

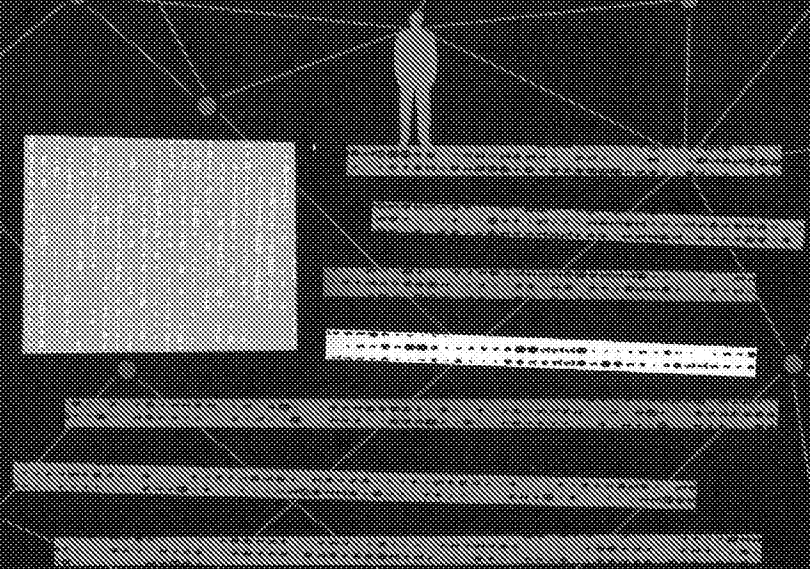
# **Exhibit 1**

# CRIME IN PROGRESS

INSIDE THE STEELE DOSSIER AND  
THE FUSION GPS INVESTIGATION  
OF DONALD TRUMP

GLENN SIMPSON and PETER FRITSCHE

Co-founders of Fusion GPS



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outline to the potential Republican client, though, was any mention of Russia or any focus on the racier side of Trump's record, which is to say his reputedly rich past with myriad women. Looking into people's sex lives wasn't Fusion's strength.

The final go-ahead to begin research on Trump came in a call from the client on Friday, September 11, while Simpson was in London. Fusion would be hired by *The Washington Free Beacon*, a conservative online publication backed by the hedge fund billionaire Paul Singer. He had been a big backer of Rudolph Giuliani and then George W. Bush but was reportedly no fan of Trump. Fusion's Republican contact gave just a verbal thumbs-up, with no specific marching orders. That was how Fusion liked it. Some research clients try to dictate the objectives (and thus the outcome) of the research process, but Fusion prefers not to work that way. Better to have no preordained thesis and instead gather up *everything* at the beginning—on the theory that if you decide what you are looking for before you begin, you risk blinding yourself to unexpected things that come up and prove to be important.

After just a few hours of cursory research, Simpson was struck by the scale of the task. The sheer abundance of lawsuits alone was mind-boggling. Fusion had done a lot of legal research over the years, and it had never encountered a person who had initiated or been the target of as much litigation as Donald Trump. A litigation search of a prominent businessman in his sixties or seventies might turn up a page or two of entries on a federal court database. When Simpson searched Trump's name, his computer spat back two dozen pages of cases that ran the gamut from allegations of fraud to unpaid bills.

Simpson ordered a used copy of Barrett's long-out-of-print *The Deals and the Downfall*, the first of ten Trump books that, by the end of the month, formed the beginnings of a digital archive on Trump. As the books arrived at Fusion's office, the spines and bindings were carefully removed using a sharp blade, and the loose pages were scanned and converted into text that could be easily searched. An instant library of thousands of pages of digitally searchable Trump literature.

The negative news stories on Trump were almost as abundant as his lawsuits. His aborted 2012 presidential run had caused a few journalists to compile hurried overviews of his business past, cataloging a pattern of questionable business partners and interactions with the mob. A spurt of stories from years earlier, concerning Trump's relationship to a convicted felon named Felix Sater, stood out from everything else. The



## CHAPTER THREE

# THE CHARLATAN

WITH THE BOMBAST OF P. T. BARNUM, TRUMP ON THE STUMP promoted a mythical image of himself as a self-made, ultrapatriotic, owned-by-no-one tycoon. Many of his most fervent Republican supporters were middle- and working-class voters attracted to his apparent business success, his hard-line positions on immigration, and his frequent denunciations of American companies that moved manufacturing jobs overseas.

