Page 256 obligations to that client? 1 A. No, it wouldn't have been consistent. 2 3 Q. Did you speak with anyone at Baker Hostetler about the work that you had been engaged 4 to do on then Candidate Trump? 5 A. Not that I recall. 6 7 Q. So the point in time at which you were in 8 meetings that included -- the meetings that you had related to the Court hearing at Prevezon that 9 you've already discussed, the dinner, the Court 10 11 hearing, and then a subsequent dinner, they occur 12 right around the same time that Natalia Veselnitskaya and Rinat Akhmetshin and the 13 14 individual you described as a translator, Anatoli 15 Samochornov, met -- or it has been reported met with individuals in the Trump campaign. Did that 16 topic just never come up during those three days? 17 18 A. It never came up. I don't know what else 19 to say. It never came up. Q. So you at the time had no idea that they 20 21 were meeting with or met -- and actually, in fact, 22 met with members of the Trump campaign? A. I didn't have any idea about that meeting 23 24 until quite recently. 25 Q. So in an August 1, 2017 news briefing

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	Page 257
1	White House Press Secretary Sarah Huckabee Sanders
2	said "The Democrat linked firm Fusion GPS actually
3	took money from the Russian government while it
4	created the phoney dossier that's been the basis
5	for all of the Russia scandal fake news." What is
6	your response to that statement?
7	A. It's not true?
8	Q. And what in particular is not true about
9	it?
10	A. Well, it's a false allegation leveled by
11	William Browder before this committee and in other
12	places for the purpose of his advantage. She's
13	repeating an allegation that was aired before this
14	committee and in other places that we were working
15	for the Russian government and it's not true.
16	Most importantly the allegation that we were
17	working for the Russian government then or ever is
18	simply not true. I don't know what to say. It's
19	political rhetoric to call the dossier phoney. The
20	memos are field reports of real interviews that
21	Chris's network conducted and there's nothing
22	phoney about it. We can argue about what's prudent
23	and what's not, but it's not a fabrication.
24	Q. And I think you've already answered you
25	contend that you were not taking money from the

Alderson Court Reporting

Page 258 Russian government and that was in relation to the 1 litigation work you had done with Baker Hostetler, 2 3 correct? A. Yes. They are a well-regarded law firm 4 that has obligations to determine the sources of 5 funds when they take a client and, to my knowledge, 6 7 they did so and the money was not coming from the 8 Russian government. O. So that was for the Prevezon work for 9 Baker Hostetler. Did you take money in any way, 10 11 shape, or form that could be attributed to the 12 Russian government for the work that you were doing -- the opposition research work that you were 13 doing on then Candidate Trump? 14 15 A. No. Q. Did, to the best of your knowledge, 16 17 Mr. Steele take money in any way, shape, or form that could be attributed to the Russian government 18 19 for the work that he did on the memos as part of the opposition research on Candidate Trump? 20 A. No. 21 22 I'll add one more thing to the response to Sarah Huckabee Sanders, which is her assertion that 23 24 we are a Democrat linked opposition research firm. I think I addressed this earlier, but to be clear, 25

	Page 259
1	we don't have a business of we're not an
2	appendage to the Democratic party. We run a
3	commercial business, we're all ex-journalists. We
4	take clients from both sides of the aisle. We have
5	a long history of that, I'm proud of that. I'm
6	happy to say I have lots of Republican clients and
7	friends.
8	Q. To the extent there have been allegations
9	or indications that the work that Mr. Steele did,
10	his research into Russian interference in the 2016
11	election, or your work could have been influenced
12	by Rinat Akhmetshin, do you believe that is true
13	and if do you believe it's true?
14	A. No.
15	Q. Do you believe that the work that
16	Mr. Steele did on Russian interference and possible
17	ties to the Trump campaign or your work could have
18	been influenced by Natalia Veselnitskaya?
19	A. No.
20	MS. SAWYER: I think my time is up for this
21	round. So I appreciate your patience and we'll
22	take a break.
23	MR. FOSTER: It's 5:34.
24	(A short break was had.)
25	MR. DAVIS: We'll go back on the record.

Page 260 1 It's 5:43 p.m. 2 EXAMINATION 3 BY MR. DAVIS: Q. Mr. Simpson, could you walk us through 4 your itinerary to the best you remember it from 5 June 8th through 10th of 2016, especially any 6 7 interactions you had with Prevezon team members 8 during those three days? 9 MR. LEVY: Beyond what he's discussed today? MR. DAVIS: Yes. 10 11 BY THE WITNESS: 12 A. I took the train to New York. I don't recall, but I may have had other business. I don't 13 remember. I think there was a dinner. I went back 14 to my hotel, went to bed. Got up the next morning. 15 I don't remember the sequence, but I remember 16 17 meeting with Weber Shandwick, the PR firm, about preparations for -- I think we expected there was 18 19 going to be a trial. I think that's what it was about. It might have been about the press coverage 20 of the hearing. I just don't remember. I went to 21 the hearing and I think -- if I remember the 22 sequence correctly, I went to the hearing, then I 23 24 had the meeting with those guys, the Weber 25 Shandwick guys, and then I hightailed it home. My

Page 261 son's junior prom was that night or senior prom and 1 2 I was under some pressure to go home and be a dad. Q. And then on the 10th, that first day back 3 in D.C.? 4 5 A. I don't think that was my first day back. I was back the evening of the 9th. 6 7 Q. Sorry. The first full day. A. I think it was a weekend. So I don't know 8 what I was doing. Probably just relaxing. I went 9 to the dinner, it was at a restaurant called 10 Barcelona up on Wisconsin Avenue, it was a social 11 12 occasion. I brought my wife, other people brought their wives. We talked about books and other other 13 14 nongermane topics. It was just a social 15 occasion. 16 (Exhibit 6 was marked for 17 identification.) BY MR. DAVIS: 18 19 Q. I'm going to show you an exhibit. I think we're on 6. We understand these are meeting notes. 20 21 Do these phrases about -- including Mr. Browder mean anything to you or relate to any of the 22 research that you conducted or otherwise aware of 23 24 regarding Mr. Browder? MR. LEVY: When say "meetings notes," meeting 25

Page 262 notes about what meeting? 1 MR. DAVIS: These are the meeting notes from 2 the June 9th meeting at Trump Tower. These are 3 Mr. Manafort's notes or they're contemporaneous. 4 BY THE WITNESS: 5 6 A. I could tell -- obviously you know who 7 Bill Browder is. Cyprus Offshore, Bill Browder's structure, you know, investment -- Hermitage 8 Capital, his hedge fund, set up numerous companies 9 in Cyprus to engage in inward investment into 10 11 Russia, which is a common structure, both partially 12 for tax reasons but also to have entities outside of Russia, you know, managing specific investments. 13 I can only tell you I assume that's what that 14 references. I don't know what the 133 million --15 MR. FOSTER: Can I interrupt? And you know 16 17 that from research that you did and provided to --MR. SIMPSON: Yes. 18 19 MR. LEVY: Let him finish. MR. FOSTER: -- research that you did and 20 21 provided to Baker Hostetler and their client? 22 MR. SIMPSON: Yes. There was a -- I can elaborate a little bit. As part of the research 23 24 into how Hermitage Capital worked we looked at various things, their banking relationships, the 25

Page 263 way they structured their investments in Russia. 1 Ι 2 don't remember how many, but there was a large 3 number of shell companies in Cyprus that were used to hold the investments of individual clients of 4 Hermitage. So one of the things we discovered from 5 that was the likely identities of some of 6 7 Hermitage's clients. 8 BY MR. DAVIS: 9 Q. Do any of the other entries in here mean anything to you in light of the research you've 10 11 conducted or what you otherwise know about 12 Mr. Browder? A. I'm going to -- I can only speculate about 13 14 some of these things. I mean, sometimes --15 MR. LEVY: Don't speculate. BY THE WITNESS: 16 17 A. Just would be guesses. 18 Q. Okay. 19 A. I can skip down a couple. So "Value in Cyprus as inter," I don't know what that means. 20 21 "Illici," I don't know what that means. "Active 22 sponsors of RNC," I don't know what that means. "Browder hired Joanna Glover" is a mistaken 23 24 reference to Juliana Glover, who was Dick Cheney's press secretary during the Iraq war and associated 25

Page 264 with another foreign policy controversy. "Russian 1 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 7 act? 8 A. I assume so. Q. The information here, is this generally 9 consistent with the type of information you or 10 11 Baker Hostetler were providing about Mr. Browder 12 and his activities? MR. LEVY: Can you repeat that question. 13 MR. DAVIS: Is the information here, to the 14 best you can decipher it, consistent with the 15 information that you and Baker Hostetler and HRAGI 16 17 were relaying to other parties about Mr. Browder's activities? 18 19 MR. LEVY: He's just told you that a lot of what's here he doesn't know what it means, he 20 21 doesn't have knowledge or recollection as to these 22 terms. 23 MR. DAVIS: The parts you do recognize. 24 BY THE WITNESS: 25 A. Couple of the items touch on things that I

