

Washington, DC

Page 1

1  
2  
3  
4  
5  
6  
7  
8  
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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

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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	11
15	8/3/17 letter agreement	
16	Exhibit 2	30
17	Privilege log	
18	Exhibit 3	138
19	BuzzFeed memos	
20	Exhibit 4	196
21	Filing in UK litigation	
22	Exhibit 5	205
23	(Not described)	
24	Exhibit 6	261
25	Meeting notes	

## Washington, DC

Page 5

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

## Washington, DC

Page 7

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?

## Washington, DC

Page 99

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.

## Washington, DC

Page 117

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?

## Washington, DC

Page 132

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.

## Washington, DC

Page 136

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 Yanukovych, 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:



## Washington, DC

Page 185

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.

## Washington, DC

Page 192

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           So with regard to that memo, were there any  
2 particular things that you independently verified?

3           A. I just need to review it here for a  
4 second.

5           Q. Sure.

6                               (Reviewing document.)

7 BY THE WITNESS:

8           A. Most of this I did not seek to  
9 independently verify and was relatively new  
10 information. I was aware at the time of  
11 connections between Russian intelligence and cyber  
12 criminals, and I was aware at the time that the  
13 Russian mafia and Russian cyber crime was a  
14 subcontractor to the Russian intelligence services.  
15 So this comported with my general knowledge of  
16 these matters, but a lot of the specifics was new  
17 information to me.

18           The only things in here that I specifically  
19 recognize from other work or from other research  
20 was that the -- the allegation that the telegram  
21 encrypted messaging system, which is an app, had  
22 been compromised by Russian intelligence and that  
23 someone else in the business of cyber security had  
24 told me that too who was in a position to know. I  
25 don't remember who that was, but I was told that by

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 nongermene 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 subsource 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.)  
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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.

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20 \_\_\_\_\_  
Tina M. Alfaro, CSR, CRR

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