EXHIBIT 6

Exhibit 17

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1 BY MR. FRAY-WITZER: 2 Q. Sure. 3 Outside of conversations at which your 4 counsel was present --5 Α. Right. 6 Q. -- were there any conversations as to who 7 would be the best witness to appear today as Fusion 8 GPS 30 (b)(6)'s witness? 9 No, there were not. Α. 10 Can you tell me generally what Fusion GPS Q. 11 is? 12 Sure. I'm happy to. Fusion GPS is a Α. premium research firm. We are a collection of former 13 14 journalists. Mr. Simpson and myself worked for roughly 15, 20 years for the Wall Street Journal. 15 16 Thomas Catan worked for the Wall Street Journal and 17 the Financial Times. 18 Mr. Felch worked for the Los Angeles Times. 19 And then we have a number of other research 20 staff who have various specialized skills such as 21 computer coding, we have people who are trained



1 archivists, people who are experts in open source research and collection. 2 So what we do primarily is collect 3 4 information, as I said, available in the open source, open source meaning publicly available records, 5 б filings, that sort of information. Our typical client 7 base are large law firms engaged in complicated 8 disputes, companies -- large companies looking for 9 deeper situation -- situational awareness of a matter. 10 We work with large hedge funds, ambassadors of private equity firms, those sorts of people. 11 12 Does the firm conduct what is typically Ο. referred to as opposition research for a political 13 14 candidate? 15 Yeah, I hear that term used a lot, 16 "opposition research." It has a certain connotation 17 that I don't really think is very helpful in 18 understanding our methodology. 19 That said, I'll explain that we rarely are 20 involved in political -- what you would describe or 21 what anyone would describe as a political matter.



1 We did so in 2012 and we did so in 2016. 2 And, again, in both those instances what we were asked to do was collect, review, digest and articulate the 3 4 meaning of public records. And if I understand it, I think -- and 5 6 please correct me if I'm wrong -- I think your 7 hesitation to use the phrase "opposition research" is 8 that Fusion GPS sees itself as collecting more than just opposition as opposed to collecting, sort of, all 9 10 information about a subject. Is that accurate? 11 MR. LEVY: Objection, form. 12 But go ahead. 13 THE WITNESS: I think the -- the intention 14 of my answer is -- resides more in -- in what is typically known as opposition research, which is 15 16 campaign driven, which is typically a collection of 17 what you call votes and quotes that are then distilled 18 for purposes of a campaign; whether it's the cutting 19 of ads or whether it's talking points for a candidate 20 in a debate, that sort of thing. 21 What we are -- what we specialize in and our



1 BY MR. FRAY-WITZER: 2 Ο. At some point in time, was Fusion engaged by 3 a client to do research into candidate Trump? 4 Α. Yes, we were. When were you engaged to do that? 5 Q. 6 MR. LEVY: Objection to form. 7 Go ahead and answer. 8 THE WITNESS: We were first engaged by a client to research Donald Trump, not Trump and Russia 9 10 in, I believe it was September, 2015. 11 BY MR. FRAY-WITZER: 12 And who was the original client that engaged Ο. Fusion GPS to conduct that research? 13 14 It was the Washington Free Beacon. Α. How did that engagement come about? 15 0. 16 I'm going to instruct the witness MR. LEVY: not to answer that question at this time inasmuch as 17 18 it is outside the scope -- more specifically limited by the Court's July 28th, 2018, order allowing 19 20 Plaintiff to question the 30 (b)(6) non-party witness 21 about any clients who may have been behind the



1 December memo, and any client who is involved in the

2 | creation of the dossier as it is referred to in the

3 subpoena.

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And beyond that, the Court's order documentary 50 states that questions by other clients are outside the scope of this deposition.

MR. FRAY-WITZER: I'm not sure that I agree with all of what you said but we'll move on for the moment, and when it becomes an issue it'll become an issue.

BY MR. FRAY-WITZER:

- Q. At some point in time, did Fusion's engagement with the Washington Free Beacon end?
 - A. Yes, it did.
 - Q. And when was that?
- A. I can't recall specifically, but I believe it was around May of 2016, maybe April. You should understand that sometimes our engagements kind of die a natural death and we don't have formal bookends or we don't memorialize the end of an engagement.
 - In this particular case the client's



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1
     interests had dissipated with the de facto nomination
 2
     of Mr. Trump as the republican candidate for
 3
     president.
 4
          Q.
               Subsequent to the engagement with the
     Washington Free Beacon ending, did Fusion GPS acquire
 5
     a -- another client who was interested in your
 6
 7
     continuing research on candidate Trump?
 8
               MR. LEVY: Objection to form.
 9
               THE WITNESS: Yes, we did.
10
     BY MR. FRAY-WITZER:
11
               When was that?
          Ο.
12
               In that same timeframe. I think we -- I
          Α.
13
     can't remember precisely when we signed the contract.
14
     It might have been April or May of 2016.
15
               And who was the new client?
          0.
16
               Perkins Coie.
          Α.
17
          Q.
               And --
               C-O-I-E.
18
          Α.
19
               Perkins Coie is a law firm. Is that
          Q.
20
     correct?
21
               That's right. They're a law firm.
          Α.
                                                    I think
```



1 their headquarters is in Seattle.

- Q. And on whose behalf did Perkins Coie engage Fusion GPS?
- A. We were not told explicitly at the time.

 However it's pretty obvious that it was the DNC and the Hillary for America campaign.
- Q. What specifically was the scope of engagement from Perkins Coie?
- A. Very broad. This gets back to what I was trying to explain to you earlier, that what we sell -- and frankly, what we insist our clients buy is a very holistic and broad inquiry that can take in any number of subject matters.
- So to fill that out a little bit, if you'd like me to?
 - Q. Go ahead.
- A. An organization like a national campaign or major political party will have its own inhouse researchers to conduct a lot of that, kind of more sort of -- how would I call it without making it sound insulting? Mundane collection, devote some quotes,



1 sort of book I was describing earlier, it's a more 2 specialized skill to pull things like bankruptcy 3 records, to collect those and to process them and 4 digest them and make them understandable by common 5 persons. 6 Q. I guess with respect to this particular 7 engagement, to the best that you recall what was the 8 scope of the engagement? What was -- what was the 9 scope of the engagement? 10 MR. LEVY: I'm going to instruct the witness 11 not to answer this question inasmuch as it would 12 implicate the attorney-client privilege, the attorney 13 work product doctrine. 14 If you want to talk about how these matters 15 worked in a general manner, you can. 16 MR. FRAY-WITZER: I believe that the Court 17 did require answers to this kind of category of 18 questions with respect to what they were hired to do. 19 MR. LEVY: And I also believe that the Court 20 in the same order preserved the opportunity for

counsel to invoke attorney work product doctrine where



1 applicable, while allowing the witness to answer 2 questions that did not implicate privilege. Rule 30 (c)(2) is consistent with that 3 4 order, of course. MR. FRAY-WITZER: And just so I understand, 5 6 which attorneys are you referring to for attorney work 7 client privilege? 8 MR. LEVY: For any lawyer at Perkins Coie directing and communicating with Fusion GPS during the 9 10 course of the engagement. 11 MR. FRAY-WITZER: And on what basis are you 12 asserting Perkins Coie's attorney-client privilege? MR. LEVY: The law firm has maintained both 13 14 privileges with Fusion GPS. It has not authorized 15 Fusion GPS to waive those privileges. It has only 16 released Fusion GPS to disclose the name of Perkins Coie and its underlying clients. There's a letter in 17 18 the public record to that effect. 19 BY MR. FRAY-WITZER: 20 What efforts did Fusion GPS initially 0. 21 undertake in connection with the assignment from



1 Perkins Coie? 2 Α. I'm sorry. I don't -- I'm not sure I understand what you mean by efforts. 3 4 Q. What did you actually do when you were hired 5 by the Democratic National Committee, Hillary for American campaign through Perkins Coie? 6 7 That I understood. Α. 8 Again, it's an iteration of what I described 9 I would boil it down as Donald Trump 10 discussed. We were given a very broad mandate to follow our instincts and our leads where they led. 11 12 Obviously we are a more specialized kind of research firm, we used to work at the Wall Street 13 14 Journal, Candidate Trump had gone through four 15 bankruptcies. That's a pile of paper. And so we were 16 obviously looking at that. 17 We were looking at his business trajectory and footprint, not just in the United States or New 18 19 York but globally. 20 So, is that helpful?



Q.

Yes.

1 I want to jump forward for a moment and we'll come back. But at some point in time, did 2 Fusion GPS's engagement with Perkins Coie on this 3 4 matter end? Yes, it did. 5 Α. 6 Q. When was that? 7 It ended on election day, 2016, early 8 November. I think it was November 8th, 2016. Was Fusion GPS subsequently hired to 9 0. 10 continue the Trump research that you had been 11 conducting? 12 I'm not sure I understand. Hired by Perkins Α. 13 Coie? 14 No. Hired by anyone else? 0. 15 Α. Yes. 16 When was Fusion GPS subsequently hired to 0. 17 continue research? 18 Α. I believe February or March of 2017. 19 MR. LEVY: And beyond that, I'm going to 20 instruct the witness not to discuss that matter 21 because it's limited by the Court's July 28th, 2018,

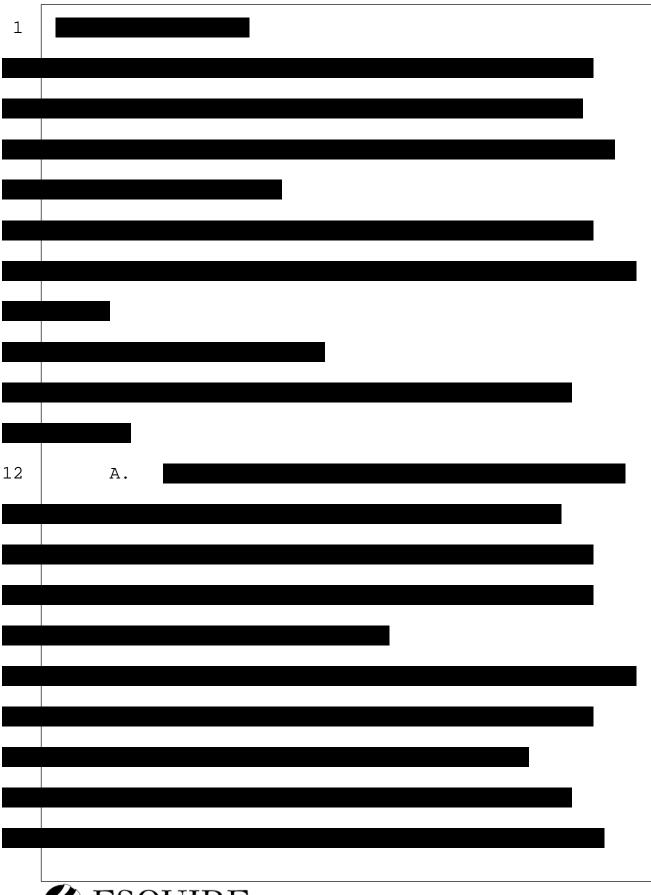


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1
     order.
