time today, your
18 patience in answering our questions.

19 You've been asked a number of questions just
20 about -- well, strike that.

21 Were any of the particular factual findings
22 or conclusions that you reached with regard to the
23 research that was being done related to Russian
24 interference in the 2016 election including
25 possible ties to the Trump campaign, were any of

1 the factual findings or conclusions influenced in
2 any way by the identity of the client for whom you
3 were doing that work?

4 A. All the questions you've asked I guess
5 this one I've not given a lot of thought to.
6 Offhand, not that I can think of.

7 Q. So you weren't trying to reach a
8 particular conclusion based on the identity had
9 they asked you to find -- well, strike that.

10 I think what I'm trying to get some sense of
11 comfort around is to the extent there might be
12 concerns that the work being done was driven in a
13 direction designed to reach a particular conclusion
14 for a client or because of the client's identity
15 was that the case?

16 A. I think it's safe to say that, you know,
17 at some point probably early in 2016 I had reached
18 a conclusion about Donald Trump as a businessman
19 and his character and I was opposed to Donald
20 Trump. I'm not going to pretend that that wouldn't
21 have entered into my thinking. You know, again, I
22 was a journalist my whole life. So we were, you
23 know, trained not to take sides and practiced in
24 not taking sides.

25 So most of what I do as a research person is

1 we try to avoid getting into situations where one's
2 etiology or political views would cloud your work
3 because it's a known hazard, but, you know, I
4 reached an opinion about Donald Trump and his
5 suitability to be president of the United States
6 and I was concerned about whether he was the best
7 person for the job.

8 Q. And given that you had been trained not to
9 allow etiology to cloud your work, it sounds like
10 you reached a conclusion and had concerns about
11 Candidate Trump. What steps did you take to then
12 ensure that your conclusion didn't cloud the work
13 that was being done?

14 A. Well, to be clear, my concerns were in the
15 category of character and competence rather than --
16 I didn't have any specific concerns for much of the
17 time about his views, which I don't share, but that
18 wasn't really the issue. Most of what we do has to
19 do with do people have integrity and whether
20 they've been involved in illicit activity. So
21 those were the things I focused on.

22 Q. So the conclusion that you reached, was it
23 informed by the research that you were -- your
24 personal conclusion, was it informed by the
25 research that you were conducting?

1 A. Yes. We deal in factual information and
2 over the course of this project we gathered lots of
3 facts about Donald Trump.

4 Q. You mentioned that earlier and I think you
5 made clear a number of times in the course of the
6 day that the specific work on Russian interference
7 and possible ties to the campaign that Mr. Steele
8 was doing was one part of that bigger picture, and
9 I did want to ask you about some of that bigger
10 picture of the work and get a sense from you, if I
11 could, you know, some of the background and
12 findings. In particular one of the things you had
13 mentioned -- well, you just mentioned right now as
14 we were speaking the term "illicit activity."
15 What, if any, research did you conduct that gave
16 you any concerns about then Candidate Trump and
17 potential illicit activity?

18 A. I think the thing I cited to you was his
19 relationship with organized crime figures, and that
20 was a concern.

21 Q. And what can you share with us about the
22 findings, your findings?

23 A. Well, I've tried to share as much as I
24 could think of over the course of today. As I say,
25 there were various allegations of fraudulent

1 business practices or dishonest business practices
2 or connections with organized crime figures. In
3 fact, you know, there was numerous others that I
4 can't remember the names of. It was a long history
5 of associations with people accused of involvement
6 in criminal activity.

7 You know, just to reiterate, the facts of
8 these investigations are the facts and we don't try
9 to drive an investigation to any particular
10 conclusion, certainly not based on our political
11 views. So I think it would be, you know, not
12 believable for me to tell you I didn't reach, you
13 know, views about Donald Trump's integrity, but,
14 you know, those were -- those didn't influence the
15 research in terms of the findings. Those were the
16 findings.

17 Q. You mentioned specifically and I think
18 with regard to organized crime particularly ties to
19 Felix Sater is one. You indicated a connection to
20 Yudkovich Mogilebich, I think it is.