Page 265 worked on, Cyprus, Bill Browder. 1 2 Q. I'm going to jump back to the Russia 3 investigation. You'd mentioned before you've had some subcontractors that you've worked with long 4 enough that you call them super subs; is that 5 correct? 6 7 A. Yes. 8 Q. Orbis or Mr. Steele, is that one such 9 super sub in your opinion? A. It's a loose term. We don't have a list 10 11 of super subs. 12 MR. FOSTER: Is he one of them? 13 MR. SIMPSON: There is no list. So I can't 14 tell you if he's one of them. He's a reliable 15 subcontractor who's worked with us in the past and we've been very satisfied with the quality of his 16 17 work. 18 MR. LEVY: Just to reiterate, I think as you 19 described these super subs earlier loosely, even with some of these super subs Mr. Simpson said that 20 he would talk about clients only on a need-to-know 21 22 basis even with the super subs, so-called. 23 BY MR. DAVIS: 24 Q. Beyond the memoranda prepared by 25 Mr. Steele, did Fusion create any other work

Page 266 product relating to this investigation? 1 2 MR. LEVY: Which investigation? 3 MR. DAVIS: The investigation into Mr. Trump and his associates. 4 MR. LEVY: In addition to what? 5 6 MR. DAVIS: Sorry. The investigation into 7 Mr. Trump and his associates. 8 MR. LEVY: I'm sorry. Just repeat the whole 9 question. MR. DAVIS: Sure. In addition to the 10 memoranda compiled by Mr. Steele, did Fusion itself 11 12 create any other work product as part of this investigation? 13 14 MR. LEVY: I just want to make sure there's 15 no confusion. It wasn't Fusion that created the memoranda. 16 17 MR. DAVIS: Right, but it was a subcontractor 18 giving it back to Fusion. 19 MR. LEVY: That's correct. BY MR. DAVIS: 20 21 Q. With that understanding, did Fusion create any work product of its own? 22 A. Yes. 23 24 Q. And can you describe what type of work 25 product that was?

Page 267 A. I believe I described it before. We do a 1 2 lot of public records research, things that are in 3 the news, things that are in court documents. We summarize those things and try to document, you 4 know, and attach them to the underlying source 5 6 material. 7 Q. So you create sort of summary memoranda of 8 those documents? A. Yes. 9 Q. Okay. And to whom is that distributed? 10 11 MR. LEVY: As a general matter? 12 MR. DAVIS: Well, within the course of this investigation. 13 14 MR. LEVY: Inasmuch as that answer calls for client communications the answer might be 15 privileged, might touch on obligations Mr. Simpson 16 17 has. So he's not going to answer that question. MR. FOSTER: Did you provide work product to 18 19 your client? MR. LEVY: Again, the answer to that question 20 might implicate privilege or his obligations. 21 2.2 BY MR. DAVIS: Q. Is the version of the Steele memoranda 23 24 that was published by BuzzFeed identical to the version that Orbis provided Fusion? 25

Page 268 A. To my knowledge, yes. 1 2 Q. The version published by BuzzFeed contains 3 several redactions, not merely the ones by Mr. Gubarev, G-U-B-A-R-E-V, that were later added. 4 Were those redactions in the versions Mr. Steele 5 provided to you? 6 7 MR. LEVY: So wait. You're asking about the 8 version in Exhibit 3? 9 MR. DAVIS: Right. MR. LEVY: And you're asking if the 10 11 redactions that appear here were delivered to 12 Fusion? 13 MR. DAVIS: Right. BY THE WITNESS: 14 A. No. 15 16 Q. Do you know who added those redactions? 17 A. No. Q. Did any version of the memoranda list 18 19 source and subsource names rather than referring to sources anonymously? 20 21 A. I'm not sure I understand the question. 22 Q. In the version that we have as an exhibit 23 obviously it doesn't give identifying information 24 for sources, it says source A, subsources, things 25 like that. Was there ever a version that listed

Page 269 the actual source names rather than substituting 1 2 them? 3 A. These are the versions that we received. Q. They're what? 4 A. These are the memos that we received. 5 Q. Those are the memos you received. Okay. 6 7 MR. FOSTER: But he's asking if you received 8 any other memos that listed the sources? MR. LEVY: He did not -- what I think he said 9 is that he did not receive any versions of these 10 11 memos that listed the sources. 12 MR. FOSTER: Okay. Did you receive any other documentation from Mr. Steele that listed the 13 14 sources? 15 MR. SIMPSON: I don't want to get into source 16 information. 17 BY MR. DAVIS: Q. Again, I don't want to repeat questions 18 19 that have been asked, but I don't want to unintentionally omit anything. Did the version 20 provided to the FBI include all source names? 21 22 A. I don't know that there was a version provided to the FBI. 23 24 Q. When Mr. Steele first met with the FBI in the summer of 2016 do you know if he provided the 25

Page 270 first memoranda that he created? 1 2 MR. LEVY: He's already answered that 3 question. BY THE WITNESS: 4 A. No, I don't know. 5 Q. Do you know if he provided any other 6 7 memoranda to the FBI on a rolling basis at all at 8 any point? 9 MR. LEVY: He's answered that question too. BY THE WITNESS: 10 11 A. I don't know. 12 Q. So I'd like to go back to Exhibit 4, I believe. On page 3, paragraph 18 Mr. Steele's 13 attorneys are describing the December memoranda and 14 they state "The Defendants" -- again, that's 15 Mr. Steele and Orbis -- "continued to receive 16 17 unsolicited intelligence on the matters covered by the pre-election memoranda after the U.S. 18 19 presidential election and the conclusion of the assignment for Fusion." 20 21 They reiterate this point on Exhibit 5 on page 4. Request 11 asks "Please state whether such 22 intelligence was actively sought by the 23 24 Defendant" --25 A. Where are you at?

	Page 271
1	Q. Page 4, request 11. It states "Please
2	state whether such intelligence was actively sought
3	by the second Defendant or merely received as
4	presently pleaded." The response they say is "Such
5	intelligence was not actively sought, it was merely
6	received."
7	Did anyone are you aware of who sent this
8	unsolicited intelligence to Mr. Steele?
9	A. No.
10	Q. Could you describe his methods of
11	compiling the dossier a little more? I think
12	before you described field interviews. He seems to
13	be talking about unsolicited information coming to
14	him rather than information he sought out?
15	A. I can try. When you're doing field
16	information gathering you have a network of people,
17	sources. It's not like a light switch that you
18	turn on and off, these are people you work with.
19	So they call you and tell you stuff. You know, you
20	don't close the window and stop answering phone
21	calls, you know, when the engagement ends. So I
22	assume this is stuff that came in straggle,
23	whatever you call it.
24	Q. To the best of your knowledge, did
25	Mr. Steele pay any of his sources or subsources in

Page 272 the memoranda for information? 1 2 A. I don't know. I think there's been a 3 little bit of confusion I would like to clear up. Some people were saying that he was paying people 4 for information. I don't know whether he does or 5 not, but that's not basically how I understand 6 7 field operations to work. You commission people to 8 gather information for you rather than sort of paying someone for a document or to sit for an 9 interview or something like that. That's not how I 10 11 understand it works. Q. To make sure I understand, are you saying 12 you don't pay for particular information, you would 13 have an established financial arrangement with 14 15 someone? A. If he did at all, but I did not ask and he 16 17 did not share that information. He did not invoice me for any such. 18 19 Q. Did Mr. Steele ever discuss his opinion of Mr. Trump with you? 20 21 A. We didn't discuss our political views of Mr. Trump, I don't think, at least not that I 22 specifically remember, if that's what you mean. 23 24 Q. That is. If I recall correctly, you said earlier that 25

	Page 273
1	once Fusion had exhausted public documentary
2	sources you turned to Mr. Steele and some other
3	subcontractors for human intelligence; is that
4	correct?
5	A. Yeah, field intelligence.
6	Q. Would your engagement with your client
7	have ended had you not turned to human
8	intelligence?
9	A. I have no idea. I mean, I can't
10	speculate.
11	Q. Well, to clarify, when say you had
12	exhausted the public documentation, are you saying
13	you reached the end of your work or was there still
14	more?
15	A. No. It's a broad project, there's lots of
16	things going on. We're pulling legal filings and
17	bankruptcies and all sorts of other stuff on all
18	kinds of issues. I was talking about specific
19	lines of inquiry.
20	Q. To the best of your knowledge, do Rinat
21	Akhmetshin and Christopher Steele know each
22	other?
23	A. I don't know.
24	Q. To the best of your knowledge, has
25	Mr. Akhmetshin ever worked with Orbis?