As tantalizing as the Russia leads seemed, Russia wasn't yet Fusion's overriding focus—not in these early months. The myriad leads on that front were piling up, to be sure, but the first order of business was to better understand the man's hypocrisies and failures—and the multiple myths he used to disguise his flaws. These were the things they believed would ultimately matter most to voters.

The more Fusion dug into Trump, the more he appeared to fit the textbook definition of a charlatan. Here was a supposed business genius whose career was littered with bankruptcies and failures. A purported multibillionaire who was almost certainly worth a fraction of what he claimed. A supposed self-made entrepreneur whose wealth actually sprang from an accident of birth. An immigrant basher who employed countless immigrants—and was even married to one. A “Buy American” proponent whose own clothing line was made in Mexico. A proud straight-talker with a long history of prevarication and outright fabrications—including under oath.

It was Fusion's job to catalog all these contradictions, exaggerations,

and utter lies into research reports with clear documentation. In commercial engagements, these reports would be solely for the client, but in political campaigns their purpose can be threefold: to expose an opponent's vulnerabilities, provide source material for the media, and feed attack ads. A typical Fusion memo was essentially a lengthy treatise on a single subject, covered in fine detail and meticulously sourced. These products provided clients with a smorgasbord of material, to be deployed any way they pleased. Fusion also made many of its findings available to interested reporters as background material that could be confirmed and expanded with their own reporting.

The issue that most neatly seemed to capture the hypocrisy at the heart of Trump's xenophobic campaign was immigration. From the first, Trump had staked his presidential hopes on stoking voter anxieties about immigration. But that also made the issue his greatest liability if it could be shown that he didn't practice what he preached: Voters tend to dislike hypocrites even more than liars and cheaters. So Fusion set its drilling rig atop Trump's record as an employer, knowing that both the construction and hospitality industries are rife with undocumented immigrants. Sure enough, Trump's record revealed him to be a longtime, avid, and quite deliberate bulk consumer of illegal immigrant labor. "He likes illegals and criminals for his workforce because he can pay them under the table," Simpson said in a note to the team. "That's a foundation of his success as a developer—his costs are lower because he cheats."

Trump viciously bashed immigrants, but it was immigrants—many hired illegally—who built his tall towers, fed his country club members, mowed his lawns, and cleaned his hotel rooms. You could sum it up another way: Donald Trump hated immigrants . . . unless they worked for him.

Trump also had a long record of recruiting workers from abroad and importing them to the United States. Fusion collected Labor Department records showing the Trump Organization had sponsored at least 1,494 foreign worker visas since 2000. His Palm Beach estate and private club, Mar-a-Lago, was the largest of his properties to import immigrant labor, with at least 872 visas to its name. Fusion wasn't the only one to come across this data. Reuters published its own report that ran in numerous publications, but Trump's Republican rivals and many other media organizations took little notice.

Like many big developers, Trump hired "illegals" despite his recent adoption of inflammatory rhetoric against the practice of employing



## CHAPTER FIVE

# NEW CLIENT

FRITSCH WOKE UP ON THE MORNING OF MARCH 1, SUPER TUESDAY, knowing a Trump nomination was now all but inevitable, even if a Trump presidency still seemed far-fetched. He figured the funders of the *Free Beacon* would soon resign themselves to a Trump candidacy and pull the plug on their opposition research efforts. Even the most fervent of Never Trump billionaires would be reluctant to turn their opposition to him into support for Hillary Clinton. It seemed obvious that demand for information on Trump would soon shift to the Democrats.

At 7:44 that morning, he fired off an email to a senior figure in the Democratic Party establishment. The subject line was simple: "Trump." So was the message: "Ok he has to be stopped," Fritsch wrote. "We have done the most on him."

Nine minutes later, Fritsch received a reply: "Yes. Let's talk."

