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.
APPEARANCES:

SENATE JUDICIARY COMMITTEE:

Patrick Davis, Deputy Chief Investigative Counsel,
Chairman Grassley

Jason Foster, Chief Investigative Counsel,
Chairman Grassley

Samantha Brennan, Investigative Counsel,
Chairman Grassley

Daniel Parker, Investigative Assistant,
Chairman Grassley

Joshua Flynn-Brown, Investigative Counsel,
Chairman Grassley

Scott Graber, Legislative Assistant/Counsel,
Senator Graham

Heather Sawyer, Chief Oversight Counsel,
Senator Feinstein

Jennifer Duck, Staff Director,
Senator Feinstein

Molly Claflin, Counsel,
Senator Feinstein

Lara Quint, Chief Counsel,
Senator Whitehouse
APPEARANCES: (Cont'd)

FOR THE WITNESS:

Joshua Levy, Cunningham Levy Muse
Robert Muse, Cunningham Levy Muse
Rachel Clattenburg, Cunningham Levy Muse
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MR. DAVIS: Good morning. This is the transcribed interview of Glenn Simpson. Chairman Grassley and Ranking Member Feinstein requested this interview as part of the Senate Judiciary Committee's investigation of Fusion GPS's activities related to the dossier compiled by Christopher Steele, the Prevezon case, and the Magnitsky Act.

Would the witness please state your name for the record.

MR. SIMPSON: Glenn Simpson.

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

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

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

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

MR. GRABER: Scott Graber, Senator Graham.

MR. PARKER: Daniel Parker, Investigative Assistant for Senator Grassley.
MR. BROWN: Joshua Flynn-Brown, Investigative Counsel for Senator Grassley.

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

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

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

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

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

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

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

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

MR. SIMPSON: Yes.

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

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

MR. LEVY: Josh levy.

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

MS. CLATTENBURG: I'm Rachel Clattenburg.

MR. DAVIS: We want you to answer our questions in the most complete and truthful manner
possible. So we will take our time. If you have any questions or if you don't understand any of our questions, please let us know. If you honestly don't know the answer to a question or don't remember, it's best not to guess. Just give us your best recollection.

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

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

It is this committee's practice to honor valid common law privilege claims as an accommodation to a witness or party when those claims are made in good faith and accompanied by
sufficient explanation so that the committee can evaluate the claim. When deciding whether to honor a privilege the committee weighs its need for the information against any legitimate basis for withholding it. The committee typically does not honor contractual confidentiality agreements.

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

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

MR. SIMPSON: Yes.

MR. DAVIS: Specifically 18 U.S.C. Section 1001 makes it a crime to make any materially false, fictitious, or fraudulent statement or representation in the course of a congressional
investigation. That statute applies to your statements in this interview. Do you understand that?

MR. SIMPSON: Yes, I do.

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

MR. SIMPSON: Yes, I do.

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

MR. SIMPSON: No.

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

Once again, the Chairman and Ranking Member withdrew their subpoena of you due to your willingness to provide information in this voluntary interview and document production. However, the extent to which the committee deems 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
background?

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

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

A. In 2009.

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

A. That's right.

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

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

Q. And who were they?

A. We had a research assistant named Margot
Williams, M-A-R-G-O-T Williams, and another administrative assistant whose name I don't recall right now.

Q. And who was the other partner?
A. Susan Schmidt was my other partner, former colleague from the Wall Street Journal, and prior to that was an investigative reporter at the Washington Post.

Q. And what was the nature of SNS Global's business?
A. Research, business intelligence.

Q. And what types of clients did SNS Global have?
A. It's a while ago, so it's not fresh in my mind. Other consulting firms, lawyers. I don't specifically remember a lot of them.

Q. And is SNS Global still in business?
A. No.

Q. When did it cease operations?
A. I believe at the end of 2010.

Q. And why did it -- why did SNS Global cease operations?
A. Basically my partner and I had different ambitions for what we wanted to do. I wanted to have a brick and mortar office with more resources.
and staff. Basically I concluded that the work that we were doing required more infrastructure and resources. Basically in modern research you need to have access to a lot of different databases and there's a lot of aspects of the work that are administrative in nature that require things that I wasn't able to do. I prefer to spend my time doing the research. So I wanted to have more of an infrastructure where I could focus on that.

Q. What is Bean, LLC?
A. That's the LLC that is my current company.

Q. And what is your role in Bean, LLC?
A. I'm the majority owner. I guess, you know, we don't have official titles, but I'm generally referred to as the CEO.

Q. Bean, LLC registered Fusion GPS as a trade name in the District of Columbia; is that correct?
A. Yes, it's a DBA.

Q. Why did you choose to use a trade name for Bean, LLC rather than directly name the company Fusion GPS?
A. Because at the time that I was deciding what I wanted to do I was recruiting a new partner and I just needed to set up a holding company while
I organized my new business. So I just picked a name. You know, a bean is a seed, a new thing. So I picked that name to begin the process of organizing a new business and didn't want to select an actual DBA, you know, a brand name until I consulted with my new partner. We wanted to mutually -- I actually had two partners in the beginning, so there were three of us, and I wanted to make it a group decision.

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

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

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

A. I don't think so.

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

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

MR. DAVIS: Sure.

MR. LEVY: Does Fusion GPS have subcontractors?

MR. DAVIS: Right. I think that would be
part of it, but the other part is: are there other
LLC's associated with Bean direct--with Bean or
Fusion directly, not just subcontractors?

BY THE WITNESS:

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

Q. What's the name of that one?

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

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

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

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

A. I own an LLC in Maryland that holds some
property that I own.
Q. And what's the name of that LLC?

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

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

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

Q. Anything that your partners would have set up?

A. Not that I can think of.

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

A. No.

Q. Domestically does Bean, LLC have an account at blank?

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

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

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

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

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

MR. FOSTER: He answered yes to the question.

BY MR. DAVIS:

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

A. DuPont Circle.

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

A. That's the address, yes.

Q. Is it Suite 400?

A. It is.

Q. How many employees and associates does Fusion GPS currently have?
A. Roughly a dozen.

Q. Who are they?

A. Do you want their names?

Q. Yes, their names.

A. [Redacted] is a partner in the business; [Redacted] is a partner in the business; [Redacted], [Redacted], is a partner in the business. [Redacted]

[Redacted] Another one of our managers is [Redacted], and he is a [Redacted]. We have several analysts whose names are [Redacted]; [Redacted]; [Redacted] whose previous position I don't recall; [Redacted] whose former position I don't recall; [Redacted] who previously was with I think [Redacted]; [Redacted] who's our administrative person. There may be one or two others whose names I don't recall.

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

A. Not that I can think of.
Q. In general, what is Fusion GPS's business?
A. We primarily are a research, strategy, consulting firm.
Q. And what types of clients has Fusion GPS had?
A. It runs the gamut from corporations to law firms, various investment funds, people involved in litigation.
Q. And roughly how many active clients --
MR. LEVY: Did you finish? I don't know if he finished.
MR. DAVIS: I'm sorry.
BY THE WITNESS:
A. It's hard to categorize them all. Those are some of the main types of clients we have.
Q. And roughly how many active clients did Fusion GPS have in 2016?
A. That's difficult for me to answer. You know, over ten I would say, but it's hard for me -- beyond that I would be guessing.
Q. Does part of Fusion GPS's business involve attempting to have media outlets publish articles that further the interests of your clients?
A. Yeah, you could -- I mean, generally speaking, we are -- generally we tend to respond to
inquiries more than try to push things, but, you know, we work with the press frequently.

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

A. Yes.

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

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

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

A. Not that I can recall.

Q. Has Fusion GPS ever had arrangements with
clients in which the amount of Fusion's compensation was dependent upon preventing articles from being published or stories from being aired?

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

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

A. Could you restate that?

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

MR. LEVY: Within the scope of this interview?

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

MR. LEVY: Hold on. Let's -- let me just talk to my client about that and get back to you on that. I just want to understand the facts so we
can evaluate whether it's appropriate to discuss that here if such a predicate for the answer exists.

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

MR. LEVY: Sure.

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

(A short break was had.)

MR. DAVIS: We'll go back on the record.

It's 10:02.

BY MR. DAVIS:

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

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

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

A. The word "associated" is really vague. I'm not sure I know what you mean by that. I can speak to my own practices and the practices of the people who work at my company.
Generally speaking, when we do a research project for a new client and they ask us -- you know, they explain, you know, what situation they're involved in, if it's a lawsuit, for example, or some other dispute, a lot of what we do is related to disputes, they say -- you know, we say we will conduct an open-ended inquiry that's not goal directed and the results of the research will guide whatever decision you want to make about how to use it.

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

So we generally don't let our clients dictate sort of the -- you know, the end result of things because we don't think that's an intelligent way of trying to do research and, you know, a lot of what we do is decision support. Your clients are frequently trying to make a decision about how they want to proceed, whether they want to -- you know, if someone thinks they've been defrauded, you can
file a lawsuit, you can go to the police. You would decide that based on what you find out about the, you know, evidence of a fraud. So that's generally the way we do it.

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

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

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

A. We've been in business since 2010, so seven years is a fairly long time, but as I say, not to my recollection. I just can't be
categorical because we've done a lot of work over
the last seven years.

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

Similarly, I'm going to refer to Prevezon and
Magnitsky, M-A-G-N-I-T-S-K-Y. When I refer to
those together, I mean all matters related to the
Justice Department's lawsuit against Prevezon
Holdings Limited, as well as all matters related to
efforts with the media, government officials, and
campaigns to overturn the Magnitsky Act, prevent
the passage of the global Magnitsky Act, remove the
word Magnitsky from either law, the Russian ban on
U.S. adoptions of Russian children, research on Mr.
Magnitsky himself or Mr. Browder, Hermitage Capital
Management and its affiliated companies. So I'm
generally putting those under that umbrella. If
you need me to clarify for any specific question,
just ask.

MR. LEVY: You obviously said a lot there.
MR. DAVIS: I did.

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

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

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

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

MR. LEVY: Okay.

BY MR. DAVIS:

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

A. We were retained by Baker Hostetler in the spring of 2014 to do litigation support, and under the heading of litigation support was things related to discovery, locating witnesses, answer questions from the press, gathering documents,
pretty much, you know, a conventional understanding
of litigation support.

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

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

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

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

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

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

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

A. The ultimate direction, of course, would
have been from the ultimate client, but the client
was outside the United States for most of its time.
So, you know, a lot of instruction came from him and he was the person who formulated the legal strategy, undertook all of the legal efforts to work the case.

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

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

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

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

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

MR. SIMPSON: I'm sure we do, yes. I am -- we have a division of labor and I don't do a lot of things like invoicing. So this is not going to be my strong suit.
MR. FOSTER: But you could figure it out later for us?

MR. SIMPSON: We maintain books and records.

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

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

(Exhibit 2 was marked for identification.)

BY MR. DAVIS:

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

Mr. Simpson, on the third page of this document, the last two entries appear to be e-mails sent on October 27, 2016 from Peter Fritsch to Mark Cymrot CC'g you. To the best of your recollection, was Fusion GPS still working for Mr. Cymrot on -- still working for Baker Hostetler on the Prevezon case as of the date of this e-mail?
A. I don't know.

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

A. Well, it was a legal --

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

BY MR. DAVIS:

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

A. Yes.

Q. Who were they?

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

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

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

MR. DAVIS: I mean all matters related to the efforts with the media, government officials, and campaigns -- or campaigns to overturn the Magnitsky
Act, prevent the passage of the global Magnitsky Act, remove the word Magnitsky from the law -- from either law, as well as the Russian ban on U.S. adoptions of Russian children.

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

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

BY THE WITNESS:

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

Q. Let's break them down by category.

A. Let's do that.

Q. Did Fusion ever work with subcontractors -- did Fusion ever hire subcontractors as part of its legal work on the Prevezon case?
A. Yes.

Q. And whom did you hire?

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

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

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

MR. FOSTER: What is his professional background?

MR. SIMPSON: He has a degree in Russian.

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

MR. SIMPSON: He runs a consulting firm like me and deals with issues more in Ukraine than Russia, but in both. Yeah, he was doing Russian language things. The case revolved around, centered on events in Russia. So a lot of what we
needed to find out were things that were in Russia or there were documents in the Russian language. I don't speak Russian, I've never been to Russia. So it would be ordinary course of business for me to identify a specialist who could supply me with that kind of specialized expertise.

BY MR. DAVIS:

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

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

MR. FOSTER: What was the previous engagement?

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

MR. FOSTER: Generally speaking, what was it?

MR. SIMPSON: It was something involving Russia.

MR. FOSTER: A little more specifically speaking.

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

MR. DAVIS: Again, it's a voluntary interview
and you are not under compulsion to answer any
questions, but, again, the extent to which you
cooperate will help the committee members evaluate
whether further compulsory process is necessary.

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

MR. SIMPSON: I'm here to cooperate.

BY MR. DAVIS:

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

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

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

A. Translators would be common, in this case
particularly. Forensic people, accountants, PR people, all those services are facets of modern litigation.

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

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

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

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

So people -- other people, you know, in a big case come and go and it's not really my position to ask, you know, who hired them and why. Generally if I'm introduced to somebody they'll explain, you know, why there were other lawyers who worked for
Prevezon who were part of the case. Other people were brought in -- you know, were brought in either by Prevezon or by the lawyers and I didn't always try to pin that down.

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

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

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

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

Q. What was the name of that PR firm?
A. There were several. We actually, you know, had a series of screening sessions. I think Weber Shandwick was the one we ended up with.

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

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

MR. DAVIS: With a little more detail.

BY THE WITNESS:

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

So the first thing, you know, in any case really is to sort of try and figure out whether your own client's story can be supported or whether it's not true, and the lawyers -- you know, we work with a lot of prominent law firms and in many cases
the first thing the lawyers need to know is whether
their client's story is real, whether it can be
supported, you know, because in any new case you
don't know whether your own client is telling you
the truth.

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

We were able to ascertain that Mr. Baranovsky
was, in fact, associated with Russia's biggest
organized crime family, the Solntsevo Brotherhood,
S-O-L-N-T-S-E-V-O brotherhood, which is the major
dominant mafia clan in Moscow. So as far as it
went, the client seemed to be telling the truth.
You know, there was extensive record of these
events and we found some indications from western
law enforcement that western law enforcement did
consider Baranovsky to be a lieutenant in this
organized crime family. So we did that for a
while. Edward Baumgartner helped a lot with that
because of his Russian language skills and his
ability to interface with the court system in
Russia.

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

So at that point I was asked to help see if
we could get an interview with William Browder.
They wrote a letter to Browder and asked him to
answer questions and he refused. Then the lawyers
wanted to know, you know, whether he could be
subpoenaed. So a lot of what I did in 2014 was
help them figure out whether he could be subpoenaed
in the United States to give a deposition, and the
first thing that we did was we researched the
ownership and registration of his hedge fund, which
was registered in Delaware and filed documents with
the Securities and Exchange Commission.

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

In any case, he said he never came to the
United States, didn't own any property here, didn't
do any business here, and therefore he was not
required to participate in the U.S. court system
even though he admitted that he brought the case to
the U.S. Justice Department. So we found this to
be a frustrating and somewhat curious situation.
He was willing to, you know, hand stuff off to the DOJ anonymously in the beginning and cause them to launch a court case against somebody, but he wasn't interested in speaking under oath about, you know, why he did that, his own activities in Russia.

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

So we began looking for public information about when he might be in Aspen, Colorado, and I found a listing on the Aspen Institute Website about an appearance he was going to make there in the summer of 2014. So we -- I served him a subpoena in the parking lot of the Aspen Institute in the summer of 2014 using two people -- two subcontractors. Actually, those other subcontractors were -- their names escape me, but I
forgot about those. We can get you that. This is all in the Pacer court record, the public court record.

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

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

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

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

I'll add that, you know, I've done a lot of Russia reporting over the years. I originally met William Browder back when I was a journalist at the Wall Street Journal when I was doing stories about corruption in Russia. I think the first time I met him he lectured me about -- I was working on a
story about Vladimir Putin corruption and he lectured me about how have Vladimir Putin was not corrupt and how he was the best thing that ever happened to Russia. There are numerous documents that he published himself, interviews he gave singing the praises of Vladimir Putin. At that time I was already investigating corruption in Putin's Russia.

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

In the course of doing this research into what he might not want to be asked about from his
history in Russia we began to learn about the
history of his tax avoidance in Russia and we began
to deconstruct the way that his hedge fund
structured its investments in Russia and, you know,
we gradually accumulated through public records,
not all from Russia, that he set up dozens of shell
companies in Cyprus and other tax havens around the
world to funnel money into Russia and to hold
Russian securities.

He also set up shell companies inside of
Russia in order to avoid paying taxes in Russia and
he set up shell companies in a remote republic
called Kalmykia, K-A-L-M-Y-K-I-A, which is next to
Mongolia. It's the only Buddhist republic in
Russia and there's nothing much there, but if you
put your companies there you can lower your taxes.
They were putting their companies in Kalmykia that
were holding investments from western investors and
they were staffing these companies -- they were
using Afghan war veterans because there's a tax
preference for Afghan war veterans, and what we
learned is that they got in trouble for this
eventually because one of Putin's primary rules for
business was you can do a lot of things, but you've
got to pay your taxes.
In fact, William Browder famously said in 2005 at Davos everybody knows under Putin you have to pay your taxes, which is ironic because at the time he was being investigated for not paying taxes. Ultimately they were caught, some of these companies were prosecuted, and he was forced to make an enormous tax payment to the government of Russia in 2006.

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

But returning to the detailed discussion of my work, we investigated William Browder's business practices in Russia, we began to understand maybe what it was he didn't want to talk about, and as we looked at that we then began to look at his decision to surrender his American citizenship in 1998. At that point somewhere in there the Panama papers came out and we discovered that he had incorporated shell companies offshore in the mid 1990s, in 1995 I believe it was in the British Virgin Islands, and that at some point his hedge fund's shares had been transferred to this offshore
This offshore company was managed -- several of his offshore companies were managed by the Panamanian law firm called Mossack Fonseca, M-O-S-S-A-C-K, Fonseca, F-O-N-S-E-C-A, which is known now for setting up offshore companies for drug kingpins, narcos, kleptos, you name it. They were servicing every bad guy around. And I'm familiar with them from other money laundering and corruption and tax evasion investigations that I've done.

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

So that's an overview of the sort of work I was doing on this case. In the course of that I also began reaching back, I read his book Red Notice to understand his story and the story of his activities in Russia. I'll add also that I was extremely sympathetic for what happened to Sergei Magnitsky and I told him that myself and I tried to help him. It was only later from this other case
that I began to be curious and skeptical about
William Browder's activities and history in Russia.

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

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

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

MR. LEVY: No problem.

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

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

BY THE WITNESS:
A. I'll just finish with one last thing and I'm happy to answer that question.

So in the course of this, you know -- I mean, one of my interests or even obsessions over the last decade has been corruption in Russia and Russian kleptocracy and the police state that was there. I was stationed in Europe from 2005 to 2007 or '08. So I was there when Putin was consolidating power and all this wave of power was coming. So it's been a subject that I've read very widely on and I'm very interested in the history of Putin's rise.

You know, in the course of all this I'll tell you I became personally interested in where Bill Browder came from, how he made so much money under Vladimir Putin without getting involved in anything illicit. So I read his book and I began doing other research and I found filings at the SEC linking him quite directly and his company, Salomon Brothers at the time, to a company in Russia called Peter Star, and I had, as it happens, vetted Peter Star and I knew that Peter Star was, you know, at the center of a corruption case that I covered as a reporter at the Wall Street Journal. When I went back into the history of Peter Star I realized that
Bill Browder did business with the mayor's office in Saint Petersburg when Vladimir Putin was the deputy mayor and was responsible for dealing with western businessmen and corporations.

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

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

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

MR. SIMPSON: Yeah.

MR. FOSTER: I just wanted to clarify that.

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

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

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

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

(A short break was had.)

MR. DAVIS: It's about 10:55.

EXAMINATION

BY MS. SAWYER:

Q. Mr. Simpson, again, I'm Heather Sawyer, I work as counsel for Senator Feinstein, and I have with me two of my colleagues. I will primarily be
asking the questions. They may have some
follow-up.

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

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

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

So essentially we gather up large quantities
of public information and we process that. We've
sort of more recently branched into data science
and, you know, digital data, obtaining databases
through FOIA. We do a lot of Freedom of
Information Act work. We work with court records
a lot, corporate records a lot. Some of my employees do a lot of financial crime and money laundering and fraud investigations, tax evasion, that sort of thing. Those are my specialties.

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

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

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

A. Generally speaking, people tend to get referred to us when they have a sort of undefined need, like they feel like they don't know what
happened or they don't know what happened, they
don't know what's going on. So I think that's what
I referred to earlier as the decision support part
of our work.

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

Q. So in some ways it's fact gathering and
due diligence for clients?
A. Well, it is certainly fact gathering and I
certainly am around the due diligence industry and
I am essentially part of it, but we don't really do
a lot of classic due diligence, which has become a
commoditized product in the business intelligence
field that is conducted, you know, at a fairly sort
of low level. It's become sort of a mass product
1 like a McDonald's cheeseburger.

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

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

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

What happens after you've done open-ended
research is then, of course, you try to apply it to
the specific issues at hand. So if you're not able
to get a government contract and you think the
other guy is up to something and we find out, you
know, indeed he's been making, you know, payments
to somebody, you know, then we would, you know,
advise them on how to address that.

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

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

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

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

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

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

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

A. 2016 presidential election.
Q. And then, by extension, when you're talking about an international businessman, I presume you're talking about then candidate now President Trump?
A. Yes.
Q. I do want to ask you more about that, but before we get to that, in general, when you do the political or campaign work you're equally free to follow the facts wherever they lead you and the firm Fusion GPS?
A. Yes, that's right.
Q. Now, certainly it sounds like you handle business for multiple clients, not just one client at one time. How do you handle the fact that you have work for more than one client in terms of protecting confidentiality in general and ensuring -- well, first of all, I presume that you take steps so that work for one client is not shared with another client?
MR. LEVY: What's the question?
MS. SAWYER: Do you take steps to ensure that work that you're doing for one client is not shared with another client?
BY THE WITNESS:
A. Yes. My partners and I don't talk
about -- it's like a lawyer wouldn't talk about one client to another client. You know, there's some exceptions when things become public. If we're working on a public matter and someone else asks us about it, I mean, obviously if it's public it's not -- it doesn't need to be protected. But we have systems to segregate our cases and clients and, you know, we deal with them individually and we operate in that sense, you know, like a lawyer would.

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

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

A. Well, our subcontractors are governed by NDA's to start with. In most cases that I can think of we don't have one subcontractor working on
more than one matter, but to the extent that would happen, we don't really -- when you're dealing with subcontractors you're giving them generally very specific assignments, find out what you can about this company or this businessman or this court case, whatever, and a lot of that you never get into who the client is. It's irrelevant.