 2
     BY MR. FRAY-WITZER:
 3
               And your counsel has anticipated my next
 4
     question, so let me ask it anyway and then you can
 5
     give the instruction.
 6
               It has been reported that Fusion GPS was
 7
     retained by the Penn Quarter Group to continue
 8
     research into President Trump.
 9
               Is that the engagement that you're referring
10
     to?
11
               MR. LEVY: I'm going to instruct the witness
12
     not to discuss any client matters outside of what
13
     you've already discussed --
14
     BY MR. FRAY-WITZER:
15
          Q.
               At --
16
               MR. LEVY: -- consistent with the Court's
17
     order.
18
     BY MR. FRAY-WITZER:
19
               At the time that the -- what we have
20
     referred to as the December memo from Christopher
21
     Steele, a memo dated December 13th, 2017 --
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1	A. '16.
2	Q. '16. Thank you.
3	At the time the December memo was created,
4	did Fusion GPS have a client that was paying for
5	research into President Trump?
6	A. No, we did not.
7	Q.
19	
1 J	







1 public record research on behalf of one of their 2 clients. 3 BY MR. FRAY-WITZER: 4 Q. And had Fusion hired Orbis prior to the 5 Trump investigation? 6 Α. I honestly don't recall. We may have. Ιf 7 we had, it would have been a small, limited 8 engagement. But I don't recall. 9 How did Fusion come to engage Mr. Steele 10 and/or Orbis in connection with the Trump 11 investigation? 12 Α. Sure. As I testified earlier, we had been looking 13 14 at Mr. Trump and his business record for the better 15 part of eight or nine months, during which time we had 16 come to a couple of decisions. One was that we were 17 exhausting some of the public record material, 18 especially as they related to Donald Trump's engagement with Russia. Public records aren't --19 20 aren't easily accessed in Russia or the former Soviet



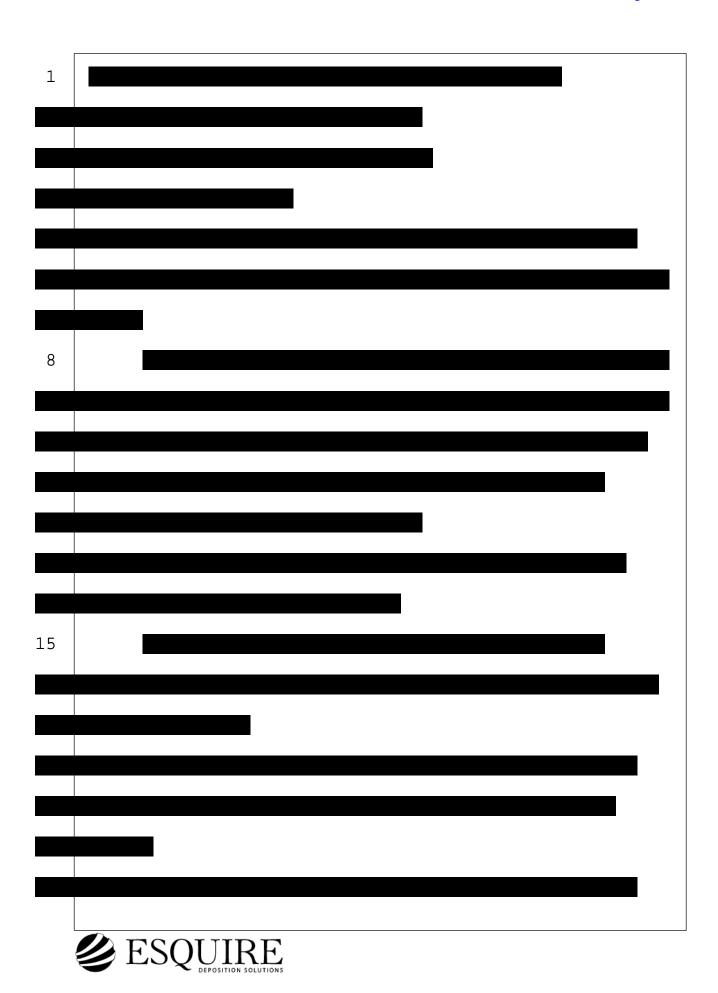
Union.

1 We decided that that was a major area of inquiry in which we could add value. 2 So Mr. Simpson and myself decided that we 3 4 would like to supplement our research with some more 5 human inquiries. We considered a number of contractors who do 6 7 that kind of work and we decided after much discussion 8 that Mr. Steele was the most highly qualified and 9 reliable contractor we could hire, and so we did so. 10 You have to understand, too, that in that line of work and especially when you're dealing with 11 12 Russia and the former Soviet Union, there's a large 13 amount of bad information and disinformation that can 14 flow through to someone like a research company like 15 ours. 20



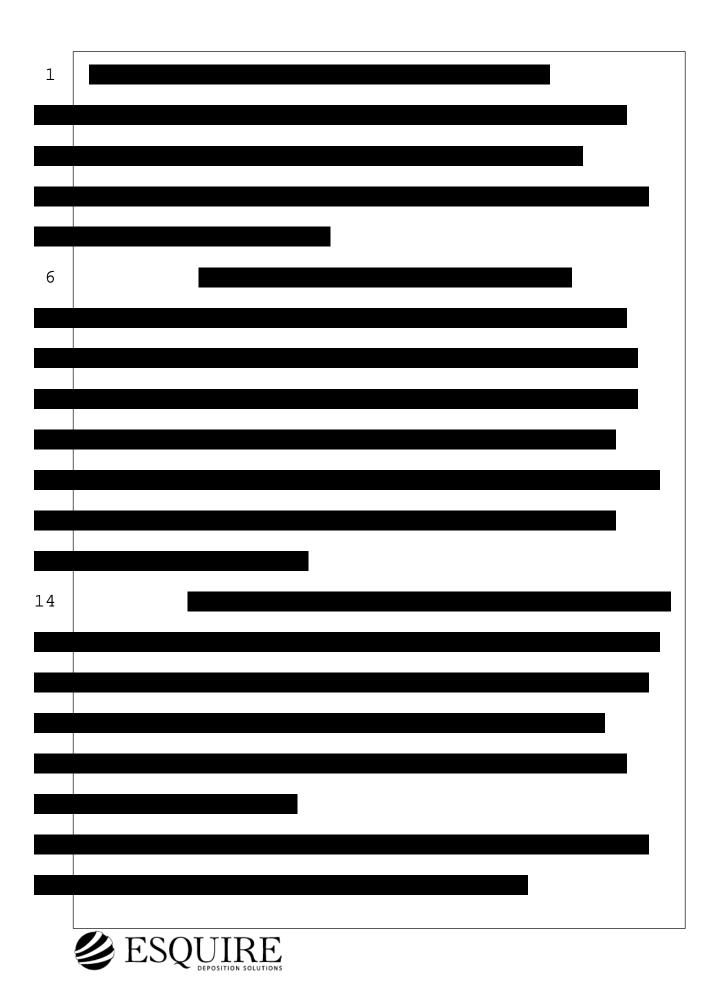
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13	BY MR. FRAY-WITZER:			
14	Q. When did when did you engage Mr. Simpson			
15	and/or Orbis?			
16	MR. LEVY: Mr. Simpson?			
17	BY MR. FRAY-WITZER:			
18	Q. Mr. Steele and/or Orbis? Thank you.			
19	A. I believe it was in May, late May of 2016.			
20	Q.			





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3	BY MR. FRAY-WITZER:
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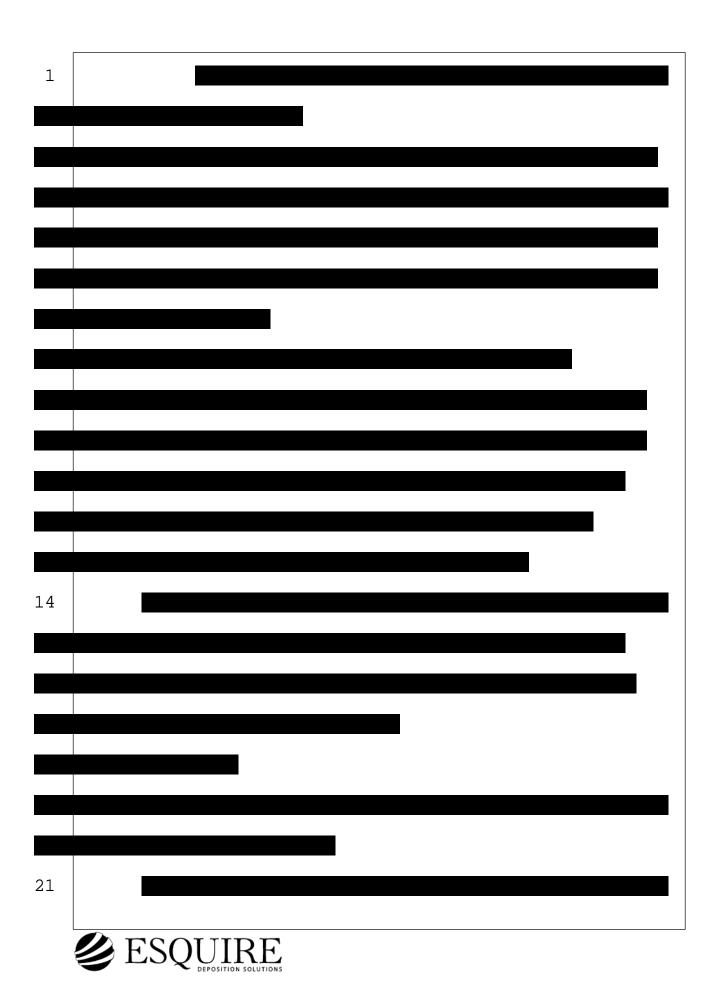


1 4 Q. What other colleagues at Orbis did you speak 5 with or did Fusion speak with other than Mr. Steele himself? 6 7 Christopher Burrows, B-U-R-R-O-W-S. 8 MR. LEVY: We've been going on for about an 9 hour. Can we take a break? 10 MR. FRAY-WITZER: Yes. THE VIDEOGRAPHER: Going off the record at 11 12 11:08. 13 (Whereupon, a recess ensued.) 14 THE VIDEOGRAPHER: Back on the record at 15 11:21. 16 BY MR. FRAY-WITZER: 17 So, I believe we were talking about Fusion O. GPS's decision to engage Christopher Steele in 18 19 connection with the Trump investigation. And I think 20 you told us some of the reasons why Fusion GPS decided 21 to engage Mr. Steele.