21 A. Mogilebich.

22 Q. Mogilebich, which we can spell for you.
23 Tell me if I have this correct.

24 M-O-G-I-L-E-B-I-C-H.

25 A. Yes.

1 THE REPORTER: What's the first name?

2 MR. SIMPSON: Semyon, S-E-M-Y-O-N.

3 BY MS. SAWYER:

4 Q. Yudkovich, did I get that --

5 A. I believe I was probably talking fast and
6 I think I might have made a reference to
7 Yanukovych, which is the former president of the
8 Ukraine.

9 Q. With regard to any of that work, did you
10 create work product based on that work?

11 A. I don't specifically recall what we would
12 have created.

13 Q. And with regard to that work, did you
14 share any of that information with law enforcement
15 agencies?

16 A. No. I mean, just to reiterate, the only
17 contact that, you know, occurred during this
18 engagement was -- at least to my knowledge, was
19 Chris's dealing with the FBI. Other than that, I
20 don't remember having any dealings with the FBI.

21 Q. You had also mentioned earlier in the day
22 work -- that there was an investigation about money
23 from Kazakhstan?

24 A. Yes.

25 Q. And could you tell me about that and what

1 you investigated and what you learned.

2 A. There was some parallel litigation in
3 New York involving attempts by the government of
4 Kazakhstan to recover money that had been allegedly
5 stolen from Kazakhstan, billions of dollars in a
6 colossal bank failure. The name of the bank was
7 BTA Bank. It's been well established in various
8 courts that the government's allegations are
9 basically true, which is that large amounts of
10 money were illicitly removed from this bank,
11 laundered across Europe and into the United States
12 apparently. Allegedly.

13 So there was a civil case, at least one civil
14 case in New York involving -- filed by the city of
15 Almaty, A-L-M-A-T-Y, against some alleged Kazakh
16 money launderers. I don't remember exactly how,
17 but we learned that -- it wasn't from Chris. We
18 learned that Felix Sater had some connections with
19 these people, and it's been more recently in the
20 media that he's helping the government of
21 Kazakhstan to recover this money. There's been
22 media reports that the money went into the Trump
23 Soho or it went into the company that built the
24 Trump Soho. I can't remember the name.

25 Q. So the connection in that instance was to

1 Felix Sater and through Felix Sater to --
2 potentially to Donald Trump?

3 A. Yes. It was a company that Felix Sater
4 and Donald Trump were involved in together.

5 Q. And the research you did on that project,
6 was that public source research? Did you have any
7 other -- did you have human intelligence sources on
8 that project?

9 A. I think I probably did have some human
10 sources. That's my answer.

11 Q. And did you use subcontractors at all on
12 that work?

13 A. I can't say specifically whether it was --
14 I remember commissioning some public record-type
15 research on Felix Sater and his history in
16 New York.

17 Q. Did you feel in the course of that that
18 you had uncovered evidence of any criminal activity
19 by Donald Trump?

20 A. In the course of that I don't think so. I
21 think my concern was the associations with known
22 organized crime figures.

23 Q. And that included Felix Sater?

24 A. Yes.

25 Q. Anyone else in particular?

1 A. There were others.

2 MR. LEVY: Beyond what we've discussed today?

3 MS. SAWYER: Yes, beyond what we've already
4 discussed.

5 BY THE WITNESS:

6 A. Another figure involved in the Trump Soho
7 project was a central Asian person named Arif,
8 A-R-I-F, is the last name. The first name is
9 generally spelled Tevfik, it's T-E-V-F-I-K. If you
10 search under a different transiteration of that
11 name you can find open source reporting alleging
12 that he's an organized crime figure from Central
13 Asia and he had an arrest for involvement in child
14 prostitution.

15 Q. You mentioned as well that you had
16 reviewed tax bills. Were these specifically Donald
17 Trump's tax bills?

18 A. They were Trump properties and I believe
19 we may have reviewed some public information about
20 estate taxes and things like that. We didn't have
21 access to his tax returns.

22 Q. Did you reach any conclusions based on
23 your review of his tax bills? I think you
24 mentioned that in connection with trying to assess
25 either financial connections or his financial

1 standing. Did you reach any conclusions with
2 regard to either of those?

3 A. Yes. I concluded -- we concluded that his
4 statements about what individual properties were
5 worth were greatly exaggerated and at odds with the
6 information that he'd supplied, you know, in legal
7 filings with tax authorities and other records,
8 corporate records.

9 Q. Did any of that indicate anything that
10 showed a connection to Russia or the Russian
11 government or Russian officials or Russian
12 oligarchs?