Page 274 A. Not to my knowledge. 1 2 MR. FOSTER: If Mr. Akhmetshin were one of 3 the sources in the dossier, would you know that? MR. SIMPSON: I believe he would have told me 4 5 that by now given the public controversy over this matter, but he hasn't. 6 7 BY MR. DAVIS: 8 Q. I'm sorry. Is the "he" --A. Chris Steele. 9 Q. How often would you say you interacted 10 with Mr. Akhmetshin during the 2016 elections 11 12 season? A. Infrequently, intermittently. 13 Q. When was the last time you spoke with him? 14 A. I don't remember, but I don't think it 15 was -- I just don't remember. 16 17 Q. To the best of your knowledge, was Ed Lieberman aware of your Trump research project? 18 19 A. Not to the best of my knowledge. MR. FOSTER: Could you just tell us generally 20 who else other than your client was aware of the 21 22 Trump research project as it was going on. So excluding your client and excluding your 23 24 subcontractors, who else knew that you were doing 25 it?

Page 275 MR. SIMPSON: Journalists. 1 2 MR. FOSTER: In the summer of 2016? 3 MR. SIMPSON: Yes. MR. FOSTER: And they knew that because you 4 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 and others we don't. I'm a former journalist, as I 9 think you know, and we do lots of different kinds 10 11 of research and people who are working on a story will call us and say what do you know about, you 12 know, Carter Page and we'll say, well, here's the 13 14 things that we know. 15 MR. FOSTER: And they're aware you're being paid to do that research for a client? 16 17 MR. SIMPSON: I don't know. Generally that's not an issue. 18 19 MR. FOSTER: So my question was who knew that you were doing the research, the Trump-Russia 20 research at the time? 21 22 MR. LEVY: He answered the question. He told you he spoke with journalists and told them what he 23 24 had found. 25 MR. FOSTER: Right. I was trying to clarify.

Page 276 My question was whether or not they knew you were 1 2 being paid to do that research. 3 MR. LEVY: He answered that question too and he said he did not explain that to the journalists. 4 MR. SIMPSON: It's hard to generalize. I run 5 a business, it's a research business. Reporters 6 7 know we have clients who pay us to do research. 8 So, you know, I don't remember any specific queries about whether we were being paid or not, but I 9 think most journalists would assume that someone 10 11 had paid us to do research. 12 MR. FOSTER: They knew you were doing a Trump oppo research project as opposed to a Hillary 13 Clinton oppo research project? 14 15 MR. LEVY: From 2015 through the end of the election? 16 17 MR. FOSTER: Can you let the witness answer, please. 18 19 MR. SIMPSON: The word "they" is extremely broad. Journalists would call and ask questions 20 21 about specific things and from that they might conclude that we were doing a Trump oppo project. 22 It's just worth pointing out that in a 23 24 political season all kinds of people are doing research on all kinds of things. Some people are 25

Page 277 interested in trade, other people are interested in 1 2 guns. So you wouldn't necessarily intuit exactly 3 what we were doing. Most people are interested in, you know -- they're interested in the story they're 4 working on. So some people will say, hey, I'm 5 interested in whether Donald Trump gets his ties 6 7 from third-world countries and they wouldn't ask 8 about anything else. BY MR. DAVIS: 9 Q. You mentioned before, if I recall 10 correctly, that Fusion was having issues with 11 persons attempting to hack it? 12 A. That's a current concern, yes. 13 Q. When did that concern -- when did you 14 first become aware of that concern? 15 16 A. Relatively recently. 17 Q. So after the election? 18 A. Yes. 19 MR. FOSTER: Did you tell journalists that you had engaged Mr. Steele in the summer of 2016? 20 MR. SIMPSON: I don't specifically remember 21 22 doing that until the fall. MR. FOSTER: After the election or before? 23 24 MR. SIMPSON: Before the election. 25 MR. FOSTER: Can you remember the context in

Page 278 which you told them that? 1 2 MR. SIMPSON: Yes. 3 MR. FOSTER: Can you describe it for us, 4 please. 5 MR. SIMPSON: Sure. Essentially there was -at some point the controversy over the Trump 6 7 campaign's possible relationship with the Kremlin 8 became, you know, one of the main -- major issues in the campaign and there were things that Chris 9 knew and understood to be the case that only he 10 11 could really explain in a credible way, and I thought that -- we thought that he should be the 12 one that explains them, you know. So we sat down 13 with a small group of reporters who were involved 14 in investigative journalism of national security 15 issues and we thought were in a position to make 16 17 use of him as a resource. MR. FOSTER: Do you recall whether that was 18 before or after he ended his relationship with the 19 FBI? 20 21 MR. SIMPSON: Before. 22 BY MR. DAVIS: Q. Do you recall what the first published 23 article -- when the first published article came 24 out that referenced material from the memoranda? 25

	Page 279
1	A. Not specifically.
2	MR. FOSTER: Earlier you talked about
3	evaluating the credibility of the information in
4	the memoranda that you were being provided by
5	Mr. Steele and, by way of summary, you talked about
6	your belief that he was credible and that you had
7	worked with him before and the information he had
8	provided you had been reliable in the past. Did
9	you take any steps to try to assess the credibility
10	of his sources, his unnamed sources in the material
11	that he was providing to you?
12	MR. SIMPSON: Yes, but I'm not going to get
13	into sourcing information.
14	MR. FOSTER: So without getting into naming
15	the sources or anything like that, what steps did
16	you take to try to verify their credibility?
17	MR. SIMPSON: I'm going to decline to answer
18	that.
19	MR. FOSTER: Why?
20	MR. LEVY: It's a voluntary interview, and in
21	addition to that he wants to be very careful to
22	protect his sources. Somebody's already been
23	killed as a result of the publication of this
24	dossier and no harm should come to anybody related
25	to this honest work.

Page 280 MR. FOSTER: I'm not asking him to identify 1 2 the sources. I'm just asking what steps he took to 3 try to verify or validate the information. MR. LEVY: He's given you --4 5 MR. FOSTER: If he can answer generally without identifying the sources, I'd ask him to 6 7 answer. 8 MR. LEVY: He's given you over nine hours of information and he's going to decline to answer 9 this one question. 10 11 MR. FOSTER: And several others. 12 MR. LEVY: Not many. 13 BY MR. DAVIS: Q. I think you mentioned that you were in 14 London when you first heard that someone was 15 interested in hiring Fusion to work on the Trump 16 17 research; is that correct? 18 MR. LEVY: Repeat the question. 19 MR. DAVIS: If I recall correctly, Mr. Simpson said that he was in London when he 20 21 first heard that somebody was interested in hiring 22 Fusion to do Trump research? 23 BY THE WITNESS: 24 A. That's my recollection. 25 Q. Were either of the clients on this project

Page 281 not American citizens? 1 2 A. Were either of the clients on this --3 MR. LEVY: Clients on which project? BY MR. DAVIS: 4 Q. Were any clients on the Trump research not 5 American citizens? 6 7 A. I don't mind answering that if that's 8 okay. They're domestic clients. MR. FOSTER: You said earlier that the 9 information that you gather in your work is owned 10 by the client, it's not owned by you, and so 11 therefore you also referenced your nondisclosure 12 agreements and that you felt like if you had 13 information that related to national security or 14 15 law enforcement that the nondisclosure agreement did not prevent you from disclosing that 16 17 information to third parties. Is that a fair 18 summary? 19 MR. LEVY: Wait. You said a lot there. Which third parties are you talking about? 20 MR. FOSTER: Well, to law enforcement. 21 2.2 MR. LEVY: I think he's answered this already. You're asking him whether it was 23 24 permittable under his contractual obligations to 25 report a crime to the national security community,

Page 282 and he said yes, it's fine for him to do that. 1 2 MR. FOSTER: Right. I'm trying to summarize 3 the previous answer as a premise to my next question. Is that an accurate summary of what you 4 said before? 5 6 MR. LEVY: Summarizing testimony is dangerous 7 after he's given nine hours of it. If you want to 8 ask him a question, ask him a question. MR. FOSTER: Is there a specific provision in 9 your NDA that provides an exception for disclosure 10 11 to law enforcement or intelligence agencies? 12 MR. LEVY: I think he earlier didn't talk about the contract, but if you want to talk about 13 it as a matter of practice what your understanding 14 is, go ahead. 15 MR. SIMPSON: I don't know. 16 17 MR. FOSTER: My colleague Ms. Sawyer asked you earlier about public reports that the initial 18 19 client on the Trump work was a Republican and that it's also been publicly reported that later there 20 21 was another client who was a supporter of Hillary Clinton. Are you the source for any of those 22 public reports? 23 24 MR. LEVY: A hundred percent of what you were saying was referring to news articles, right. 25

Page 283 MR. SIMPSON: I've been asked about this by 1 2 various journals as to what I've heard, whether 3 they can report things that they've heard elsewhere, and I have not -- I don't know if you'd 4 classify that as being a source, but I've been 5 asked those questions and I've avoiding getting 6 7 into specifics. But I have -- if people have 8 accurate information of a general nature like that, I generally would not -- I would confirm things. 9 MR. FOSTER: Sorry. I didn't understand your 10 11 answer. 12 MR. MUSE: It's quite clear. MR. SIMPSON: Depends on what you say a 13 source is. If someone calls me and say I hear 14 client No. 1 was a Republican, then I'd say I don't 15 have any problem with you writing that. That's not 16 quite the same thing. 17 MR. FOSTER: So you confirm the accuracy of 18 19 information? MR. LEVY: He didn't say that. 20 21 MR. SIMPSON: There are certain things that I've chosen not to deny. You know, generally 22 speaking, I deal with a lot of journalists. I'm 23 24 not going to mislead people. 25 BY MR. DAVIS:

Alderson Court Reporting

Page 284 Q. To the extent you can clarify, is it that 1 2 there were two sets of clients, one of whom was 3 Republican and one of which was a Clinton 4 supporter, or was it one person's whose views 5 changed? MR. LEVY: We're not going to get into the 6 7 identity of clients. As you know, we've agreed to 8 an interview about questions 5 through 13 of the March 24 request. Questions 1 through 4 talk about 9 the identities of the clients. The Chair and the 10 11 Ranking Member agreed with counsel for Mr. Simpson about the scope of this interview and that question 12 is outside of it. In addition, the answer to that 13 question would implicate privilege and obligations. 14 He's talked to you for nine hours, he's given you a 15 lot of information, and he's not going to answer 16 17 questions about identities of clients. 18 MR. DAVIS: You've asserted attorney-client 19 work product privilege --MR. LEVY: There is no such privilege. I've 20 21 asserted the attorney work product privilege, we've asserted privileges under the First Amendment, 22 we've asserted the attorney-client privilege, and 23 24 we've asserted privileges of confidentiality. It's a voluntary interview and he's declining to answer 25

Page 285 the question. 1 MR. DAVIS: I understand that. 2 3 BY MR. DAVIS: Q. So with the Prevezon matter, then, is it 4 correct the law firm involved was Baker Hostetler 5 and the ultimate client was Prevezon, is that 6 7 right, while you were working there? A. Yes. 8 Q. So any attorney-client privileges within 9 the context of that information would be -- the 10 11 holder of that privilege is Prevezon; is that 12 correct? 13 MR. LEVY: That's a legal conclusion that 14 he's not qualified to draw. MR. DAVIS: You don't feel that you can speak 15 to it without their permission? 16 17 MR. LEVY: Speak to what? MR. DAVIS: To questions that would be 18 19 covered by attorney-client privilege. MR. LEVY: I'm not sure he's qualified to 20 21 answer that question. 22 BY MR. DAVIS: 23 Q. Did you work with any law firms in 24 relation to the Trump investigation? 25 MR. LEVY: Again, we're not getting into the

Page 286 identity of any clients --1 2 MR. DAVIS: I didn't say client. 3 MR. LEVY: I understand. Or their lawyers. MR. FOSTER: I think the issue we're trying 4 5 to deal with is in order to assess your claims of privilege the committee needs to understand at 6 7 least as much about the context of the dossier work 8 as it does about the Prevezon work in terms of who was involved. So if there's a law firm involved or 9 if he was reporting to a law firm or acting under 10 the direction of a law firm, then we need to be 11 able to assess whether or not that was in 12 anticipation of litigation, whether he was doing it 13 by the direction of a law firm in order to assess 14 your assertions of privilege. 15 MR. LEVY: I understand. We've identified 16 17 our position. We've been talking -- Mr. Simpson has been answering your questions since 9:30 this 18 19 morning, it's now 6:15. He's been fully cooperative and he's here because the Chair and the 20 21 Ranking Member agreed to a limited scope. The questions you're asking are outside of that scope 22 and this is part of why appearing at a hearing was 23 24 going to be impossible. Through this agreement we're here. He's given you a ton of information. 25

	Page 287
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

Page 288 caused his campaign chair to resign. The record is 1 2 replete -- or the public report of my work is 3 replete with examples of investigations I've done of Democrats that resulted in them losing their 4 5 elections and being prosecuted. 6 MR. LEVY: At the Wall Street Journal? 7 MR. SIMPSON: Yes. 8 BY MR. DAVIS: Q. Are you party to a joint defense agreement 9 related to your Prevezon work? 10 11 MR. LEVY: He's not going to talk about privileged discussions or agreements, and he's 12 probably not qualified to answer anyway. 13 BY MR. DAVIS: 14 15 Q. Is Fusion GPS paying Cunningham Levy for the firm's representation of you or as a third 16 17 party? MR. LEVY: That's privileged also. 18 He's not 19 getting into payments to his lawyers and it's beyond the scope of this interview which has now 20 gone on for almost nine hours. 21 22 BY MR. DAVIS: 23 Q. Has Fusion GPS ever offered directly or 24 indirectly to pay journalists to publish 25 information?

Page 289 A. No. 1 2 Q. Are you aware of any Fusion clients 3 offering directly or indirectly to pay journalists to publish information from Fusion? 4 MR. LEVY: While working for Fusion on a 5 Fusion matter or as a general matter? 6 7 MR. FOSTER: Can you let the witness answer. 8 MR. LEVY: Well, if the question's clear he 9 can answer any question --MR. FOSTER: I think the question was clear. 10 11 MR. LEVY: -- within the scope of the 12 interview --13 MR. DAVIS: Are there any of Fusion's clients offering --14 15 THE REPORTER: Guys. 16 BY MR. DAVIS: 17 Q. I'll repeat the question. Are you aware of any of Fusion's clients offering directly or 18 19 indirectly to pay journalists to publish information from Fusion? 20 A. Not to my knowledge or recollection, no. 21 22 MR. FOSTER: What was the end date of the 23 Trump engagement? 24 MR. LEVY: He told you he didn't recall 25 exactly.

Page 290 MR. SIMPSON: That's not correct. The 1 2 election was the end date. I assume you're asking about the general election? The election date 3 would have been the end. 4 MR. FOSTER: So you didn't do any work on the 5 Trump matter after the election date, that was the 6 7 end of your work? MR. SIMPSON: I had no client after the 8 9 election. MR. FOSTER: It's 6:21. Let's go off the 10 11 record for a minute. 12 (A short break was had.) 13 MS. SAWYER: We'll go back on the record. It's 6:30. 14 15 EXAMINATION BY MS. SAWYER: 16 17 Q. We appreciate your time today, your patience in answering our questions. 18 19 You've been asked a number of questions just about -- well, strike that. 20 21 Were any of the particular factual findings or conclusions that you reached with regard to the 22 research that was being done related to Russian 23 24 interference in the 2016 election including 25 possible ties to the Trump campaign, were any of

	Page 291
1	the factual findings or conclusions influenced in
2	any way by the identity of the client for whom you
3	were doing that work?
4	A. All the questions you've asked I guess
5	this one I've not given a lot of thought to.
6	Offhand, not that I can think of.
7	Q. So you weren't trying to reach a
8	particular conclusion based on the identity had
9	they asked you to find well, strike that.
10	I think what I'm trying to get some sense of
11	comfort around is to the extent there might be
12	concerns that the work being done was driven in a
13	direction designed to reach a particular conclusion
14	for a client or because of the client's identity
15	was that the case?
16	A. I think it's safe to say that, you know,
17	at some point probably early in 2016 I had reached
18	a conclusion about Donald Trump as a businessman
19	and his character and I was opposed to Donald
20	Trump. I'm not going to pretend that that wouldn't
21	have entered into my thinking. You know, again, I
22	was a journalist my whole life. So we were, you
23	know, trained not to take sides and practiced in
24	not taking sides.
25	So most of what I do as a research person is

Page 292 we try to avoid getting into situations where one's 1 2 etiology or political views would cloud your work 3 because it's a known hazard, but, you know, I reached an opinion about Donald Trump and his 4 suitability to be president of the United States 5 and I was concerned about whether he was the best 6 7 person for the job. 8 Q. And given that you had been trained not to allow etiology to cloud your work, it sounds like 9 you reached a conclusion and had concerns about 10 11 Candidate Trump. What steps did you take to then ensure that your conclusion didn't cloud the work 12 that was being done? 13 A. Well, to be clear, my concerns were in the 14 category of character and competence rather than --15 I didn't have any specific concerns for much of the 16 17 time about his views, which I don't share, but that wasn't really the issue. Most of what we do has to 18 19 do with do people have integrity and whether they've been involved in illicit activity. So 20 those were the things I focused on. 21 22 Q. So the conclusion that you reached, was it informed by the research that you were -- your 23 24 personal conclusion, was it informed by the 25 research that you were conducting?