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

Q. So you had mentioned a few minutes ago that you had done some political or campaign research in the course of the 2016 presidential
election and you clarified that that was work related to then Candidate and now President Trump. What can you tell us about that work? Can you just describe it first generally and then I'll ask you some follow-up.

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

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

So anyway, we read everything we could read about Donald Trump. Those books cover his
divorces, his casinos, his early years dealings
with labor unions and mafia figures. I'm trying to
think what else. His taxes certainly have always
been a big issue. Again, it was sort of an
unlimited look at his -- you know, his business and
finances and that sort of thing.

Q. And when did this work begin?
A. It was either September or October of
2015. I recall being in London on other business
and hearing somebody wanted for us to take a look
at it.

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

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

BY MS. SAWYER:

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

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

BY MS. SAWYER:

Q. So with regard to this engagement in
September -- that began initially in September or
October 2015, what were you asked specifically to do by the client?

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

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

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

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

BY MS. SAWYER:

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

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

Q. Sure.

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

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

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

BY THE WITNESS:

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

Q. And then when you spoke with my colleagues
earlier you had indicated that sometimes when facts are gathered you present options to a client and you articulated kind of four options, a potential lawsuit, take it to a government agency, give it to Congress, give it to the press. Did you -- were those the general options on the table with regard to this engagement as well?

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

BY THE WITNESS:

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

Q. And are you free today to talk to us about
any of the actual findings from that research and
that engagement?

A. Yes.

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

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

In the early -- the very first weekend that I started boning up on Donald Trump, you know, I found various references to him having connections to Italian organized crime and later to a Russian organized crime figure named Felix Sater, S-A-T-E-R. It wasn't hard to find, it wasn't any great achievement, it was in the New York Times, but as someone who has done a lot of Russian organized crime investigations as a journalist
originally that caught my attention and became
something that, you know, I focused on while other
people looked at other things.

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

As it happens, Felix Sater was, you know,
connected to the same Russian crime family that was
at issue in the Prevezon case, which is the
dominant Russian crime family in Russia and has a
robust U.S. presence and is involved in a lot of
crime and criminal activity in the United States
and for many years was the -- the leader of this
family was on the FBI most wanted list and lives
openly in Moscow as a fugitive from U.S. law for a very elaborate stock fraud.

Q. Who is that individual and family?

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

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

Q. And what, if anything, did you conclude
about the connection between and in the business dealings that then Candidate Trump had had with Mr. Sater?

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

You know, we also conducted a much broader sort of look at his entire career and his overseas investments in places like Europe and Latin America. You know, it wasn't really a Russia focused investigation for the first half of it. That was just one component of a broader look at
his business career, his finances. We spent a lot of time trying to figure out whether he's really as rich as he says he is because that was the subject of a libel case that he filed against a journalist named Tim O'Brien for which there was quite a lot of discovery and litigation filings detailing O'Brien's allegation that he was worth, you know, maybe a fifth to a third of what he claims and Trump's angry retort that he was worth far more than that.

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

One of the things we found out was that, you know, when it comes to paying taxes, Donald Trump claims to not have much stuff. At least the Trump organization. So they would make filings with
various state and local authorities saying that
their buildings weren't worth much.

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

A. I can't answer that.

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

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

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

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

MR. SIMPSON: It's difficult to specifically
recall when we did exactly what. For example, the
specific issue of the golf courses I think did come
up later, much later, but these things run in
stages. For instance, in the early stage of an
investigation, you know, particularly of Donald
Trump you want to get every lawsuit the guy's ever
been in. So, you know, we collected lawsuits from
around the country and the world. And I do
remember one of the earlier things we did was we
collected a lot of documents from Scotland because
he'd been in a big controversy there about land
use. There had been another one in Ireland. There
was a lot of Freedom of Information Act requests
and that sort of thing.

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

BY MS. SAWYER:

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

A. I can only estimate it.
Q. And in general when do you think that ended?
A. Spring of 2016.

MR. LEVY: Don't guess.
MR. SIMPSON: I'm sorry.

BY MS. SAWYER:
Q. Okay. But that engagement did come to an end and it came to an end before November 8th, the election, November 8, 2016?
A. It did end before the election, yes.

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

Q. And can you tell us generally when that engagement began?
A. It was in the first half of 2016.

Q. And what, if anything, can you tell us about that client?
A. Nothing.

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

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

MR. LEVY: Privilege.
MS. SAWYER: Okay.

MR. LEVY: And other obligations of confidentiality.

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

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

MS. SAWYER: Okay.

BY MS. SAWYER:

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

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

MR. LEVY: Sure.

(Whereupon a discussion was had sotto voce.)

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

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

MR. LEVY: It's a voluntary interview and it
would implicate privileges and obligations that we've set forth with the committee potentially.

MS. SAWYER: Sure.

BY MS. SAWYER:

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

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

Q. So it has been widely reported that you engaged Christopher Steele to do part of the 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 subcontractor for you? And when I say "you" here I mean Fusion GPS.
4
A. Yes.
5
Q. And when did you engage Mr. Steele to conduct opposition research on Candidate Trump?
6
A. I don't specifically recall, but it would have been in the -- it would have been May or June of 2016.
7
Q. And why did you engage Mr. Steele in May or June of 2016?
8
A. That calls for a somewhat long answer. We had done an enormous amount of work on Donald Trump generally at this point in the project and we began to drill down on specific areas. He was not the only subcontractor that we engaged. Other parts of the world required other people. For example, we were interested in the fact that the Trump family was selling merchandise under the Trump brand in the United States that was made in sweat shops in Asia and South America -- or Latin America. So we needed someone else for that. So there were other things. We were not totally focused on Russia at
that time, but we were at a point where we were --
you know, we'd done a lot of reading and research
and we were drilling down on specific areas.
Scotland was another one.

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

Q. So in May or June 2016 you hired
Christopher Steele to, as you've just indicated,
find out what he could about Donald Trump's
business activities in Russia. Did something in
particular trigger that assignment?
A. No, I don't think I could point to
something in particular as a trigger. I mean, the basis for the request was he had made a number of trips to Russia and talked about doing a number of business deals but never did one, and that struck me as a little bit odd and calling for an explanation.

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

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

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

A. I don't specifically remember. What I know was that there was chatter around Washington
about hacking of the Democrats and Democratic think
tanks and other things like that and there was a
site that had sprung up called D.C. Leaks that
seemed to suggest that somebody was up to
something. I don't think at the time at least that
we were particularly focused on -- well, I don't
specifically remember.

Q. So you hired Mr. Steele. Had you worked
with him before?
A. Yes.

Q. And can you generally describe what he had
done in the capacity of working with you and your
firm, what kind of projects?
A. Generally speaking, like me, Chris tends
to work for lawyers who are attempting to assist
clients in litigation or an asset recovery-type
situation. And so, you know, the former Soviet
Union throws off an enormous number of disputes
about who owns what because of the history of state
ownership of everything and the transfers of
property into private hands following the collapse
of the Soviet Union was a murky process. So
particularly in Europe there's a lot of disputes
over who really owns what.

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

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

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

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

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

So -- I mean, I hope you won't be insulted,
but he's basically a Boy Scout. You know, he worked for the government for a very long time. He lives a very modest, quiet life, and, you know, this is his specialty. We got along very well because my specialty is public information. So he was comfortable working with me and I was comfortable working with him and, you know, we've both been around a lot of criminal investigations and national security stuff.

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

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

A. The way our firm runs we pursue things, you know, somewhat out of curiosity. So we didn't know -- it was opaque what Donald Trump had been doing on these business trips to Russia. We didn't know what he was doing there. So I gave Chris --
we gave Chris a sort of assignment that would be
typical for us which was pretty open ended. We
said see if you can find out what Donald Trump's
been doing on these trips to Russia. Since Chris
and I worked together over the years there's a lot
that didn't need to be said. That would include
who is he doing business with, which hotels does he
like to stay at, you know, did anyone ever offer
him anything, you know, the standard sort of things
you would look at. I don't think I gave him any
specific instructions beyond the general find out
what he was up to.

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

A. In Russia?

Q. Yes.

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

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

A. At some point, I think probably after the
end of the Prevezon case we asked him to help with
I think -- my specific recollection is he worked on
specific issues involving Paul Manafort and
Ukraine.

Q. With regard to the presidential election
of 2016?
A. Yes.

Q. We had talked about work for multiple
clients. What steps were taken, if any, to make
sure that the work that Mr. Baumgartner was doing
for Prevezon was not shared across to the clients
you were working for with regard to the
presidential election?
A. He didn't deal with them. He didn't deal
with the clients. There wouldn't have been any
reason to -- he operates under the same rules that
I do.

Q. And with regard to Mr. Steele, did he ever
do any work for Fusion GPS on the Prevezon
litigation matter?
A. No.

Q. It's my understanding that Mr. Steele
works with a company called Orbis & Associates.
Did anyone else at Orbis, to the best of your
knowledge, work with Mr. Steele on the engagement
that you had with him related to Candidate Trump?

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

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

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

Q. First within his company.

MR. LEVY: If you know.

BY THE WITNESS:

A. I mean, I just don't remember their names.

I remember meeting somebody in London who I think worked on it, but I just don't remember.

Q. Somebody else associated with Orbis?

A. Yes.

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

A. Yes.

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

A. I don't recall giving him specific
instructions. We spoke on the phone about various areas of interest. For example, when Paul Manafort was elevated to running the campaign, we talked about Paul Manafort and his long history of dealings with Russian oligarchs. So it's more of a collaboration than, you know, sort of manager-employee kind of relationship. You know, we would talk about things that were interesting to us and that seemed to be -- you know, needed to be (indecipherable).

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

A. Yes, I think that's fair.

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

A. Well, I think it's important to understand we were doing in my company, you know, all kinds of research, including lots of Russia research, and part of what you do when you get information from someone outside the company who's specifically looking at a discrete set of questions or issues is you add it to the stuff you've already gathered. So we did all kinds of stuff on public information about Donald Trump's business trips to Russia and
business dealings with Russians. I mean, Chris's role was specifically to do the thing that we couldn't do, which was to arrange to talk to people. Generally speaking, we don't do a lot of interviewing. Our research is very document focused.

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

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

So, you know, when Chris started asking around in Moscow about this the information was sitting there. It wasn't a giant secret. People
were talking about it freely. It was only, you know, later that it became a subject of great controversy and people clammed up, and at that time the whole issue of the hacking was also, you know, not really focused on Russia. So these things eventually converged into, you know, a major issue, but at the time it wasn't one.

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

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

A. When Chris -- I don't believe it, I know it. When Chris briefs in a sort of more formal setting, which I've seen, you know, when he introduces himself -- you know, he was the lead Russianist for MI6. So the first sort of beginning of that is he says, you know, I've worked on this
issue all my life and when you're trained in Russian intelligence matters the fundamental problem of your profession is disinformation. It's the number one issue.

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

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

A. I just don't know. I can just tell you that it was -- I mean, things follow the political cycle. So there was a point at which the Republican primaries were fundamentally over and the Democrats hadn't really begun yet. So there was some transition period. That's all I can say. I don't keep the books at my place. So I would feel -- I'm afraid to give you a wrong answer that. I just don't know.
Q. Did either client know that you had hired Mr. Steele specifically?
A. I don't think I can answer that.
Q. And on what basis can you not answer that?
MR. LEVY: The answer to that question would -- could require the disclosure of client communications which might implicate privileges and obligations that we've previously set forth to the committee.

BY MS. SAWYER:
Q. Okay. Maybe you can answer this question, then. Did either client ever direct Mr. Steele themselves, directly engage and have conversations with Mr. Steele?
A. I don't think I can answer that.
MR. LEVY: Do you want to take a break?
MR. SIMPSON: Sure.
MR. LEVY: Let's take a break and confer.
MR. SIMPSON: That's fine.
MS. SAWYER: Sure. We'll go off the record for a few minutes.
MR. FOSTER: It's 11:51.
(A short break was had.)
MR. FOSTER: It's 11:53.
MS. SAWYER: I think the question pending was
just whether or not the clients specifically spoke
with or directed Mr. Steele's work?

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

BY MS. SAWYER:

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

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

A. Right. We're both professionals and we
both deal with multiple clients. So we don't talk about a case with one client with another client.

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

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

BY THE WITNESS:

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

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

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

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

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

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

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

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

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

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

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

A. That's how we did it. We would assess it based on the content and the credibility of -- we'd
try to determine the credibility of what we were reading.

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

MR. SIMPSON: Yeah.

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

MR. SIMPSON: Okay.

MS. SAWYER: So we'll go off the record. It's high noon, 12:00. So let's go off the record. (A short break was had.)

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

EXAMINATION

BY MR. DAVIS:

Q. All right. Mr. Simpson, I'm going to return to the topic of Prevezon. Let me know if I'm accurately summarizing the scope of work you're describing. I think you've described three main areas so far. First is that you were investigating
Prevezon's side of the story to see if it was credible; the second is you were investigating Bill Browder's ties to the U.S. and related subpoena issues; and the third is that you were investigating Bill Browder's Russian businesses.

Is that correct?

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

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

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

BY THE WITNESS:

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

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

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

Q. So is it correct, then, people associated with Fusion did communicate with journalists about
the Prevezon case and the information you found out about Mr. Browder?

A. Yes.

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

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

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

BY THE WITNESS:

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

Q. So then was it typically done on a case-by-case basis or did you have blanket
authorization regardless of specific interactions
with the attorneys?

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

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

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

   MR. FOSTER: Do you bill hourly?
MR. SIMPSON: It depends on the case.

MR. FOSTER: On this case?

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

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

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

BY MR. DAVIS:

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

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

Q. Was the Financial Times possibly one of
Q. Politico?

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

Q. What about NBC?

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

Q. And the New Republic?

A. I think so.

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

A. I don't know if it's in the weeds, but generally speaking, the work -- we provided information about the work that I had done about William Browder's credibility. The whole case ended up -- when I said when he declined to appear voluntarily as I am here and explain things, you
know, it ended up being an issue of why he didn't want to talk. So a lot of it was about his credibility, about his account of his activities in Russia, about his history of tax avoidance, all these things.

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

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

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

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

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

A. I think the answer to that is yes, but I'm struggling to think of a specific example. As I was saying earlier, the lawyers did a lot of the
research too. So there was obviously a sharing of research where, you know, we were feeding research to them and they were housing a central repository of research and then the research would become memoranda and given in court filings. In a lot of these cases we were giving people court filings. So the information was mixed together from various sources.

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

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

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

Q. And did Prevezon or Baker Hostetler ever direct Fusion to relay to the media information
that they had provided to Fusion?

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

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

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

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

A. Yes.

Q. Do any --

A. Most of them were Russian court documents.

Q. Do any Fusion employees or associates speak Russian?

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

Q. Aside from Mr. Baumgartner, do you have
any other support from Russian-speaking individuals in reviewing the Russian documents?

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

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

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

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

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

MR. FOSTER: Feel free to correct me if I'm
wrong. My question is were there instances where you were initiating contact with the press or pitching stories to the press?

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

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

MR. SIMPSON: Yes, but I think we should note here that William Browder is an especially 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
10 There were certainly moments, particularly
11 concerning his unwillingness to appear for a
12 deposition, where we said to some reporters, hey,
13 guy, you know, he's just dodged his third subpoena,
14 you might want to write about this, it's pretty
15 funny. In fact, you know, the third one he ran
16 down a street in Manhattan in the middle of a
17 blizzard to get away from our process servers, but
18 that one we actually had them film it.
19
20 So, you know, did we want to get that
21 covered, did we think it was important that people
22 know that this guy was unwilling to appear in court
23 in public under oath to talk about the story that
24 he'd been selling for years about his activities in
25 Russia? Yeah, we wanted people to know that.
26
27 BY MR. DAVIS:
28
29 Q. Other than the media and Baker Hostetler,
did Fusion provide any information regarding the
Prevezon matter to any other third parties?

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

Q. We'll get into that a little bit more.
Also to go back to the translator you
mentioned, you said Anatoli and that you didn't
know how to pronounce --

A. Samochornov I think is his --

Q. Okay.

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

Q. Do you know Rinat Akhmetshin?

A. Yes, I do.

MR. MUSE: Spell it.

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


BY MR. DAVIS:

Q. When did you first meet Mr. Akhmetshin?

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

Q. And as far as you know, what is his
business?
A. Some kind of PR consulting lobbyist. I think he's a registered lobbyist.

Q. Have you ever worked with Mr. Akhmetshin?

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

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

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

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

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

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

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

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

A. A former Kazakh politician whose name escapes me.

Q. Do you remember when you met that client?

A. Years ago in London.

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

A. Not to my knowledge.

Q. Has he ever provided information to Fusion
GPS for use in your work?

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

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

A. Not to my knowledge.

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

A. I did not have a clear understanding of his role initially. He started attending meetings sometime in 2016, just a handful of things, and it's -- you know what? I don't recall anyone ever saying to me you're not doing X, Y, or Z. They may have. I just don't recall. The lane that I was in was the court case and this fight over whether Browder would have to testify, which morphed then into this fight over whether -- you know, his allegations that John Moscow had a conflict of interest. So I was very focused on that. These
other issues came up two plus years into the case
and he was clearly dealing with them, but I don't
recall anyone sort of giving me a specific
explanation, you know, of what he was doing.

MR. FOSTER: What other issues?

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

BY MR. DAVIS:

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

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

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

MR. SIMPSON: Ed Lieberman is a lawyer in
Washington who has a specialty in international tax
who worked for Baker Hostetler on some of the
analysis of the alleged tax evasion by Hermitage
Capital and William Browder. And then subsequently
also he knows Rinat from I guess, I don't know,
college or something and subsequently the two of
them were working on the -- I don't know what to
call it, the congressional stuff.

MR. FOSTER: Lobbying Congress?

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

BY MR. DAVIS:

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

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

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

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

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

A. Well, I knew he had been a soldier, I knew
he had been in the Soviet military, and I also knew
that he went to Moscow a fair bit because he said
on several occasions I'm in Moscow or I'm going to Moscow. He may have -- I don't recall whether he mentioned having worked with the Russian government.

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

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

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

A. Not that I specifically recall.

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

A. I have reason to wonder whether he has ties to the Russian government, but, you know, in the course of my work for Baker Hostetler the question of whether he had some connection to the
Russina government wasn't germane really. It just
didn't come up. Obviously with the news of this
meeting at Trump Tower and the allegations in the
media that there's some relationship there I share
everyone's interest in the answer to that
question.

Q. Do you know Natalia Veselnitskaya?
A. Yes.

Q. When did you first interact with
Ms. Veselnitskaya?
A. I believe it was sometime in 2014.

Q. Has Fusion ever worked with
Ms. Veselnitskaya?
A. Didn't I just answer that? Yes. I mean,
she was the lawyer, the Russian lawyer who retained
Baker Hostetler who retained us. So when you say
"worked with," I don't know that as a technical
meaning, but we interacted with her as part of the
Prevezon litigation.

Q. Has Fusion ever been paid by her?
A. Well, she arranged -- as the lawyer for
Prevezon she would have arranged for Prevezon to
pay Baker Hostetler which paid us. So if that's
what your question is, then the answer is yes, but
I mean, I don't think the money came from her. It
Q. Were there any direct payments that didn't go through Baker Hostetler?

A. No.

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

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

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

A. Well, I certainly discussed it with her at some point, but it was all in Russian. You know, the bulk of the Russian-English translating just
for, you know, chain of evidence reasons went from
her to Baker Hostetler. They would have materials
analyzed and translated and then they would -- I
don't read a word of Russian. So I would get the
certified translations of stuff from Baker.

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

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

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

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

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

A. I recall some of the when and the where.
There were a couple of dinners in New York and a couple of dinners in D.C. I don't remember when they started. I think probably 2015. And there was some in 2016 in both cities.

Q. Were any in June 2016?
A. Yes. Two.

Q. Were those in New York or in D.C.?
A. I believe that one was in New York and one was in D.C.

Q. Do you recall the specific date of either?
A. I didn't until we tried to piece these things together, but June 8th I think was the dinner in New York and I think the 10th was the dinner in D.C., something like that.

Q. And what were the purposes of these dinners?
A. Well, the first one was just an obligatory client dinner which, you know, when you work on a legal case you get invited to dinner with the clients. The one in D.C. was more of a social thing. It wasn't -- she was at it, but it wasn't really about the case. It was just a bunch of Mark Cymrot's friends. You know, the editor of the Washington Post book section was there and his wife who's a well-known author were also there. I can't
remember who else was there. But anyway, she sat at the other end of the table from me and, you know, as I said, she doesn't really speak English and I don't speak Russian. So not a lot of chit-chat.

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

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

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

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

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

A. No.

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

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

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

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

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

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

A. I don't think so.

Q. Or Fusion more broadly?

A. Not that I can recall.

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

A. No.

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

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
Mr. Lieberman has ties to the Russian government?
   A. No.

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

Q. As far as you know, what is Mr. -- what is Robert's business?
   A. I don't know.

Q. So presumably, then, has Fusion ever worked with him?
   A. Not to my knowledge.

Q. What did you understand Mr. Arakelian's role to be in the Prevezon work?
   A. I didn't know he had a role. If someone told me I've forgotten, but, again, I was pretty narrowly focused on a few things and he wasn't involved in those things.
Q. Were you aware that he was a registered lobbyist for HRAGI?
A. No.

Q. Other than meeting him at that dinner, did you have any other interactions with him in the course of the Prevezon work?
A. Not that I can recall.

Q. Did Fusion provide any research to him directly or through an intermediary such as Baker Hostetler?
A. I don't know. I mean, if Baker Hostetler gave him information from my research or my company's research, they didn't tell me.

Q. Do you have any reason to believe he has ties to the Russian government?
A. No.

Q. But you said he is friends with the Katsyvs?
A. I shouldn't speculate. I recall he was introduced to me as a friend of someone and I don't remember whether it was Rinat or Denis Katsyv, but it was one or the other.

Q. Do you know Howard Schweitzer?
A. I don't, not that I can recall.

Q. So you've never done any business with
him; is that correct?
A. I don't think so.
Q. Do you know if he had any role in the Prevezon work?
A. I've read that his firm was involved in the lobbying, but it's just something I read. I don't believe I had any personal interactions.
Q. Do you know who Denis Katsyv is?
A. He's the owner of Prevezon.
Q. Did you have any interactions with him?
A. Again, I sat in a few meetings, a couple of client meals, but it was limited by his limited English and my limited Russian.
Q. In your interactions with Ms. Veselnitskaya did she claim to be acting as the attorney for Prevezon Holdings and the Katsyv family or just for Prevezon Holdings?
A. She was introduced to me as the lawyer for Prevezon. I never --
MR. LEVY: When you say "the Katsyv family," Denis Katsyv is the only person named in the lawsuit. I'm just wondering what you mean by that.
MR. DAVIS: Denis or Pyotr.
MR. SIMPSON: As I said, she was introduced to me as the lawyer for Prevezon. So -- and I
think the lawyer for Denis. So beyond that I
don't know.