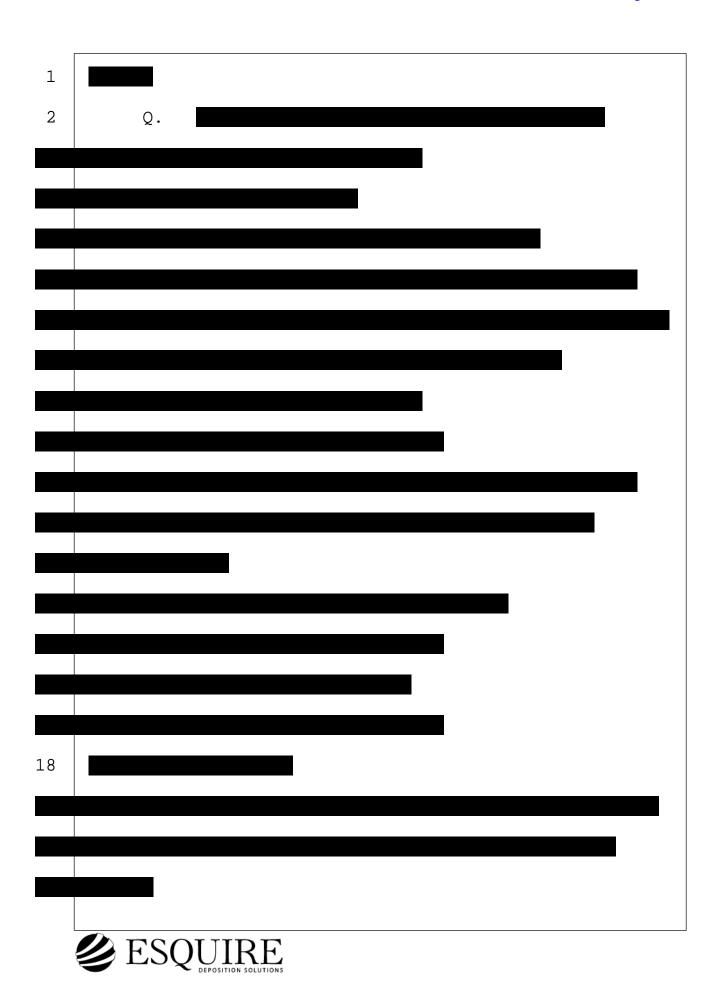
1	Once the decision was made, what was the
2	next step? Who communicated with Mr. Steele?
3	MR. LEVY: Which question do you want him to
4	answer?
5	MR. FRAY-WITZER: There's only one there.
6	BY MR. FRAY-WITZER:
7	Q. Who communicated with Mr. Steele?
8	

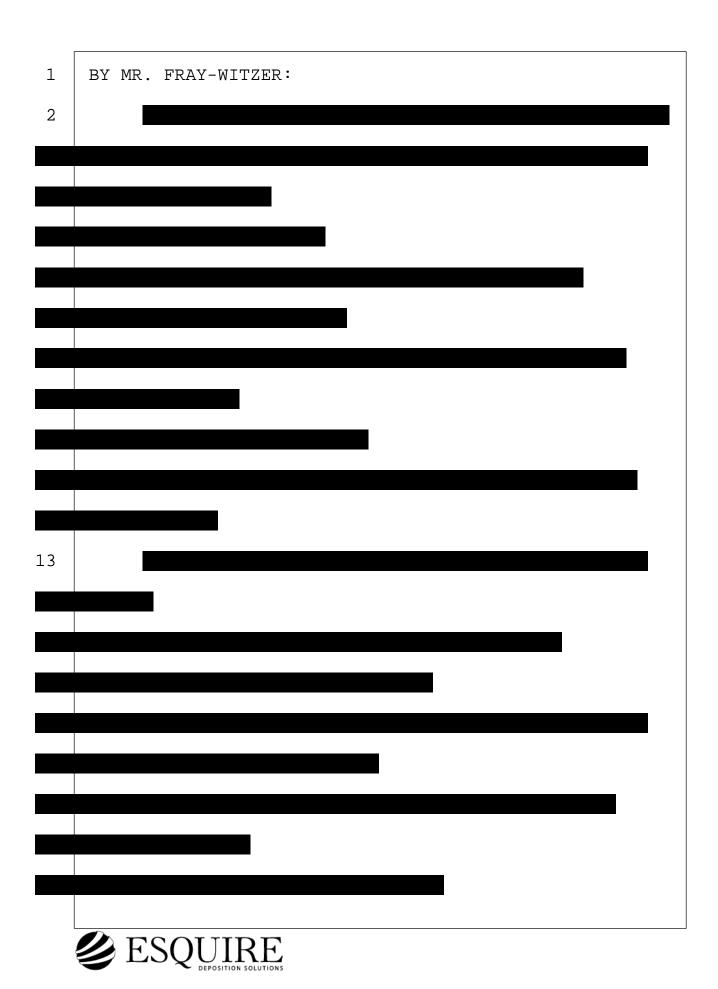


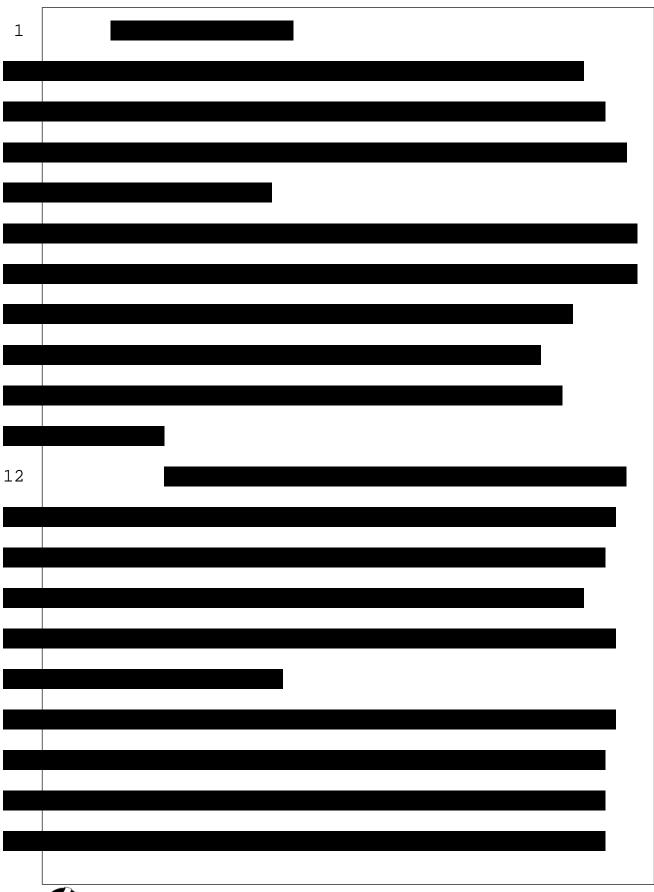


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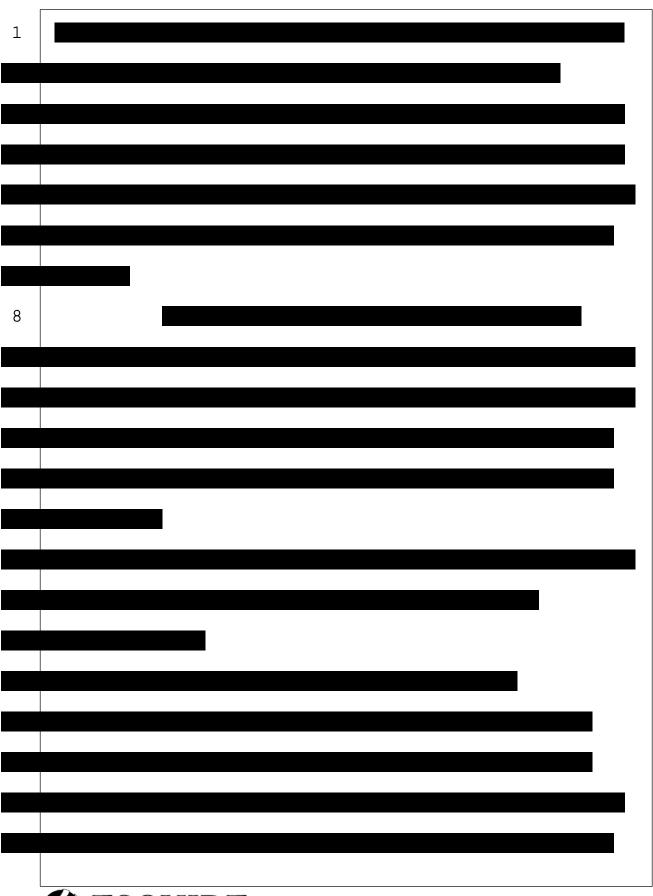






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6	BY MR. FRAY-WITZER:
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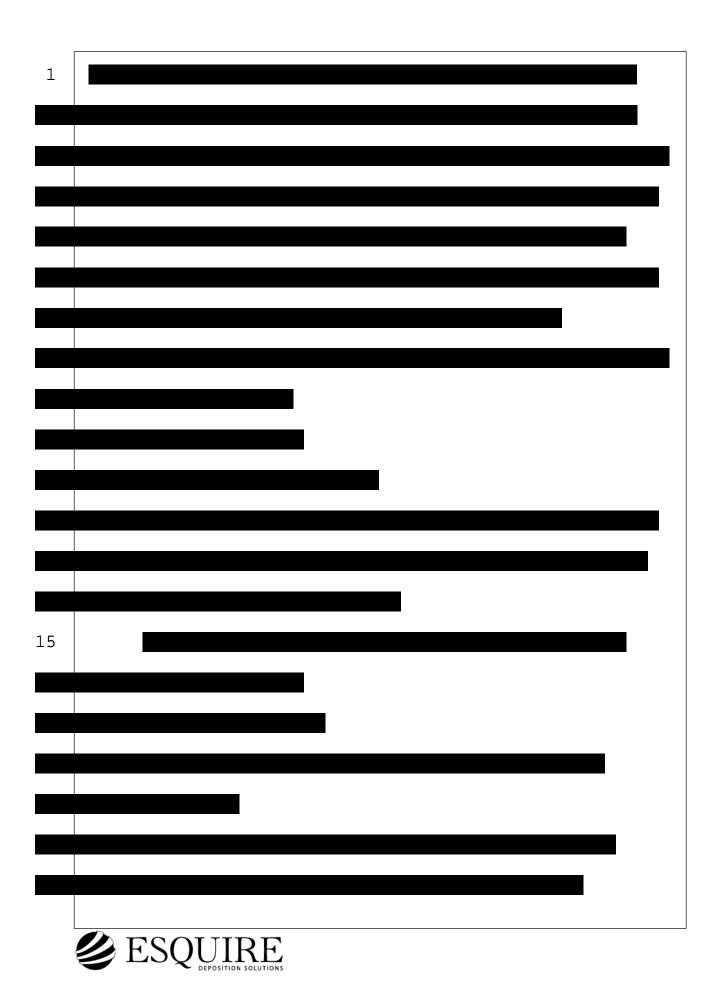




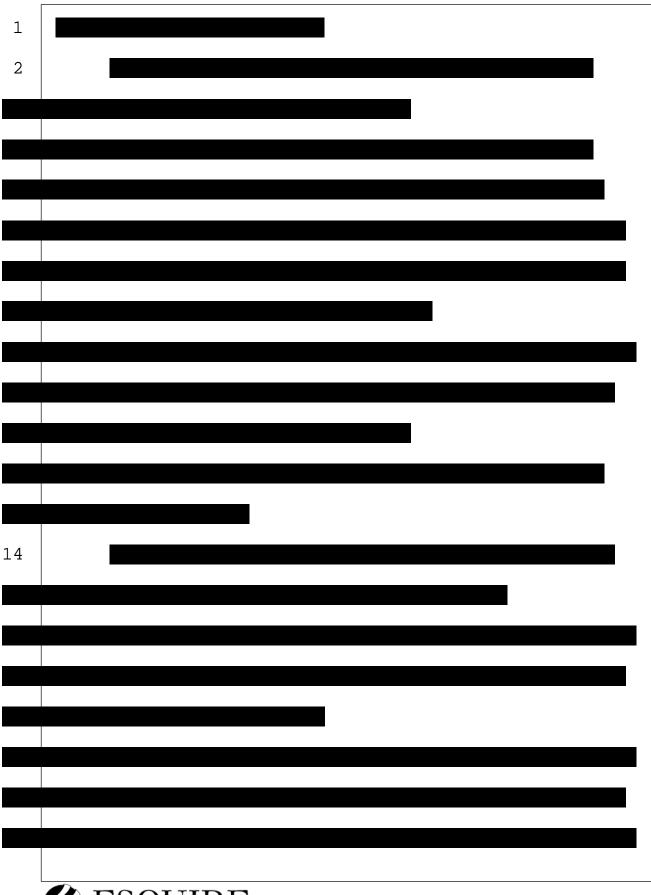


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5 6	BY MR. FRAY-WITZER:





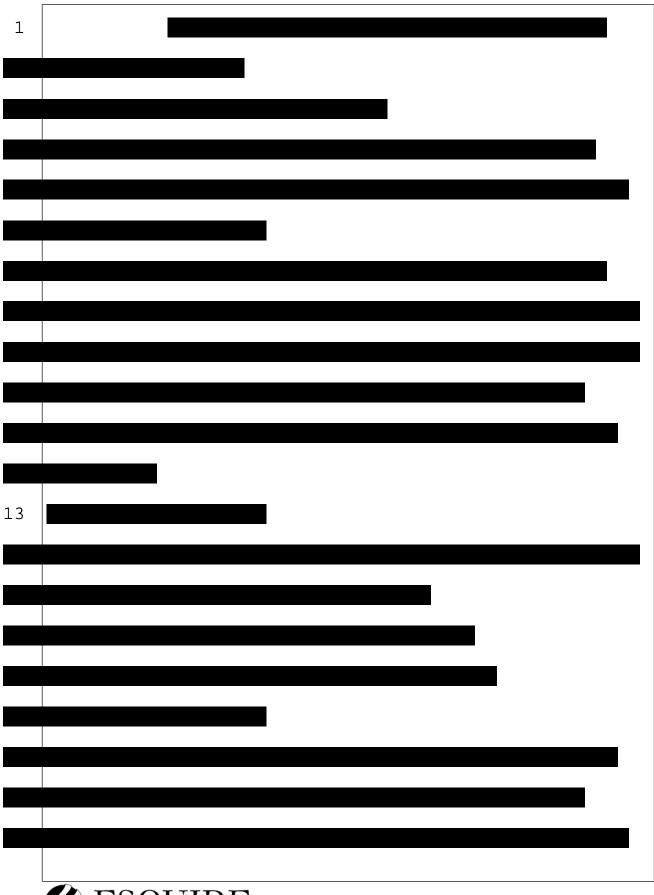
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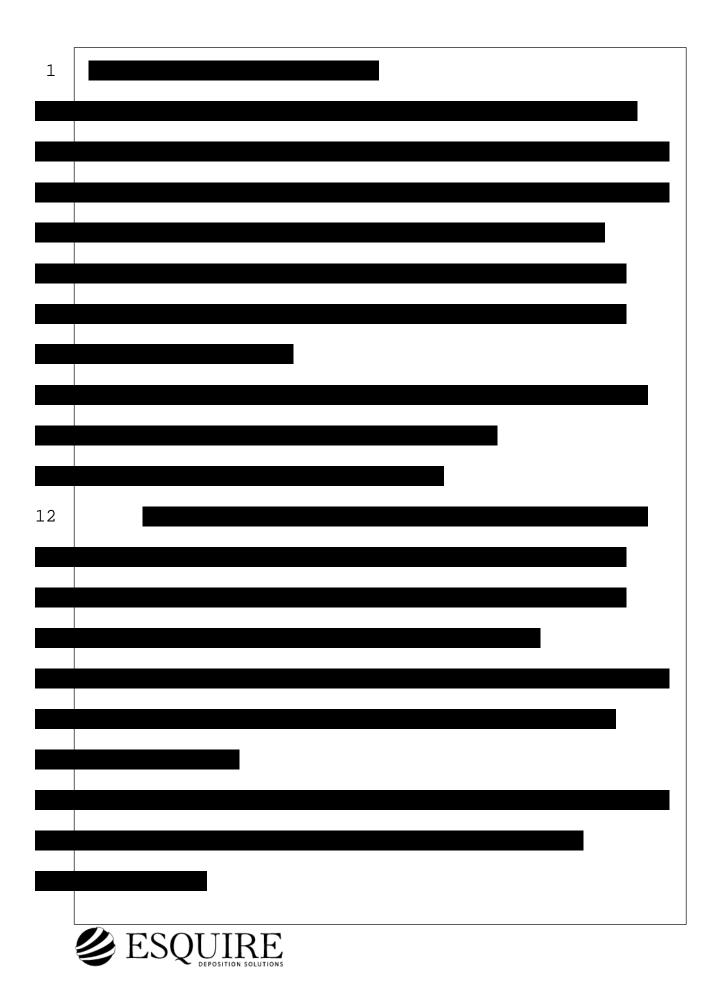


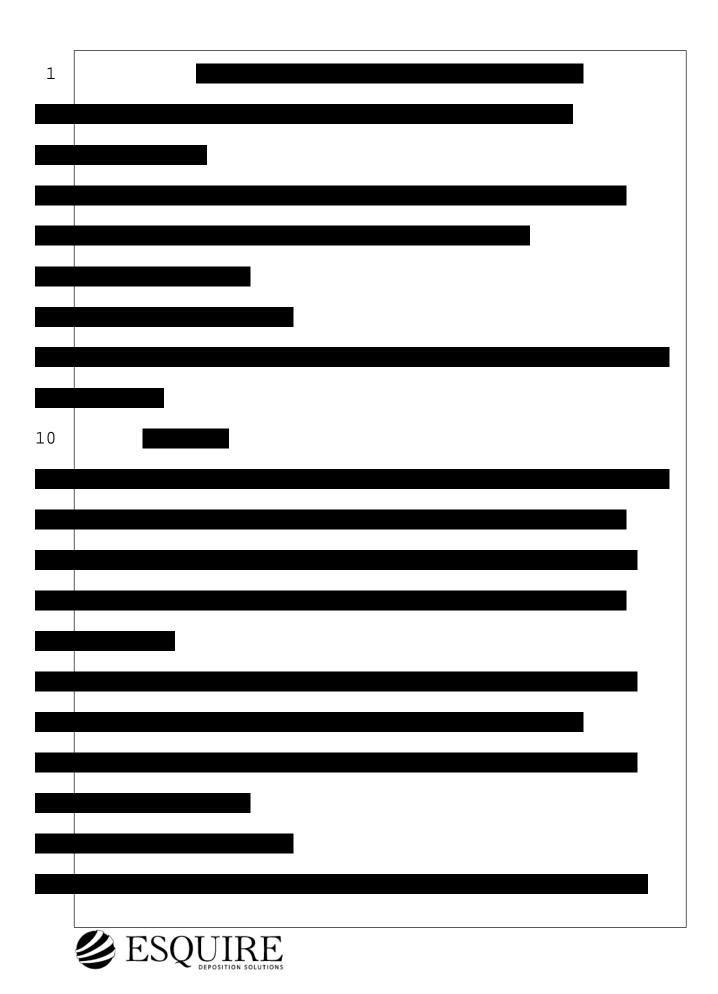
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10	BY MR. FRAY-WITZER:	
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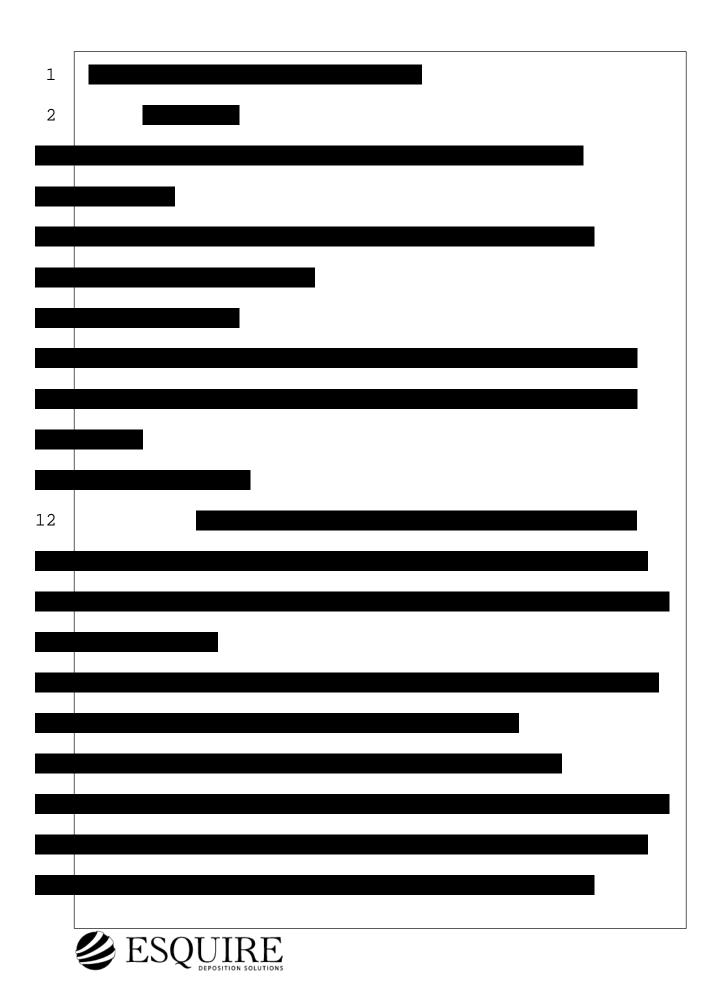