Washington, DC

Page 293 A. Yes. We deal in factual information and 1 2 over the course of this project we gathered lots of facts about Donald Trump. 3 Q. You mentioned that earlier and I think you 4 made clear a number of times in the course of the 5 day that the specific work on Russian interference 6 7 and possible ties to the campaign that Mr. Steele 8 was doing was one part of that bigger picture, and I did want to ask you about some of that bigger 9 picture of the work and get a sense from you, if I 10 11 could, you know, some of the background and 12 In particular one of the things you had findings. mentioned -- well, you just mentioned right now as 13 we were speaking the term "illicit activity." 14 What, if any, research did you conduct that gave 15 you any concerns about then Candidate Trump and 16 potential illicit activity? 17 A. I think the thing I cited to you was his 18 19 relationship with organized crime figures, and that 20 was a concern. 21 Q. And what can you share with us about the findings, your findings? 22 23 A. Well, I've tried to share as much as I 24 could think of over the course of today. As I say, there were various allegations of fraudulent 25

Alderson Court Reporting

	Page 294
1	business practices or dishonest business practices
2	or connections with organized crime figures. In
3	fact, you know, there was numerous others that I
4	can't remember the names of. It was a long history
5	of associations with people accused of involvement
6	in criminal activity.
7	You know, just to reiterate, the facts of
8	these investigations are the facts and we don't try
9	to drive an investigation to any particular
10	conclusion, certainly not based on our political
11	views. So I think it would be, you know, not
12	believable for me to tell you I didn't reach, you
13	know, views about Donald Trump's integrity, but,
14	you know, those were those didn't influence the
15	research in terms of the findings. Those were the
16	findings.
17	Q. You mentioned specifically and I think
18	with regard to organized crime particularly ties to
19	Felix Sater is one. You indicated a connection to
20	Yudkovich Mogilebich, I think it is.
21	A. Mogilebich.
22	Q. Mogilebich, which we can spell for you.
23	Tell me if I have this correct.
24	M-O-G-I-L-E-B-I-C-H.
25	A. Yes.

Page 295 THE REPORTER: What's the first name? 1 2 MR. SIMPSON: Semyon, S-E-M-Y-O-N. 3 BY MS. SAWYER: Q. Yudkovich, did I get that --4 A. I believe I was probably talking fast and 5 I think I might have made a reference to 6 7 Yanukovych, which is the former president of the 8 Ukraine. Q. With regard to any of that work, did you 9 create work product based on that work? 10 11 A. I don't specifically recall what we would 12 have created. Q. And with regard to that work, did you 13 share any of that information with law enforcement 14 15 agencies? A. No. I mean, just to reiterate, the only 16 17 contact that, you know, occurred during this engagement was -- at least to my knowledge, was 18 19 Chris's dealing with the FBI. Other than that, I don't remember having any dealings with the FBI. 20 Q. You had also mentioned earlier in the day 21 22 work -- that there was an investigation about money 23 from Kazakhstan? 24 A. Yes. 25 Q. And could you tell me about that and what

	Page 296
1	you investigated and what you learned.
2	A. There was some parallel litigation in
3	New York involving attempts by the government of
4	Kazakhstan to recover money that had been allegedly
5	stolen from Kazakhstan, billions of dollars in a
6	colossal bank failure. The name of the bank was
7	BTA Bank. It's been well established in various
8	courts that the government's allegations are
9	basically true, which is that large amounts of
10	money were illicitly removed from this bank,
11	laundered across Europe and into the United States
12	apparently. Allegedly.
13	So there was a civil case, at least one civil
14	case in New York involving filed by the city of
15	Almaty, A-L-M-A-T-Y, against some alleged Kazakh
16	money launderers. I don't remember exactly how,
17	but we learned that it wasn't from Chris. We
18	learned that Felix Sater had some connections with
19	these people, and it's been more recently in the
20	media that he's helping the government of
21	Kazakhstan to recover this money. There's been
22	media reports that the money went into the Trump
23	Soho or it went into the company that built the
24	Trump Soho. I can't remember the name.
25	Q. So the connection in that instance was to

Alderson Court Reporting

Page 297 Felix Sater and through Felix Sater to --1 2 potentially to Donald Trump? 3 A. Yes. It was a company that Felix Sater and Donald Trump were involved in together. 4 Q. And the research you did on that project, 5 was that public source research? Did you have any 6 7 other -- did you have human intelligence sources on 8 that project? A. I think I probably did have some human 9 sources. That's my answer. 10 11 Q. And did you use subcontractors at all on 12 that work? A. I can't say specifically whether it was --13 I remember commissioning some public record-type 14 15 research on Felix Sater and his history in New York. 16 17 Q. Did you feel in the course of that that you had uncovered evidence of any criminal activity 18 19 by Donald Trump? A. In the course of that I don't think so. I 20 21 think my concern was the associations with known 22 organized crime figures. 23 Q. And that included Felix Sater? 24 A. Yes. 25 Q. Anyone else in particular?

Washington, DC

Page 298 A. There were others. 1 2 MR. LEVY: Beyond what we've discussed today? 3 MS. SAWYER: Yes, beyond what we've already discussed. 4 BY THE WITNESS: 5 6 A. Another figure involved in the Trump Soho 7 project was a central Asian person named Arif, 8 A-R-I-F, is the last name. The first name is generally spelled Tevfik, it's T-E-V-F-I-K. If you 9 search under a different transiteration of that 10 11 name you can find open source reporting alleging 12 that he's an organized crime figure from Central Asia and he had an arrest for involvement in child 13 14 prostitution. 15 Q. You mentioned as well that you had reviewed tax bills. Were these specifically Donald 16 17 Trump's tax bills? A. They were Trump properties and I believe 18 19 we may have reviewed some public information about estate taxes and things like that. We didn't have 20 access to his tax returns. 21 22 Q. Did you reach any conclusions based on your review of his tax bills? I think you 23 24 mentioned that in connection with trying to assess 25 either financial connections or his financial

Glenn Simpson

Washington, DC

Page 299 standing. Did you reach any conclusions with 1 2 regard to either of those? 3 A. Yes. I concluded -- we concluded that his statements about what individual properties were 4 worth were greatly exaggerated and at odds with the 5 information that he'd supplied, you know, in legal 6 7 filings with tax authorities and other records, 8 corporate records. Q. Did any of that indicate anything that 9 showed a connection to Russia or the Russian 10 11 government or Russian officials or Russian 12 oligarchs? A. Not that I can recall. 13 Q. You mentioned as well, you brought up 14 15 Trump golf courses. What in particular were you looking into with regard to Donald Trump's golf 16 17 courses? A. The original inquiry was into the value of 18 19 the courses, whether he had to borrow money to buy them, whether they were encumbered with debt, how 20 much money they brought in, what valuations he put 21 22 on them, and property tax filings. 23 Q. And in general can you share what findings 24 and conclusions you reached? 25 MR. LEVY: With regard to?

Page 300 MS. SAWYER: To the work on the golf 1 2 properties. BY THE WITNESS: 3 A. A number of them don't make any money. 4 5 His valuations of the properties are questionable. I guess those would be the main findings. 6 7 Q. You just mentioned broadly but didn't 8 describe it, you mentioned research on Scotland. Ι don't know if it was particular properties or 9 something with regard to Scotland. Can you just 10 11 describe what that research was. 12 A. Sure. He has golf courses in Scotland and Ireland and one of the facets of UK or anglo 13 company law is that private companies have to file 14 financial statements, public financial statements. 15 So when you're looking at a guy like Donald Trump 16 17 who doesn't like to share information about his company, it's useful to find a jurisdiction where 18 19 he's required to share that information with the 20 local government. So we went and ordered the records -- the 21 financial statements of the golf courses. There's 22 also a long-running land use controversy -- I think 23 24 there's multiple long-running land use controversies over those properties. We haven't 25

Page 301 really touched on this at all, but there were also 1 2 environmental issues that were part of the 3 research. Q. With regard to the public financial 4 5 statements, did you reach any conclusions based on that? 6 7 A. That they were not profitable entities. Ι 8 don't specifically recall. I just remember that these were not doing very well and that he'd sunk a 9 lot of money into them and he hadn't gotten a lot 10 of money back yet. 11 12 MS. QUINT: You mentioned a couple of times, Mr. Simpson, that you had particular familiarity 13 with Mr. Manafort and even that you were more 14 familiar with him in particular than Chris Steele 15 was. In general and it might not be easy to be 16 general about it, but what was your focus when you 17 had looked into Manafort? What main areas were you 18 19 familiar with? MR. SIMPSON: Over the years, originally at 20 the Wall Street Journal we learned of his 21 relationship with Ukrainian and Russian oligarchs. 22 So it was generally continued in that vein. He was 23 24 subject of some litigation over his business 25 dealings in New York. There was a lawsuit filed by

	Page 302
1	the opposition politician from Ukraine accusing him
2	of involvement in corruption in Ukraine. So as
3	just a not for any particular client, but just
4	because these matters are something I follow I had
5	collected those documents. I think there's
6	probably some other litigation that I collected
7	that was in a similar vein.
8	MS. QUINT: And it was all documentary or did
9	you have human sources for your Manafort research?
10	MR. SIMPSON: I don't think for the most
11	part it was just what you call gathering string,
12	just accumulating files on people or subjects that
13	are of interest.
14	BY MS. SAWYER:
15	Q. The committee, certain members of the
16	committee, the Chairman and Ranking Member along
17	with Senators Graham and Whitehouse had sent a
18	request for documents and information on July 19.
19	I understand your efforts to identify that
20	information are ongoing and I know that in response
21	to one of my questions about Mr. Page your attorney
22	has already said that the request for information
23	is pending and being reviewed. I just wanted to
24	ask you a couple of questions about some of the
25	other individuals that we had identified in that