Inside Fusion, Fritsch was out on a limb. Simpson wasn't a big fan of the Clintons, having covered them as a journalist: the Whitewater mess, the Monica Lewinsky scandal, and, most important, Bill Clinton's courtship of Chinese campaign contributions during the 1996 race for president—a race that posed some parallels to what would play out through the rest of 2016. The river of foreign money that later coursed through the Clinton Global Initiative suggested to Simpson that the Clintons presided over a twenty-first-century political machine built on peddling influence to foreign oligarchs and other foreign interests, many of whom benefited in one way or another from Secretary of State Hillary Clinton's actions in office.

Fritsch and Fusion partner Tom Catan sympathized with Simpson's wariness of the Clintons, but they ultimately took a different view as Trump ascended. Fritsch made a lesser-of-two-evils argument in support of approaching the Hillary camp. In a head-to-head with Trump, there was only one evil, he'd argue. Catan would remind Simpson that continuing the Trump research was also a business decision: They'd be stupid not to capitalize on all the work they'd done.

By March 1, Simpson had begun to reconsider. At 10:25 that morning, he emailed Catan and Fritsch. "The only way I could see working for HRC is if it is against Trump," he wrote. "We should make sure [the Democrats] know we have a big book on Trump. Lest they try to buy it someplace else."

As expected, Trump romped on Super Tuesday, winning seven of the eleven states. The next day, March 2, Fritsch had a preliminary chat with Fusion's Democratic contact, who promised to make some inquiries inside the Hillary campaign and get back ASAP.

The partners' growing knowledge of Trump's troubling Russia ties and his questionable business practices had fed a collective sense of concern as Trump racked up primary wins. When Fritsch finally told Simpson about his side conversations about working for the Clinton campaign, Simpson barely looked up from his computer. "Guess we have no choice," he muttered.

There was now unanimity inside Fusion on the need to do what they could to keep Trump out of the White House, and also unanimity as to why. Many of his traits disqualified him for the job, and his political rhetoric was loathsome, but his ties to the criminal underworld, his reliance on hidden flows of Russia money, and his record of chicanery in business topped the list.

On March 15, Trump all but put the nomination away, driving Senator Marco Rubio from the race by drubbing him in his home state of Florida. The state's governor, Rick Scott, endorsed Trump the next day and said it "is now time for Republicans to accept and respect the will of the voters." The candidate himself said that if the party somehow conspired to deny him the nomination, "I think you'd have riots."

Fusion's move to the Hillary campaign would take some time; the firm was more than a month from signing on. In the meantime, the work for the *Free Beacon* would keep going, at least for now. Their pa-

trons had apparently not given up hope of somehow stopping Trump before the Republican convention in July. One reason appeared to be that they had been persuaded by Fusion's research that Trump was vulnerable on his ties to Russia.

That view solidified with Manafort's arrival on the scene at the end of the month. The *Free Beacon* team was initially eager to expose Manafort's Russian entanglements and his adventures in Ukraine. Two days after Manafort joined the Trump campaign, the *Beacon* posted a story on a theme that others in the mainstream media would write about only later: "Lawsuit: Trump Aide Funneled Mob-Linked Ukrainian Oligarch's Fortune into U.S. Real Estate." Soon, the *Free Beacon's* appetite for attacking Trump began to wane as Trump's nominating position grew stronger, which suggested to Fusion that even Trump's most ardent conservative critics were unlikely to abandon the Republican banner if Trump emerged as their standard-bearer. Email queries slowed to a trickle, and there was no longer the same hunger for fresh material.

On April 19, Trump took the New York primary with 59 percent of the vote.

The next day, Simpson and Fritsch sat down in Washington with Marc Elias, an attorney at Perkins Coie, a Seattle-based law firm with a large political practice in D.C. on the Democratic side of the aisle. Fusion's Democratic contact had made the introduction to Elias, arguably the most powerful attorney in Democratic politics. He served as general counsel to both the Democratic National Committee and the Hillary for America campaign. He was also personal counsel to many Democratic senators. As a voting rights specialist, he had argued—and won—multiple cases before the U.S. Supreme Court.