13 A. Not that I can recall.

14 Q. You mentioned as well, you brought up
15 Trump golf courses. What in particular were you
16 looking into with regard to Donald Trump's golf
17 courses?

18 A. The original inquiry was into the value of
19 the courses, whether he had to borrow money to buy
20 them, whether they were encumbered with debt, how
21 much money they brought in, what valuations he put
22 on them, and property tax filings.

23 Q. And in general can you share what findings
24 and conclusions you reached?

25 MR. LEVY: With regard to?

1 MS. SAWYER: To the work on the golf
2 properties.

3 BY THE WITNESS:

4 A. A number of them don't make any money.
5 His valuations of the properties are questionable.
6 I guess those would be the main findings.

7 Q. You just mentioned broadly but didn't
8 describe it, you mentioned research on Scotland. I
9 don't know if it was particular properties or
10 something with regard to Scotland. Can you just
11 describe what that research was.

12 A. Sure. He has golf courses in Scotland and
13 Ireland and one of the facets of UK or anglo
14 company law is that private companies have to file
15 financial statements, public financial statements.
16 So when you're looking at a guy like Donald Trump
17 who doesn't like to share information about his
18 company, it's useful to find a jurisdiction where
19 he's required to share that information with the
20 local government.

21 So we went and ordered the records -- the
22 financial statements of the golf courses. There's
23 also a long-running land use controversy -- I think
24 there's multiple long-running land use
25 controversies over those properties. We haven't

1 really touched on this at all, but there were also
2 environmental issues that were part of the
3 research.

4 Q. With regard to the public financial
5 statements, did you reach any conclusions based on
6 that?

7 A. That they were not profitable entities. I
8 don't specifically recall. I just remember that
9 these were not doing very well and that he'd sunk a
10 lot of money into them and he hadn't gotten a lot
11 of money back yet.

12 MS. QUINT: You mentioned a couple of times,
13 Mr. Simpson, that you had particular familiarity
14 with Mr. Manafort and even that you were more
15 familiar with him in particular than Chris Steele
16 was. In general and it might not be easy to be
17 general about it, but what was your focus when you
18 had looked into Manafort? What main areas were you
19 familiar with?

20 MR. SIMPSON: Over the years, originally at
21 the Wall Street Journal we learned of his
22 relationship with Ukrainian and Russian oligarchs.
23 So it was generally continued in that vein. He was
24 subject of some litigation over his business
25 dealings in New York. There was a lawsuit filed by

1 the opposition politician from Ukraine accusing him
2 of involvement in corruption in Ukraine. So as
3 just a -- not for any particular client, but just
4 because these matters are something I follow I had
5 collected those documents. I think there's
6 probably some other litigation that I collected
7 that was in a similar vein.

8 MS. QUINT: And it was all documentary or did
9 you have human sources for your Manafort research?

10 MR. SIMPSON: I don't think -- for the most
11 part it was just what you call gathering string,
12 just accumulating files on people or subjects that
13 are of interest.

14 BY MS. SAWYER:

15 Q. The committee, certain members of the
16 committee, the Chairman and Ranking Member along
17 with Senators Graham and Whitehouse had sent a
18 request for documents and information on July 19.
19 I understand your efforts to identify that
20 information are ongoing and I know that in response
21 to one of my questions about Mr. Page your attorney
22 has already said that the request for information
23 is pending and being reviewed. I just wanted to
24 ask you a couple of questions about some of the
25 other individuals that we had identified in that

1 letter and in particular in request No. 6?

2 MR. LEVY: Do you have an exhibit or should I
3 just get my copy out?

4 MS. SAWYER: I'm happy to enter it as an
5 exhibit or I can just read the names. I don't
6 think there's any reason we need to --

7 MR. LEVY: Just read the names to move it
8 along, that's fine.

9 MS. SAWYER: I don't think there's any
10 reason -- there's nothing in this letter to inform
11 your answer otherwise.

12 BY MS. SAWYER:

13 Q. So with regard to Alpha Group, sometimes
14 I've heard Alpha Group, sometimes I've heard Alpha
15 Bank. I don't know if they're two distinct
16 entities. Do you know anything about Alpha Bank or
17 Alpha Group with regard to Russian interference in
18 the 2016 election?