Page 303 letter and in particular in request No. 6? 1 2 MR. LEVY: Do you have an exhibit or should I 3 just get my copy out? MS. SAWYER: I'm happy to enter it as an 4 5 exhibit or I can just read the names. I don't think there's any reason we need to --6 MR. LEVY: Just read the names to move it 7 8 along, that's fine. MS. SAWYER: I don't think there's any 9 reason -- there's nothing in this letter to inform 10 your answer otherwise. 11 12 BY MS. SAWYER: Q. So with regard to Alpha Group, sometimes 13 I've heard Alpha Group, sometimes I've heard Alpha 14 Bank. I don't know if they're two distinct 15 entities. Do you know anything about Alpha Bank or 16 17 Alpha Group with regard to Russian interference in the 2016 election? 18 19 A. Alpha Group is not a corporate person, it's not an entity. It's just a collective name. 20 21 Alpha Bank is a bank. I know a limited amount. I know, you know, journalists were working on some 22 23 issues related to this and they asked us about it, 24 but the information didn't come from us. 25 Q. So you were asked by journalists about it,

Page 304 but you're saying whatever information you had was 1 2 not generated by Fusion GPS? 3 A. That's right. I know they're a big player and they have long, deep ties to Vladimir Putin. 4 One of the founders, Pyotr Aven, P-Y-O-T-R, second 5 word Aven, A-V-E-N, was an associate of Vladimir 6 7 Putin when he was in the mayor's office in Saint 8 Petersburg around the time same that Bill Browder was doing business with the mayor's office. 9 They're very powerful politically and economically 10 11 in Russia and they have -- in the tens of billions 12 are the assets of the founders and they have all sorts of interests. They have epic disputes with 13 western corporations, including BP. So people in 14 my business tend to just have a lot of 15 institutional knowledge about them and, you know, I 16 shared my institutional knowledge about them. 17 Q. You mentioned other founders. Are those 18 19 other founders Mikhail Fridman and German Khan? 20 A. Yes. 21 Q. Do you have any information there have been reports about potential communications between 22 a server at Alpha Bank and potentially servers that 23 24 belong to the Trump organization or Trump -- some entity associated with Donald Trump? Do you have 25

	Page 305
1	any information about those particular reports?
2	A. That's kind of an open-ended question. I
3	think what I said is we were asked about that and
4	it wasn't that information wasn't generated by
5	us and I'm happy to say it's beyond our competence
6	to have generated, but in the course of being asked
7	about it, you know, people gave us information. I
8	don't know what else to say.
9	Q. And what information were you given?
10	A. A bunch of data. I mean, we were shown
11	like do you know what this would mean, does this
12	<pre>mean, and it's beyond it's really it's</pre>
13	certainly beyond my competence.
14	Q. So the data that you were shown, you could
15	not draw any conclusions from it?
16	A. I did not draw any conclusions from the
17	data.
18	Q. Another individual that there's been a lot
19	of press reporting on is Sergei Millian. Other
20	than what what, if anything, can you tell us
21	about did you conduct any research into
22	Mr. Millian? And, if so, what conclusions did you
23	reach with regard to Russian interference in the
24	2016 election?
25	A. We learned from sources that he had

Page 306 connections to the Trump organization and we did an 1 2 open source investigation of him. We found a 3 picture of him with Donald Trump and another real estate investor in Florida. We've discovered 4 that's not his real name or at least not the name 5 he came to the United States with and that before 6 7 he became a real estate broker he was a linguist 8 and translator. Speaking generally, people with advanced training in linguistics are oftentimes 9 involved in intelligence matters, but I don't know 10 11 whether he is or isn't. Various reporters became 12 interested in him because he was boasting about his connections to the Trump organization in the Trump 13 campaign. So we got lots of inquiries about who 14 15 was he, was he a spy, you know, that sort of thing. Q. And did you make a determination whether 16 17 or not he had actual ties to the Trump campaign? 18 A. Well, some of the -- yes. I mean, he 19 was -- I think he's Facebook friends with Michael Cohen. I'm sorry. It was some social media 20 connection. It was either Twitter friends or 21 Facebook friends. It was public information. We 22 took it from that that they did know each other. 23 Ι 24 guess we gradually learned of Michael Cohen's role in the Trump campaign as opposed to in the Trump 25

Washington, DC

Page 307 organization. 1 2 Q. And what did you learn about Mr. Cohen's role in the Trump campaign? 3 A. We learned that his job included dealing 4 with inquiries about Russia and he seemed to get 5 all of the serious inquiries, investigative 6 7 inquiries about Russia. He seemed to know a lot 8 about that. We learned that he was a very intimidating person who had a history of 9 threatening reporters with libel suits. We learned 10 11 that he's married to -- his father-in-law is a 12 Ukrainian emigre, that he had some Ukrainian clients and connections to the taxi industry in 13 New York which is heavily populated with Russian 14 15 emigres, and we learned that he was involved in some of Trump's projects where there was a lot of 16 17 Russian buyers. The only other thing I can think of is that he was also the person who dealt with 18 19 allegations against Mr. Trump from the tabloids. Q. And with regard to Trump projects with 20 Russian buyers, what specific projects had a number 21 22 of Russian buyers? 23 A. I don't specifically remember. Florida 24 maybe. I think it was Florida. Sorry. 25 MS. SAWYER: Just give us a minute.

	Page 308
1	I think that's really all of our questions.
2	I don't know if there's follow-up that you all had.
3	MR. FOSTER: Just very quickly. I can do it
4	from right here.
5	So I asked you or you were asked earlier
6	about representations that you're not you don't
7	see your firm as being Democrat linked and in my
8	previous question I asserted that there had been
9	public reports that you had done work, opposition
10	research during the 2012 election aimed at
11	Mr. Romney, but I didn't ask you to confirm that.
12	Is that correct?
13	MR. LEVY: Work for clients outside the scope
14	of the interview is not within the scope of the
15	interview.
16	MR. FOSTER: It's relevant to his claim that
17	he's not a Democrat linked firm.
18	MR. LEVY: He's answered that question. He's
19	given you multiple answers to that question and
20	significant information in support of his answer to
21	that question, and that small fact which may or may
22	not be pertinent is that he's going to decline to
23	answer because it's outside the scope of this
24	interview.
25	MR. SIMPSON: I decline to answer.

Page 309 MR. FOSTER: In some of the questioning in 1 2 the last round there was some talk of your -- you 3 didn't have a particular aim in your research, you were following the facts wherever they lead. Is it 4 fair to say -- is it a fair description to say that 5 your job was opposition research aimed at 6 7 Mr. Trump? That's been widely reported and 8 characterized that way. Do you think that's a fair characterization of what your job was? 9 MR. LEVY: He's been talking for nine and a 10 half hours, a lot of which was describing his work. 11 To simplify it in any particular way at this point 12 I think is unfair to the witness. 13 MR. FOSTER: You weren't hired to find 14 positive information about Mr. Trump, were you? 15 MR. SIMPSON: To the contrary. I think when 16 17 you're doing research on any subject you're trying to figure out what the truth is. So if Donald 18 19 Trump's got a good business record and he's really worth billions of dollars, that's important 20 information. In fact, you shouldn't be feeding 21 reporters stories about how Donald Trump is not 22 worth billions of dollars if he's worth billions of 23 24 dollars. So, you know, I think the connotation of 25 negativity, I get, you know, where you're coming

Page 310 from, but, in fact, you're just trying to figure 1 2 out what's true. 3 It's like with the Prevezon case, we were trying to figure out who's telling the truth, is it 4 our guys or is it Browder. I do my job well and I 5 get rehired when I give them the right information, 6 7 when I give them accurate information. So if 8 Donald Trump turned out to be a great businessman, that's what I would have to tell people. 9 MR. FOSTER: Nothing further from me. 10 11 MR. LEVY: Before we go off the record, will 12 we be entitled to a copy of the transcript? 13 MR. FOSTER: You'll be able to review the 14 transcript and request corrections, make an 15 errata. MR. LEVY: Will it be kept confidential? 16 17 We'd like to make a request that it be kept confidential given the sensitivity of the matters 18 19 discussed today. MR. FOSTER: Your request is noted. 20 MR. LEVY: Noted, but no decision on it? 21 22 MR. FOSTER: No decision. 23 MR. LEVY: And upon reviewing the transcript, 24 when will we have that opportunity? 25 MR. FOSTER: We can arrange that off the

Page 311 record. 1 2 MR. LEVY: When we do we just reserve the 3 right obviously to correct the record or supplement it. 4 MR. FOSTER: That's why we'd allow you to 5 review it. 6 7 MR. LEVY: Thank you very much. MR. DAVIS: Nothing further. We're going off 8 9 the record at 7:04. (Whereupon the interview was 10 11 concluded at 7:04 p.m.) 12 13 14 15 16 17 18 19 20 21 22 23 24 25