Despite his résumé, Elias is a supremely informal character. He is a large, balding man who looks like he could have played on the offensive line of his favorite NFL team, the New York Giants. His shoes are sensible, his sentences short. He is as happy talking about his dog, Bode, as he is discussing election law or politics. A dog bed shares space in his office with Giants swag and framed letters of appreciation from every Democratic senator you can name, and a few you can't.

Elias didn't need much convincing. He had heard of the research Fusion had done on Mitt Romney and Bain Capital during the 2012 campaign and said he needed that kind of deep research on Trump. The



existing in-house research at the DNC and the campaign was incomplete. The campaign wanted a belt-and-suspenders approach to its research efforts; redundancy was tolerable if that meant the campaign ended up with the very best information at its disposal.

Money wouldn't be a problem, Elias said. Clinton, the Democratic Party, and related PACs would go on to raise over \$1.2 billion for her campaign.

Elias said the campaign knew what it needed to know about Trump on a lot of the issues—Trump's cynical flip-flops to a pro-life stance on abortion rights and his latter-day opposition to a ban on assault weapons. Less understood, he said, was how Trump had managed to recover from a string of bankruptcies that should have ruined him. Where did his money come from, how much did he really have, and who helped him? "We know what he says," Elias said. "We need you guys to figure out who he is."

Fritsch disclosed that Fusion was currently engaged by an unnamed Republican client to do research on Trump but expected that engagement to end soon. Simpson said the firm couldn't share the written reports it had done for the Republicans but had a wealth of knowledge and promising leads gleaned from public records that could be drawn upon in new, general-election-focused research. Elias didn't see a conflict or a problem.

Elias said Fusion would be reporting only to him, which sounded great to Fritsch and Simpson. They didn't want to have any contact with the campaign brass. Elias wanted it that way for legal reasons: If Fusion's communications were with a lawyer, they could be considered privileged and kept confidential. Political work like this can be perilous, provoking lawsuits down the road—as this job would later prove. Elias also didn't want Fusion drawn into the daily fire drill of a presidential campaign, forced to respond to the jack-in-the-box demands of political operatives. He wanted Fusion to focus on the big picture, and Trump himself.

For all the conspiracy theories and accusations that came later, that rule was strictly applied. As far as Fusion knew, Clinton herself had no idea who they were. To this day, no one in the company has ever met or spoken to her.

"Okay, what do you guys got?" Elias said, turning the conversation back to the substance of the case. "Plenty," Simpson replied.

Fritsch and Simpson ran through some highlights of Fusion's Trump

public record research thus far: the Trump University scam, his history of not paying his debts, his hypocrisy on immigration, and the mounting evidence that he was lying about his wealth. The most perplexing element of the work to date, they told him, was Trump's intense and long-lasting fascination with Russia—and his failure to consummate any meaningful deal there. His business world intersected repeatedly with the Russian Mafia in New York, while the sudden re-emergence of Manafort—a consultant who had remade the Kremlin's favorite Ukrainian politician in Manafort's own image—was a major red flag.

"We think you guys will really want to pay attention to the Russia angle," Fritsch said. It was obvious from Elias's reaction that the Russia element was new to him. "Can you tell me more?" he said.

Trump's affiliations with Russians of all kinds, Simpson said, went way back to the opening of Trump Tower in the early 1980s, when known Russia-connected mobsters like David Bogatin began scooping up units, often to obscure the source of criminal profits. The five luxury condos Bogatin bought in 1984 were later seized by the feds as part of a massive money-laundering case. This would soon emerge as a distinct pattern, they told Elias. In project after project, from Florida to Panama to Toronto, Russians with dubious résumés and questionable pasts turned out in great numbers to buy Trump-branded units.

Elias was intrigued, if a bit befuddled by all the names and dates. He wasn't in a hurry, and his face said: *Keep going*. Simpson cracked open his MacBook to walk him through some documents.

As Trump's own financial travails grew in the late 1980s, so did his outreach and ties to Russia. In 1987, he took an all-expenses-paid trip to Moscow at the invitation of the Soviet ambassador to the United States. While there, he and his then-wife, Ivana, toured several sites for a proposed Trump Tower. No deal seemed likely, but soon after he came back Trump spoke of running for the White House and took out a full-page ad in several U.S. papers arguing that the United States should stop spending so much to defend foreign countries, foreshadowing the pro-Russian, anti-NATO stance he would take on the campaign trail thirty years later.