19 A. Alpha Group is not a corporate person,
20 it's not an entity. It's just a collective name.
21 Alpha Bank is a bank. I know a limited amount. I
22 know, you know, journalists were working on some
23 issues related to this and they asked us about it,
24 but the information didn't come from us.

25 Q. So you were asked by journalists about it,

1 but you're saying whatever information you had was
2 not generated by Fusion GPS?

3 A. That's right. I know they're a big player
4 and they have long, deep ties to Vladimir Putin.
5 One of the founders, Pyotr Aven, P-Y-O-T-R, second
6 word Aven, A-V-E-N, was an associate of Vladimir
7 Putin when he was in the mayor's office in Saint
8 Petersburg around the time same that Bill Browder
9 was doing business with the mayor's office.
10 They're very powerful politically and economically
11 in Russia and they have -- in the tens of billions
12 are the assets of the founders and they have all
13 sorts of interests. They have epic disputes with
14 western corporations, including BP. So people in
15 my business tend to just have a lot of
16 institutional knowledge about them and, you know, I
17 shared my institutional knowledge about them.

18 Q. You mentioned other founders. Are those
19 other founders Mikhail Fridman and German Khan?

20 A. Yes.

21 Q. Do you have any information there have
22 been reports about potential communications between
23 a server at Alpha Bank and potentially servers that
24 belong to the Trump organization or Trump -- some
25 entity associated with Donald Trump? Do you have

1 any information about those particular reports?

2 A. That's kind of an open-ended question. I
3 think what I said is we were asked about that and
4 it wasn't -- that information wasn't generated by
5 us and I'm happy to say it's beyond our competence
6 to have generated, but in the course of being asked
7 about it, you know, people gave us information. I
8 don't know what else to say.

9 Q. And what information were you given?

10 A. A bunch of data. I mean, we were shown
11 like do you know what this would mean, does this
12 mean, and it's beyond -- it's really -- it's
13 certainly beyond my competence.

14 Q. So the data that you were shown, you could
15 not draw any conclusions from it?

16 A. I did not draw any conclusions from the
17 data.

18 Q. Another individual that there's been a lot
19 of press reporting on is Sergei Millian. Other
20 than what -- what, if anything, can you tell us
21 about did you conduct any research into
22 Mr. Millian? And, if so, what conclusions did you
23 reach with regard to Russian interference in the
24 2016 election?

25 A. We learned from sources that he had

1 connections to the Trump organization and we did an
2 open source investigation of him. We found a
3 picture of him with Donald Trump and another real
4 estate investor in Florida. We've discovered
5 that's not his real name or at least not the name
6 he came to the United States with and that before
7 he became a real estate broker he was a linguist
8 and translator. Speaking generally, people with
9 advanced training in linguistics are oftentimes
10 involved in intelligence matters, but I don't know
11 whether he is or isn't. Various reporters became
12 interested in him because he was boasting about his
13 connections to the Trump organization in the Trump
14 campaign. So we got lots of inquiries about who
15 was he, was he a spy, you know, that sort of thing.

16 Q. And did you make a determination whether
17 or not he had actual ties to the Trump campaign?

18 A. Well, some of the -- yes. I mean, he
19 was -- I think he's Facebook friends with Michael
20 Cohen. I'm sorry. It was some social media
21 connection. It was either Twitter friends or
22 Facebook friends. It was public information. We
23 took it from that that they did know each other. I
24 guess we gradually learned of Michael Cohen's role
25 in the Trump campaign as opposed to in the Trump

1 organization.

2 Q. And what did you learn about Mr. Cohen's
3 role in the Trump campaign?

4 A. We learned that his job included dealing
5 with inquiries about Russia and he seemed to get
6 all of the serious inquiries, investigative
7 inquiries about Russia. He seemed to know a lot
8 about that. We learned that he was a very
9 intimidating person who had a history of
10 threatening reporters with libel suits. We learned
11 that he's married to -- his father-in-law is a
12 Ukrainian emigre, that he had some Ukrainian
13 clients and connections to the taxi industry in
14 New York which is heavily populated with Russian
15 emigres, and we learned that he was involved in
16 some of Trump's projects where there was a lot of
17 Russian buyers. The only other thing I can think
18 of is that he was also the person who dealt with
19 allegations against Mr. Trump from the tabloids.

20 Q. And with regard to Trump projects with
21 Russian buyers, what specific projects had a number
22 of Russian buyers?