BY MR. DAVIS:

Q. Do you know who Pyotr Katsyv is?

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

Q. Did you have any interactions with him?

A. No.

Q. Do you know Chris Cooper?

A. Yes.

Q. How long have you known Mr. Cooper?

A. Probably ten years, maybe longer.

Q. As far as you know, what is his
business?

A. Public relations.

Q. Is he associated with the Potomac Square
Group?

A. I believe he is the Potomac Square Group.

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

A. Yes.

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

A. I believe we've paid him. I don't know if
Q. What did you understand his role to be in the Prevezon work?
A. He worked on his movie doing essentially as I understand it and recall it, he was asked to help find a place where they could show this movie. William Browder likes to use the press, but he doesn't like anyone talking freely about him or raising questions about the story of his activities in Russia. So when this movie came together they were going to screen it in Europe and he hired the meanest libel firm in London which has previously sued me on behalf of Saudi billionaires and -- unsuccessfully I might add, and he threatened to file libel cases against the people who were daring to offer to host a showing of this film.

So, as you know, they don't have the First Amendment in Europe. So he was able to successfully suppress the showings of this film which questioned his credibility and whether -- the truth of his story and his activities in Russia. So Chris came up with the idea of showing it at the Newseum which is dedicated to the First Amendment 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
in establishing this screening. Do you know how he 
came to be hired by Prevezon or HRAGI or whoever?

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

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

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

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

Q. What kind of interaction did Fusion have 
directly or indirectly with HRAGI?
A. I remember hearing about it. I remember Rinat talking about it and maybe others. We were very peripheral to this stuff and I don't remember if I had any specific interactions with it. I don't know if they had an office, I don't know if they had a bank account. I just don't know. I do know they registered to lobby.

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

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

Q. Has Fusion ever worked with him?

A. I don't think so, no.

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

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

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

A. I think we had lunch once.
Q. Do you have any reason to believe that Mr. Wiles has ties to the Russian government?
A. No.

Q. So as you mentioned, in 2016 people associated with HRAGI met and attempted to meet with people in a number of congressional offices. Were you aware of any of these meetings?
A. The meeting that I was aware of was a meeting that actually didn't happen which was some meeting that Mark Cymrot was supposed to have. It's possible that he was going to meet some Congressman. It's possible that I was told about other meetings by some of these people that we're discussing, but I don't specifically remember hearing about other meetings. I was generally aware that there was stuff going on on the Hill.

Q. If I could refer back to Exhibit 2, the partial privilege log. The first page of that document lists a 5/13/16 e-mail from Rinat Akhmetshin to Mark Cymrot with the subject/description "Appointment with Cong. Hill." Do you believe that to be a reference Congressman French Hill?
A. I don't know. I believe it was a
Congressman named Hill. I don't know if it was a
Congressman named French Hill.

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

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

Q. Did Fusion have any role in these
meetings?

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

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

A. I don't know.

Q. You mentioned you had dinner with
Ms. Veselnitskaya on June 8th and 10th of 2016.
Were you generally aware of her trip to the United
States in June?
A. I was. She had trouble getting a visa and the lawyers -- there was some drama over whether she could get a visa. This would have been a recurring issue in the case. You know, our lawyers believed that the Justice Department was interfering with her visas because they wanted to inhibit her from collaborating with us on the case, but I don't have any independent knowledge of her visa issues. I just remember that was an issue.

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

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

Q. And that hearing was on June 8th; is that correct?
A. I believe it was June 9th.

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

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

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

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

A. Yes.

Q. And dinner again on the 10th?

A. In D.C.

Q. Did you see her any other time?

A. Not that I recall.

Q. Did Fusion play any role assisting Ms. Veselnitskaya during that trip?
A. Not that I recall.

Q. It has widely been reported Ms. Veselnitskaya and Mr. Akhmetshin and others met with Donald Trump, Junior, Paul Manafort, and Jared Kushner on June 9th, 2016. Were you aware of this meeting beforehand?

A. No.

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

A. No.

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

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

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

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

Q. I should clarify, discussed with you.

A. Yeah. So if she discussed with somebody
else, I wouldn't --

Q. Right.

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

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

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

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

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

A. I don't.

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

A. I mean, that's kind of an analytical
question. I don't have any factual reason to
believe that. I don't have possession of any
information about this that would allow me to say one way or the other. You know, as a sort of question of counterintelligence and just general investigation of Russian methods and that sort of thing, I think that's a reasonable interpretation.

Q. Have you had any communications about the meeting at any time with Rinat Akhmetshin?
A. No. No.

Q. Have you had any communications about the meeting, again, at any time with Ms. Veselnitskaya?
A. No.

Q. Have you had any communications about the meeting with anyone you worked with on the Prevezon matter?
A. Probably. I think we all exchanged mutual expressions of surprise. I think I talked to Paul Levine, a lawyer at Baker Hostetler. I'm sure I discussed it with Ed Baumgartner, Mark Cymrot. You know, if anyone knew about it they certainly didn't confess it to me.

Q. Do you know -- I'm going to butcher this name -- Irakle Kaveladze?
A. I know who he is.

A. No, I don't know.

Q. Has Fusion ever worked with him?

A. No, not to my knowledge.

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

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

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

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

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

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

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

Q. Has Fusion ever worked with him other than
on the Prevezon case?
A. No.

Q. And to the best of your knowledge, what
was his role in the Prevezon case?
A. As I understood it, he was recruited off
the rack basically as a certified -- a translator
who had courtroom experience in New York who was
qualified to do sort of technical-legal type
translation work. He, to my knowledge, didn't have
a pre-existing relationship with Ms. Veselnitskaya
or Prevezon. That's my understanding to this day.

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

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

AFTERNOON SESSION

MS. SAWYER: We'll go back on the record.
It's 1:55.

EXAMINATION

BY MS. SAWYER:

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

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

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

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

(Exhibit 3 was marked for identification.)

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

A. Yes, it is.

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

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

Q. And does this represent the entire universe of memos that Mr. Steele created as part of this particular engagement for you?
A. To the best of my knowledge as part of this engagement, this is it.

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

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

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

Q. So the company referenced in Company Intelligence Report, your understanding is that
1 would be Orbis, not Fusion GPS?

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

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

A. No.

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

BY THE WITNESS:

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

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

A. Within a couple days, yeah. Yes.

Q. And not every single discrete memo has a 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
hacking. I don't really remember the precise
details. I just remember there were rumblings at
that time about whether there had been lot of
hacking and there was going to be -- political
digital espionage was going to be a component of
the campaign.

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

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

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

A. The first memo.

Q. That's the report 2016/080?

A. Correct.

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

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

MR. MUSE: Just for clarification of "this," there are bates numbers I think that could be
MS. SAWYER: Right. So that first document, the one that we've just been talking about, has Bates Nos. 49391 to 41393. Do we need to go off the record for a moment? Let's go off the record for a moment.

(A short break was had.)

BY MS. SAWYER:

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

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

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

BY THE WITNESS:

A. I can't remember specifically what I had in mind to get from him. This form of reporting was, in fact, the form that the rest of the project took, which was, you know -- I've done other kinds of research in Russia, but something this sensitive...
I don't think I've ever been involved in. So in an ordinary case you would try to gather public records and you would conduct yourself in a much more open fashion.

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

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

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

A. We assessed it for credibility, whether it was credible. The question of the credibility of the information is obviously a big question here, can this be believed. There's other secondary questions that would follow on from that, can it
somehow be used, does it have any use and that sort of thing, but the threshold question is is it credible information.

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

So the issue is where is it coming from and then the other issue is does it make sense or are there events in there that can be externally, you
know, reviewed or backed up. On the question of whether it makes sense -- well, let me stay on the question of some of the events that are described. We were aware of some of these trips and we were obviously aware of the hostility toward Hillary Clinton and, you know, there was a lot of general knowledge that we had that fit with this just in terms of dates and places and roles of people in the Kremlin. So on a surface level, you know, it was credible too, but the thing that, you know, most concerned me at this point was my own familiarity with foreign meddling in American elections, which is a subject that I've dealt with for a long time.

In the 1990s I was working at the Wall Street Journal and I wrote some of the very first stories about the Chinese government's interference in the 1996 presidential election which triggered a massive national security investigation, numerous prosecutions, lots of business for Bob Muse, and a lot of congressional hearings, congressional inquiries. And in that episode it was eventually dug out by congressional investigations that the fundraisers, the Asian fundraisers were Chinese 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.

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.

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.

Q. Okay. So if I can stop you there. It
25 sounds like the components -- you can tell me if
there were more -- that you considered in assessing
the credibility of this was Mr. Steele, his
background, his reputation, overall the fact that
you had information and knowledge of Russia
meddling in other countries' elections, and then
the broader work of Russia to disrupt political
systems of other countries?

A. I covered that. I also would add that the
China case was for me in my journalistic career a
formative event that took -- you know, consumed
years of my reporting and was about, you know, a
Chinese intelligence operation to swing the '96
election to the Democrats.

The only other thing I'd add to all that is,
again, in the mid 2000s one of the stories I
wrote -- actually, I wrote a couple different
stories about a Russian oligarch having a meeting
with Senator John McCain shortly before the 2008
presidential election and another story or set of
stories about Paul Manafort and his involvement
with some Russian and Ukrainian oligarchs who were
considered to be suspicious or corrupt.

So I also knew -- or I formed an opinion or
impression that the Russians were interested in
making friends with the Republicans and that Paul
Manafort, you know, there was this previous episode involving Paul Manafort, John McCain. So all of that was in my head when this came in which, as I say, tended to support the credibility -- the possibility that this information was credible.

Q. You mentioned a Russian oligarch who had met with Senator McCain. Who specifically was that?

A. Oleg Deripaska, O-L-E-G, D-E-R-I-P-A-S-K-A. He's not able to travel to the United States because he's banned for suspicion of ties to organized crime. He's extremely close to the Kremlin, or at least he was, and is -- I broke the story of him being banned from the United States which caused him a lot of embarrassment and trouble with his business and led to him hiring a lobbyist and trying to get involved with getting a visa to the U.S.

Q. And you had also mentioned your background knowledge of Paul Manafort and his involvement with Russian oligarchs. Can you identify who those individuals were and the basis of that knowledge?

A. The issue I specifically wrote about I believe was his work for the Party of Regions and Victor Yanukovych, Y-A-N-U-K-O-V-Y-C-H, I think,
and that's the Pro-Russia party or was the
Pro-Russia party in Ukraine, and all that work sort
of grew out of work I had done about the Kremlin
working with the Russian mafia to siphon money off
the gas trade between Russia and Ukraine.

Q. Was that work you had done while still a
reporter with the Wall Street Journal?

A. Yes.

Q. So any conclusions you had reached from
that, would that be material that we would be able
to obtain and may already have in your public
reporting?

MR. LEVY: We'd have to talk to the Wall
Street Journal about that probably.

BY THE WITNESS:

A. My articles about this are available on
the Internet.

MR. LEVY: Some of them we've produced to you
already because it was responsive to your request.

MS. SAWYER: Understood.

BY MS. SAWYER:

Q. And there's potentially additional work
product related to the work that you had done on
Mr. Manafort?

A. For the Wall Street Journal or later?
Q. Let's start with the Wall Street Journal?

A. I collected lots of information on Mr. Manafort during my years at the Journal.

Q. And then we'll get into the work on Mr. Manafort more recently.

So this particular memo that we've been talking about, this first one doesn't specifically mention, as far as I can see, any efforts to interfere by Russia. It does talk about potential -- as it's called in here, a dossier of compromising material on Hillary Clinton. Did you take any steps to verify whether that dossier of compromising material existed on Hillary Clinton?

A. I will answer that, but can I just back you up a little bit. I think your observation it doesn't mention anything about interfering I wouldn't agree with.

Q. Okay.

A. I mean, one of the key lines here in the second paragraph says "However, he and his inner circle have accepted a regular flow of intelligence from the Kremlin, including on his democratic and other political rivals."

So the issue with the Trump Tower meeting, as
I understand it, is that the Trump people were eager to accept intelligence from a foreign government about their political rivals and that is, you know, I would say, a form of interference. If you're getting help from a foreign government and your help is intelligence, then the foreign government's interfering. I mean, you know, I think that also -- of course, in retrospect we now know this was pretty right on target in terms on what it says. So anyway --

Q. In reference to you think that particular sentence?

A. I mean, it clearly refers to, you know, them being interested in and willing to -- it depicts them as accepting information. What we have seen to date with the disclosures this year is they were at a minimum super interested in getting information.

Q. And when you're referencing the "disclosures this year," could you just be specific about that.

A. The Trump Tower meeting.

Q. So with reference to the June 9th Trump Tower meeting?

A. Yes. Yes.
Q. Okay.

A. I will go back to your question, but, again, it says "Source B asserted the Trump operating was both supported and directed by Putin aimed to sew discord within the U.S.," and, you know, basically -- you know, there's a number of different ways that it seems they're trying to intervene in our politics in this memo. What was your question?

Q. I appreciate that clarification. You were actually clarifying a statement I made, which I appreciate.

So you had testified a little earlier that at the point in time in which you received this first memo you used it a little more as background to inform your thinking on it, but you didn't take discrete steps. Had you -- were you involved in editing this memo in any way?

A. No.

Q. Did you give Mr. Steele any specific direction on, you know, next steps based on this memo?

A. Not that I can recall, no.

Q. So at this point in time was he still operating with the understanding that he was just
to engage in an open-ended research project?

   A. Actually it wasn't really an open-ended research project -- well, it was open-ended in scope, it wasn't open-ended in time. It was take a few weeks, see if there's anything there that's interesting, notable, important, and if we think there's reason to go on we'll make that decision at that time. So it was a short-term engagement in the beginning.

   Q. And to the best you can explain to us, did the client that you were working for know that he was engaged in this particular research or what his findings were at that point in time?

   MR. LEVY: The answer to that question might implicate privilege or obligations.

   BY MS. SAWYER:

   Q. Did you interfere in any way with Mr. Steele's research, tell him not to pursue any particular avenues?

   A. No.

   Q. To the best of your knowledge, did anyone else give him that direction, either directly or through you, and tell him not to --

   A. No.

   Q. If I could just finish.
1       A. I'm sorry.
2
3       Q. -- and tell him not to pursue any
4 particular avenues of research?
5       A. No.
6       Q. Do you know -- if we could just move on to
7 kind of the next memo, which begins with Bates
8 No. 41394 and it ends with 41396. It appears to
9 be -- it's three pages and it has a date of 26 July
10 2015 and it has "Company Intelligence Report
11 2016/086." To the best of your recollection, was
12 this the second memo you had received from
13 Mr. Steele?
14       A. To the best of my recollection, this is
15 the second memo.
16       Q. And how did you kind of use this
17 information?
18       A. Well, I think the context of external
19 events is important here. I believe -- it's my
20 recollection that what prompted this memo was, in
21 fact, the beginning of public reporting on the
22 hack. I think -- what is the date again? Yeah,
23 it's 26 July. So by this time Debbie Wasserman
24 Schultz has been the subject of a very aggressive
25 hacking campaign, weaponized hack, the likes of
which, you know, have never really been seen.
We've seen hacking in politics before, but this kind of, you know, mass theft of e-mail and then to dump it all into, you know, the public sphere was extraordinary and it was criminal.

So the question by now of whether this was Russia and whether this might have something to do with the other information that we'd received was, you know, the immediate question, and I think this is also -- by the time this memo was written Chris had already met with the FBI about the first memo. So he's -- if I can interpret a little bit here. In his mind this is already a criminal matter, there's already a potential national security matter here.

I mean, this is basically about a month later and there's a lot of events that occurred in between. You know, after the first memo, you know, Chris said he was very concerned about whether this represented a national security threat and said he wanted to -- he said he thought we were obligated to tell someone in government, in our government about this information. He thought from his perspective there was an issue -- a security issue about whether a presidential candidate was being blackmailed. From my perspective there was a law
enforcement issue about whether there was an
illegal conspiracy to violate the campaign laws,
and then somewhere in this time the whole issue of
hacking has also surfaced.

So he proposed to -- he said we should tell
the FBI, it's a national security issue. I didn't
originally agree or disagree, I just put it off and
said I needed to think about it. Then he raised it
again with me. I don't remember the exact sequence
of these events, but my recollection is that I
questioned how we would do that because I don't
know anyone there that I could report something
like this to and be believed and I didn't really
think it was necessarily appropriate for me to do
that. In any event, he said don't worry about
that, I know the perfect person, I have a contact
there, they'll listen to me, they know who I am,
I'll take care of it. I said okay. You know, I
agreed, it's potentially a crime in progress. So,
you know, if we can do that in the most appropriate
way, I said it was okay for him to do that.

Q. Okay. So let me just stop you there and
let's just make sure we get the sequencing
accurate.

A. Sure.
Q. So after Mr. Steele had found out the information that he put in the very first of these memos, the one dated June 20, 2016, he approached you about taking this information to specifically the FBI, the Federal Bureau of Investigation?

A. That's my recollection.

Q. So to the best of your recollection, that request or idea came directly from Mr. Steele, not anyone else?

A. That's right.

Q. And who was involved in discussions about whether it was appropriate to take either the memo or the information in the memo to the FBI?

A. It was Chris and me. I mean, that's the only ones I remember, the two of us. The only ones I know of.

Q. You said you had asked for some time to think it over. What in particular did he articulate to you was of significant national security concern to indicate that it should be taken to the FBI?

A. His concern, which is something that counterintelligence people deal with a lot, is whether or not there was blackmail going on, whether a political candidate was being blackmailed
or had been compromised. And the whole problem of compromise of western businessmen and politicians by the Russians is an essential part of -- it's like disinformation, it's something they worry about a lot and deal with a lot and are trained to respond to. So, you know, a trained intelligence officer can spot disinformation that you or I might not recognize, certainly that was Chris's skill, and he honed in on this issue of blackmail as being a significant national security issue.

Chris is the professional and I'm not. So I didn't agree with that -- it wasn't that I disagreed with it. It was that I didn't feel qualified to be the arbitrar of whether this is a national security expert. He's the pro and I'm the ex-journalist.

Q. In that regard when you say he's a professional and you're not, I take that to mean that he was the intelligence expert?

A. He was -- yes, he was the national security guy. I know a lot about politics, I know a good bit about financial crime, but, you know, my specialty was journalism and his was security.

Q. And with specific regard to the issue of blackmail, what was the -- what were the facts that
he had gathered that made him concerned about the possibility of blackmail and who did he think was going to be blackmailed?

A. Well, the facts are -- beyond what's here I don't have any additional facts. The alleged incident that's described here is the one that he was referring to. As I say, I don't have really any additional information beyond this except that -- I mean, it's probably in here somewhere actually, but it's well known in intelligence circles that the Russians have cameras in all the luxury hotel rooms and there are memoirs written about this by former Russian intelligence agents I could quote you. So the problem of kompromat and kompromating is just endemic to east-west intelligence work. So that's what I'm referring to. That's what he's referring to.

Q. Got it. So that would be in the summary the kind of third dash point down where it mentions --

A. Yes, that's right.

Q. -- that FSB -- what is your understanding of who or what FSB is?

A. It's a successor to the KGB. I mean, nominally it's the domestic intelligence agency on
the domestic side of what was the KGB. In practice
it's sort of the preeminent intelligence organ of
the Russian state, government.

Q. And do you recall when you -- when you and
Mr. Steele decided kind of that he could or should
take this to the FBI, approximately the time frame
of that?

A. I believe it was sometime around the turn
of the month. It would have been in late June or
at latest early July. That's my recollection.

Q. And Mr. Steele was the one who was then
responsible for doing the initial outreach to them
and making that contact?

A. Yes. Well, I mean, let's be clear, this
was not considered by me to be part of the work
that we were doing. This was -- to me this was
like, you know, you're driving to work and you see
something happen and you call 911, right. It
wasn't part of the -- it wasn't like we were trying
to figure out who should do it. He said he was
professionally obligated to do it. Like if you're
a lawyer and, you know, you find out about a crime,
in a lot of countries you must report that. So it
was like that. So I just said if that's your
obligation, then you should fulfill your
Q. And were you a part of those conversations with -- that Mr. Steele had with whoever his contact was at the FBI?

A. No.

Q. Do you have any knowledge of when that first conversation actually then took place?

A. Over the last several months that this has become a public controversy I've learned the general date and I believe it was if first week of July, but I don't believe he told me -- if he told me the time, I don't remember when he told me.

Q. And that information about that time, that first week of July, where does that come from?

A. It comes from news accounts of these events and conversations between Chris and I and some of my -- presumably my business partners too. Generally speaking, we have, as you know, not been eager to discuss any of this in public and there's been a lot of speculation and guessing and stories, many of which are wrong. So when an incorrect story comes out we would, you know, talk about it. So, you know, in the course of those kinds of things I generally obtained a sense of when things occurred that I might otherwise not be able to
Q. And do you know who it is that Mr. Steele contacted and talked with at the FBI?

A. I did not know at the time. I believe I know now, but I don't have authoritative information on that. I didn't -- yeah. I didn't know who it was in July.

Q. And do you now know who that was?

A. I think I know, but Chris never told me. I figured it out eventually based on other sources and other information, but that was not until December or November.

Q. December of -- November or December 2016?

A. November, December 2016. It was after the election.

Q. And what is your understanding from what you've been able to put together of who that would have been?

A. My understanding of?

Q. Of who Mr. Steele would have talked to at the FBI.

A. I believe it was a, an official named, an official named. Q. And we had talked about that discussion
that you had with Mr. Steele about potentially
going to the FBI. You had indicated that it was
just the two of you having those conversations and
coming to that decision. Once the decision was
made, did you share that decision with anyone, that
he was going to go to the FBI with this
information?

A. I think we're not able to answer that.

MR. LEVY: He's going to decline to answer
that question.

BY MS. SAWYER:

Q. Did you seek anyone else's approval for
him to go to the FBI?

A. No.

Q. Did anyone ever encourage you to ask him
on to go to the FBI?

A. No.

Q. Did anyone discourage you from having him
go to the FBI?

A. No.

Q. Do you know whether Mr. Steele when he had
that first meeting, which you said occurred in the
first week of July, do you know whether Mr. Steele
actually gave the FBI this document that we've been
talking about, the intelligence report 2016/080?
A. I don't know.

Q. With regard to providing -- what was the goal -- as you understood it, what was the purpose of the kind of goal in taking this to the FBI from Mr. Steele's perspective?

MR. LEVY: Beyond what he's said already?

MS. SAWYER: Yes.

BY THE WITNESS:

A. I mean, for him it was professional obligations. I mean, for both of us it was citizenship. You know, people report crimes all the time.