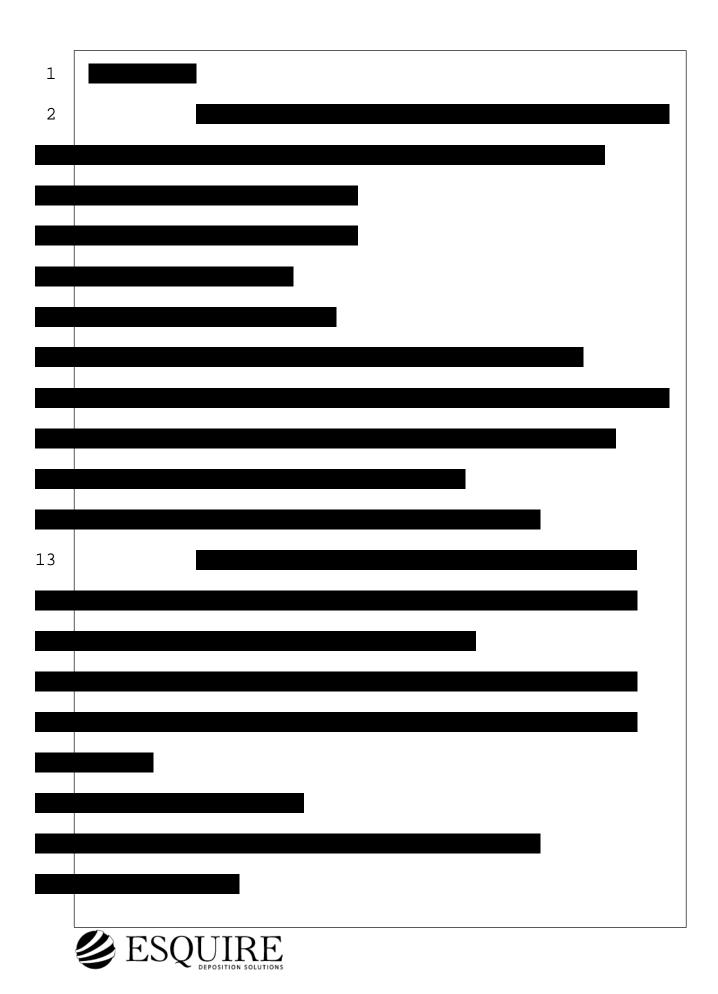
1	It's just the document.	
10		

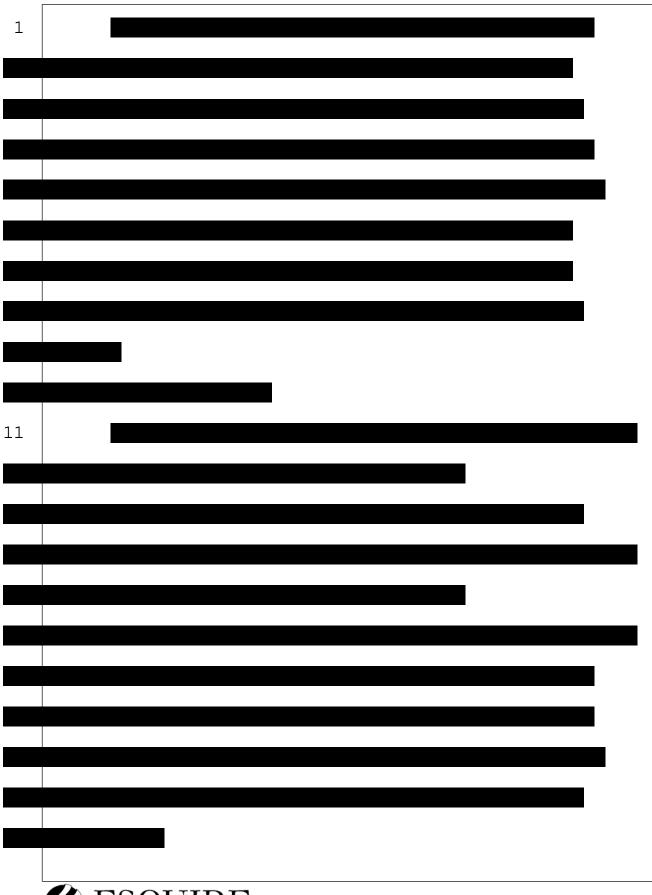


1 The memos that were produced between May of 2 Q. 2016 and November of 2016 have sometimes been referred 3 4 to as the pre-election memos. Are you familiar with that term? 5 I don't know that I'm familiar with it but I 6 Α. 7 don't dispute it. 8 12 Did you review the memos in preparation for Ο. 13 today? 14 I reviewed them carefully. I didn't count Α. 15 them. 16 MR. LEVY: If you want to put them in front 17 of the witness, feel free. 18 MR. FRAY-WITZER: I will at some point. 19 BY MR. FRAY-WITZER: 20









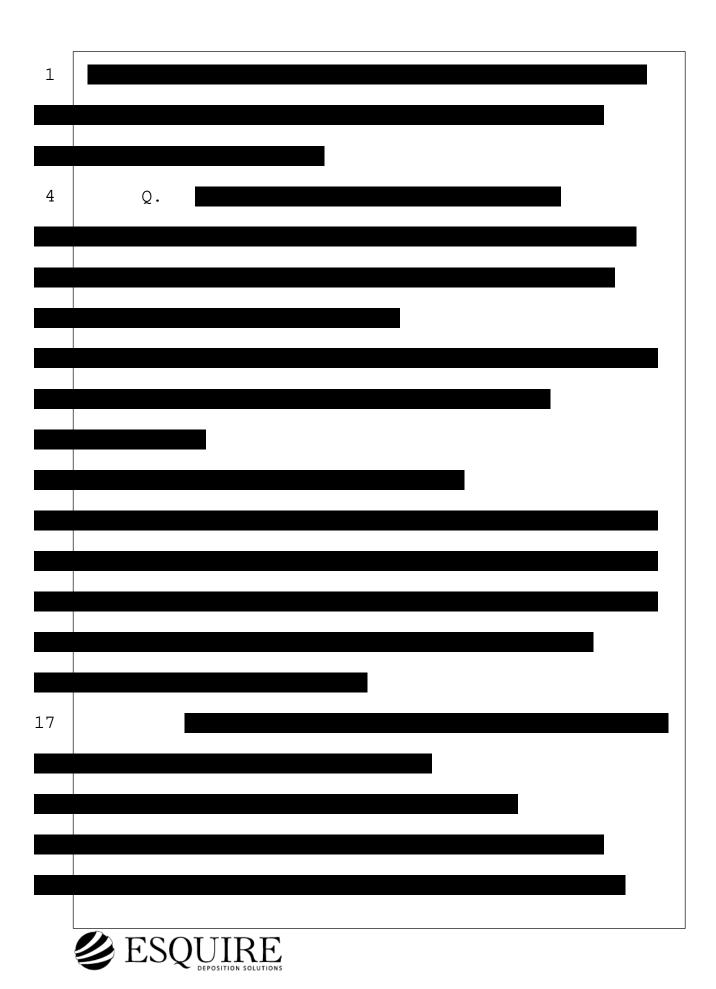


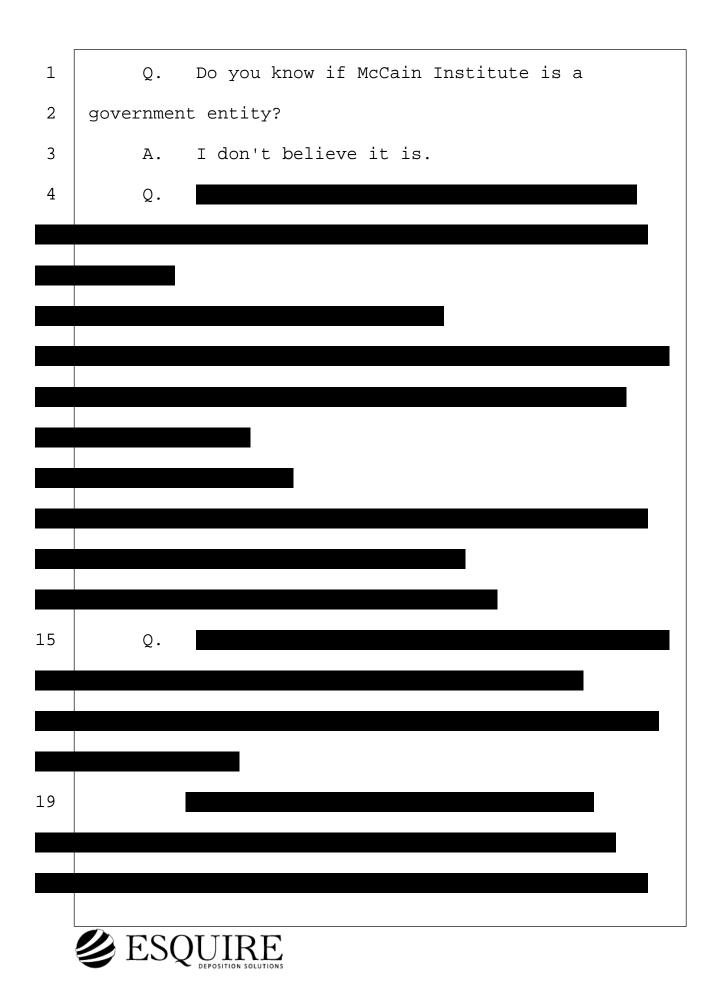
1 9 Did anyone at Fusion have conversations with Q. 10 Congress concerning the pre-election memos? 11 MR. LEVY: During the election campaign? Exhibit 6 is a lengthy conversation about 12 13 the pre-election memos with Congress. 14 BY MR. FRAY-WITZER: Prior to Mr. Simpson's testimony in front of 15 Ο. Congress, did Fusion have any communications with 16 anyone in Congress concerning the pre-election memos? 17 18 Α. No, we did not. 19 Did anyone at Fusion have communications Q. 20 with the Department of Justice concerning the 21 pre-election memos?

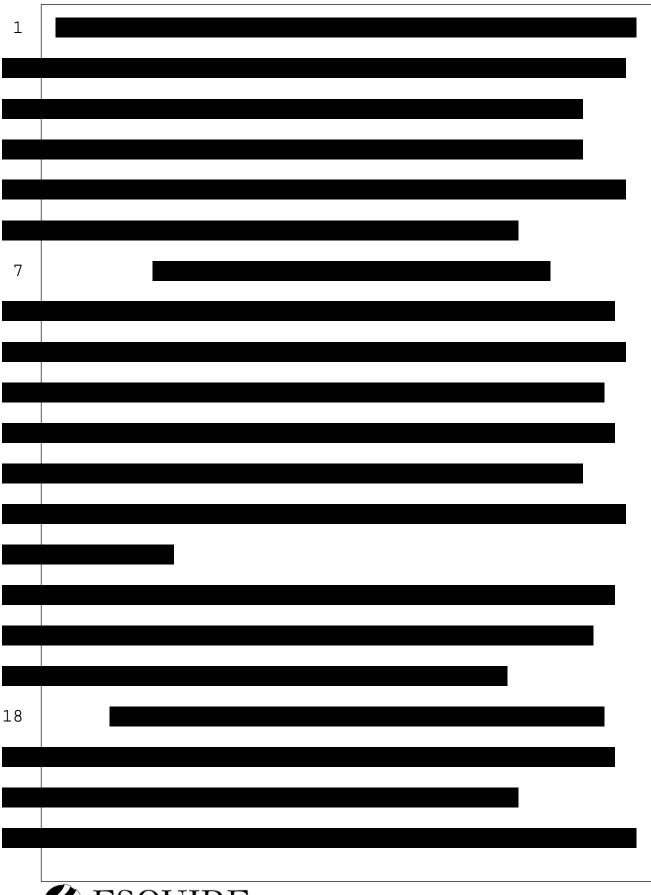


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1
               MR. LEVY: At what time?