	Page 312
1	CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC
2	I, TINA M. ALFARO, Certified Shorthand
3	Reporter No. 084-004220, Certified Realtime
4	Reporter, and Notary Public in and for the State of
5	Illinois, do hereby certify:
6	That GLENN SIMPSON, whose interview is
7	hereinbefore set forth, was duly sworn by me and
8	that said deposition is a true record of the
9	testimony given by such witness.
10	I further certify that I am not counsel
11	for nor in any way related to any of the parties to
12	this suit, nor am I in any way interested in the
13	outcome thereof.
14	In witness, whereof, I have hereunto set
15	my hand this day of,2017.
16	
17	
18	
19	
20	Tina M. Alfaro, CSR, CRR
21	
22	
23	
24	
25	

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(b)(6) per FBI (b)(7)(C) per FBI

12/19/17

McCabe testimory Dulit did Roo Dul unom Dul unom USG response Masting / unmarking - Sterle -- Opening - Comey & T reviewed. GCO must review & concur. - Why not GP? He didn't say he was interaction -3021 generated based on interviews of ogente of five gov. - Steala negosting on his own, -Not pd during time reporting a -10238 -- CH met uf Steale -6-1.0 (b)(3) per FBI -Trip or 101 - By Fist (b)(7)(E) per FBI - Who augh + nede-- D. DD. AD @ OPA - GC painta . Man revert. - McCain met of Comey -

Steele was paid in 8/16 for work done 93/16-5/16 - Handling agent, not of source. - Soveadshort - Malfu Strzak, Priestep -Priester, Strzak Cor answer. (b)(6) per FBI (b)(7)(C) per FBI - who he worked for a fast you I wont I know? You Throw & have wonter to those sources bree Clinton press conference have have nevelytion hould Coming for time dec Structured heir the c enjogen on had cradibility concern DOJ Approver G. F. DAG. Should hav vecul pole didn't brit leader she low - Moller issu -Add renormy the non l'andemin. (b)(1) per FBI (b)(3) per FBI (b)(7)(E) per FBI eporting sail Ab pretting Cures

Minarity -- No discussion of disclosing Trung company. - No convertion disclosing Cet in connection of disclosing Cet in connection of dispropriationate import a election. - Steals -Firng -16/17 Briefing--why full not under inv. -True - D'wanted to answer que directly 1/27/17 -Meetix --Loyalton was that R muest? -He thank Wood & frontly concept. Did-Papedopoular tell WH about FBI interview Ace to Schift, GB interview & Porles loyalty veguest Seeme too day. - Same as stud 21417-- Was stut that Pray said MF lind to VP inaccurate is did FDI know of Portus knew of Flyn-7 concurrention. I - Ines acking him to drop on in. Gruth Concerning to D & me. Don't recent disary 0/5. No mpat. - No confirmation of POTUS knowlodged lying to PBI

-AG apperted to recur. Majority -Structural anonaly - DAG/AG did not exercise. leadering. - Press Conference - It was a recommendation -- Discussed how I whether Alt con - Concept of S.C. did not come yp. - Concept of S.C. did not come yp. - We were very clear on how DUS career folly on fear saw the Ces. - Perte 300 role on Clinton -- Started of Superintary Inc. - Eventially he becant Section Chief in CD @ HQ. - SES promotion -Voluntary intervitions weathout by DEJ & ferring of who would be preserved present, - Dos decided to pursue acless avidence & people voluntarily. friction blue FBJ & DOS. - Who was making downon - Grage Torca, Laughan neger tot to Get oversaw line oeters die hud Scott Julie Edelstein - John Carlin ober mthe loop. Carlin not or actury

-1 don't know whether he set of Steale in 1/16 -1 late summer early fill, I leavent that Ohr had relationdup. - July 2016 - Steale / Ohr mitog - We would have known about DNL connection. - DNL connection - Don't know when or who, but someone team. Minority -- Comey sail agents did not discorn physical indication of deception. -Yotes: Did not tell what Flynn said to FBI. - 3/30/M-- What can they do to lift the cloud? - Goet it out that not min him - Reused Andy. Our perception. Veiled threat. - Called back D Asked him to call Acting -Very logel to you ha hat that thing you know -Slider Como of Kichach + Lauron -

5/9/h- Went & see, AG. Tild m AG fined. I would not to serve at Acting D. -No discussion of the ve firing -Ab- Don't know of your heard but back had by fin D of FBI. Didn't Suy why. Putter decided to fin. Might Not be very low. -1 said I had a let of question. I didn't out the didn't sug. 68/17 testimony-- the JJJR - find ble of R m. Itt my assessment of usl. Analgon of itser. - J lowed about con - Peuple DAG did not word to malace - Russie -DAG-Stewart Majority--Described dossier or ansubstantisted. HUL Can upon use -Anything less than what was m package was insufficient.

-Sessi - Haven't total - Texts - auful. .

Disterle - McCain provided dossier 2) Ohr -- Acc to Goudy, met in 7/16. 3) Comay conversations of POTUS - no obje (1) DAG comme with POTUS 5) Texts - disclosure of texts to Congress - Some people contexted about disclosurer. of texts & media. @ Press conference - Reasons for. 1 Peras. > Did not seal my counsel. (8) Session interviewed! No-Did GP fell WH he was interviewed? 10 POTUS/AG as open cases did not come up

inority - Paga opolocy - r a nteru (b)(6) per FBI (b)(7)(C) per FBI Jodore LNY -Sally went to water on 1/26. Driver of Convey on 1/22. Juglieall Maprity -Michael Grimme indictment press conference? CA ten - Comecy, McCole Boter, Poti Triche Anderson, Peze, Majta Basity, (b)(6) per FBI (b)(7)(C) per FBI Peter & have - les long or 16 looking Should come off. Texts > tragic. - O they Andy = Andrew Harton

Unar hy Russian threat summary (b)(1) per FBI (b)(3) per FBI (b)(7)(E) per FBI - D W-S had top ingernation foundation ve the information - Email in Atlantic Council f recounted mfs. W-S had told inde S JOVOF - Voting machines. - Majority. -Andy I Conflict tober 2016 - letter - 1 did not porticipate i discussion. Andy recused from MYE after 10/28 -Car dromad from call on 10hr ble set dropped from ca esi pudesta ZNU DIT motuente

- Winorty--Unmocking Flyne - no. ()

ELLET FBI 10/20/17 No 3021 of Steele Only Dsub-source wer intervienal 2 DATE 3/22/2021 FBI INFO. CLASSIFIED BY: NSICG/ No REASON: 1.4(C) DECLASSIFY ON 20921231 (b)(1) per FBI (b)(3) per FBI 4 (b)(6) per FBI (b)(7)(C) per FBI (b)(7)(E) per FBI E John Maffer briefd both Ds. Can talk about efforts to verify 6 Ovoral Sivalo fa First on 302 way perlande A. (b)(1) per FBI (b)(3) per FBI (b)(7)(E) per EBI - 102oduance of interview W dor 24 multis ation (8) Personul People warli Mude ever Seure don -Source information

SELERET FBL 10/20/17 - Aug M way candidate. Trump, Christe, Flyn - Pence got same briaf -- Id-2 countries -- Staff hruping, lete Aug, early Sept. Pribibly didn't tele attendance. - SOP - net ble of X-fine Huwicon. reports net dif t. (b)(7)(E) per FBI -Never given 1023s - Don't want to open door. - Document seems contact chie afe SECHET

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August 25, 2017

MALELECTRONIC TRANSMISSION

The Honorable Christopher A. Wray Director Federal Bureau of Investigation 935 Pennsylvania Avenue, NW Washington, DC 20535

Dear Director Wray:

On March 6, 2016, I wrote to then-Director Comey asking a series of questions stemming from press reports about the FBI's interaction with Mr. Christopher Steele author of the political opposition research dossier of allegations of collusion against President Trump and his associates. While the Committee did receive some responsive information during a classified briefing and classified document review, most of the questions went unanswered. The information the Committee received contained material inconsistencies. To address these, I sent Mr. Comey a follow up letter on April 28, requesting that the FBI answer all the questions in the original letter, explain the inconsistencies, and answer some additional questions. Although Mr. Comey indicated at his oversight hearing on May 3, 2017, that the FBI would provide the Committee answers, the President fired him shortly thereafter. Since then, the Committee has not received additional information from the FBI about these issues. The Committee continues to need this information to perform its constitutional duty of oversight of the FBI. Because the details are classified. I have enclosed a classified memorandum describing the situation.

Thank you for your prompt attention to this important matter. If you have any questions, please contact Patrick Davis of my Committee staff at (202) 224-5225.