Q. So beyond reporting -- certainly if I'm mischaracterizing please let me know, but beyond reporting what he believed was an issue of national security and a potential crime, I think you had said kind of a potential crime in progress, do you know whether he requested that the FBI open an investigation?

A. I don't know that. I mean, all he told me in the immediate aftermath was that he filled him in. I can talk generally about the FBI and what happens when you give them information because I know that from years of experience, but generally, you know, you don't ask them to do it. There's no
Q. But you don't know what concrete steps they may have taken once they got the information from him?

A. I do not. Of course we know now that shortly thereafter they got a vice award on one of the people who's dealt with in here. He's not dealt with in this memo, but he's dealt with in the later memos. I don't know there's any connection between these events. I do know in Director Comey's testimony he said -- I'm sorry. Maybe I'm skipping ahead. As far as I know, they didn't -- I don't know what they did.

Q. So then with regard to Mr. Steele's ongoing work, I presume that his work then continued after you got this first memo because we have additional memos between June?

A. Yes.

Q. Was there a discussion about whether and when he would take information to the FBI?

A. Not that I recall. After the initial memo he told me that he had briefed him. I don't remember anything specific about the issue arising again other than to say generally that as the summer progressed the situation with the hacking of
the Democrats and the efforts by the Russians to influence the election and the possibility that the Trump organization was, in fact, doing things to curry favor with the Russians became more and more serious as external developments occurred.

So, for instance, they changed the Republican platform, which is addressed in here. Carter Page shows up in Moscow and gives a speech. He's a campaign advisor and he gives a speech about dropping sanctions. Trump continues to say mysterious things about what a great guy Putin is.

So I vaguely recall that these external events prompted us to say I wonder what the FBI did, whoops, haven't heard from them. So that was basically the state of things through September.

Q. So do you know whether or not Mr. Steele did have any subsequent conversations with the FBI after that initial conversation in the first week of July 2016?

A. Yes, I do. He did.

Q. So can you explain the next incident where you know that Mr. Steele met with the FBI?

A. Yes. I guess what I'd like to explain is what I knew at the time and what I know now. It was September and obviously the controversy was
really front and center now in the election. I can't remember whether the intelligence community had come out with their statement, but, you know, there was a lot of concern in Washington and in the U.S. about whether there was a Kremlin operation to interfere with our election and there was a lot of debate throughout this period about whether they were trying to help Trump or just trying to cause trouble. But there wasn't much debate that they were up to something.

So, you know, I'm dealing with Chris on the underlying reporting and by this time my concern, you know, was -- I was very concerned because Chris had delivered a lot of information and by this time we had, you know, stood up a good bit of it. Various things he had written about in his memos corresponded quite closely with other events and I began, you know, to view his reporting in this case as, you know, really serious and really credible.

So anyway, we were working on all of that and then he said, hey, I heard back from the FBI and they want me to come talk to them and they said they want everything I have, to which I said okay. He said he had to go to Rome, I said okay. He went to Rome. Then afterwards he came back and said,
I'll add because I didn't consider this to be -- you know, there was no objective here politically because you can't -- in an ordinary election I know from my decades of dealing with U.S. elections that you can't expect the government or the FBI to be of any use in a campaign because the DOJ has rules against law enforcement getting involved in investigations in the middle of a campaign and this was obviously -- you know, this obviously became a huge issue.

Anyway, because it wasn't really part of the project in my mind I didn't really ask a lot of questions about these meetings. I didn't ask who he met with, I didn't ask, you know, much of anything, but he did tell me that he gave --

Q. Before we get to that, which I do want to hear, I just want to get a sense of the chronology.

A. Sure.

Q. So when did that -- you had said the FBI then came back and contacted Mr. Steele?

A. That's my understanding.

Q. When did that, to the best of your knowledge, take place?

A. Mid to late September.
Q. So in that intervening time period Mr. Steele continues his research, he also continues to provide you with memos?

A. Yes.

Q. And at no point in that time between July -- the first week of July when he first met with the FBI and then mid to late September did you suggest to him that he should go back to the FBI?

A. Not that I recall. What I would -- what I believe I may have said was have you heard anything from the FBI because by then it was obvious there was a crime in progress. So I just was curious whether he'd heard back.

Q. And when you say it was obvious that there was a crime in progress, what specifically are you referencing?

A. Espionage. They were hacking into the computers of Democrats and think tanks. That's a computer crime.

Q. So the thing that was apparent was Russia or somebody had engaged in cyber intrusion and computer crimes?

A. Yes.

Q. So do you know whether or not Mr. Steele was directed -- you said you did not direct him or
ask him to go back to the FBI -- whether anyone
else either directly or indirectly asked him to go
to the FBI after his July 5th --

A. To my knowledge, no one else told him to
report this. He may have conferred with his
business associates, but I don't know.

Q. And you said that meeting with the FBI,
you said Mr. Steele said he had to go to Rome for
this meeting. Do you otherwise know who he met
with?

A. This gets into the chronology of what I
learned when. At some point I learned that he was
meeting with the lead FBI guy from Rome. I don't
remember when he told me that.

Q. And did you have a name associated with
who that was?

A. Not at that time.

Q. You said that he told you of the meeting
with the FBI in Rome in mid or late September, that
he "gave them a full briefing"?

A. A debrief I think is what he probably
said, they had debriefed him. I don't remember him
articulating the specifics of that. You know, my
understanding was that they would have gotten into
who his sources were, how he knew certain things,
and, you know, other details based on their own intelligence. Essentially what he told me was they had other intelligence about this matter from an internal Trump campaign source and that -- that they -- my understanding was that they believed Chris at this point -- that they believed Chris's information might be credible because they had other intelligence that indicated the same thing and one of those pieces of intelligence was a human source from inside the Trump organization.

Q. And did you have any understanding then or now as to who that human intelligence source from inside the Trump campaign might have been?

MR. LEVY: He's going to decline to answer that question.

MS. SAWYER: On what basis?

MR. SIMPSON: Security.

MR. LEVY: Security.

BY THE WITNESS:

A. We had been really careful -- I was really careful throughout this process to not ask a lot of specific sourcing questions. There are some things I know that I just don't feel comfortable sharing because obviously it's been in the news a lot lately that people who get in the way of the
Russians tend to get hurt.

MR. LEVY: And I would just add that there are privileges and obligations that might be implicated in the disclosure of any source related to this matter.

BY MS. SAWYER:

Q. Was this individual also a person who had been a source for Mr. Steele, without identifying who that was?

A. No.

Q. So this was someone independent of Mr. Steele's sources who potentially had information also on the same topics?

A. Yes. I mean, I don't think this implicates any of the issues to say I think it was a voluntary source, someone who was concerned about the same concerns we had.

MR. DAVIS: I'm having a hard time hearing you. Please speak up.

BY THE WITNESS:

A. It was someone like us who decided to pick up the phone and report something.

Q. And your understanding of this, does that come from Mr. Steele or from a different source?

A. That comes from Chris, yes.
Q. And when did he share that information with you?
   A. I don't remember exactly.
   Q. Do you think it was around the same time that he had met with the FBI, so mid to late September of 2016?
   A. I think more likely early October.
   Q. Do you know whether when Mr. Steele met with the FBI he provided them with the memos that he would have had at that point in time, which would have been mid to late September of 2016?
   A. I don't know that. He didn't tell me that. He did say they asked him for -- they wanted to know everything he had, but whether that would include getting paper I don't know.
   Q. And did he indicate that he had cooperated fully and given them whatever information he had available?
   A. Yes. In the course of these, you know, discussions, you know, he indicated to me this was someone he had worked with previously who knew him and that they had a -- they worked together.
   Q. By that person you're referring to in Rome?
   A. Yes.
Q. Now, with regard to -- just to finish up on the interactions with FBI, do you know were there any additional interactions between Mr. Steele and the FBI?

A. There was some sort of interaction, I think it was probably telephonic that occurred after Director Comey sent his letter to Congress reopening the investigation into Hillary Clinton's e-mails. That episode, you know, obviously created some concern that the FBI was intervening in a political campaign in contravention of long-standing Justice Department regulation.

So it made a lot of people, including us, concerned about what the heck was going on at the FBI. So, you know, we began getting questions from the press about, you know, whether they were also investigating Trump and, you know, we encouraged them to ask the FBI that question. You know, I think -- I'm not sure we've covered this fully, but, you know, we just encouraged them to ask the FBI that question.

On October 31st the New York Times posed a story saying that the FBI is investigating Trump and found no connections to Russia and, you know, it was a real Halloween special.
Sometime thereafter the FBI -- I understand Chris severed his relationship with the FBI out of concern that he didn't know what was happening inside the FBI and there was a concern that the FBI was being manipulated for political ends by the Trump people and that we didn't really understand what was going on. So he stopped dealing with them.

Q. Okay. So I do want to get to the timing on that. I know that I'm getting close to the end of my hour. Can I just ask you a general question on the memos that we were talking about. I had asked you specifically about the first one, if you had in any way -- first of all, with regard to the packet on whole, did you have any input or involvement in the drafting of these or input for the research?

A. No.

Q. And did you edit any of them in any way?

A. No.

Q. So these were documents that you were just receiving from Mr. Steele?

A. Yes. I mean, the only qualifier I'd add is I'm sure I said things like Paul Manafort was just named campaign manager, what do you know about
him, that kind of thing.

Q. I do want to get into some more specifics about kind of what steps and what items you may also clarify, but I do want to make sure, if I could have your indulgence, just that we -- well, we can finish up the FBI part on our next hour because it sounds like there's a little more to finishing that. So our hour is up. If you'll just give me a moment.

Okay. So we'll go ahead and go off the record. It is 2:58.

(A short break was had.)

MR. DAVIS: We'll go back on the record.

It's now 3:09.

EXAMINATION

BY MR. DAVIS:


MR. LEVY: Personally or just does he know about him?

MR. DAVIS: Personally.

BY THE WITNESS:

A. No.

Q. Do you know Aras, A-R-A-S, Agalarov?

A. No.
Q. Has Fusion ever worked with either of them?
A. No.

Q. To the best of your knowledge, have either of them had any role in the Prevezon work?
A. Not to my knowledge.

Q. Do you know Rob Goldstone?
A. No.

Q. Has Fusion ever worked with him?
A. No.

Q. Paid him or been paid by him?
A. No.

Q. To the best of your knowledge, has Mr. Goldstone had any work in the Prevezon or Magnitsky work?
A. Not to my knowledge.

Q. When you had these dinners in June of 2006 with Ms. Veselnitskaya, who else attended those dinners?

BY THE WITNESS:
A. The Baker lawyers would have attended, did attend.

Q. Was Rinat Akhmetshin there?
A. I specifically remember he was at the second dinner on I think it was the 10th. I don't specifically remember if he was at the other dinner. I don't have many memory of the other dinner.

Q. Do you recall if he was at the court hearing on the 9th?

A. I believe he was. I'm not certain of it. The other person would have been a translator at some of these dinners. I can't remember which ones.

Q. Were there any other individuals there involved with HRAGI or Prevezon work beyond the people you've mentioned?

MR. LEVY: When you say "there," you're talking about now?

MR. DAVIS: You're right. At the hearing.

BY THE WITNESS:

A. The hearing. Before you were asking about the dinners, right?

Q. I was.

A. Now you're asking about the hearing. I just want to be clear. Well, it was a crowded hearing and there may have been other people involved. I mean, I remember specifically pretty
much most of the Baker legal team was there,
Natalia was there, I believe she -- I believe
Anatoli was her translator for that. There was
some other people who I think were also from Baker
Hostetler who were there. Former Attorney General
Mukasey was arguing for Prevezon. So I just
remember that there were lawyers -- people who I
believed were lawyers who were there to watch the
argument and maybe had some connection to the case.
There was another associate I think from New York
who was there, usually came to some of the Court
hearings. That's all I remember.

Q. And the first dinner on the 8th were there
any other attendees?
A. I don't remember. I think John Moscow
might have been there.

Q. And the second dinner on the 10th, were
there any other attendees beyond the ones you've
already described?
A. I don't recall. My wife.

Q. You mentioned that information Fusion had
gathered may have been passed on to the HRAGI
people via Baker Hostetler or if they instructed
you to that you would have. Did you have any
expectation that that would reasonably result in
them influencing U.S. policy?

A. I can't say that I would have specifically expected anything from that. I was acting -- lawyers hire me to do research for them, the research is their property or their client's property, it's not mine. So if they want me to provide it to somebody else, it's their information. So I would -- it's a fairly ministerial thing. I'm not sure I would have an expectation of any sort of specific result from that.

Q. But you did understand HRAGI to be lobbying on the Hill?

A. They were registered to lobby on the Hill. So I believe that's what they were doing, yeah.

Q. And did you understand that your actions on behalf of Prevezon or Baker Hostetler would principally benefit the Russian government? Who did you believe the principal beneficiary to be?

MR. LEVY: I'd like to note for the record that Patrick is smiling as he's asking the question. You can answer.

MR. MUSE: He's trying to contain his laughter.
A. We did not believe that was being done on behalf of the Russian government.

Q. What do you understand Prevezon's relationship, if any, to be with the Russian government?

A. Prevezon was introduced to me as the client and Denis Katsyv was the owner of Prevezon. Generally speaking, when we take on a new case, you know, from a respected law firm part of the, you know, discussion is who's the client, and, you know, Mark Cymrot said they've checked out Denis Katsyv and he has -- he's a legitimate businessman. He's got a real estate company, it's a successful company, and he has an explanation for how he makes his money and appears to be legit. To some extent whenever you enter a new case that's part of what you're being hired to determine is whether that initial due diligence stands up, but in any event, he was presented to me as a successful real estate investor.

As I say, I worked with Baker Hostetler for a number of years and it's a conservative midwestern law firm with a lot of respected people in it, and part of the obligations of lawyers in this country and now in a lot of other countries is to determine
where their money comes from and who their clients are and whether their clients are involved in criminal activity. I don't remember the exact specifics of our discussions of these matters, but one of the issues was whether he's a legitimate businessman.

Q. Did you ever receive a letter of inquiry from the Department of Justice regarding the applicability of the Foreign Agent Registration Act to your work on the Prevezon case or Magnitsky matter?

A. No, I have not.

Q. Did you charge any fees to any other entities or people besides Baker Hostetler for work on the Prevezon or Magnitsky matters?

A. I don't think so, no. I specifically can tell you I wasn't compensated by this foundation or anybody else involved in any of the lobbying.

Q. At the time of this June -- early June trip to New York had you already engaged Mr. Steele to do work on Mr. Trump's involvement with Russia?

A. I don't specifically remember. As I mentioned, the actual agreements are handled by other people on my staff.

Q. Which employees and associates of Fusion
1 worked on the project investigating then candidate
2 Donald Trump?
3  
4 MR. LEVY: We can give you that information
5 at the end of the interview.
6  
7 MR. DAVIS: Why at the end of the interview?
8 MR. LEVY: I just want to make sure that
9 employees involved in this matter are protected.
10 We've had death threats come to the company. We'll
11 be happy to cooperate with the committee and give
12 the names of those people. I just want to do it
13 outside of this transcript, unless you're going to
14 assure me the transcript is going to be kept
15 confidential.
16  
17 MR. FOSTER: Let's go back to the previous
18 question. What was the previous question?
19  
20 MR. DAVIS: Whether he'd already started
21 working with Mr. Steele during the time of the --
22  
23 MR. FOSTER: During the time of the meetings
24 in early June, right? And your answer was?
25  
26 MR. SIMPSON: I don't know.
27  
28 MR. FOSTER: Do you have -- you said you
29 don't handle those issues at the company.
30  
31 MR. SIMPSON: That's right.
32  
33 MR. FOSTER: So your company does have
34 records that would establish that fact?
MR. SIMPSON: We keep books and records. We should have records of agreements and things, yeah.

MR. FOSTER: So did you not review any of those in preparation for today?

MR. LEVY: What he reviewed is privileged.

MR. FOSTER: Have you reviewed them -- I'm not asking if you reviewed them with counsel. Have you reviewed them recently?

MR. LEVY: If he reviewed anything to prepare for this interview it would have been at the direction of counsel and attorney work product.

MR. FOSTER: So you do or don't know whether you have such records that would identify the date -- the precise dates of the engagements?

MR. LEVY: We will --

MR. FOSTER: I'm just asking what he knows.

MR. LEVY: I think he's told you. Go ahead.

MR. SIMPSON: I'll just restate that we run a -- it's a reasonably well-run company, we keep books and records. So, you know, those kinds of things are kept in our corporate files.

BY MR. DAVIS:

Q. Did Baker Hostetler or Prevezon pay for your travel to New York for the meetings in June of 2016?
1       MR. LEVY: The meetings?
2
3       MR. DAVIS: The dinner after the hearing.
4
5       BY THE WITNESS:
6
7       A. The purpose of the trip was the hearing.
8
9       It was routine for me to attend hearings. So I
10       would bill them -- my office would bill them for my
11       train trips and hotels depending on whether there
12       was -- whether it was specifically for the Prevezon
13       case. I don't know if -- I don't know for a fact
14       that we billed them.
15
16       Q. Did you travel with any other members of
17       the Prevezon team either to or from New York?
18
19       A. I don't think so.
20
21       Q. So I think you've already stated that Ed
22       Baumgartner worked on both projects, on the
23       Prevezon project and another Trump investigation.
24       To the best of your knowledge, does Mr. Baumgartner
25       know Rinat Akhmetshin?
26
27       A. I don't know. I'd just like to clarify,
28       you know, my recollection is that Ed worked -- the
29       Prevezon thing wound down and I don't think I
30       brought Ed on until it was either ending or had
31       already ended.
32
33       Q. Can you clarify the time frame for when it
34       was winding down?
MR. LEVY: Talk about what the "it" was when you say "it."

BY THE WITNESS:

A. The hearing was on June 9th, I guess we said, and that was the culmination of a long controversy over whether Browder was going to have to testify and whether, you know, we had to be disqualified and, you know, there was a whole series of media attacks on us during that period from Browder. Then nothing happened after that and that was, you know, sort of the peak of that. It was after that that a lot of the issues involving Russia and the campaign started to heat up.

Q. Was there any overlap between the employees from Fusion who were working on the Trump investigation and the Prevezon case?

A. I think the primary employees did not overlap, but I can't tell you that there was a Chinese wall of separation. Various people specialize in certain things and can contribute ad hoc to something.

Q. And you worked on both, correct?

A. Yes, I did.

Q. You previously mentioned that Fusion had hired subcontractors beyond Mr. Steele to work on
the Trump project. Was there any overlap of other subcontractors between the Trump investigation and the Prevezon work?

A. Not to my recollection.

Q. And had Fusion worked with Mr. Steele prior to this project regarding Mr. Trump?

A. Yes.

Q. And had you previously paid him or Orbis?

A. I believe so, yeah.

Q. And had Fusion been paid by him or Orbis as well?

A. Yes, I believe so.

Q. And are you aware of any interactions Mr. Steele had with the FBI prior to his work on the investigation of Mr. Trump and his associates?

MR. MUSE: Could you repeat that?

MR. DAVIS: Are you aware of any interactions with Mr. Steele with the FBI prior to his work on the investigation of Mr. Trump and his association?

BY THE WITNESS:

A. I was not at the time, but I am now.

Q. Did you have reason to believe that in his prior position within British intelligence he would have interacted with the FBI?

A. Yes, he's told me that.
Q. Do you believe that the FBI generally considers sources more credible if they have previously provided reliable information?
   A. That's my understanding.

Q. Was Mr. Steele's reportedly successful history in working with the FBI a factor in deciding to hire Orbis for the Trump project?
   A. No.

Q. Do you know Christopher Burrows?
   A. Yes.

Q. Do you know if he worked on the Trump-Russia project with Orbis?
   A. I do not.

Q. Do you know Sir Andrew Wood?
   A. No.

Q. Are you aware he's an associate of Orbis Business Intelligence?
   A. I am aware of that as of now. I didn't know it -- I don't know when I learned of it, but I didn't know it last year, much of last year.

Q. Did Fusion ask Orbis to undertake other actions beyond preparing the memoranda containing the allegations regarding Mr. Trump and his associates?
   A. Not that I specifically -- I'm sorry. In
connection with that engagement?

Q. In connection with that engagement.

A. Not that I specifically recall.

Q. Did you communicate with Mr. Steele other than through these memos? Did you have phone calls and e-mails with him?

A. Mostly we spoke by phone.

MR. FOSTER: You did also e-mail with him?

MR. SIMPSON: Nothing -- I don't believe I had anything substantive. E-mail security is a major problem. So, generally speaking, we would try to communicate telephonically on an encrypted line.

MR. FOSTER: Did you have another method of communicating with him via text.

MR. SIMPSON: I mean, we used encrypted methods of communicating. Part of the security concern we have involve there's been a lot of attempts to break into our systems. So I prefer not to get into a lot of that, but suffice to say we use secured encrypted systems.

MR. FOSTER: Regardless of the details of how you did, do you retain copies of written communications that you may have engaged with him through some other secure method?
MR. SIMPSON: Generally not.

MR. FOSTER: You have not retained?

MR. SIMPSON: Generally we use things that can't be stolen because they no longer exist.

MR. FOSTER: Disappearing messages, auto deleting messages? Is that correct?

MR. SIMPSON: That sort of thing, yes, that's correct.

MR. FOSTER: I just needed a verbal answer.

MR. SIMPSON: Yeah. Sorry.

BY MR. DAVIS:

Q. You previously mentioned the relationship with Mr. Steele was more collaborative than a manager-employee and I think you referenced mentioning as an example Paul Manafort's been named campaign chairman, what do you know about him. Did you collaborate with Mr. Steele on the content of the memos even if he did the drafting?

A. No, generally speaking. I was managing a much bigger project and he's a reliable provider. So I did very little tasking.

Q. You mentioned other subcontractors were focusing on other regions in which the Trump organization has business. Were those other subcontractors retained until the election or how
1. How 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.

Q. One point I'd like to clarify from
Ms. Sawyer's questioning. I believe you said that
Mr. Steele had told you that the FBI had a source
from inside the Trump organization and I believe
she referred to a source from inside the Trump
campaign. Do you know which is the accurate --

MR. LEVY: He's not going to get into the
details of that source.

MR. DAVIS: I'm not asking for any particular
details. It was characterized differently by you
and by counsel. I just wanted to make sure.

BY THE WITNESS:
A. I don't know.

MR. FOSTER: So you don't know whether it was
the organization or the campaign, in other words?
MR. SIMPSON: That's correct.

MR. FOSTER: Meaning the business versus the
campaign.

BY MR. DAVIS:
Q. And did Mr. Steele tell you that the FBI had relayed this information to him?
A. He didn't specifically say that.
Q. I'm going to have you take a look at one of the filings --
MR. FOSTER: I thought you said earlier that he did say the FBI told him.
MR. SIMPSON: I think I was saying we did not have the detailed conversations where he would debrief me on his discussions with the FBI. He would say very generic things like I saw them, they asked me a lot of questions, sounds like they have another source or they have another source. He wouldn't put words in their mouth.