Trump tried again in 1996 to cook up a big Moscow project, Simpson and Fritsch told Elias, this time with the help of Howard Lorber, one of Trump's only true friends and a broker for wealthy Russians seeking real estate investments in the United States. That project, too, fell flat. The Trumps kept trying to kindle something, making repeated trips to Moscow to view potential sites or talk to possible partners.

While Trump hadn't succeeded in investing in Russia, they said, the Russians had definitely begun making an investment in Trump. Many had troubling backgrounds, and they highlighted the criminal record of Felix Sater and Trump's history of lying about their relationship. By 2008, Donald Trump Jr. was boasting that Russians "make up a pretty disproportionate cross-section of a lot of our assets." Five years later, in Moscow for the Miss Universe pageant, Trump again suggested that he was deep into talks for a Trump skyscraper. (Only much later would investigators uncover that his own representatives were trying to cook up a Trump project in Moscow even as he campaigned to be president.)

In other words, Fritsch and Simpson stated what seemed obvious: The party of Ronald Reagan, whose antipathy to the Soviet Union had helped precipitate its collapse, might have real qualms about a nominee with such close ties to the remnants of what Reagan had called the Evil Empire.

This angle was all new to Elias, and he loved it. The research book the DNC had put together on Trump, he said, contained none of this stuff. Fusion's research team would soon be hired and given wide latitude to go where the story led it.

Formalizing the engagement with Perkins Coie, Elias's firm, would take weeks.

The biggest sticking point was the matter of indemnification. In 2013, Fusion had been drawn into a defamation lawsuit against *Mother Jones* by a rich Romney donor and campaign finance official who had concluded—wrongly—that Fusion was behind an unflattering article about him published the previous year. *Mother Jones* eventually won that suit, but Fusion had to defend against a third-party subpoena that sought to expose its client and its work. That had cost the company tens of thousands of dollars in legal fees—costs its client declined to cover. If something like that happened again, Fusion wanted to know it wouldn't again be stuck with the legal fees. Trump was famously litigious, and the last thing Fusion wanted was a legal fight with a vindictive tabloid figure with a long history of aggressive litigation.

The potential for an ugly, public fight is one big reason most private consultants like Fusion eschew political work. (A pay scale below that of commercial work is the other.) In a political battle with high stakes, there is a huge incentive to attack the credibility of anyone bearing bad tidings about a candidate or elected official, however well substantiated.

In the end, Perkins Coie would not guarantee to cover Fusion's costs in a legal fight. That realization was the point when Fusion might have said to Elias: *Thanks, but no thanks*. Fusion's partners, in fact, discussed bailing on the project but eventually decided the risk was worth it. The Trump project was just too important and interesting a research subject.

The costliest component of the work, they told Elias, would be some on-the-ground reporting they envisioned doing outside the United States. They ran through Trump's many trouble-plagued projects in developing countries and business dealings abroad; the budget would need to include funding for foreign investigators in Mexico and other countries. The riskiest bit of fieldwork, which they didn't yet share with Elias, would be in Russia. They knew just the guy for the job: a Russian-speaking former spy. They figured they could do that work discreetly. No one would ever find out about it.



Simpson traveled to the U.K. in mid-May of 2016 to broach the Trump work to Steele. They met at a branch of the Italian restaurant chain called Carluccio's, in Heathrow Airport's Terminal 5. Steele was already waiting when Simpson arrived, dragging his carry-on bag. Over lasagna, Simpson told Steele that Fusion had been investigating Trump for about eight months on behalf of an unnamed client. That work had ended, but a new client had come along that had deep pockets. Simpson had just come down from Edinburgh, where he had lined up some local help investigating Trump's money-losing collection of golf courses in Scotland and Ireland. The courses were an inviting target for Fusion's efforts to document Trump's dismal business record and the fake valuations of his properties in his official candidate disclosure filings: Unlike in the United States, private companies in the U.K. and Ireland are required to file detailed financial statements for public inspection.