23 A. I don't specifically remember. Florida
24 maybe. I think it was Florida. Sorry.

25 MS. SAWYER: Just give us a minute.

1 I think that's really all of our questions.
2 I don't know if there's follow-up that you all had.

3 MR. FOSTER: Just very quickly. I can do it
4 from right here.

5 So I asked you -- or you were asked earlier
6 about representations that you're not -- you don't
7 see your firm as being Democrat linked and in my
8 previous question I asserted that there had been
9 public reports that you had done work, opposition
10 research during the 2012 election aimed at
11 Mr. Romney, but I didn't ask you to confirm that.
12 Is that correct?

13 MR. LEVY: Work for clients outside the scope
14 of the interview is not within the scope of the
15 interview.

16 MR. FOSTER: It's relevant to his claim that
17 he's not a Democrat linked firm.

18 MR. LEVY: He's answered that question. He's
19 given you multiple answers to that question and
20 significant information in support of his answer to
21 that question, and that small fact which may or may
22 not be pertinent is that he's going to decline to
23 answer because it's outside the scope of this
24 interview.

25 MR. SIMPSON: I decline to answer.

1 MR. FOSTER: In some of the questioning in
2 the last round there was some talk of your -- you
3 didn't have a particular aim in your research, you
4 were following the facts wherever they lead. Is it
5 fair to say -- is it a fair description to say that
6 your job was opposition research aimed at
7 Mr. Trump? That's been widely reported and
8 characterized that way. Do you think that's a fair
9 characterization of what your job was?

10 MR. LEVY: He's been talking for nine and a
11 half hours, a lot of which was describing his work.
12 To simplify it in any particular way at this point
13 I think is unfair to the witness.

14 MR. FOSTER: You weren't hired to find
15 positive information about Mr. Trump, were you?

16 MR. SIMPSON: To the contrary. I think when
17 you're doing research on any subject you're trying
18 to figure out what the truth is. So if Donald
19 Trump's got a good business record and he's really
20 worth billions of dollars, that's important
21 information. In fact, you shouldn't be feeding
22 reporters stories about how Donald Trump is not
23 worth billions of dollars if he's worth billions of
24 dollars. So, you know, I think the connotation of
25 negativity, I get, you know, where you're coming

1 from, but, in fact, you're just trying to figure
2 out what's true.

3 It's like with the Prevezon case, we were
4 trying to figure out who's telling the truth, is it
5 our guys or is it Browder. I do my job well and I
6 get rehired when I give them the right information,
7 when I give them accurate information. So if
8 Donald Trump turned out to be a great businessman,
9 that's what I would have to tell people.

10 MR. FOSTER: Nothing further from me.

11 MR. LEVY: Before we go off the record, will
12 we be entitled to a copy of the transcript?

13 MR. FOSTER: You'll be able to review the
14 transcript and request corrections, make an
15 errata.

16 MR. LEVY: Will it be kept confidential?
17 We'd like to make a request that it be kept
18 confidential given the sensitivity of the matters
19 discussed today.

20 MR. FOSTER: Your request is noted.

21 MR. LEVY: Noted, but no decision on it?

22 MR. FOSTER: No decision.

23 MR. LEVY: And upon reviewing the transcript,
24 when will we have that opportunity?

25 MR. FOSTER: We can arrange that off the

1 record.

2 MR. LEVY: When we do we just reserve the
3 right obviously to correct the record or supplement
4 it.

5 MR. FOSTER: That's why we'd allow you to
6 review it.

7 MR. LEVY: Thank you very much.

8 MR. DAVIS: Nothing further. We're going off
9 the record at 7:04.

10 (Whereupon the interview was
11 concluded at 7:04 p.m.)

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2 I, TINA M. ALFARO, Certified Shorthand
3 Reporter No. 084-004220, Certified Realtime
4 Reporter, and Notary Public in and for the State of
5 Illinois, do hereby certify:

6 That GLENN SIMPSON, whose interview is
7 hereinbefore set forth, was duly sworn by me and
8 that said deposition is a true record of the
9 testimony given by such witness.

10 I further certify that I am not counsel
11 for nor in any way related to any of the parties to
12 this suit, nor am I in any way interested in the
13 outcome thereof.

14 In witness, whereof, I have hereunto set
15 my hand this ____ day of _____, 2017.

16

17

18

19

Tina M. Alfaro, CSR, CRR

21

22

23

24

25