(Exhibit 4 was marked for identification.)

BY MR. DAVIS:
Q. I'm going to have you take a look at one of the filings by Mr. Steele's attorneys in the lawsuit against him and Orbis in the United Kingdom. This will be Exhibit 4. If you could please turn to page 2 and read paragraph No. 8. That paragraph states "At all material times Fusion was subject to an obligation not to disclose to 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
7 MR. MUSE: There's also a context to that who
8 the Defendants are in other such matters.
9
10 MR. DAVIS: Sure. The Defendants are Orbis
11 Business Intelligence Limited and Christopher
12 Steele.
13
14 BY THE WITNESS:
15
16 A. What's the question?
17
18 Q. Is that an accurate description of what
19 you understood the obligations to be with that
20 material?
21
22 A. I mean, that's hard for me to answer.
23 There's a mutual expectation of confidentiality,
24 and if that's what you read that as saying, then
25 yes, there's a mutual expectation of
26 confidentiality.
27
28 Q. Was that expectation established by
29 contract?
30
31 MR. LEVY: We're not going to talk about
32 contracts with clients.
33
34 BY MR. DAVIS:
Q. Was it established by practice?

A. I guess I'll just reiterate we do confidential work together and we treat all matters as confidential. He's pretty good at sticking to that and so am I.

Q. Was any of the information included in the memoranda Orbis prepared during the Trump investigation not considered "confidential intelligence" under this understanding such that Fusion was not required to obtain Orbis's permission in order to disclose it?

A. I don't really understand the question.

Q. I'm saying if the understanding is that you weren't to disclose confidential intelligence material, were the memos confidential intelligence material, the dossier memos?

A. They're confidential, yes.

MR. MUSE: Hold on one second. Here's the mischief that's created by that. Someone else is sending this and you're asking what they mean. There may be direct answers to those questions if you ask direct questions, but to do it in the frame of reference of someone else putting forth a piece of evidence, which this is, it inevitably creates confusion. The reference to the document adds
nothing to his knowledge. It's just simply a point of reference by you, but it doesn't add anything to what he might be saying. So I think the better way to get at it is simply to ask direct questions.

MR. DAVIS: There are two parties to this, at least, and we've got one's description. I'd like to know if he agrees with that description.

MR. MUSE: But even within what do they mean by this is the question. I mean, what do they mean by this sort of paragraph. You're asking him for an interpretation. He can answer questions about the relationship.

MR. DAVIS: I'm asking him to give an interpretation of their agreement in terms of what he did.

MR. MUSE: And therein lies the problem.

MR. DAVIS: But if it's an agreement to which he's a party, there's a basis for that understanding.

MR. MUSE: I don't think that's the way the rule works.

MR. FOSTER: Well, I think the bigger mischief from my point of view is the fact that we're trying to get an understanding of what the contractual relationship was. You're telling us
you're not going to provide us with details about that contractual relationship, you're not going to provide us with copies of any nondisclosure agreements, contracts we've asked for and we don't have. So we're asking him for his understanding of what obligations he had.

MR. LEVY: And that's outside the scope of this interview. Go ahead.

MS. SAWYER: Can I in general ask that you guys all speak up a little bit because we're right under the blower.

MR. LEVY: Will do.

MR. FOSTER: The record will reflect we are not raising our voices.

To be clear, you're instructing him not to answer that question because you think it's outside the scope of what he agreed to come here to talk about voluntarily?

MR. LEVY: That's not what I said. You had made a comment about contracts, and I just wanted to make sure that obviously the Chair and the Ranking Member have agreed those questions are not part of the scope of this interview. That said, I've now forgotten what the pending question was.

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
16 To the best of your knowledge, did Orbis ever
17 authorize Fusion to make any disclosures of the
18 memoranda to the media?
19
20 MR. LEVY: Just before we get into this
21 question, this paragraph began with a sentence you
22 did not read and it says "In the first sentence of
23 subparagraph 8.2.5 as noted." I don't know what
24 they're referring to. Maybe you do. Can you show
25 us that?
26 MR. DAVIS: I don't have that with me at the
27 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 not sure I know the answer to this.
5     MR. LEVY: If you don't know, then...
6     MR. SIMPSON: It's a little confusing.
7     MR. FOSTER: You don't know whether or not Orbis or Mr. Steele authorized you to distribute the memos to the media?
8     MR. SIMPSON: I think what I would like to say is that we had discussions about, you know, information as opposed to memos and, you know, at various times in talking to reporters about the Trump-Russia connection, you know, things -- those discussions would be informed by what's in the memos.
9     MR. FOSTER: So are you saying that you may have provided information from the memos to the media without discussing whether or not -- without getting permission specifically From Mr. Steele or Orbis?
10    MR. SIMPSON: What I'm saying is we discussed that. No. I'm saying we discussed generally the wisdom of answering questions from reporters about
different matters, what we could say and what we couldn't say.

MR. FOSTER: And in those discussions did he ever authorize you to discuss the information contained in the memoranda with the media?

MR. SIMPSON: As I've stated before, this is not a master-servant relationship. We worked together. Sometimes he's working for my clients, sometimes I'm working for his. So we might jointly make a decision, but it's not a sort of can I do this, yes you can do that kind of relationship. So if they -- so I hope that's responsive.

MR. FOSTER: So did you ever share either the memos or the content of the memos with the media independently of him without having discussed it with him?

MR. SIMPSON: I think what I said was I had spoken with reporters over the course of the summer and through the fall about the investigations by the government and the controversy over connections between -- alleged connections between the Trump campaign and the Russians. Some of what we discussed was informed by Chris's reporting. So whether that was -- I don't think there's any sense that that was an unauthorized thing to do.
MR. DAVIS: On page 5 --

MR. FOSTER: Is it something that you discussed with him that you were doing?

MR. SIMPSON: We would discuss inquiries that we had received from reporters, yes.

MR. FOSTER: And that you were answering?

MR. SIMPSON: To the best of our ability. I mean, we obviously didn't tell people about the existence of these things for a long time.

BY MR. DAVIS:

Q. On page 5 of that same exhibit, paragraph 32 there's a portion of the sentence -- and I'll just read this for background before we move on to another segment. I think this is relevant for context. There's a portion here in which Steele's attorneys state that he gave -- that the Defendants gave "Off-the-record briefings to a small number of journalists about the pre-election memoranda in late summer/autumn 2016." I'd like to provide Exhibit 5 which is the second filing by Mr. Steele's attorneys.

MS. SAWYER: Patrick, you've represented this one as the second filing. Are we sure these are --

MR. DAVIS: Second for the purpose of this interview, second one we're referencing.
MS. SAWYER: Were these documents that were requested or obtained from a third party in the course of the investigation?

MR. DAVIS: These were documents that were published in the media. I believe the second one was published by McClatchy.

MS. SAWYER: And what about the first?

MR. DAVIS: That was the one published by the Washington Times.

(Exhibit 5 was marked for identification.)

BY MR. DAVIS:

Q. So with the second one on page 8 of Exhibit 5, under the response to 18 Steele's attorneys state "The journalists initially briefed at the end of September 2016 by the second Defendant and Fusion at Fusion's instruction were from the New York Times, the Washington Post, Yahoo News, the New Yorker, and CNN. The second Defendant" -- that would be Mr. Steele -- "subsequently participated in further meetings at Fusion's instruction with Fusion and the New York Times, the Washington Post, and Yahoo News which took place in mid-October 2016. In each of those cases the briefing was conducted verbally in
person. In addition, and again at Fusion's instruction, in late October 2016 the second Defendant briefed the journalist from Mother Jones by Skype. No copies of the pre-election memoranda were ever shown or provided to any journalist by or with the authorization of the Defendants. The briefings involved the disclosure of limited intelligence regarding indications of Russian interference in the U.S. election process and the possible coordination of members of Trump's campaign team and Russian government officials."

To the best of your knowledge, is that a full and accurate account of all the news organizations with which Fusion and Mr. Steele shared information from the memoranda.

A. I'd say it's largely right.

Q. Are there any that have been omitted?

A. Maybe, yeah.

MR. LEVY: Just say what you know or recall.

BY THE WITNESS:

A. Yeah. I think there's at least one thing misidentified. There might have been another. I can't specifically think of it, but I think this is incomplete, that maybe one of the broadcast networks is misidentified. I just don't have a
tally of this. It's mostly right.

Q. By broadcast network I assume you mean CNN is incorrect, it was a different network?

A. I think so.

Q. Do you recall which network it was?

A. I think it was ABC.

Q. Did you attend these meetings with Mr. Steele?

A. Yeah. Yes.

Q. Did any other Fusion associates attend?

A. Possibly, yes.

Q. Can you identify them?

MR. LEVY: We can give that to you afterwards.

BY MR. DAVIS:

Q. Do you recall the specific dates of these meetings?

A. No.

Q. I believe the filing says end of September 2016. Does that comport with your recollection?

A. Yes.

Q. Was this, as far as you know, before or after Mr. Steele had had his second meeting with the FBI?

A. I don't remember. Sorry.
Q. Did Mr. Steele ever indicate to you whether the FBI had asked him not to speak with the media?

A. I remember Chris saying at some point that they were upset with media coverage of some of the issues that he had discussed with him.

Q. Sorry. I didn't hear.

A. He never said they told him he couldn't talk to them.

Q. Do you recall which journalists you spoke to at each of these organizations and what information from the memoranda was revealed to each?

A. I remember some of them and I remember some of the names, yeah, some of the people I talked to and some of these discussions.

Q. Can you tell us what those were?

MR. LEVY: The answer to that question goes to confidential conversations that's been declined to answer.

MR. FOSTER: Sorry. Confidential what?

MR. LEVY: The answer to that question might implicate privilege and other obligations we've already set forth and he's not going to answer the question.
MR. FOSTER: What's the privilege?

MR. LEVY: First amendment, confidentiality.

MR. FOSTER: Confidentiality agreement, contractual obligation, is that what you're talking about?

MR. LEVY: No. Just talking to confidential sources, First Amendment issue. We can discuss it later after the interview.

BY MR. DAVIS:

Q. Mr. Steele's filing indicates that these meetings occurred at Fusion's instruction. Is that correct, did you initiate these meetings and instruct Mr. Steele to participate in them?

A. I'd just reiterate the nature of our relationship was that we would -- I might propose something and he might agree to do it, but it was not a -- it was not a military style relationship where I gave the orders and he carried them out.

Q. Was part of the purpose of your investigation to share information with journalists?

A. I think that's a fair statement. To the extent -- I mean, I'm sorry. Could you be clear. You mean the project overall?

Q. Yes, investigating Mr. Trump and his
associates.

A. As I said earlier, in any project, and that would include this one, the objective is to gather relevant information, and some of that information was gathered for other purposes and some of it was gathered for the possibility that it might be useful to the press.

Q. Did your client instruct you to have these meetings?

MR. LEVY: The answer to that question might implicate privilege or obligations that we've set forth.

BY MR. DAVIS:

Q. Do you have any reason to believe that Mr. Steele passed any information on to journalists without Fusion?

A. Without me -- you mean without me participating, without me authorizing it? Can you be more specific?

Q. Sure. Let's start without you participating. The filing references meetings that both you and Fusion jointly had with journalists. Do you believe he had any meetings with journalists without you present?

MR. LEVY: Without Mr. Simpson physically
1 present?

MR. DAVIS: For physical meetings or via Skype, without him aware of them contemporaneously.

BY THE WITNESS:

A. That's a difficult question to answer because I don't know what I don't know, but I don't have any reason to believe that he did anything that I didn't authorize or approve.

Q. Jason may have already touched on this, but did Fusion disclose hard copies of the memoranda to any journalists?

MR. LEVY: The answer to that question might implicate privilege or obligations. So he's going to decline to answer that question.

MR. FOSTER: Doesn't the filing say that they did not?

MR. LEVY: While our letter to the committee has said that neither Mr. Simpson nor Fusion GPS provided the dossier to BuzzFeed, Mr. Simpson's going to decline to answer your question respectfully. He's given you a lot of information today. He's not going to answer that question.

BY MR. DAVIS:

Q. Still with Exhibit 5 on page 2, the responses to 4 and 6. Here the attorneys for Orbis
and Mr. Steele --

MR. LEVY: Where are you again?

BY MR. DAVIS:

Q. Page 2, the response to 4 and to 6. Here the attorneys for Orbis and Mr. Steele state "The duty not to disclose intelligence to third parties without the prior agreement of the Defendants" -- again, that's Orbis and Mr. Steele -- "do not extend to disclosure by Fusion to its clients, although the Defendants understand that copies of the memoranda were not disclosed by Fusion."

A. Where are you? You're on page 2 -- okay. I see it now.

Q. -- "do not extend to disclosure by Fusion to its clients, although the Defendants understand that copies of the memoranda were not disclosed by Fusion to its clients."

Further down on that same page in response to a question about whether Fusion's clients, insofar as disclosure to them, was permitted, could themselves disclose the intelligence from Orbis, the filing responds "Defendants understood that the arrangement between Fusion and its clients was that intelligence would not be disclosed."

Is that a correct statement of the
relationship between you and the client, did Fusion
not disclose the memoranda or information contained
there in to its clients?

MR. LEVY: He's not going to get into
discussion with the client because of privileges
and obligations that might be implicated by the
answer to that question.

BY MR. DAVIS:

Q. Do you believe this filing is accurate in
those paragraphs?

MR. LEVY: Again, to comment on that he would
have to talk about client communications that are
privileged and might implicate privilege or
obligation were he to answer your question.

BY MR. DAVIS:

Q. Mr. Simpson, do you believe that any
confidentiality obligations regarding the memos did
not extend to law enforcement and intelligence
services?

A. Yes. I mean, I -- well, in general I
think that in the course of any sort of
confidential business lawyers or other
professionals engage in if they come across
information about a possible terrorist attack or a
mafia operation they should report it, yes, and
that that is, in fact, not covered by ordinary confidentiality.

Q. Was Fusion aware of the reports that the FBI considered -- let me rephrase. Was Fusion aware that the FBI considered paying Mr. Steele to investigate Mr. Trump and his associates?

A. When?

Q. At any time.

MR. LEVY: When you say "paying," what do you mean by that?

MR. DAVIS: Providing money.

MR. LEVY: For a fee? Are you talking about reimbursements?

MR. DAVIS: Fees or reimbursements in this context.

BY THE WITNESS:

A. We've learned that. We know that now. In fact, it was --

MR. LEVY: Learned what?

BY THE WITNESS:

A. Well, we learned -- sometime after the election we learned that Chris had discussed working for the FBI on these matters after the election and that that didn't happen.

Q. Did Mr. Steele discuss that with you at
the time?

A. He didn't discuss it -- I don't remember exactly when he mentioned this to me, but he mentioned to me at some point I think after the election that he had discussed this with them.

MR. FOSTER: So prior to news reports to that effect? In other words, you learned it from him not from the news; is that right?

MR. LEVY: Wait. You asked two different questions. I'm trying to figure out which one you want him to answer.

MR. FOSTER: The last one.

MR. LEVY: What was the last one?

MR. FOSTER: You learned it from the news and not from him? Are you saying you learned it from him?

MR. LEVY: Learned what from him?

MR. FOSTER: That he discussed with the FBI having the FBI pay Mr. Steele.

MR. SIMPSON: I don't remember.

MR. LEVY: The witness is yawning. Let's take a break.

MR. MUSE: We will attribute that to fatigue as opposed to the questions.

MR. FOSTER: Let's go off the record. It is
3:55.

(A short break was had.)

MR. DAVIS: We'll go back on the record.

It's now 4:05. We'll continue with the questions.

BY MR. DAVIS:

Q. Mr. Simpson, did anyone from Fusion ever communicate with the FBI regarding information in the memoranda or other allegations regarding Mr. Trump and his associates?

A. From Fusion, did anyone from Fusion communicate with the FBI? No, no one from Fusion ever spoke with the FBI, to the best of my knowledge.

Q. Did you ever exchange any e-mails with them?

A. We did not communicate with them by e-mail either.

Q. Do you know any current or former FBI personnel?

MR. LEVY: As a general matter?

MR. DAVIS: Yeah, as a general matter.

BY THE WITNESS:

A. As a general matter I'm sure I do. I know current and former law enforcement officials. I go to a lot of crime conferences and things like
Q. Were any of them consulted as part of this investigation?

A. Not to my recollection.

Q. Was the amount of Fusion's compensation in the Trump investigation dependent on the FBI initiating an investigation of Mr. Trump or his associates?

A. No.

Q. Was the amount of Orbis's compensation dependent on the FBI initiating an investigation of Mr. Trump and his associates?

A. No.

Q. Other than Senator McCain, who we'll discuss later, did Fusion or Orbis disclose any of the memoranda information contained therein or related information from Mr. Steele with any elected officials or staff in Congress?

A. I don't recall having done so, no.

Q. If we could turn briefly back to Exhibits 4 and 5. I just want to reference two things.

MR. LEVY: I also want to clarify in the premise of that question there were factual assertions made that may or may not be true to which the witness did not respond.
MR. DAVIS: Sure. Understood. To be clear, we obviously were not referencing any disclosures to this committee as part of the committee's inquiry.

BY MR. DAVIS:

Q. So on Exhibit 4, page 3, paragraph 21A, Mr. Steele's attorneys state that the post-election dossier memoranda was provided to a senior United Kingdom government national security official acting in his official capacity. In Exhibit 5 on page 2 -- I'm sorry -- page 5, the response to 13 similarly references disclosing that memoranda to the UK national security official.

Mr. Simpson, to the best of your knowledge, were the memoranda or information contained therein disclosed to foreign governments?

A. I have no knowledge of this beyond what you're showing me. I can tell you about, you know, what I know about Chris's encounter with David Kramer and how all that came about. If Chris specifically said something to me about showing this to one of his government officials I don't remember it. So...

MR. LEVY: Why don't you walk them through.

BY THE WITNESS:
A. If you want to know the rest of the story,
I'm happy to walk you through it.

Q. Sure, we can do that.

A. So after the election obviously we were as
surprised as everyone else and Chris and I were
mutually concerned about whether the United States
had just elected someone who was compromised by a
hostile foreign power, more in my case whether the
election had been tainted by an intervention by the
Russian intelligence services, and we were, you
know, unsure what to do. Initially we didn't do
anything other than to discuss our concerns, but we
were gravely concerned.

At some point a few weeks after the election
Chris called me and said that he had received an
inquiry from David Kramer, who was a long-time
advisor to Senator McCain, and that according to --
Kramer told Chris that he had run into Sir Andrew
Wood at a security conference in Halifax,
Nova Scotia and that Kramer was accompanying
Senator McCain to this conference and that the
three of them had had an unscheduled or unplanned
encounter where the issue of this research was
discussed and the essence of it, I guess, was
conveyed to Senator McCain and to David Kramer from
Andrew Wood. I don't remember whether Andrew Wood's name was specifically given to me by Christopher Steele at that time. It was later given to me. It later became an accepted fact that Chris had mentioned him to me. I believe he probably mentioned it.

But anyway, he did say someone that he worked with in the past who was a former UK government official with experience in Russia had had this conversation with David Kramer and John McCain and that Senator McCain had followed up on it as to what more there was to know about these allegations, this information.

So Chris asked me do you know David Kramer, and I said yes, I've known David Kramer for a long time. David Kramer is part of a small group of people that I'm sort of loosely affiliated with. We've all worked on Russia and are very concerned about kleptocracy and human rights and the police state that Russia has become, in particular the efforts of the Russians to corrupt and mess with our political system. So we shared this concern going back to when I was at the Wall Street Journal and that's how I met David. He was working at the State Department as assistant secretary for human
rights, and I was reporting on human rights and corruption in Russia.

So I told Chris he's legit. David is someone I've known for a long time and he knows a lot about these issues and he's very concerned about Putin and the Kremlin and the rise of the new Russia and criminality and kleptocracy. So he said, well, can we trust him? And I said yes, I think we can trust him. He says he wants information to give to Senator McCain so that Senator McCain can ask questions about it at the FBI, with the leadership of the FBI. That was essentially -- all we sort of wanted was for the government to do its job and we were concerned about whether the information that we provided previously had ever, you know, risen to the leadership level of the FBI. We simply just didn't know. It was our belief that Director Comey if he was aware -- if he was made aware of this information would treat it seriously.

Again, at this time, you know, while we believed that we had very credible reporting here, you know, what we really -- we just wanted people in official positions to ascertain whether it was accurate or not. You know, we just felt that was our obligation. So I said to Chris I think we can
trust him, and he said okay. Well, he was here, I
met with him, and I told him what happened. Now
he's back in Washington and, you know, I'm going to
hand him to you.

I don't remember whether I called David or
David called me, I just don't remember, but we got
in touch and he, you know, asked me -- we met.

Q. And after you met how did he -- did you
provide the memoranda to --

MR. LEVY: Sorry. Finish your question.

BY MR. DAVIS:

Q. -- did you provide the memoranda to him?

MR. LEVY: The answer to that question might
implicate privilege and other obligations. So he's
going to decline to answer the question.

BY MR. DAVIS:

Q. Did Mr. Steele represent to you that Orbis
or Mr. Wood had initiated this contact with
Mr. Kramer and Mr. McCain to share the dossier
information?

A. Well, that has two parts on that question.

I think I can answer the first part which I think
answers the second. Anyway, he did not describe
this as having been initiated by Orbis. He
described this as a chance encounter at a security
conference where, you know, someone who had some
knowledge of these matters shared it with Senator
McCain and David Kramer and that caused David
Kramer to follow up with Chris and that it was
passive. In other words, it was initiated by
Mr. Kramer.

Q. Did Mr. Steele describe anyone else being
involved at the Halifax international security
conference in this discussion?

A. Not that I can recall.

Q. According to the official attendee list
for that conference, Mr. Akhmetshin was also there.
To the best of your knowledge, was he involved in
any capacity in the effort to discuss the dossier
information with Mr. Kramer and Mr. McCain?

A. That's the first time I've received that
information. So I don't have any knowledge.

Q. And you haven't spoken with Mr. Akhmetshin
about that, I assume?

A. No.

Q. In addition to the disclosures we have
already discussed, to whom did Fusion GPS provide
the memoranda, information contained therein, or
related information from Orbis?

MR. LEVY: Beyond what you've discussed?
MR. DAVIS: Anyone we've left out.

MR. LEVY: The answer to that might implicate privilege or other obligations. So he's going to decline to answer the question.

BY MR. DAVIS:

Q. To the extent there's any portion of the answer to that question that would not implicate those privileges, I would ask that you reveal those.

A. I'm not sure I see how I could answer that question without getting into privileged areas.

MR. FOSTER: Again, what privilege?