"He seems to lie about pretty much everything," Simpson told Steele, describing how the work in Scotland aimed to disprove Trump's claim that his two courses there were each worth over \$50 million. "These figures are beyond exaggerated," he told Steele. "They're fictional."

Simpson said they had unearthed numerous connections between Trump and various characters from the former Soviet Union, as well as a series of mysterious trips Trump had made over the years to explore building projects in Russia. Now that the primaries were coming to an end, he said, Fusion expected to soon have a new budget to pursue some of its leads in Russia. Would Steele be interested? The project he had in mind was a modest one, he said. Just a month of inquiries with his Russia sources to see if there were any interesting leads on Trump.

Steele confessed to not knowing very much about Trump. That didn't really matter. He was interested.

Fusion thought there might be information in Russia to indicate that Trump had unsavory dealings with corrupt politicians or businessmen. Another possibility, Simpson said, was that Trump was merely going to Russia to chase women, and his pursuit of business deals in the country was just a cover story. If that was all it was, he added, "no one will give a shit."

To the contrary, said Steele, if Trump was engaged in sexual dalliances in Moscow, he'd probably been taped by the FSB. "*Kompromat* is a serious issue," he said. "It still happens all the time."

Steele suggested the Russians might have taken a political interest in Trump, and mentioned that he had recently completed a similar project on Russian meddling in the politics of European countries for another client. Project Charlemagne, as Orbis called it, had chronicled signs of extensive Russian electoral interference in support of right-wing parties all across Western Europe.

The work had been undertaken for a private client, he said, but the findings were so troubling that he had voluntarily provided copies of his Charlemagne reports to the U.S. government. The Kremlin, he claimed, had "a secret black budget of several tens of millions of dollars" earmarked for populist nationalist politicians in Europe who were opposed to the European Union.

Steele said he was unable to travel to Russia himself and had even received what appeared to be veiled threats from the Russians via intermediaries. However, he added, the vast Russian diaspora in the West made it possible to build and manage productive networks of sources on the ground in Moscow.

Steele came back quickly with a proposal to conduct a one-month inquiry for about \$30,000. He and Fritsch, who normally handled budget matters, hammered out the terms verbally. Simpson gave Steele the simplest of tasking instructions: *Find out what you can about what Trump and his circle have been up to in Moscow over the years.*

Fusion didn't share with Steele any of its reports on Trump, nor did it identify its new client beyond eventually saying that it was a law firm. This was important from an operational standpoint. Contractors, even professionals, have a natural tendency to tailor their finds to what they think clients want to hear. Fusion didn't want to infect Steele's inquiry with any preconceived goals or even basic theories of the case, much less the political context of the engagement.\*

Steele set out to find what he could on Donald Trump and Russia.

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\*The exchange was later captured by the FBI in a classified submission to a special court in Washington that deals exclusively with intelligence matters: "Source #1," a.k.a. Steele, "was approached by an identified U.S. person, who indicated to source #1 that a U.S.-based law firm had hired the identified U.S. person to conduct research regarding candidate #1's ties to Russia. . . . The identified U.S. person never advised Source #1 as to the motivation behind the research into candidate #1's ties to Russia."





"Officials behind the now discredited 'Dossier' plead the Fifth. Justice Department and/or FBI should immediately release who paid for it." —DONALD J. TRUMP (@realDonaldTrump), October 21, 2017 • "Report out that **Obama Campaign paid \$972,000 to Fusion GPS**. The firm also got \$12,400,000 [really?] from DNC. Nobody knows who OK'd! —DONALD J. TRUMP (@realDonaldTrump), October 30, 2017 "I look at what's happening with the Justice Department, **why aren't they going after Hillary Clinton** with her emails and with her dossier... I don't know, is it possible that they paid \$12.4 million for the dossier, which is total phony, fake, fraud and how is it used?" —DONALD J. TRUMP,

November 2, 2017 should never have there was no collusion **crime**. It was based and a fake Dossier Hillary and the DNC, in FISA COURT of my campaign.