 2
     BY MR. FRAY-WITZER:
 3
               At any time.
          0.
 4
          A. At any time?
 5
             At any time.
          Ο.
 6
          Α.
               Yes.
 7
               What conversations did Fusion have with the
          0.
 8
     Department of Justice concerning the pre-election
 9
     memos?
10
               We recall a meeting between Glenn Simpson
     and Bruce Ohr, that's O-H-R,
11
                  for the purpose of transmitting to
13
     Mr. Ohr a copy of these pre-election memoranda.
14
               That would have taken place after the
15
     election.
16
               On what date?
          0.
               I don't recall the specific date. I think
17
     it was late November.
18
19
               And did Mr. Simpson provide Mr. Ohr with a
          Ο.
20
     copy of the pre-election memo?
21
          Α.
               Yes.
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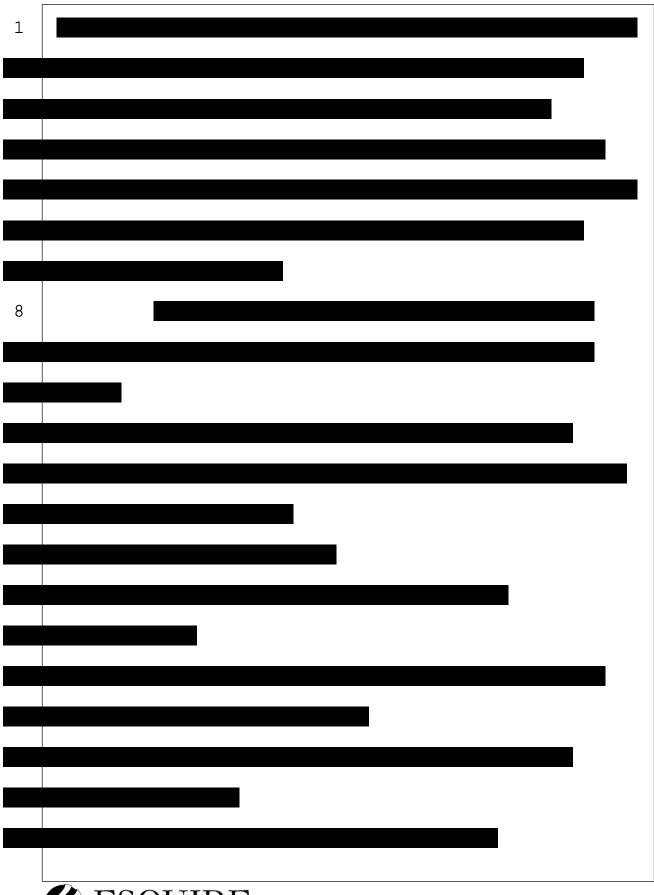




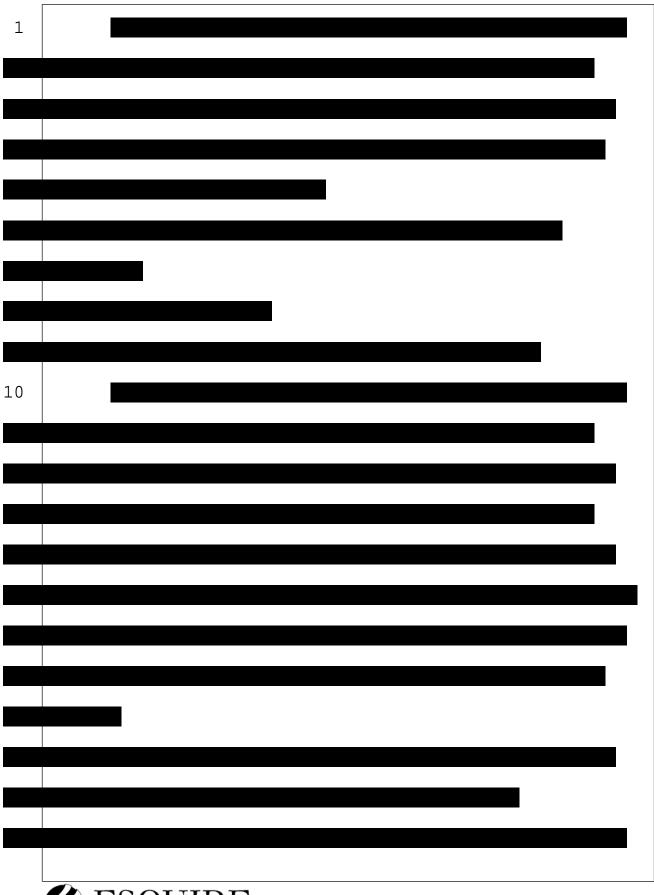




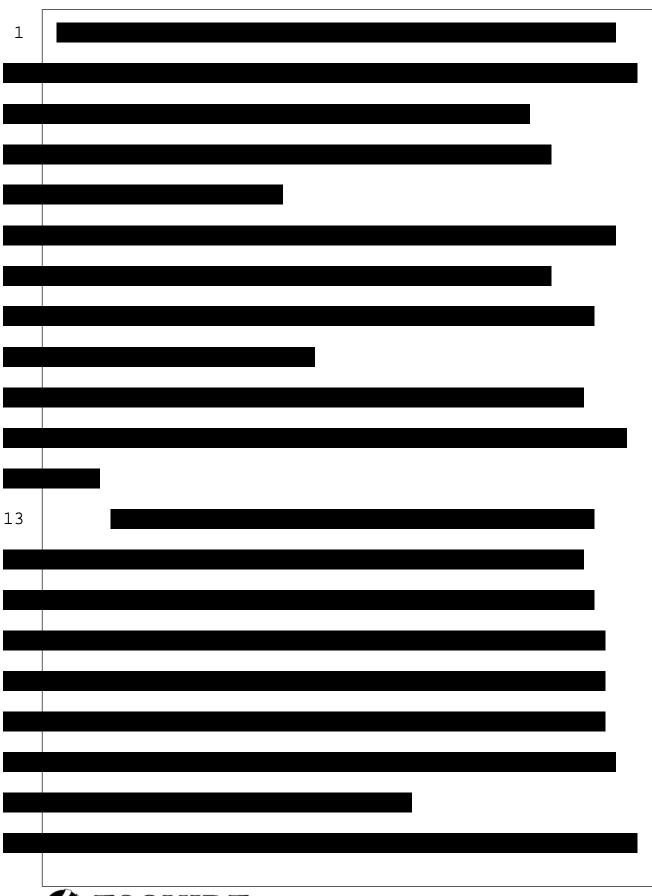




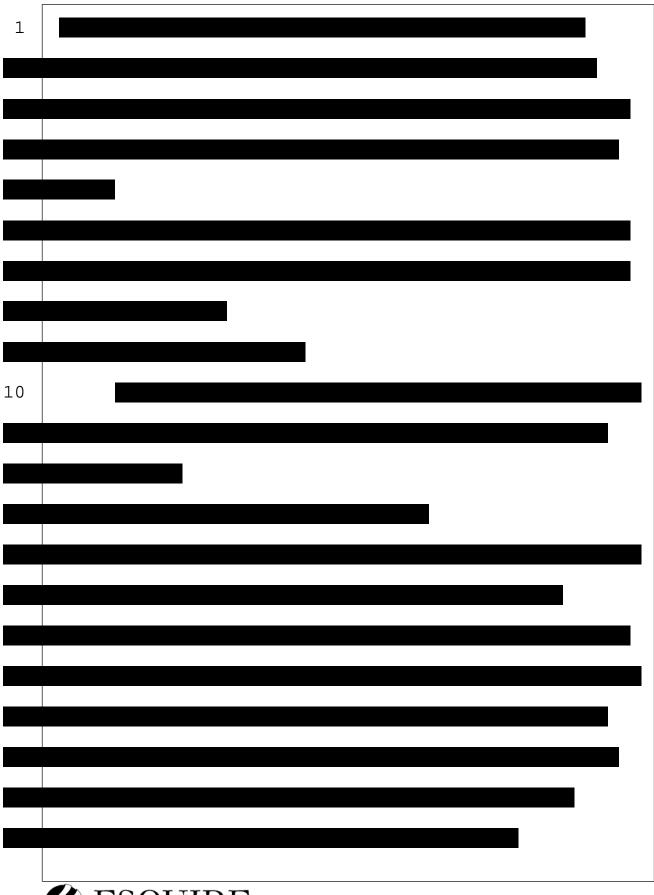














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1
               MR. SIEGEL: Objection.
 2
               THE WITNESS: No, we don't.
 3
     BY MR. FRAY-WITZER:
 4
11
               MR. LEVY: Are you moving an exhibit? Can I
     just take a quick break?
12
13
               MR. FRAY-WITZER: Yeah.
               THE VIDEOGRAPHER: Going off the record at
14
15
     1423.
16
               (Whereupon, a recess ensued.)
17
               THE VIDEOGRAPHER: Back on the record at
     1426.
18
19
     BY MR. FRAY-WITZER:
20
               So we've talked a bit about the pre-election
          0.
21
     memos and I want to turn now to the -- what we've
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1
     referred to as the December memo. It's the memo of
 2
     December 13th, 2016.
               And let me ask you first, when did you first
 3
     learn -- and in this context I mean Fusion. When did
 4
 5
     Fusion first learn that there was an additional memo
 6
     that Mr. Steele had created?
 7
               MR. LEVY: Objection, vague. When you say
 8
     additional memo, additional to what?
 9
     BY MR. FRAY-WITZER:
10
               Other than the -- what we've referred to as
          0.
     the December memo, were there any other post election
11
12
     memos prior to January 10th, 2017?
13
               MR. LEVY: Objection. Memos from whom?
14
               MR. FRAY-WITZER: From Mr. Steele.
15
               MR. LEVY: About what?
16
               MR. FRAY-WITZER: About the Russia
     investigation, about the Trump investigation.
17
18
               THE WITNESS: I don't believe so.
19
     BY MR. FRAY-WITZER:
20
               So post election but before January 10th,
          0.
21
     2017, there's only one additional memo, correct?