MR. LEVY: We can discuss it at the end. It's a voluntary interview. He's declining to answer that.

BY MR. DAVIS:

Q. Did any Fusion employees communicate with any foreign governments or foreign intelligence agencies about the memoranda or the information contained therein?

A. I don't believe so, certainly not knowingly.

Q. Did you and Mr. Steele ever discuss any communications he had with foreign government officials about the information in the memoranda?
A. It would be difficult -- nothing specific that I recall. There are parts of the memos that talk about information that foreign government officials provided in the course of their research, but beyond what's in the memos I don't really have any recollection.

Q. Do you know who paid for Mr. Steele's trip to Rome to meet with the FBI?

A. I have read recently that -- I think in a letter from Senator Grassley that the FBI reimbursed the expense, but to be clear, I mean, that's it. He was, to my knowledge, not been compensated for that work or any other work during this time.

MR. FOSTER: I'm sorry. You're saying that Fusion did not pay for the trip?

MR. LEVY: Go ahead and answer the question.

MR. SIMPSON: I don't think we did. I have no information that we paid for it. Again, this sort of emphasizes, you know, the point I was making earlier which was this was something that I considered to be something that Chris took on on his own based on his professional obligations and not something that was part of my project. So it makes sense to me that he was reimbursed by them,
BY MR. DAVIS:

Q. To clarify, you were saying his interactions with the FBI were not part of your project?

A. They obviously grew out of the project, but as he explained it to me, you know, when you learn things in your daily life that raise national security considerations you're obligated to report them. So that wouldn't have anything to do with my client's goals or project.

Q. But in your briefings with journalists you did reference his interactions -- Mr. Steele's interactions with the FBI, correct?

A. At some point that occurred, but I don't believe it occurred until very late in the process.

Q. Can you estimate when in the process?

A. It was probably the last few days before the election or immediately thereafter.

Q. So the meetings in September that you referenced, you didn't reveal Mr. Steele passing on information to the FBI?

MR. LEVY: Can you repeat the question.

Sorry.
MR. DAVIS: So in your meetings with journals in September you didn't reference Mr. Steele's interactions with the FBI or passing on of information to them?

BY THE WITNESS:

A. I don't recall.

MR. DAVIS: I think my hour is up.

MR. FOSTER: Off the record at 4:21.

(A short break was had.)

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

It's 4:30.

EXAMINATION

BY MS. SAWYER:

Q. I wanted to return to our conversation about interactions that Mr. Steele had with the FBI. We had been talking about a second time he met in Rome. Besides that meeting and the first meeting in early July, are you aware of any other meetings or conversations that Mr. Steele had with the FBI?

A. I think I was just recounting that he vaguely said that he had broken off with them over this concern that we didn't really know what was going on. I'm sorry to be vague, but we just didn't understand what was going on and he said he
had broken off with them.

Q. When you say "we" did not understand what was going on, who are you referring to as the "we"?

A. Chris and I, mostly just the two of us.

There was a lot of public controversy over the conduct of the FBI. I remember discussing it with many people, but this conversation was between the two of us.

Q. And what was the time frame of when Steele said he had broken off with the FBI?

A. I can -- I don't know exactly, but it would have been between October 31st and election day.

MS. QUINT: October 31st was when you said there was an article --

MR. SIMPSON: In the New York Times. There was an article in the New York Times on October 31st that created concern about what was going on at the FBI.

MS. QUINT: Because it wasn't consistent with your understanding of the investigation?

MR. SIMPSON: Exactly.

BY MS. SAWYER:

Q. And I think, just to be clear, this was an article you had talked about that both revealed
that Director Comey had alerted Congress to
something about the Clinton e-mail investigation?

A. No. That happened a few days previous. I
don't know the exact date that he sent the letter
to Congress, but this was an article specifically
about -- it was disclosing the existence of an FBI
investigation of Trump's ties to Russia, which, to
my recollection, was the first time that anyone
reported that the FBI was looking at whether the
Trump campaign had ties to the Kremlin but at the
same time saying that they had investigated this
and not found anything, which threw cold water on
the whole question through the election.

Q. And was that -- just to tie it together
when you were talking previously, was that in
connection with your conversation with journalists
where you directed them to ask the FBI as to
whether there was an investigation going on?

A. I'm not going to get into specific news
organizations or reporters or stories, but I would
restate that this was during the period when we
were encouraging the media to ask questions about
whether the FBI was, in fact, investigating these
matters.

I'll add that, you know, a lot of what we
were talking to the media about were things in the public record, specifically Carter Page, Paul Manafort had resigned over allegations of illicit relationships with Russian oligarchs and Ukrainian oligarchs. So there was, you know, a lot of open source public information pointing towards the possibility that the Russians had infiltrated the Trump campaign. So we spoke broadly to reporters and encouraged them to look into this.

Q. And did you ever come to find out who the journalists had spoken with at the FBI about the existence of an investigation into Russian interference and possible ties to the Trump campaign?

A. No.

Q. So you had indicated that Mr. Steele said he had -- I think your phrase was "broken off" with the FBI. What did you understand that to mean?

A. That Chris was confused and somewhat disturbed and didn't think he understood the landscape and I think both of us felt like things were happening that we didn't understand and that we must not know everything about, and therefore, you know, in a situation like that the smart thing to do is stand down.
Q. And had he been reaching out affirmatively to the FBI and providing them with information or were they reaching out to him and he was simply responding to their requests?

A. The first contact was initiated by Chris to someone that he said he knew.

Q. And now you're just going back to the July contact?

A. Yes. The September briefing or debriefing in Rome I believe I understood -- to this day I understand that to have been initiated by the FBI. Subsequent contacts during this period I just don't know.

Q. Do you know if there were any contacts after that second meeting in Rome between then and the point in time which occurred sometime between October 31st and the election day when he stopped communicating with the FBI, do you know if there actually were any conversations or meetings between Mr. Steele and the FBI?

A. He didn't literally tell me about specific contacts. I just recall that there was -- that he broke off, which implies that he told him he didn't want to have anything more to do with them. I believe he also mentioned that they didn't like
media coverage, that there was media coverage of, you know, FBI interest in Donald Trump. I don't know what it was that they didn't like.

Q. And I think you've already answered this question, but to the best of your knowledge, did Mr. Steele ever obtain payment from the FBI for actual research that he was doing on Russian interference or on possible ties between the Trump campaign and Russia?

A. He told me he did not, and I have no independent information other than what he told me. I don't believe he ever received compensation for working on anything related to Trump and Russia.

Q. I'm going to direct your attention back to what we marked as Exhibit 3, which is the series of memos that you had received from Mr. Steele in the course of his work. We talked about the first memo and we also talked about the second memo to some degree. You were explaining to me why you believed the second memo, which starts at page 41394, came about, why he had generated that report or done that research, and you had indicated that there was much more public reporting on the hacking. I think you had mentioned -- that's when you mentioned Debbie Wasserman Schultz.
So with regard to that memo, were there any particular things that you independently verified?

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

Q. Sure.

(Reviewing document.)

BY THE WITNESS:

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

The only things in here that I specifically recognize from other work or from other research was that the -- the allegation that the telegram encrypted messaging system, which is an app, had been compromised by Russian intelligence and that someone else in the business of cyber security had told me that too who was in a position to know. I don't remember who that was, but I was told that by
an American. And issues of Russian criminal
operations with names like Booktrap and Maddel
(phonetic) rings a bell to me or did ring a bell to
me at the time. There's been a great deal -- there
had been a great deal at this time even of U.S. law
enforcement activity against organized Russian
cyber crime operations.

Q. And this memo which is dated 26 July -- it
actually bears the date 2015.
A. I noticed that.

Q. Is that just, as far as you understand it,
a typo or mistake? Was it actually 2016?
A. Yes.

Q. Then similarly with what I have -- and I'm
just doing it in the order that it was Bates-
stamped and appeared on BuzzFeed -- there's a
two-page report and it bears the Bates Nos. 41397
and 41398 and it has a company report number
2016/095. This one has the title "Russia/U.S.
Presidential Election, Further Indications of
Extensive Conspiracy Between Trump's Campaign Team
and the Kremlin."

Did you do any independent verification of
these facts?
A. I did some work on aspects of this. We
were separately -- you know, my team and myself were separately investigating various things in here. So I can't talk about this as a verification, but I was analyzing this.

MR. FOSTER: Speak up, please.

BY THE WITNESS:

A. I analyzed this information in the same manner I analyzed the other stuff.

Q. So based on the work that you were doing, did any of that independent work that you did alter the content of this?

A. No.

Q. So it was in addition to whatever was provided in this memo, this two-page memo?

A. Yes, that's right.

Q. And to the best that you can recall, can you tell us what you were learning at the same time about the topics covered in this memo?

A. Yes. Could I just clarify something? I assume this is exactly how it was published and someone mixed up the sequence of the memos. So the next memo's numbered 94 and is dated July 19th and this one is 95 and is not dated, I don't believe. Maybe that's why they got mixed up.

But in any event, what I would loosely call
the Carter Page memo came before this conspiracy memo. So with that caveat I can say we were investigating just based on open sources and, you know, other methods, more public information Carter Page's trip to Russia. We watched tapes of it, we did background work on Carter Page, I did research on his business dealings, and in the course of trying to analyze -- you know, this is some new detail here about how the operation is working in the Kremlin and how they are trying to use influence and it comports with my knowledge and Chris's knowledge of how the Kremlin does this, which is they offer people business deals as a way to compromise them. And, in fact, you know, to my knowledge, this is a much bigger issue than personal indiscretions when it comes to the way the Kremlin operates and is something I know a fair bit about.

So we looked into Carter Page and we also looked into Igor Sechin and whether Sergei Ivanov was in a position to be managing the election operation, which is what 94 talks about, and we determined that he was. I, you know, independently verified he does have a deputy who's very obscure named Igor Divyekin. It's spelled two different
ways here. I believe the correct spelling is D-I-V-Y-E-K-I-N.

MR. MUSE: Can you give the Bates number of the document you're looking at.

MR. SIMPSON: This one is 41399.

BY MS. SAWYER:

Q. And just for the record, it's a two-page document, 41399 to 41400, and it has the date, I think you indicated before, 19 July 2016. Is this the memo that you said you referred to as the Carter Page memo?

A. Yes.

Q. And you were explaining that in the sequencing this one came before the document that actually in terms of Bates numbers --

A. Right.

Q. -- comes before it which we had talked about which had the company report No. 095. So 94 came to you before 095 -- report No. 095; is that correct?

A. That's my recollection.

Q. So with regard to the research you were also doing, is it also just true that whatever independent research you were doing did not then get incorporated into document company report
2016/94, the Carter Page memo?

A. That's correct. We essentially segregated this reporting from other things we were doing for reasons we discussed earlier. A lot of this is human intelligence, it's not the kind of thing that you would share with almost anyone basically. A lot of the work that we do is public record research. Generally speaking, most of this information is useful for making decisions and trying to understand what's going on, but it's not -- doesn't have much use beyond that unless you can independently verify it. So our reports are full of footnotes and appendices and court records and that sort of thing.

Q. So is it fair to characterize the research that you were doing as kind of a separate track of research on the same topic sometimes?

A. I think so. I wouldn't say it was completely separate because, for instance, on some subjects I knew more than Chris. So when it comes to Paul Manafort, he's a long-time U.S. political figure about whom I know a lot. But his reporting -- you know, so there may have been some bleed between things I told him about someone like Manafort, but most of these characters neither of
us know much about and it's really just he's
faithfully reporting information to him that's
being reported to him by his network.

In British intelligence the methodology's a
little different from American intelligence.
There's a practice of being faithful to what people
are saying. So these are relatively
straightforward recitations of things that people
have said. Obviously as we talked about before,
you know, disinformation is an issue that Chris
wrestles with, has wrestled with his entire life.
So if he believed any of this was disinformation,
he would have told us.

Q. And did he ever tell you that information
in any of these memos, that he had concerns that
any of it was disinformation?

A. No. What he said was disinformation is an
issue in my profession, that is a central concern
and that we are trained to spot disinformation, and
if I believed this was disinformation or I had
concerns about that I would tell you that and I'm
not telling you that. I'm telling you that I don't
believe this is disinformation.

Q. And then on the memo, the Carter Page
memo, which is company report 2016/94, you said
that you had done -- you, Fusion -- you, Glenn Simpson had done some research into Carter Page, including Mr. Page's business dealings?

A. Yes.

Q. Is that information that you still have?

A. I don't know. I haven't looked for it. I don't know.

Q. You also specifically mentioned Igor Sechin and maybe work that you had done research into Sechin. Is that work that you would also still have?

A. I don't know if I have anything specific on Sechin. Sechin is a well-known character. I collect, you know, research on various people who are oligarchs or mafia figures. I don't think I have any specific reports on Sechin, but I know a lot about him. He's, you know, sort of Putin's No. 1 compadre in the kleptocracy.

Q. And with regard to Carter Page, did you reach any findings, conclusions about his business dealings, about him, about his connections in particular to, you know, Russia?

A. Yes.

Q. And can you share what those were?

A. Carter Page seemed to us to be a typical
person who the Russians would attempt to co-opt or compromise or manipulate. He was on the younger side, a little bit -- considered to be a striver who was ambitious and not terribly savvy, and those are the kind of people that the Russians tend to compromise. That was the general sense we had. He was also, you know, from early on described as somewhat eccentric.

There was a -- I remember quite clearly there was a bit of a -- when we were talking to reporters about him because he was all over the news for this trip to Russia and we had done -- there was a fair amount of open source on his consulting firm, his complaint that he'd lost money on Russian investments and he owned stock in Gazprom and he was really mad about the sanctions and he went over there in this hastily-arranged trip to speak to this school and that was all pretty unusual, but there's a lot of skepticism in the press about whether he could be linked between the Kremlin and the Trump campaign because he seemed like a zero, a lightweight.

I remember sort of not being able to kind of explain to people that's exactly why he would end up as someone who they would try to co-opt. Of
course, you know, when we talk about things in the
dossier that are confirmed, this is one of the
things that I think really stands out as notable,
which is that Chris identified Carter Page as
someone who had -- seemed to be in the middle of
the campaign, between the Trump campaign and the
Kremlin, and he later turned out to be an espionage
suspect who was, in fact, someone that the FBI had
been investigating for years.

Q. So beyond what is in the dossier, did you
kind of find any evidence that he had actually been
compromised? Now I'm speaking of Carter Page.

A. Well, the definition of compromised is
someone who has been influenced sometimes without
even their knowledge. We had reason to believe
that he had, in fact, been offered business deals
that were -- that would tend to influence him,
business arrangements.

Q. And do you have the records of those
business deals that you had collected?

A. Yeah. I don't think so. Most of that
was, in fact, reporting that we did with other
people who knew him from the business world.

Q. And then just the next memo that we had
touched on, 2016/95, it has Bates numbers 41397 to
398, it does not bear a date on it. Do you recall roughly when you received this particular report?

A. Sometime in midsummer.

Q. The next report, which is 2016/097 which is two pages, has the date of 30 July 2016. Just by the numbers it would appear to maybe have come between those two. Does it seem logical that it came sometime between July 19th and July 30th?

A. That seems logical.

Q. And then just in general, with regard to this particular memo did you do any research to verify this information that was in this memo?

MR. LEVY: Beyond what he said as a general matter?

MR. MUSE: I'm sorry. You were going back and forth. Which one in particular?

MS. SAWYER: This is memo No. -- it has Company Intelligence Report 2016/095, it's Bates numbers 41397 and 41398.

MR. MUSE: Thank you.

BY MS. SAWYER:

Q. Was there particular information in this memo that you did verify?

A. One of the things I did, which is pretty typical of how I would sort of analyze things, was
I looked at the Russian pension system to determine if, in fact, the Russian government was distributing lots of pension payments to Russian immigrants in the United States, and I found some reports from the Social Security Administration and other places describing this system.

Basically because everyone in Russia, you know, more or less works for the government, there's a lot of -- there's a large number of Russian emigres in the United States who receive pension payments that are paid through the embassies and various people, Russian lawyers and others who we became interested in in the course of this investigation seem to be involved in that process. I'm not saying they did anything illegal. I'm just saying, you know, we looked at this system, and as someone who does a lot of money laundering work this was an interesting thing that I hadn't heard about.

There's all this money flowing in the United States from Russia, it probably flows in under some sort of diplomatic status. So if there's sanctions on Russia and the Russians can't move money in the United States for most things, this would, in fact, be an ideal mechanism for moving money into the
United States for whatever purpose, for some kind of illicit purpose. I think that's a pretty good example of the kind of general work I would do to determine whether there's some base level of credibility to the things we're getting.

Q. And in answering that you said that some of the officials that you had identified as involved in this effort seemed to come up with regard to the pension disbursements. Who specifically are you referring to?

A. We identified a lawyer in Sunny Isles Beach, Florida who said she previously worked for Gazprom and just had on her professional Website or someplace that she was -- she had some kind of relationship with the Russian embassy in dealing with these pension issues.

Q. And do you recall that lawyer's name?

A. I don't.

Q. Anyone else besides that individual?

A. If I could look at this for a second.

Q. Sure.

(Reviewing document.)

BY THE WITNESS:

A. I don't have a clear recollection of this.

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
4 Q. To the extent you have records about this
5 and the individual in Sunny Isles, would you at
6 least look for them and let us know whether you
7 would be willing to provide them to the committee?
8
9 MR. LEVY: Counsel has the request.
10
11 BY MS. SAWYER:
12
13 Q. Just moving on to the next memo, which is
14 Company Intelligence Report 2016/097, it bears the
15 Bates Nos. 401 and 41402, it's a two-page memo
16 dated 30 July 2016. Again, when you take a look at
17 that, was there anything that you independently
18 verified that comes out of this memo?
19 (Reviewing document.)
20
21 BY THE WITNESS:
22
23 A. I don't think so.
24
25 Q. Okay. Then Company Intelligence Report
26 2016/100, was there any information there that you
27 either independently verified or had independent
28 research on any of the individuals mentioned in
29 there? It mentions Sergei Ivanov, Dmitry Peskov.
30
31 MR. MUSE: If I may, some clarification.
32
33 When you say is there anything that you
34 independently verified that comes out of the memo,
are you talking -- it's a little confusing because
the memo comes in, he already knows some
information, but I think he's generally said that
he's not doing a draft of the memo beforehand and
yet your question seems to permit that possibility.

MS. SAWYER: No. I appreciate the
clarification.

BY MS. SAWYER:

Q. Just to be clear, I'm not trying to --
what we're trying to determine is is there
information that either you had in your possession
that corroborated and verified this or even went
beyond what was in this and amplified information
on any of these individuals relevant to Russia's
interference or possible ties with the Trump
campaign?

A. Yes. I'm trying to be as helpful as I
can. The thing that we worked on with regard to
Sergei Ivanov, who was the head of what's called
the head of administration which we confirmed from
open sources is kind of an internal Kremlin
intelligence operation, and that Ivanov according
to experts on Russia, the Russian military, Russian
intelligence, does, in fact, run this internal
Kremlin intelligence operation that sort of sits
atop the FSB and the SVR, the GRU, which are the other agencies specifically tasked with areas of intelligence, military for the GRU, foreign for the SVR, domestic for the FSB.

Before I got this memo I didn't know about this internal Kremlin structure. It was either this one or the previous one. So in the course of saying who is this Ivanov guy, you know, we looked at Ivanov and found journal articles and other public information about his long history of intelligence. He's a veteran of the FSB, his long history with Vladimir Putin, and his role atop this internal operation.

In particular I remember reading a paper by a superb academic expert whose name is Mark Galeotti, G-A-L-E-O-T-T-I, who's done a lot of work on the Kremlin's black operations and written quite widely on the subject and is very learned. So that would have given me comfort that whoever Chris is talking to they know what they're talking about.

Q. With regard to that just in general, I did want to ask you not to identify based on the particular sources, but did Mr. Steele ever share with you who his sources were?

MR. LEVY: That conversation, if it occurred,
would implicate obligations and he's going to
decline to answer that question.

MS. SAWYER: And is that based just on the --
can you just articulate the obligations so we can
understand them.

MR. LEVY: It's a very sensitive security
issue and I just don't -- in a transcript where
there's no assurance of confidentiality it's not a
discussion we want to have here.

BY MS. SAWYER:

Q. And do you know whether he shared his
sources with the FBI?

A. I don't. I don't know.

MR. FOSTER: What was the answer?

MR. SIMPSON: Sorry. I don't know whether he
shared his sourcing with the FBI.

MS. SAWYER: Can we just take a minute. We
can go off the record for a minute.

(A short break was had.)

MS. SAWYER: Just with sensitivity toward the
lateness of the day and in the interest of time it
would just be helpful -- and I'll give you as much
time as you need to take a few minutes and, if you
could, look through the remaining memos and let us
know if anything kind of stood out to you, if there
were things that either did not ring true at the
time and that you were concerned about or things in
particular that in addition to what's in here you
had independent research about that you could share
with the committee in the context of our
investigation. Is that a clear request?
MR. MUSE: Heather, may I make a suggestion?
MS. SAWYER: Sure.
MR. MUSE: Why don't we break for a few
minutes so he can look at it, but here's a bigger
problem and I don't mean this as criticism
particularly with regard to the sensitivity as to
time. The difficulty is in summary questions
there's sometimes the problem that is created when
you try to sort of do a wholesale commentary,
particularly after it's been sort of more
focused --
MS. SAWYER: I understand where you're going.
So yeah. I don't want to put us in a position
where --
MR. LEVY: Let's just take some time for the
witness to review the document.
MS. SAWYER: Why don't you take a little bit
of time.
MR. MUSE: In that spirit maybe you could
look in case you have a more focused inquiry too.

MS. SAWYER: We can certainly do that. Why don't we take a five-minute break and I'll ask whatever remaining questions we have on the dossier.

MR. FOSTER: We'll go off the record at 5:11.

(A short break was had.)

MS. SAWYER: We're back on the record at 5:20.

BY MS. SAWYER:

Q. We appreciate you are walking through some of these and we understand your general practice and I want to make sure I'm characterizing this accurately. When you would get the memos you would -- from Mr. Steele you would review them, you would see if they resonated with information that you already knew and other research you may already have done. I think you already told me that you don't recall at the time anything jumping out at you as patently inaccurate; is that fair to say?

A. Yes, that's fair to say.

Q. And I had just asked you to review and I appreciate you taking the time to review the additional memos which would just run from Bates No. 41405 to 41425 to just try to determine for the
committee if research that you had been doing on
the separate track on some of these topics in
particular amplified the work in the dossier.

MR. LEVY: When you say "amplified the work
in the dossier," what do you mean?

MS. SAWYER: Both kind of verified and maybe
gave you some additional information and insights
on either the factual allegations in them or
whether or not the key players identified had also
engaged in either similar or related behavior on
Russian -- you know, related to Russian
interference.