—DONALD J. TRUMP March 17, 2018 the Fake News report is lowlife many meetings with and his beautiful Fusion GPS that

the phony & discredited Dossier, **paid for by Crooked Hillary & the DNC...**" —DONALD J. TRUMP (@realDonaldTrump), August 11, 2018 • "**The Dossier is Fake**, nothing in it has been verified. It then filters into our American court system in order to spy on Barrack Obama and Hillary Clinton's political opponent..." —DONALD J. TRUMP (@realDonaldTrump), September 1, 2018 • "Is it really possible that Bruce Ohr, whose wife Nellie was paid by Simpson and GPS Fusion for work done on the Fake Dossier, and who was used as a Pawn in this whole **SCAM (WITCH HUNT)**, is still working for the Department of Justice?????"

—DONALD J. TRUMP October 16, 2018

### ADVANCE PRAISE FOR CRIME IN PROGRESS

"Glenn Simpson and Peter Fritsch's *Crime in Progress* untangles one of the great mysteries of the Trump era—the full story of the Steele dossier—and provides a fascinating insight into the investigatory mind at work. It's an indispensable guide to the Russia scandals—and a reminder of the redemptive power of facts over lies." —JEFFREY TOOBIN

"The Mueller probe been started in that and **there was no** on fraudulent activities paid for by Crooked and improperly used for surveillance **WITCH HUNT!**" (@realDonaldTrump),

"The big story that Media refuses to Christopher Steele's Deputy A.G. Bruce Ohr wife, Nelly. It was hired Steele to write

Can this really be so?????" (@realDonaldTrump)

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# **Exhibit 2**

EXECUTIVE SESSION  
PERMANENT SELECT COMMITTEE ON INTELLIGENCE,  
U.S. HOUSE OF REPRESENTATIVES,  
WASHINGTON, D.C.

INTERVIEW OF: GLENN SIMPSON

Tuesday, November 14, 2017

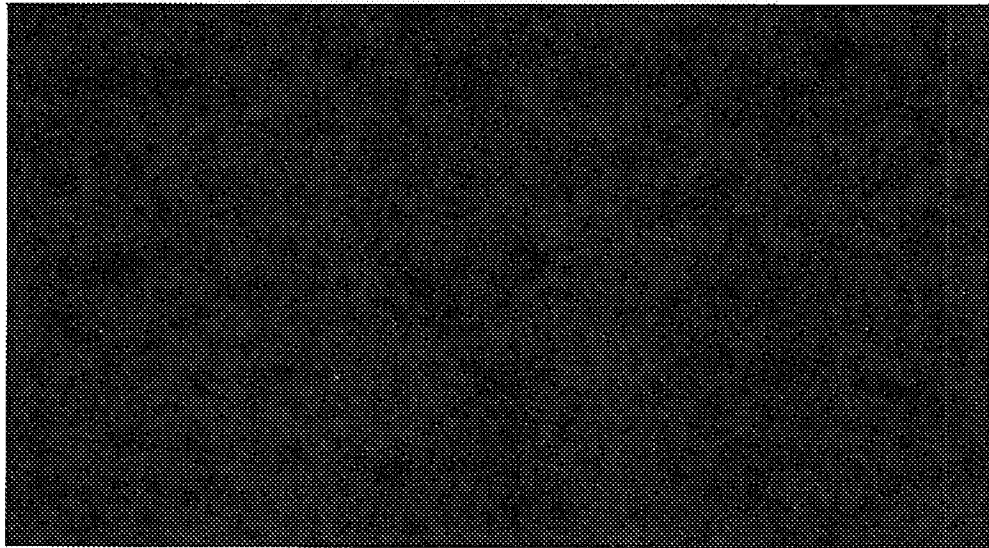
Washington, D.C.

The interview in the above matter was held in Room HVC-304, the Capitol, commencing at 2:13 p.m.

Present: Representatives Conaway, King, Rooney, Ros-Lehtinen, Gowdy, Schiff, Himes, Speier, Quigley, Swalwell, Castro, and Heck.

Appearances:

For the PERMANENT SELECT COMMITTEE ON INTELLIGENCE:



For GLENN SIMPSON:

ROBERT F. MUSE, ESQ.

JOSHUA LEVY, ESQ.