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1 receiving the December memo, 3 I think you've testified that in December of 6 Q. 7 2016, Fusion no longer had a client for this work, for 8 the investigation that you were conducting, correct? 9 MR. LEVY: Objection. I just want to be really precise here. I'm objecting to form. Can you 10 repeat the question, please, if there's a question? 11 12 MR. FRAY-WITZER: I think there was. Could you read it back, please? 13 14 (Requested portion of record read.) 15 BY MR. FRAY-WITZER: 16 The question is, is that correct? 0. 17 MR. LEVY: And I'm going to object because 18 it's vaque. 19 BY MR. FRAY-WITZER: 20 In December of 2016 did Fusion GPS have a 0. 21 client for whom it was working and conducting



1 additional research into Donald Trump? 2 MR. LEVY: Objection, asked and answered. 3 No, we did not. THE WITNESS: 4 BY MR. FRAY-WITZER: Given that you did not have a client at that 5 6 time, was Fusion surprised to learn that there was an 7 additional memo coming? 8 Α. A little bit. However, let me fill that in for you if I may. 9 10 The context, again, is our abiding belief at this time that the United States had elected someone 11 12 who had been compromised by the Russian government and 13 was colluding in some way with the Russian government 14 and that Russia was interfering with our electoral 15 process to elect this specific individual who had won. 16 So there comes a point when this is not 17 about clients and money and dollars and cents, it's 18 about your national security. That's where our head 19 was, 20 So if there's more information that can shed 21 light on that emergency or the crime in progress I've

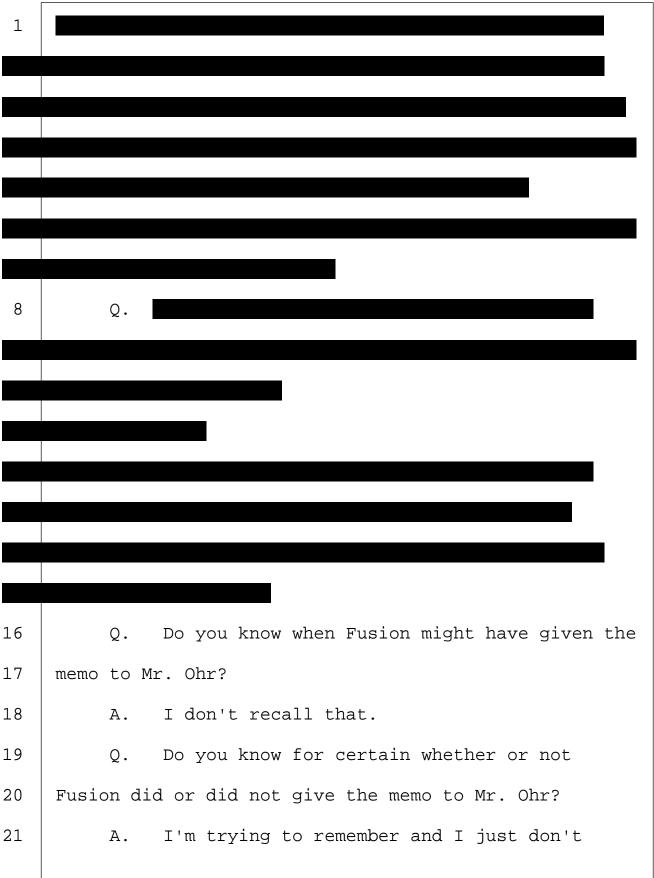


described, we were going to go get it and we were 1 going to deliver it. 2 3 You were going to deliver it to whom? In this case, James Comey. 4 Α. 5 Q. 16 I'm going to -- I'm going to back up for Q. just a moment. 17 18



1	
4	Q. And I want to get a little specific with
5	you
6	A. Sure.
7	Q because I believe your testimony was that
8	those things were your understanding.
15	BY MR. FRAY-WITZER:
16	







1 recall. I believe we did.

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- Q. Was there a meeting with Mr. Ohr subsequent
- 3 to the meeting that you had described earlier today?
 - A. There may have been but we don't recall one.
- Q. How would Fusion have provided the memo to Mr. Ohr if there was no meeting?
 - A. I don't think we would have.
 - Q. The meeting that you described earlier was before December 13th, 2016. Is that correct?
 - A. That's correct.
 - Q. And so I guess I'm confused. If the only way that you would have provided the document to Mr. Ohr if you did was in a meeting and there was no meeting after the first meeting, how would you have provided the document to Mr. Ohr?
 - A. I'm sorry. I'm just -- we're not able to recall a subsequent meeting. There may have been.
 - Q. So Fusion -- and this is fine, but Fusion doesn't know one way or another whether or not there was a meeting and whether or not the document was provided to Mr. Ohr?

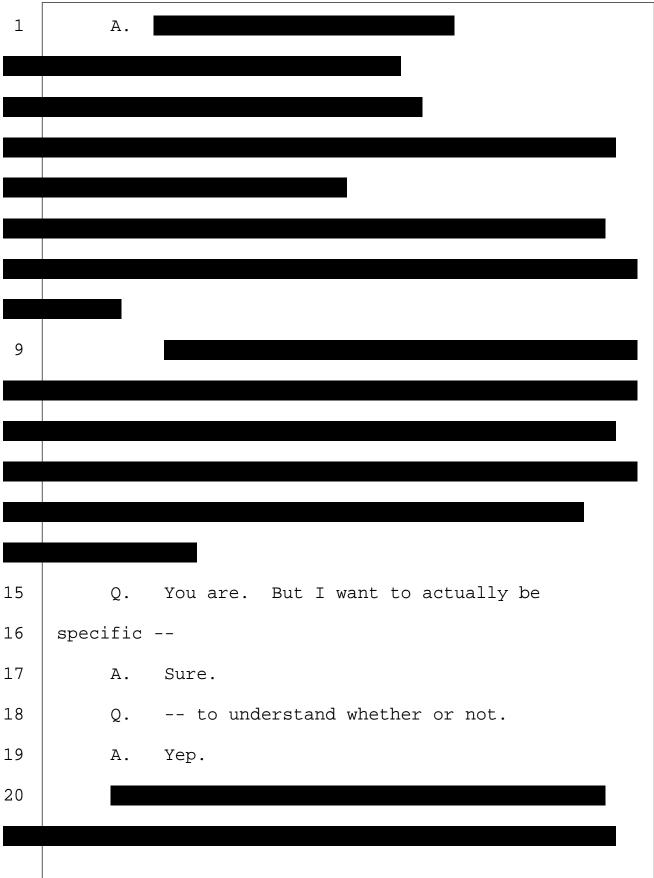


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1
               MR. SIEGEL: Objection.
               MR. LEVY: Asked and answered, object --
 2
 3
     objection.
               THE WITNESS: Right.
 4
 5
     BY MR. FRAY-WITZER:
               Did --
 6
          Q.
               I don't dispute that if it would have been
 7
 8
     we would have done that.
               But you don't know if you did?
 9
          Q.
10
          Α.
               I don't recall.
               Did Fusion provide the December memo either
11
          Q.
12
     on its own or as part of the dossier to any media
13
     outlets?
14
               The December 13th memo?
          Α.
15
          Q.
               Yes.
16
               MR. LEVY: Before publication of the
17
     dossier?
18
               MR. FRAY-WITZER: Before January 10th, 2017.
               THE WITNESS: No. We don't believe so.
19
20
     BY MR. FRAY-WITZER:
21
          Q.
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1	
3	A. Just to be clear, you're talking about the
4	December 13th memorandum?
5	Q. Either on its own or as part of the
6	collection of memos?
7	A. No, we did not.
8	Q.
15	

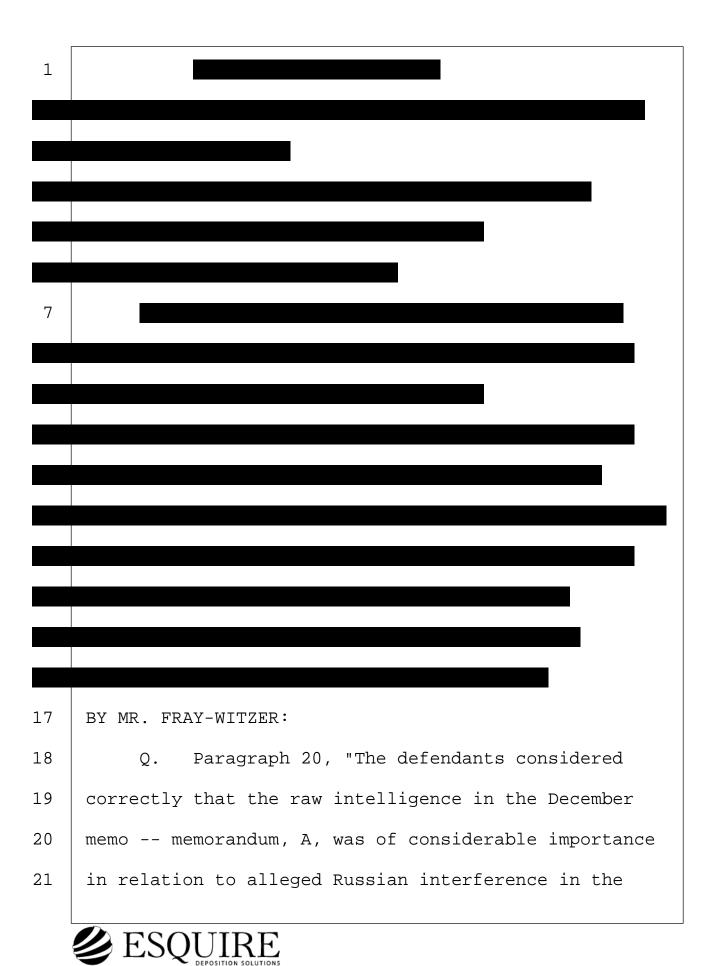






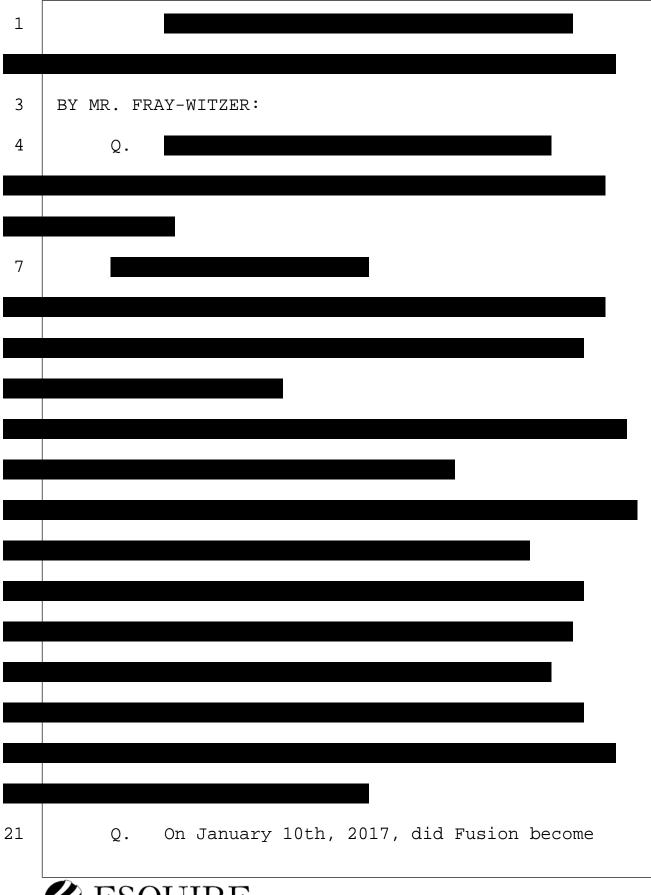
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1
               Do you see where it says Statement of Truth:
          0.
     "The defendants believe the facts set out in the
 2
 3
     particulars of the claim are true."
 4
               Do you see that?
 5
               Yes, I do.
          Α.
 6
          Q.
               Do you recognize Mr. Steele's signature
 7
     under that?