BY THE WITNESS:

A. I'd say that's generally right. I read a
lot of books and studies on Russia and organized
crime. So over the years I just have a lot of
residual knowledge of some of the people and
subjects that are covered in the memos.

Q. Okay. So nothing certainly jumped out at
you and then as --

A. Nothing jumped out at me --

Q. -- as inconsistent with information that
you had gained from other sources?

A. That's correct.

Q. And did you have any reason to believe
either then or now that Mr. Steele would have kind of fabricated any of the information that he included in any of these memos?

A. No.

Q. I do want to return to a few of the topics and a few of the specifics, but I think I'll hold that until the next round because I have a few other just follow-up questions for you.

It had come up in the last round that there was a meeting and some information was provided to Mr. Kramer. Were you still -- at the time that occurred were you, Fusion GPS, still working on behalf of a client who had engaged you to do research as part of the presidential campaign or did that occur after that engagement ended?

A. It occurred after the engagement had ended.

Q. And besides Mr. Steele, did you discuss sharing information with Mr. Kramer with anyone else?

A. Not that I recall.

Q. My colleagues had also asked you about meetings and particularly that occurred between June 8th and June 10th of 2016 and some of the
individuals involved in those meetings. As a general matter, did you discuss the work you were doing related to the presidential election campaign with -- did you ever discuss that with Natalia Veselnitskaya?

A. I don't believe I ever discussed it with her. I'd just add that she doesn't speak much English. So the possibilities are almost none. I didn't discuss it with her.

Q. Do you have any reason to believe that she knew that you were doing work -- opposition research work on then Candidate Trump?

A. No.

Q. Do you have any reason to believe that she knew that Christopher Steele was doing work for you as part of that project, the opposition research on Candidate Trump?

A. No.

Q. What about Rinat Akhmetshin, did you ever talk with Rinat Akhmetshin about the fact that you were doing opposition research on Candidate Trump?

A. Not that I recall, no.

Q. Do you have any reason to believe that Christopher Steele ever spoke with Rinat Akhmetshin about the fact that Christopher Steele had been
engaged by you to do work -- related to the
opposition work on then Candidate Trump?

A. Do I have any reason to believe that he
spoke? No, I have no reason to believe he did.

Q. Do you know if he did or not?

A. It's never -- we've never discussed it, 
but I have no reason to think he would have.

Q. And if he had discussed it, would that
have been consistent with the nondisclosure
agreement that you indicated you would have had
with Mr. Steele?

A. That would -- if he discussed it with
someone like that without my knowledge, it would
not have been consistent with our agreement.

Q. And then given that, would it surprise you
if Mr. Steele had talked with Rinat Akhmetshin
about the work he was doing related to then
Candidate Trump?

A. Yes, that would surprise me.

Q. Did you discuss the fact that you were
doing opposition research on Candidate Trump with
anyone at Prevezon Holdings?

A. Not that I recall, no.

Q. And if you had done so, would that have
been consistent with your confidentiality
obligations to that client?

A. No, it wouldn't have been consistent.

Q. Did you speak with anyone at Baker Hostetler about the work that you had been engaged to do on then Candidate Trump?

A. Not that I recall.

Q. So the point in time at which you were in meetings that included -- the meetings that you had related to the Court hearing at Prevezon that you've already discussed, the dinner, the Court hearing, and then a subsequent dinner, they occur right around the same time that Natalia Veselnitskaya and Rinat Akhmetshin and the individual you described as a translator, Anatoli Samochornov, met -- or it has been reported met with individuals in the Trump campaign. Did that topic just never come up during those three days?

A. It never came up. I don't know what else to say. It never came up.

Q. So you at the time had no idea that they were meeting with or met -- and actually, in fact, met with members of the Trump campaign?

A. I didn't have any idea about that meeting until quite recently.

Q. So in an August 1, 2017 news briefing
White House Press Secretary Sarah Huckabee Sanders said "The Democrat linked firm Fusion GPS actually took money from the Russian government while it created the phoney dossier that's been the basis for all of the Russia scandal fake news." What is your response to that statement?

A. It's not true?

Q. And what in particular is not true about it?

A. Well, it's a false allegation leveled by William Browder before this committee and in other places for the purpose of his advantage. She's repeating an allegation that was aired before this committee and in other places that we were working for the Russian government and it's not true.

Most importantly the allegation that we were working for the Russian government then or ever is simply not true. I don't know what to say. It's political rhetoric to call the dossier phoney. The memos are field reports of real interviews that Chris's network conducted and there's nothing phoney about it. We can argue about what's prudent and what's not, but it's not a fabrication.

Q. And I think you've already answered you contend that you were not taking money from the
Russian government and that was in relation to the litigation work you had done with Baker Hostetler, correct?

A. Yes. They are a well-regarded law firm that has obligations to determine the sources of funds when they take a client and, to my knowledge, they did so and the money was not coming from the Russian government.

Q. So that was for the Prevezon work for Baker Hostetler. Did you take money in any way, shape, or form that could be attributed to the Russian government for the work that you were doing -- the opposition research work that you were doing on then Candidate Trump?

A. No.

Q. Did, to the best of your knowledge, Mr. Steele take money in any way, shape, or form that could be attributed to the Russian government for the work that he did on the memos as part of the opposition research on Candidate Trump?

A. No.

I'll add one more thing to the response to Sarah Huckabee Sanders, which is her assertion that we are a Democrat linked opposition research firm. I think I addressed this earlier, but to be clear,
we don't have a business of -- we're not an appendage to the Democratic party. We run a commercial business, we're all ex-journalists. We take clients from both sides of the aisle. We have a long history of that, I'm proud of that. I'm happy to say I have lots of Republican clients and friends.

Q. To the extent there have been allegations or indications that the work that Mr. Steele did, his research into Russian interference in the 2016 election, or your work could have been influenced by Rinat Akhmetshin, do you believe that is true and if -- do you believe it's true?

A. No.

Q. Do you believe that the work that Mr. Steele did on Russian interference and possible ties to the Trump campaign or your work could have been influenced by Natalia Veselnitskaya?

A. No.

MS. SAWYER: I think my time is up for this round. So I appreciate your patience and we'll take a break.

MR. FOSTER: It's 5:34.

(A short break was had.)

MR. DAVIS: We'll go back on the record.
It's 5:43 p.m.

EXAMINATION

BY MR. DAVIS:

Q. Mr. Simpson, could you walk us through your itinerary to the best you remember it from June 8th through 10th of 2016, especially any interactions you had with Prevezon team members during those three days?

MR. LEVY: Beyond what he's discussed today?

MR. DAVIS: Yes.

BY THE WITNESS:

A. I took the train to New York. I don't recall, but I may have had other business. I don't remember. I think there was a dinner. I went back to my hotel, went to bed. Got up the next morning. I don't remember the sequence, but I remember meeting with Weber Shandwick, the PR firm, about preparations for -- I think we expected there was going to be a trial. I think that's what it was about. It might have been about the press coverage of the hearing. I just don't remember. I went to the hearing and I think -- if I remember the sequence correctly, I went to the hearing, then I had the meeting with those guys, the Weber Shandwick guys, and then I hightailed it home. My
son's junior prom was that night or senior prom and I was under some pressure to go home and be a dad.

Q. And then on the 10th, that first day back in D.C.?

A. I don't think that was my first day back. I was back the evening of the 9th.

Q. Sorry. The first full day.

A. I think it was a weekend. So I don't know what I was doing. Probably just relaxing. I went to the dinner, it was at a restaurant called Barcelona up on Wisconsin Avenue, it was a social occasion. I brought my wife, other people brought their wives. We talked about books and other other nongermane topics. It was just a social occasion.

(Exhibit 6 was marked for identification.)

BY MR. DAVIS:

Q. I'm going to show you an exhibit. I think we're on 6. We understand these are meeting notes. Do these phrases about -- including Mr. Browder mean anything to you or relate to any of the research that you conducted or otherwise aware of regarding Mr. Browder?

MR. LEVY: When say "meetings notes," meeting
notes about what meeting?

MR. DAVIS: These are the meeting notes from the June 9th meeting at Trump Tower. These are Mr. Manafort's notes or they're contemporaneous.

BY THE WITNESS:

A. I could tell -- obviously you know who Bill Browder is. Cyprus Offshore, Bill Browder's structure, you know, investment -- Hermitage Capital, his hedge fund, set up numerous companies in Cyprus to engage in inward investment into Russia, which is a common structure, both partially for tax reasons but also to have entities outside of Russia, you know, managing specific investments. I can only tell you I assume that's what that references. I don't know what the 133 million --

MR. FOSTER: Can I interrupt? And you know that from research that you did and provided to --

MR. SIMPSON: Yes.

MR. LEVY: Let him finish.

MR. FOSTER: -- research that you did and provided to Baker Hostetler and their client?

MR. SIMPSON: Yes. There was a -- I can elaborate a little bit. As part of the research into how Hermitage Capital worked we looked at various things, their banking relationships, the
way they structured their investments in Russia. I don't remember how many, but there was a large number of shell companies in Cyprus that were used to hold the investments of individual clients of Hermitage. So one of the things we discovered from that was the likely identities of some of Hermitage's clients.

BY MR. DAVIS:

Q. Do any of the other entries in here mean anything to you in light of the research you've conducted or what you otherwise know about Mr. Browder?

A. I'm going to -- I can only speculate about some of these things. I mean, sometimes --

MR. LEVY: Don't speculate.

BY THE WITNESS:

A. Just would be guesses.

Q. Okay.

A. I can skip down a couple. So "Value in Cyprus as inter," I don't know what that means.

"Illici," I don't know what that means. "Active sponsors of RNC," I don't know what that means.

"Browder hired Joanna Glover" is a mistaken reference to Juliana Glover, who was Dick Cheney's 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.

Q. And by "adoption issue" do you mean Russia
4 prohibiting U.S. families from adopting Russian
5 babies as a measure in response to the Magnitsky
6 act?

A. I assume so.

Q. The information here, is this generally
9 consistent with the type of information you or
10 Baker Hostetler were providing about Mr. Browder
11 and his activities?

MR. LEVY: Can you repeat that question.

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?

MR. LEVY: He's just told you that a lot of
19 what's here he doesn't know what it means, he
20 doesn't have knowledge or recollection as to these
21 terms.

MR. DAVIS: The parts you do recognize.

BY THE WITNESS:

25 A. Couple of the items touch on things that I
worked on, Cyprus, Bill Browder.

Q. I'm going to jump back to the Russia investigation. You'd mentioned before you've had some subcontractors that you've worked with long enough that you call them super subs; is that correct?

A. Yes.

Q. Orbis or Mr. Steele, is that one such super sub in your opinion?

A. It's a loose term. We don't have a list of super subs.

MR. FOSTER: Is he one of them?

MR. SIMPSON: There is no list. So I can't tell you if he's one of them. He's a reliable subcontractor who's worked with us in the past and we've been very satisfied with the quality of his work.

MR. LEVY: Just to reiterate, I think as you described these super subs earlier loosely, even with some of these super subs Mr. Simpson said that he would talk about clients only on a need-to-know basis even with the super subs, so-called.

BY MR. DAVIS:

Q. Beyond the memoranda prepared by Mr. Steele, did Fusion create any other work
MR. LEVY: Which investigation?

MR. DAVIS: The investigation into Mr. Trump and his associates.

MR. LEVY: In addition to what?

MR. DAVIS: Sorry. The investigation into Mr. Trump and his associates.

MR. LEVY: I'm sorry. Just repeat the whole question.

MR. DAVIS: Sure. In addition to the memoranda compiled by Mr. Steele, did Fusion itself create any other work product as part of this investigation?

MR. LEVY: I just want to make sure there's no confusion. It wasn't Fusion that created the memoranda.

MR. DAVIS: Right, but it was a subcontractor giving it back to Fusion.

MR. LEVY: That's correct.

BY MR. DAVIS:

Q. With that understanding, did Fusion create any work product of its own?

A. Yes.

Q. And can you describe what type of work product that was?
A. I believe I described it before. We do a lot of public records research, things that are in the news, things that are in court documents. We summarize those things and try to document, you know, and attach them to the underlying source material.

Q. So you create sort of summary memoranda of those documents?

A. Yes.

Q. Okay. And to whom is that distributed?

MR. LEVY: As a general matter?

MR. DAVIS: Well, within the course of this investigation.

MR. LEVY: Inasmuch as that answer calls for client communications the answer might be privileged, might touch on obligations Mr. Simpson has. So he's not going to answer that question.

MR. FOSTER: Did you provide work product to your client?

MR. LEVY: Again, the answer to that question might implicate privilege or his obligations.

BY MR. DAVIS:

Q. Is the version of the Steele memoranda that was published by BuzzFeed identical to the version that Orbis provided Fusion?
A. To my knowledge, yes.

Q. The version published by BuzzFeed contains several redactions, not merely the ones by Mr. Gubarev, G-U-B-A-R-E-V, that were later added. Were those redactions in the versions Mr. Steele provided to you?

MR. LEVY: So wait. You're asking about the version in Exhibit 3?

MR. DAVIS: Right.

MR. LEVY: And you're asking if the redactions that appear here were delivered to Fusion?

MR. DAVIS: Right.

BY THE WITNESS:

A. No.

Q. Do you know who added those redactions?

A. No.

Q. Did any version of the memoranda list source and subsource names rather than referring to sources anonymously?

A. I'm not sure I understand the question.

Q. In the version that we have as an exhibit obviously it doesn't give identifying information for sources, it says source A, subsources, things like that. Was there ever a version that listed
the actual source names rather than substituting them?

A. These are the versions that we received.

Q. They're what?

A. These are the memos that we received.

Q. Those are the memos you received. Okay.

MR. FOSTER: But he's asking if you received any other memos that listed the sources?

MR. LEVY: He did not -- what I think he said is that he did not receive any versions of these memos that listed the sources.

MR. FOSTER: Okay. Did you receive any other documentation from Mr. Steele that listed the sources?

MR. SIMPSON: I don't want to get into source information.

BY MR. DAVIS:

Q. Again, I don't want to repeat questions that have been asked, but I don't want to unintentionally omit anything. Did the version provided to the FBI include all source names?

A. I don't know that there was a version provided to the FBI.

Q. When Mr. Steele first met with the FBI in the summer of 2016 do you know if he provided the
first memoranda that he created?

MR. LEVY: He's already answered that question.

BY THE WITNESS:

A. No, I don't know.

Q. Do you know if he provided any other memoranda to the FBI on a rolling basis at all at any point?

MR. LEVY: He's answered that question too.

BY THE WITNESS:

A. I don't know.

Q. So I'd like to go back to Exhibit 4, I believe. On page 3, paragraph 18 Mr. Steele's attorneys are describing the December memoranda and they state "The Defendants" -- again, that's Mr. Steele and Orbis -- "continued to receive unsolicited intelligence on the matters covered by the pre-election memoranda after the U.S. presidential election and the conclusion of the assignment for Fusion."

They reiterate this point on Exhibit 5 on page 4. Request 11 asks "Please state whether such intelligence was actively sought by the Defendant" --

A. Where are you at?
Q. Page 4, request 11. It states "Please state whether such intelligence was actively sought by the second Defendant or merely received as presently pleaded." The response they say is "Such intelligence was not actively sought, it was merely received."

Did anyone -- are you aware of who sent this unsolicited intelligence to Mr. Steele?

A. No.

Q. Could you describe his methods of compiling the dossier a little more? I think before you described field interviews. He seems to be talking about unsolicited information coming to him rather than information he sought out?

A. I can try. When you're doing field information gathering you have a network of people, sources. It's not like a light switch that you turn on and off, these are people you work with. So they call you and tell you stuff. You know, you don't close the window and stop answering phone calls, you know, when the engagement ends. So I assume this is stuff that came in straggle, whatever you call it.

Q. To the best of your knowledge, did Mr. Steele pay any of his sources or subsources in
the memoranda for information?

A. I don't know. I think there's been a little bit of confusion I would like to clear up. Some people were saying that he was paying people for information. I don't know whether he does or not, but that's not basically how I understand field operations to work. You commission people to gather information for you rather than sort of paying someone for a document or to sit for an interview or something like that. That's not how I understand it works.

Q. To make sure I understand, are you saying you don't pay for particular information, you would have an established financial arrangement with someone?

A. If he did at all, but I did not ask and he did not share that information. He did not invoice me for any such.

Q. Did Mr. Steele ever discuss his opinion of Mr. Trump with you?

A. We didn't discuss our political views of Mr. Trump, I don't think, at least not that I specifically remember, if that's what you mean.

Q. That is.

If I recall correctly, you said earlier that
Once Fusion had exhausted public documentary sources you turned to Mr. Steele and some other subcontractors for human intelligence; is that correct?

A. Yeah, field intelligence.

Q. Would your engagement with your client have ended had you not turned to human intelligence?

A. I have no idea. I mean, I can't speculate.

Q. Well, to clarify, when say you had exhausted the public documentation, are you saying you reached the end of your work or was there still more?

A. No. It's a broad project, there's lots of things going on. We're pulling legal filings and bankruptcies and all sorts of other stuff on all kinds of issues. I was talking about specific lines of inquiry.

Q. To the best of your knowledge, do Rinat Akhmetshin and Christopher Steele know each other?

A. I don't know.

Q. To the best of your knowledge, has 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.
My question was whether or not they knew you were being paid to do that research.

MR. LEVY: He answered that question too and he said he did not explain that to the journalists.

MR. SIMPSON: It's hard to generalize. I run a business, it's a research business. Reporters know we have clients who pay us to do research. So, you know, I don't remember any specific queries about whether we were being paid or not, but I think most journalists would assume that someone had paid us to do research.

MR. FOSTER: They knew you were doing a Trump oppo research project as opposed to a Hillary Clinton oppo research project?

MR. LEVY: From 2015 through the end of the election?

MR. FOSTER: Can you let the witness answer, please.

MR. SIMPSON: The word "they" is extremely broad. Journalists would call and ask questions about specific things and from that they might conclude that we were doing a Trump oppo project. It's just worth pointing out that in a political season all kinds of people are doing research on all kinds of things. Some people are
interested in trade, other people are interested in guns. So you wouldn't necessarily intuit exactly what we were doing. Most people are interested in, you know -- they're interested in the story they're working on. So some people will say, hey, I'm interested in whether Donald Trump gets his ties from third-world countries and they wouldn't ask about anything else.

BY MR. DAVIS:

Q. You mentioned before, if I recall correctly, that Fusion was having issues with persons attempting to hack it?

A. That's a current concern, yes.

Q. When did that concern -- when did you first become aware of that concern?

A. Relatively recently.

Q. So after the election?

A. Yes.

MR. FOSTER: Did you tell journalists that you had engaged Mr. Steele in the summer of 2016?

MR. SIMPSON: I don't specifically remember doing that until the fall.

MR. FOSTER: After the election or before?

MR. SIMPSON: Before the election.

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, please.
4
5 MR. SIMPSON: Sure. Essentially there was -- at some point the controversy over the Trump campaign's possible relationship with the Kremlin became, you know, one of the main -- major issues in the campaign and there were things that Chris knew and understood to be the case that only he could really explain in a credible way, and I thought that -- we thought that he should be the one that explains them, you know. So we sat down with a small group of reporters who were involved in investigative journalism of national security issues and we thought were in a position to make use of him as a resource.
6
7 MR. FOSTER: Do you recall whether that was before or after he ended his relationship with the FBI?
8
9 MR. SIMPSON: Before.
10
11 BY MR. DAVIS:
12
13 Q. Do you recall what the first published article -- when the first published article came out that referenced material from the memoranda?
A. Not specifically.

MR. FOSTER: Earlier you talked about evaluating the credibility of the information in the memoranda that you were being provided by Mr. Steele and, by way of summary, you talked about your belief that he was credible and that you had worked with him before and the information he had provided you had been reliable in the past. Did you take any steps to try to assess the credibility of his sources, his unnamed sources in the material that he was providing to you?

MR. SIMPSON: Yes, but I'm not going to get into sourcing information.

MR. FOSTER: So without getting into naming the sources or anything like that, what steps did you take to try to verify their credibility?

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

MR. FOSTER: Why?

MR. LEVY: It's a voluntary interview, and in addition to that he wants to be very careful to protect his sources. Somebody's already been killed as a result of the publication of this dossier and no harm should come to anybody related to this honest work.
MR. FOSTER: I'm not asking him to identify the sources. I'm just asking what steps he took to try to verify or validate the information.

MR. LEVY: He's given you --

MR. FOSTER: If he can answer generally without identifying the sources, I'd ask him to answer.

MR. LEVY: He's given you over nine hours of information and he's going to decline to answer this one question.

MR. FOSTER: And several others.

MR. LEVY: Not many.

BY MR. DAVIS:

Q. I think you mentioned that you were in London when you first heard that someone was interested in hiring Fusion to work on the Trump research; is that correct?

MR. LEVY: Repeat the question.

MR. DAVIS: If I recall correctly, Mr. Simpson said that he was in London when he first heard that somebody was interested in hiring Fusion to do Trump research?

BY THE WITNESS:

A. That's my recollection.

Q. Were either of the clients on this project
1 not American citizens?

A. Were either of the clients on this --

MR. LEVY: Clients on which project?

BY MR. DAVIS:

Q. Were any clients on the Trump research not American citizens?

A. I don't mind answering that if that's okay. They're domestic clients.

MR. FOSTER: You said earlier that the information that you gather in your work is owned by the client, it's not owned by you, and so therefore you also referenced your nondisclosure agreements and that you felt like if you had information that related to national security or law enforcement that the nondisclosure agreement did not prevent you from disclosing that information to third parties. Is that a fair summary?

MR. LEVY: Wait. You said a lot there. Which third parties are you talking about?

MR. FOSTER: Well, to law enforcement.

MR. LEVY: I think he's answered this already. You're asking him whether it was permissible under his contractual obligations to report a crime to the national security community,
and he said yes, it's fine for him to do that.

MR. FOSTER: Right. I'm trying to summarize
the previous answer as a premise to my next
question. Is that an accurate summary of what you
said before?

MR. LEVY: Summarizing testimony is dangerous
after he's given nine hours of it. If you want to
ask him a question, ask him a question.

MR. FOSTER: Is there a specific provision in
your NDA that provides an exception for disclosure
to law enforcement or intelligence agencies?

MR. LEVY: I think he earlier didn't talk
about the contract, but if you want to talk about
it as a matter of practice what your understanding
is, go ahead.

MR. SIMPSON: I don't know.

MR. FOSTER: My colleague Ms. Sawyer asked
you earlier about public reports that the initial
client on the Trump work was a Republican and that
it's also been publicly reported that later there
was another client who was a supporter of Hillary
Clinton. Are you the source for any of those
public reports?