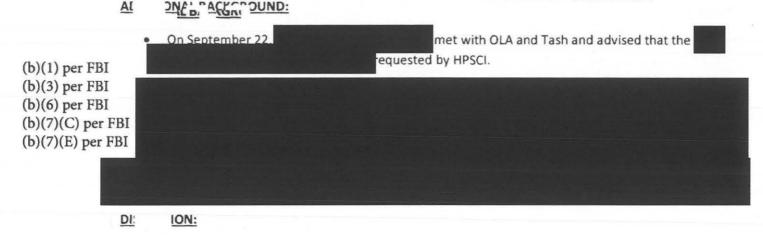
Chairman Committee on the Judiciary

Enclosure : As stated

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DATE 3/31/2021 FBI INFO CLASSIFIED BY: NSICG REASON: 1.4 (D) DECLASSIFY ON 20921231



- The Department has no desire to frustrate or impede the legitimate interest of the Committee, but the reality is that the subpoena implicates very strong DOJ equities that we have been protecting for decades if not centuries. That being said, we very much want to accommodate the Committee's request in a way that preserves the equities we have been protecting for so long.
- Those equities include the desire to protect ongoing criminal investigations from the appearance of or actual political interference. As long ago as 1940, Attorney General Jackson sent a letter to Congress explaining why the Department would not provide investigative reports generated as part of an ongoing criminal investigation, and in 2000, the Department set forth our view of the appropriate level of engagement with Congress pertaining to ongoing criminal investigations.
- We do not seek to protect these equities out of lack of respect for Congress but rather to ensure that the public has confidence that the decision whether to bring criminal charges is free from pi olitical influence.

Classified By: Name: Scott Schools DEPARTMENT: UPN: SNSchools@doj.ic.gov Derived From: DOJ/NSI SCG I AIS dated 20120701 Declassify On: 20421231



In our best case scenario, Congress would avoid conducting a simultaneous investigation of a matter known to be under criminal investigation because that facilitates the most effective criminal investigation. In the ordinary course of an investigation, agents and prosecutors make careful decisions about when to interview witnesses, how to confront witness, and what information to share with them. These tactics are intended to test the credibility of the witnesses and to avoid witnesses' being educated by the accounts of other witnesses or by being made aware of investigative developments we would like to keep secret. Despite this best case scenario, we have not, as I understand we have on previous occasions, asked Congress to stand down. Rather, you have called witnesses with relevant information about our investigation. [NB: As a result of his testimony before HPSCI this week, Roger Stone publicly released his opening statement to the Committee and a longer version of the events that is now available to any witness who might corroborate or refute his account.]

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- Furthermore, information about intelligence sources, how they are developed, and how they
 are evaluated and managed is extremely sensitive information for the FBI. Their charge is to
 prevent terrorist attacks before they happen and any actions that could have the effect of
 chilling potential sources or the American allies who sometimes provide those sources would be
 detrimental to the FBI's mission.
- Despite our attempt to stay out of each other's way, your subpoena requests documents that
 were generated as part of an ongoing investigation of the utmost importance to the Department
 and the nation. While there is an intelligence component to the investigation, we are different
 than the CIA and other intelligence agencies in that our investigations could lead to criminal
 charges and ultimately loss of liberty.
- When your staff met at DOJ on September 14, they were asked to tell us why they needed the information you have requested to help us assess how we might accommodate your needs. They either declined to say or did not know. Regardless, our offer of a briefing was designed to give us an opportunity to address concerns that we think you have or that you will share with us. For example, we think that you may think that despite what you may have heard in classified briefings,

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briefing would address that issue. A briefing could also specifically address some of the questions your subpoena raises more readily than documents, including, for example, whether and how much Steele was paid by the FBI and for what. If there are other specific concerns that you have that we might address in a briefing, please tell us what they are, and we will try to figure out how to answer those.

• On the other hand, Steele is not a percipient witness. He does not purport to have firsthand knowledge of the events described in the dossier, and thus, the information he may have





provided in connection with other FBI investigations seems particularly unrelated to your and our investigation.

(b)(6) per FBI (b)(7)(C) per FBI (b)(7)(E) per FBI We are also prepared to offer Steele as part of the briefing. He would be prepared to answer questions about when Steele provided information to the FBI and what he did with it.

I understand that you may view our desire to protect DOJ equities as merely an impediment, but
to us this discussion is way more than that. These lines regarding ongoing DOJ investigations
were not drawn by me. They were drawn by people much smarter than me, but it is my job to
protect the Department's ability to conduct criminal investigations free from political
interference. But, I also respect Congress and I want us to find common ground. I hope you will
help. I think the American people expect us to figure this out.

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- summary Report of FLINN? are we goesp to get this? (b)(3) per FBI (b)(7)(E) per FBI Steel (b)(7)(E) per FBI trying to complorate smole, no fire yet. - Feinstein > Any more of the Dossner. · Comey > said would get make to hor. · Apadosalos Z seled Qs. · Manefait J her Compy-Said Motives 10 Rtm. At Collosion > Didn't need kinston help No endence that Themp compenies colled.

SHUE 00 Fendlein > Manefact is the senses player comey > have nothing le POP > How did he know about the offer? Hoppond in May? News of Herberger yet. Feinskin 10pt Asking - ADW Secious 20 His? ->All classified · fact of involgation is classified comey > Much in the Ress is not the. FQ-Hawlorg > Several Mmithes May vever get Ann. charges Ferneterin » Herre never seen husia von-Response to PNG.

143 DATE 3/22/2021 10/20/17 FBI INFO. CLASSIFIED BY: NSICG REASON: 1.4(C) DECLASSIFY ON 20921231 (b)(6) per FBI (b)(7)(C) per FBI Meet w/ FBI - Re Leg. issues Q @ austhousid c/ investigation Clinnestration -inital (b)(7)(E) per FBI . For will find paper work - producating serial of mouncatine answer of known to Direck + subordinates Q 3- circular reporting question. @>PBI-NO. no convoctity B/w sources who pour French GAS 3 Did Q 5ever find for (b)(6) per FBI (b)(7)(C) per FBI BB schutos Esquee Ble > did not know law firm John higha - surfed that and then an FBI Source, 80 not · ABI > Was pud By other mant + years of reliable reporting source Contercupument & took this at face value Q.6 - ventication of dosper. work a being dire dad. SC FBI > extensive Efforts) lact BI Part (b)(7)(E) per FBI mor 302 1023-> de source, adud use 1073, 300 > Della le seas (b)(7)(E) per FBI are not



(b)(1) per FBI (b)(3) per FBI (b)(7)(E) per FBI 1023 > Kirks in once opened Q 8- personnel > will not took about it (b)(3) per FBI (b)(7)(E) per FBI a > Depensive Brolompt used the under reports - unclassified for the most part. supportainst Fol piece - Suget to use element not include of the muy 8/17/16 Trup, clus hie, Flynn 0 VP-Ssbequent Builde in Septem War - D'D countries of concern > Pussia to ast Alaber 3 tection Try Sence clint Ume Scott > con we un down who else Bufripe? was a chally at the DO

345 ie. - Bundaps -> Both Ca SOP, A fation. invest specific 4 rol. FB1 - procedantical 9 acident (b)(3) per FBI (b)(7)(E) per FBI Report 1023-· Neyme open 4C · Dolonsine (b)(3) per FBI (b)(7)(E) per FBI log adarno rook Now Œ selon B witte Seinbech

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Document ID:	0.7.367.5059	
From:	Gauhar, Tashina administrative group/cn=recipients/cn=tgauher>	(b)(6) per FBI (b)(7)(C) per FBI
To:	Eisenberg, John A.	
	<jeisenberg@nsc.eop.ic.gov>; Ellis, Michael J.</jeisenberg@nsc.eop.ic.gov>	
	<mellis@nsc.eop.ic.gov></mellis@nsc.eop.ic.gov>	
Cc:	Schools, Scott N administrative group	
	(fydibohf23spdlt)/cn=recipients/cn=266db0533d2a45aab240f7c68e5c 2af8-schools, scott n>	
Bcc:		
Subject:	(TS//NF) Updated Redactions	
Date:	Fri Feb 23 2018 11:17:47 EST	
Attachments:	HPSCI Minority (02232018).pdf	

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Classified By: Name: Tashina Gauhar DEPARTMENT: UPN: tgauhar@doj.ic.gov Derived From: Multiple Sources Declassify On: 50X1-HUM

Hi John. Per our conversation, attached is the most recent version that incorporates

Standing by.

Thanks.

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Filename:	HPSCI Minority (02222018).pdf	
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Document ID: 0.	7.367.5056-000001
Owner:	Gauhar, Tashina
Filename:	HPSCI Minority (FBI Review).pdf
Last Modified:	Thu Feb 22 11:10:57 EST 2018

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From:	Schools, Scott N administrative group (fydibohf23spdlt)/cn=recipients/cn=266db0533d2a45aab240f7c68e5c	(b)(6) per FBI (b)(7)(C) per FBI
То:	2af8-schools, scott n> Gauhar, Tashina <td></td>	
	administrative group/cn=recipients/cn=tgauher>	
Cc:		
Bcc:		
Subject:	FW: (U) HPSCI Minority Memo Marked	
Date:	Wed Feb 21 2018 20:07:59 EST	
Attachments:	2018-02-21 HPSCI Minority (FBI Review) comparison.pdf	
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FYI

From: Schools, Scott N Sent: Wednesday, February 21, 2018 8:08 PM To: 'Eisenberg, John A.' Cc: Ellis, Michael J. Subject: RE: (U) HPSCI Minority Memo Marked

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Attached is a version that shows th

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Scott