 8
          Α.
               No, I don't.
 9
               Do you have any reason to believe that that
          Ο.
10
     is not Mr. Steele's signature?
11
          Α.
               I don't.
12
               If you would turn to Page 3, please.
          Ο.
13
               (Witness complies.)
          Α.
14
               Paragraph 18, under a heading:
          Ο.
     Confidential December Memorandum. "Defendants
15
16
     continued to receive unsolicited intelligence on the
17
     matters covered by the pre-election memorandum after
18
     the U.S. presidential election and the conclusion of
19
     the assignment to Fusion."
20
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5	MR. LEVY: Objection.
6	MR. SIEGEL: Objection.
7	MR. LEVY: Evan, you've got seven hours
8	under the rules.
9	MR. FRAY-WITZER: Then please let the
10	witness answer the question and we can get past it.
11	MR. LEVY: It's been answered.
12	THE WITNESS: The question was repeat it
13	for me. Sorry. I'm just getting a little tired.
14	BY MR. FRAY-WITZER:
15	
21	MR. LEVY: Objection, asked and answered.







aware that the memos written by Orbis and Christopher

Steele had been published by BuzzFeed?

A. Yes, we did.

- Q. How did Fusion first become aware of the publication?
 - A. I can't specifically recall.
- Q. Do you recall how you first became aware of the publication?
 - A. Vaguely.
 - Q. And how is that?
- A. In the internet age and the age of Twitter things don't stay quiet for very long. So someone in the office -- I don't know if it was Glenn or another colleague said these memos had been published.
- Q. To the best of your recollection, what was Mr. Simpson's reaction to the publication of the memo?
- A. We shared the same reaction, which was disappointment, extreme disappointment. Because publication of these memoranda in an un-redacted fashion could have jeopardized sources and methods that could jeopardize, in turn, the ultimate sources



- 1 of the information and their physical safety. That
- 2 | was our primary concern, and overarching concern I
- 3 | would say.
- 4 Q. What, if anything, did Fusion do on
- 5 January 10th of 2017 when it learned that the memos
- 6 | had been published by BuzzFeed?
- 7 A. We called, in the first instance, Ken
- 8 | Bensinger. It was myself and Mr. Simpson as we recall
- 9 | it. And we -- we called him because his name was on
- 10 | the accompanying story and we knew him. And we asked
- 11 him to immediately see if he could take those down
- 12 because we told him about our concerns about the
- 13 | safety of sources and methods.
- 14 Q. As specifically as you can recall, what did
- 15 | Fusion say to Mr. Bensinger?
- 16 A. You need to take those memos down right now.
- 17 Q. What do you recall Mr. Bensinger saying in
- 18 response?
- 19 A. I recall that he had no power to do that and
- 20 | that we needed to speak to his superiors.
- 21 Q. And did you -- by you in this instance I



mean Fusion, did Fusion subsequently speak to, as you put it, Mr. Bensinger's superiors at BuzzFeed?

- A. We did. As we recall we put in a phone call to Ben Smith, who is the editor in chief or executive editor of BuzzFeed with whom we were acquainted, and we reiterated that same concern to him.
 - O. And what was Mr. Smith's response?
- A. He responded not unreasonably in my view and in retrospect, that these memoranda -- at this point it had been reported that these memoranda had been summarized to the tune of two pages for the sitting president of the United States and briefed to the president elect by James Comey. So he argued that it was a clear matter of public and national interest. And I should say as the former national security editor of the Wall Street Journal, he's not wrong about that. We would -- I would have made the exact same argument.

The narrow thing we were concerned about was that issue of the security, physical security of sources and method. And we were concerned that there



were indicia of numbers of sources, of their placement
in Russia and outside of Russia that could have
jeopardized their safety.

That's all we were thinking about. We agreed that it was a matter, a vital matter of national and public interest.

- Q. Does Fusion know what information was contained in the supposed two-page summary?
- A. No, we do not. However, I can tell you again, I'm relying on my own experience as -- for what that's worth of being the national security editor for the Wall Street Journal, that a two-paged memorandum does not reach the desk of the president of the United States without multi-agency review, a thorough vetting and thorough corroboration on some level. It just doesn't happen.
- Q. Do you have any information whatsoever in this specific instance as to what steps were taken to create that two-paged memo and what it contained?

MR. LEVY: Objection, asked and answered.

THE WITNESS: I do not have that specific



1 A. Good afternoon.

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Q. I just have a few questions for you.

What is the -- just because the jury is

4 unlikely to be familiar with it, what is the

5 Washington Free Beacon? What is it?

- A. It's a conservative leaning publication based in Washington, D.C.
 - Q. Okay. And would it be fair to characterize it as republican leaning?
 - A. Yes, it would.
 - Q. So, would it be accurate to say that between roughly September of 2015 and the spring of 2016,

 Fusion was retained to conduct research on Donald

 Trump by a republican leaning organization and that it subsequently was retained to conduct research by the democratic party indirectly. Is that accurate?
 - A. That's correct.
 - Q. I mean, you -- you did research for both sides on this one. Is that fair -- in a sense? Not -- I don't mean for both sides but you were retained by both sides at different times to conduct research?



1 MR. FRAY-WITZER: Objection. 2 THE WITNESS: That's correct. BY MR. SIEGEL: 3 4 Q. You testified that as you received the memoranda from Mr. Steele, that Fusion undertook its 5 own efforts to try to independently assess the 6 7 credibility of the information. And I believe you 8 testified about Carter Page, you testified about Paul 9 Manafort, you testified about Alexsei Gubarev and XBT. 10 Are there any other examples that you can 11 recall of people or topics within the dossier that 12 Fusion undertook to look at the credibility of those 13 -- of those allegations on its own? 14 Α. Sure. 15 I would say that the most prominent example 16 I probably overlooked is Michael Cohen who is Donald 17 Trump's -- or was Donald Trump's attorney, personal 18 attorney, and I believe worked with the Trump 19 Organization for many years. 20 Mr. Cohen who I believe has now pled guilty 21 to eight felonies is accused or it is written in --



1 the dossier represents that he has made deniable cash payments to individuals. I believe that's 2 substantially what Mr. Cohen has pled quilty to. 3 4 Q. And did you -- at the time these memos came 5 -- were coming in, did you make any efforts to look at Michael Cohen? 6 7 We made substantial efforts to look at 8 Michael Cohen. 9 And can you describe those? Q. 10 Α. Sure. We looked as his history, we looked at his 11 12 taxi business, we looked at his family background. 13 His taxi business it would appear was financed and 14 supported in part by Russians, Russian-Americans. He himself is married to someone who is 15 16 Russian. 17 We looked at his background and his 18 relationships to people like Felix Sater with whom --19 they were connected on social media. And those were

just a few examples of many things we looked at



regarding Mr. Cohen.

20

1 Did those enhance your confidence in the Ο. 2 credibility of the statements in the dossier about Mr. 3 Cohen? 4 Α. Substantially so. Do you know who Mr. Agalarov is? 5 Q. 6 Α. I do. Did you undertake any efforts to investigate 7 Ο. 8 the statements related to Mr. Agalarov? 9 Yes, we did. Α. 10 What did you do? Q. 11 We researched his history with Mr. Trump and Α. 12 his support for the Miss Universe pageant. We also 13 looked at -- just to be clear you're talking about 14 pre-publication? 15 Pre-publication, yes, as the memos are 16 coming in? 17 We looked at his background. We found 18 evidence of a substantial relationship between the Agalarov family and Mr. Trump including a music video 19 20 cut by Aras Agalarov's son Emin in which Mr. Trump



appears.

1 And did the research you conducted about Mr. 0. Agalarov enhance your confidence level about the 2 3 credibility of the statements made to him -- or connected, related to him? 4 Yes, it did. 5 Α. 6 Q. Do you know who Sergei Ivanov is? 7 Α. I do. 8 Did you undertake any efforts to assess Q. 9 statements related to Sergei Ivanov in the dossier? 10 Yes, we did. Α. 11 What did you do? Q. 12 We read substantially about Mr. Ivanov who's Α. 13 known to us. He is the head of the presidential 14 administration or was. 15 The dossier recounts in large, in many 16 instances, a story of tension between various individuals in the Kremlin, inside the Kremlin, 17 18 specifically between a camp related to Mr. Peskov, who 19 is the spokesman for the Kremlin and Mr. Ivanov. 20 talks about how those tensions are coming to a head. 21 Subsequently we learned that Mr. Ivanov did in fact --



was in fact let go by Mr. Putin, which was a

surprising development to us because of their long

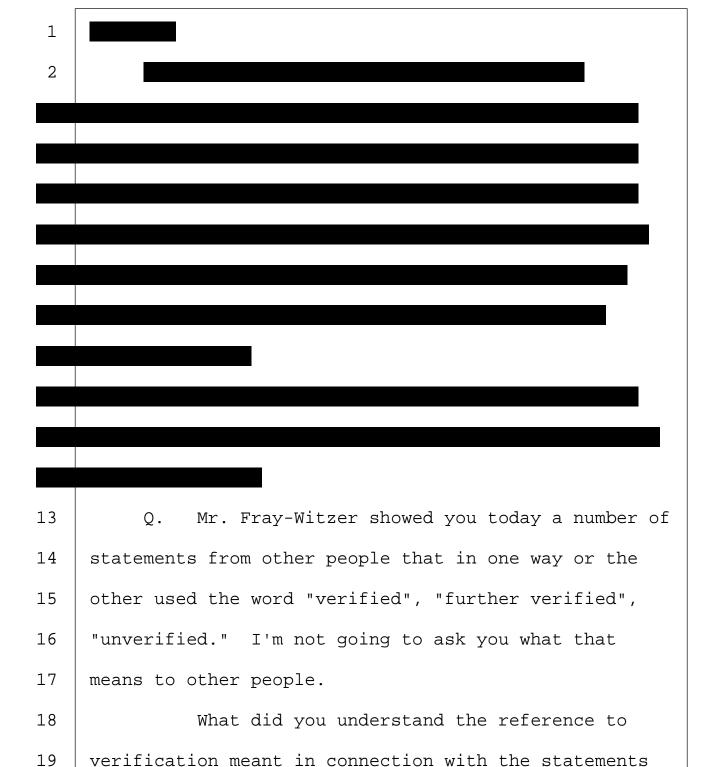
history together going back to Saint Petersburg.

And did you look at all into whether their

- Q. And did you look at all into whether there was a pension payment system that involved Russian --
 - A. We did.
 - Q. What did you find?
- A. And there is such a system and we -- in fact as recently as the other day, it was reported that Sergey Kislyak the former ambassador to the United States undertook such cash payments to people. Mr. Kislyak obviously is someone who had met with Michael Flynn who is awaiting a plea agreement under -- with Mr. Mueller and with -- Mr. Kislyak also met with various other people in the Trump orbit including Carter Page, including Jeff Sessions.

17 Q.





MR. FRAY-WITZER: Objection. What context?



in the dossier?

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