MR. LEVY: A hundred percent of what you were
saying was referring to news articles, right.
MR. SIMPSON: I've been asked about this by various journals as to what I've heard, whether they can report things that they've heard elsewhere, and I have not -- I don't know if you'd classify that as being a source, but I've been asked those questions and I've avoiding getting into specifics. But I have -- if people have accurate information of a general nature like that, I generally would not -- I would confirm things.

MR. FOSTER: Sorry. I didn't understand your answer.

MR. MUSE: It's quite clear.

MR. SIMPSON: Depends on what you say a source is. If someone calls me and say I hear client No. 1 was a Republican, then I'd say I don't have any problem with you writing that. That's not quite the same thing.

MR. FOSTER: So you confirm the accuracy of information?

MR. LEVY: He didn't say that.

MR. SIMPSON: There are certain things that I've chosen not to deny. You know, generally speaking, I deal with a lot of journalists. I'm not going to mislead people.

BY MR. DAVIS:
Q. To the extent you can clarify, is it that there were two sets of clients, one of whom was Republican and one of which was a Clinton supporter, or was it one person's whose views changed?

MR. LEVY: We're not going to get into the identity of clients. As you know, we've agreed to an interview about questions 5 through 13 of the March 24 request. Questions 1 through 4 talk about the identities of the clients. The Chair and the Ranking Member agreed with counsel for Mr. Simpson about the scope of this interview and that question is outside of it. In addition, the answer to that question would implicate privilege and obligations. He's talked to you for nine hours, he's given you a lot of information, and he's not going to answer questions about identities of clients.

MR. DAVIS: You've asserted attorney-client work product privilege --

MR. LEVY: There is no such privilege. I've asserted the attorney work product privilege, we've asserted privileges under the First Amendment, we've asserted the attorney-client privilege, and we've asserted privileges of confidentiality. It's a voluntary interview and he's declining to answer
the question.

MR. DAVIS: I understand that.

BY MR. DAVIS:

Q. So with the Prevezon matter, then, is it correct the law firm involved was Baker Hostetler and the ultimate client was Prevezon, is that right, while you were working there?

A. Yes.

Q. So any attorney-client privileges within the context of that information would be -- the holder of that privilege is Prevezon; is that correct?

MR. LEVY: That's a legal conclusion that he's not qualified to draw.

MR. DAVIS: You don't feel that you can speak to it without their permission?

MR. LEVY: Speak to what?

MR. DAVIS: To questions that would be covered by attorney-client privilege.

MR. LEVY: I'm not sure he's qualified to answer that question.

BY MR. DAVIS:

Q. Did you work with any law firms in relation to the Trump investigation?

MR. LEVY: Again, we're not getting into the
identity of any clients --

MR. DAVIS: I didn't say client.

MR. LEVY: I understand. Or their lawyers.

MR. FOSTER: I think the issue we're trying to deal with is in order to assess your claims of privilege the committee needs to understand at least as much about the context of the dossier work as it does about the Prevezon work in terms of who was involved. So if there's a law firm involved or if he was reporting to a law firm or acting under the direction of a law firm, then we need to be able to assess whether or not that was in anticipation of litigation, whether he was doing it by the direction of a law firm in order to assess your assertions of privilege.

MR. LEVY: I understand. We've identified our position. We've been talking -- Mr. Simpson has been answering your questions since 9:30 this morning, it's now 6:15. He's been fully cooperative and he's here because the Chair and the Ranking Member agreed to a limited scope. The questions you're asking are outside of that scope and this is part of why appearing at a hearing was going to be impossible. Through this agreement 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
caused his campaign chair to resign. The record is replete -- or the public report of my work is replete with examples of investigations I've done of Democrats that resulted in them losing their elections and being prosecuted.

MR. LEVY: At the Wall Street Journal?

MR. SIMPSON: Yes.

BY MR. DAVIS:

Q. Are you party to a joint defense agreement related to your Prevezon work?

MR. LEVY: He's not going to talk about privileged discussions or agreements, and he's probably not qualified to answer anyway.

BY MR. DAVIS:

Q. Is Fusion GPS paying Cunningham Levy for the firm's representation of you or as a third party?

MR. LEVY: That's privileged also. He's not getting into payments to his lawyers and it's beyond the scope of this interview which has now gone on for almost nine hours.

BY MR. DAVIS:

Q. Has Fusion GPS ever offered directly or indirectly to pay journalists to publish information?
Q. Are you aware of any Fusion clients offering directly or indirectly to pay journalists to publish information from Fusion?

MR. LEVY: While working for Fusion on a Fusion matter or as a general matter?

MR. FOSTER: Can you let the witness answer.

MR. LEVY: Well, if the question's clear he can answer any question --

MR. FOSTER: I think the question was clear.

MR. LEVY: -- within the scope of the interview --

MR. DAVIS: Are there any of Fusion's clients offering --

THE REPORTER: Guys.

BY MR. DAVIS:

Q. I'll repeat the question. Are you aware of any of Fusion's clients offering directly or indirectly to pay journalists to publish information from Fusion?

A. Not to my knowledge or recollection, no.

MR. FOSTER: What was the end date of the Trump engagement?

MR. LEVY: He told you he didn't recall exactly.
MR. SIMPSON: That's not correct. The election was the end date. I assume you're asking about the general election? The election date would have been the end.

MR. FOSTER: So you didn't do any work on the Trump matter after the election date, that was the end of your work?

MR. SIMPSON: I had no client after the election.

MR. FOSTER: It's 6:21. Let's go off the record for a minute.

(A short break was had.)

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

It's 6:30.

EXAMINATION

BY MS. SAWYER:

Q. We appreciate your time today, your patience in answering our questions.

You've been asked a number of questions just about -- well, strike that.

Were any of the particular factual findings or conclusions that you reached with regard to the research that was being done related to Russian interference in the 2016 election including possible ties to the Trump campaign, were any of...
the factual findings or conclusions influenced in any way by the identity of the client for whom you were doing that work?

A. All the questions you've asked I guess this one I've not given a lot of thought to.

Offhand, not that I can think of.

Q. So you weren't trying to reach a particular conclusion based on the identity had they asked you to find -- well, strike that.

I think what I'm trying to get some sense of comfort around is to the extent there might be concerns that the work being done was driven in a direction designed to reach a particular conclusion for a client or because of the client's identity was that the case?

A. I think it's safe to say that, you know, at some point probably early in 2016 I had reached a conclusion about Donald Trump as a businessman and his character and I was opposed to Donald Trump. I'm not going to pretend that that wouldn't have entered into my thinking. You know, again, I was a journalist my whole life. So we were, you know, trained not to take sides and practiced in not taking sides.

So most of what I do as a research person is
we try to avoid getting into situations where one's etiology or political views would cloud your work because it's a known hazard, but, you know, I reached an opinion about Donald Trump and his suitability to be president of the United States and I was concerned about whether he was the best person for the job.

Q. And given that you had been trained not to allow etiology to cloud your work, it sounds like you reached a conclusion and had concerns about Candidate Trump. What steps did you take to then ensure that your conclusion didn't cloud the work that was being done?

A. Well, to be clear, my concerns were in the category of character and competence rather than -- I didn't have any specific concerns for much of the time about his views, which I don't share, but that wasn't really the issue. Most of what we do has to do with do people have integrity and whether they've been involved in illicit activity. So those were the things I focused on.

Q. So the conclusion that you reached, was it informed by the research that you were -- your personal conclusion, was it informed by the research that you were conducting?
A. Yes. We deal in factual information and over the course of this project we gathered lots of facts about Donald Trump.

Q. You mentioned that earlier and I think you made clear a number of times in the course of the day that the specific work on Russian interference and possible ties to the campaign that Mr. Steele was doing was one part of that bigger picture, and I did want to ask you about some of that bigger picture of the work and get a sense from you, if I could, you know, some of the background and findings. In particular one of the things you had mentioned -- well, you just mentioned right now as we were speaking the term "illicit activity."

What, if any, research did you conduct that gave you any concerns about then Candidate Trump and potential illicit activity?

A. I think the thing I cited to you was his relationship with organized crime figures, and that was a concern.

Q. And what can you share with us about the findings, your findings?

A. Well, I've tried to share as much as I could think of over the course of today. As I say, there were various allegations of fraudulent
business practices or dishonest business practices or connections with organized crime figures. In fact, you know, there was numerous others that I can't remember the names of. It was a long history of associations with people accused of involvement in criminal activity.

You know, just to reiterate, the facts of these investigations are the facts and we don't try to drive an investigation to any particular conclusion, certainly not based on our political views. So I think it would be, you know, not believable for me to tell you I didn't reach, you know, views about Donald Trump's integrity, but, you know, those were -- those didn't influence the research in terms of the findings. Those were the findings.

Q. You mentioned specifically and I think with regard to organized crime particularly ties to Felix Sater is one. You indicated a connection to Yudkovich Mogilebich, I think it is.

A. Mogilebich.

Q. Mogilebich, which we can spell for you.

Tell me if I have this correct.

M-O-G-I-L-E-B-I-C-H.

A. Yes.
THE REPORTER: What's the first name?

MR. SIMPSON: Semyon, S-E-M-Y-O-N.

BY MS. SAWYER:

Q. Yudkovich, did I get that --

A. I believe I was probably talking fast and I think I might have made a reference to Yanukovych, which is the former president of the Ukraine.

Q. With regard to any of that work, did you create work product based on that work?

A. I don't specifically recall what we would have created.

Q. And with regard to that work, did you share any of that information with law enforcement agencies?

A. No. I mean, just to reiterate, the only contact that, you know, occurred during this engagement was -- at least to my knowledge, was Chris's dealing with the FBI. Other than that, I don't remember having any dealings with the FBI.

Q. You had also mentioned earlier in the day work -- that there was an investigation about money from Kazakhstan?

A. Yes.

Q. And could you tell me about that and what
you investigated and what you learned.

A. There was some parallel litigation in New York involving attempts by the government of Kazakhstan to recover money that had been allegedly stolen from Kazakhstan, billions of dollars in a colossal bank failure. The name of the bank was BTA Bank. It's been well established in various courts that the government's allegations are basically true, which is that large amounts of money were illicitly removed from this bank, laundered across Europe and into the United States apparently. Allegedly.

So there was a civil case, at least one civil case in New York involving -- filed by the city of Almaty, A-L-M-A-T-Y, against some alleged Kazakh money launderers. I don't remember exactly how, but we learned that -- it wasn't from Chris. We learned that Felix Sater had some connections with these people, and it's been more recently in the media that he's helping the government of Kazakhstan to recover this money. There's been media reports that the money went into the Trump Soho or it went into the company that built the Trump Soho. I can't remember the name.

Q. So the connection in that instance was to
Felix Sater and through Felix Sater to -- potentially to Donald Trump?

A. Yes. It was a company that Felix Sater and Donald Trump were involved in together.

Q. And the research you did on that project, was that public source research? Did you have any other -- did you have human intelligence sources on that project?

A. I think I probably did have some human sources. That's my answer.

Q. And did you use subcontractors at all on that work?

A. I can't say specifically whether it was -- I remember commissioning some public record-type research on Felix Sater and his history in New York.

Q. Did you feel in the course of that that you had uncovered evidence of any criminal activity by Donald Trump?

A. In the course of that I don't think so. I think my concern was the associations with known organized crime figures.

Q. And that included Felix Sater?

A. Yes.

Q. Anyone else in particular?
A. There were others.

MR. LEVY: Beyond what we've discussed today?

MS. SAWYER: Yes, beyond what we've already discussed.

BY THE WITNESS:

A. Another figure involved in the Trump Soho project was a central Asian person named Arif, A-R-I-F, is the last name. The first name is generally spelled Tevfik, it's T-E-V-F-I-K. If you search under a different transiteration of that name you can find open source reporting alleging that he's an organized crime figure from Central Asia and he had an arrest for involvement in child prostitution.

Q. You mentioned as well that you had reviewed tax bills. Were these specifically Donald Trump's tax bills?

A. They were Trump properties and I believe we may have reviewed some public information about estate taxes and things like that. We didn't have access to his tax returns.

Q. Did you reach any conclusions based on your review of his tax bills? I think you mentioned that in connection with trying to assess either financial connections or his financial
standing. Did you reach any conclusions with regard to either of those?

A. Yes. I concluded -- we concluded that his statements about what individual properties were worth were greatly exaggerated and at odds with the information that he'd supplied, you know, in legal filings with tax authorities and other records, corporate records.

Q. Did any of that indicate anything that showed a connection to Russia or the Russian government or Russian officials or Russian oligarchs?

A. Not that I can recall.

Q. You mentioned as well, you brought up Trump golf courses. What in particular were you looking into with regard to Donald Trump's golf courses?

A. The original inquiry was into the value of the courses, whether he had to borrow money to buy them, whether they were encumbered with debt, how much money they brought in, what valuations he put on them, and property tax filings.

Q. And in general can you share what findings and conclusions you reached?

MR. LEVY: With regard to?
MS. SAWYER: To the work on the golf properties.

BY THE WITNESS:

A. A number of them don't make any money.

His valuations of the properties are questionable.

I guess those would be the main findings.

Q. You just mentioned broadly but didn't describe it, you mentioned research on Scotland. I don't know if it was particular properties or something with regard to Scotland. Can you just describe what that research was.

A. Sure. He has golf courses in Scotland and Ireland and one of the facets of UK or anglo company law is that private companies have to file financial statements, public financial statements. So when you're looking at a guy like Donald Trump who doesn't like to share information about his company, it's useful to find a jurisdiction where he's required to share that information with the local government.

So we went and ordered the records -- the financial statements of the golf courses. There's also a long-running land use controversy -- I think there's multiple long-running land use 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
don't specifically recall. I just remember that
these were not doing very well and that he'd sunk a
lot of money into them and he hadn't gotten a lot
of money back yet.
8
MS. QUINT: You mentioned a couple of times,
9 Mr. Simpson, that you had particular familiarity
10 with Mr. Manafort and even that you were more
11 familiar with him in particular than Chris Steele
12 was. In general and it might not be easy to be
13 general about it, but what was your focus when you
14 had looked into Manafort? What main areas were you
15 familiar with?
16
MR. SIMPSON: Over the years, originally at
17 the Wall Street Journal we learned of his
18 relationship with Ukrainian and Russian oligarchs.
19 So it was generally continued in that vein. He was
20 subject of some litigation over his business
21 dealings in New York. There was a lawsuit filed by
the opposition politician from Ukraine accusing him of involvement in corruption in Ukraine. So as just a -- not for any particular client, but just because these matters are something I follow I had collected those documents. I think there's probably some other litigation that I collected that was in a similar vein.

MS. QUINT: And it was all documentary or did you have human sources for your Manafort research?

MR. SIMPSON: I don't think -- for the most part it was just what you call gathering string, just accumulating files on people or subjects that are of interest.

BY MS. SAWYER:

Q. The committee, certain members of the committee, the Chairman and Ranking Member along with Senators Graham and Whitehouse had sent a request for documents and information on July 19. I understand your efforts to identify that information are ongoing and I know that in response to one of my questions about Mr. Page your attorney has already said that the request for information is pending and being reviewed. I just wanted to ask you a couple of questions about some of the other individuals that we had identified in that
letter and in particular in request No. 6?

MR. LEVY: Do you have an exhibit or should I
just get my copy out?

MS. SAWYER: I'm happy to enter it as an
exhibit or I can just read the names. I don't
think there's any reason we need to --

MR. LEVY: Just read the names to move it
along, that's fine.

MS. SAWYER: I don't think there's any
reason -- there's nothing in this letter to inform
your answer otherwise.

BY MS. SAWYER:

Q. So with regard to Alpha Group, sometimes
I've heard Alpha Group, sometimes I've heard Alpha
Bank. I don't know if they're two distinct
entities. Do you know anything about Alpha Bank or
Alpha Group with regard to Russian interference in
the 2016 election?

A. Alpha Group is not a corporate person,
it's not an entity. It's just a collective name.
Alpha Bank is a bank. I know a limited amount. I
know, you know, journalists were working on some
issues related to this and they asked us about it,
but the information didn't come from us.

Q. So you were asked by journalists about it,
but you're saying whatever information you had was not generated by Fusion GPS?

A. That's right. I know they're a big player and they have long, deep ties to Vladimir Putin.

One of the founders, Pyotr Aven, P-Y-O-T-R, second word Aven, A-V-E-N, was an associate of Vladimir Putin when he was in the mayor's office in Saint Petersburg around the time same that Bill Browder was doing business with the mayor's office. They're very powerful politically and economically in Russia and they have -- in the tens of billions are the assets of the founders and they have all sorts of interests. They have epic disputes with western corporations, including BP. So people in my business tend to just have a lot of institutional knowledge about them and, you know, I shared my institutional knowledge about them.

Q. You mentioned other founders. Are those other founders Mikhail Fridman and German Khan?

A. Yes.

Q. Do you have any information there have been reports about potential communications between a server at Alpha Bank and potentially servers that belong to the Trump organization or Trump -- some entity associated with Donald Trump? Do you have
any information about those particular reports?

A. That's kind of an open-ended question. I think what I said is we were asked about that and it wasn't -- that information wasn't generated by us and I'm happy to say it's beyond our competence to have generated, but in the course of being asked about it, you know, people gave us information. I don't know what else to say.

Q. And what information were you given?

A. A bunch of data. I mean, we were shown like do you know what this would mean, does this mean, and it's beyond -- it's really -- it's certainly beyond my competence.

Q. So the data that you were shown, you could not draw any conclusions from it?

A. I did not draw any conclusions from the data.

Q. Another individual that there's been a lot of press reporting on is Sergei Millian. Other than what -- what, if anything, can you tell us about did you conduct any research into Mr. Millian? And, if so, what conclusions did you reach with regard to Russian interference in the 2016 election?

A. We learned from sources that he had
connections to the Trump organization and we did an open source investigation of him. We found a picture of him with Donald Trump and another real estate investor in Florida. We've discovered that's not his real name or at least not the name he came to the United States with and that before he became a real estate broker he was a linguist and translator. Speaking generally, people with advanced training in linguistics are oftentimes involved in intelligence matters, but I don't know whether he is or isn't. Various reporters became interested in him because he was boasting about his connections to the Trump organization in the Trump campaign. So we got lots of inquiries about who was he, was he a spy, you know, that sort of thing.

Q. And did you make a determination whether or not he had actual ties to the Trump campaign?

A. Well, some of the -- yes. I mean, he was -- I think he's Facebook friends with Michael Cohen. I'm sorry. It was some social media connection. It was either Twitter friends or Facebook friends. It was public information. We took it from that that they did know each other. I guess we gradually learned of Michael Cohen's role in the Trump campaign as opposed to in the Trump
Q. And what did you learn about Mr. Cohen's role in the Trump campaign?

A. We learned that his job included dealing with inquiries about Russia and he seemed to get all of the serious inquiries, investigative inquiries about Russia. He seemed to know a lot about that. We learned that he was a very intimidating person who had a history of threatening reporters with libel suits. We learned that he's married to -- his father-in-law is a Ukrainian emigre, that he had some Ukrainian clients and connections to the taxi industry in New York which is heavily populated with Russian emigres, and we learned that he was involved in some of Trump's projects where there was a lot of Russian buyers. The only other thing I can think of is that he was also the person who dealt with allegations against Mr. Trump from the tabloids.

Q. And with regard to Trump projects with Russian buyers, what specific projects had a number of Russian buyers?

A. I don't specifically remember. Florida maybe. I think it was Florida. Sorry.

MS. SAWYER: Just give us a minute.
I think that's really all of our questions. I don't know if there's follow-up that you all had.

MR. FOSTER: Just very quickly. I can do it from right here.

So I asked you -- or you were asked earlier about representations that you're not -- you don't see your firm as being Democrat linked and in my previous question I asserted that there had been public reports that you had done work, opposition research during the 2012 election aimed at Mr. Romney, but I didn't ask you to confirm that.

Is that correct?

MR. LEVY: Work for clients outside the scope of the interview is not within the scope of the interview.

MR. FOSTER: It's relevant to his claim that he's not a Democrat linked firm.

MR. LEVY: He's answered that question. He's given you multiple answers to that question and significant information in support of his answer to that question, and that small fact which may or may not be pertinent is that he's going to decline to answer because it's outside the scope of this interview.

MR. SIMPSON: I decline to answer.
MR. FOSTER: In some of the questioning in
the last round there was some talk of your -- you
didn't have a particular aim in your research, you
were following the facts wherever they lead. Is it
fair to say -- is it a fair description to say that
your job was opposition research aimed at
Mr. Trump? That's been widely reported and
characterized that way. Do you think that's a fair
coloration of what your job was?

MR. LEVY: He's been talking for nine and a
half hours, a lot of which was describing his work.
To simplify it in any particular way at this point
I think is unfair to the witness.

MR. FOSTER: You weren't hired to find
positive information about Mr. Trump, were you?

MR. SIMPSON: To the contrary. I think when
you're doing research on any subject you're trying
to figure out what the truth is. So if Donald
Trump's got a good business record and he's really
worth billions of dollars, that's important
information. In fact, you shouldn't be feeding
reporters stories about how Donald Trump is not
worth billions of dollars if he's worth billions of
dollars. So, you know, I think the connotation of
negativity, I get, you know, where you're coming
from, but, in fact, you're just trying to figure out what's true.

It's like with the Prevezon case, we were trying to figure out who's telling the truth, is it our guys or is it Browder. I do my job well and I get rehired when I give them the right information, when I give them accurate information. So if Donald Trump turned out to be a great businessman, that's what I would have to tell people.

MR. FOSTER: Nothing further from me.

MR. LEVY: Before we go off the record, will we be entitled to a copy of the transcript?

MR. FOSTER: You'll be able to review the transcript and request corrections, make an errata.

MR. LEVY: Will it be kept confidential? We'd like to make a request that it be kept confidential given the sensitivity of the matters discussed today.

MR. FOSTER: Your request is noted.

MR. LEVY: Noted, but no decision on it?

MR. FOSTER: No decision.

MR. LEVY: And upon reviewing the transcript, when will we have that opportunity?

MR. FOSTER: We can arrange that off the
MR. LEVY: When we do we just reserve the right obviously to correct the record or supplement it.

MR. FOSTER: That's why we'd allow you to review it.

MR. LEVY: Thank you very much.

MR. DAVIS: Nothing further. We're going off the record at 7:04.

(Whereupon the interview was concluded at 7:04 p.m.)
CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

I, TINA M. ALFARO, Certified Shorthand Reporter No. 084-004220, Certified Realtime Reporter, and Notary Public in and for the State of Illinois, do hereby certify:

That GLENN SIMPSON, whose interview is hereinbefore set forth, was duly sworn by me and that said deposition is a true record of the testimony given by such witness.

I further certify that I am not counsel for nor in any way related to any of the parties to this suit, nor am I in any way interested in the outcome thereof.

In witness, whereof, I have hereunto set my hand this ___ day of __________, 2017.

_____________________________
Tina M. Alfaro, CSR, CRR