RACHEL CLATTENBURG, ESQ.

[REDACTED] Good afternoon. This is an unclassified transcribed interview of Mr. Glenn Simpson.

Thank you for speaking to us today. For the record, I am [REDACTED] a staff member of the House Permanent Select Committee on Intelligence. Others present today will introduce themselves when they speak.

But before we begin, I have a security reminder. If you haven't left your electronics outside, please do so at this time. That includes blackberries, iPhones, androids, tablets, iPads, or eReaders, laptops, iPods, MP3 players, recording devices, cameras, wireless headsets, pagers, and any type of bluetooth wristbands or watches.

I also want to state a few things for the record. The questioning will be conducted by members and staff during their allotted time period. Some questions may seem basic, but that is because we need to clearly establish facts and understand the situation. Please do not assume we know any facts you have previously disclosed as part of any other investigation or review.

We ask that you give complete and fulsome replies to questions, based on your best recollection. If a question is unclear or you are uncertain in your response, please let us know. And if you do not know the answer to a question or cannot remember, simply say so.

During the course of this interview, we will take any breaks that you desire.

This interview will be transcribed. There is a reporter making a record of these proceedings so we can easily consult a written compilation of your answers. Because the reporter cannot record gestures, we ask that you answer verbally. If you forget to do this, you might be reminded to do so. You may also be asked to

spell certain terms or unusual phrases.

You are entitled to have a lawyer present for this interview, though you are not required to do so. I see that you have counsel present and would ask that your attorneys make an appearance for the record.

MR. LEVY: Joshua Levy, counsel for Glenn Simpson.

MR. MUSE: I am Bob Muse, also counsel for Glenn Simpson.

[REDACTED] Thank you. To ensure confidentiality, we ask that you do not discuss this interview with anyone other than your --

MS. CLATTENBURG: Rachel Clattenburg, also for Glenn Simpson.

[REDACTED] To ensure confidentiality, we ask that you do not discuss the interview with anyone other than your attorney.

Consistent with the committee rules of procedure, you and your counsel, if you wish, will have a reasonable opportunity to inspect the transcript of this interview in order to determine whether your answers were correctly transcribed. The transcript will remain in the committee's custody. The committee also reserves the right to request you return for additional questions should the need arise.

The process for today's interview is as follows: The majority will be given 45 minutes to ask questions; and the minority will be given 45 minutes to ask questions. Immediately thereafter, we will take a 5-minute break, after which the majority will be given 15 minutes to ask questions; and the minority will be given 15 minutes to ask questions. These time limits will be strictly adhered to, with no extensions being granted. Time will be kept for each portion of the interview, with warnings given at the 5-minute and 1-minute marks.

Our record today will reflect that you are appearing voluntarily, pursuant to

an agreement dated today. Under procedures adopted for the 115th Congress that have been provided to you along with Rule 11 of the rules of the House of Representatives, only you or your personal counsel may make objections during a deposition.

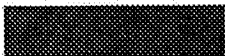
I also want to state for the record that the agreement that has been struck today was signed by both Mr. Conaway and Mr. Schiff.

Objections must be stated concisely and in a nonargumentative manner. If you or your counsel raises an objection, the interview will proceed and testimony taken is subject to any objection. You may refuse to answer a question only to preserve a testimonial privilege. When you or your counsel have refused to answer a question to preserve a testimonial privilege, the objection may be ruled on by the chairman after the interview has recessed.

Finally, you are reminded that it is unlawful to deliberately provide false information to Members of Congress or staff.

As this interview is under oath, please raise your right hand. Do you swear to tell the truth, the whole truth, and nothing but the truth?

MR. SIMPSON: I do.

 The record will reflect that the witness has been duly sworn.

MR. CONAWAY: Gentlemen, thank you for coming.

Adam, any comments before we start?

MR. CONAWAY: All right. The floor is yours.

MR. GOWDY: Good afternoon, Mr. Simpson.

MR. SIMPSON: Good afternoon.

MR. GOWDY: My name is Trey Gowdy. I'm from South Carolina. I will

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ask you questions initially. If I ask you any question that you don't understand, just ask me to rephrase it.

MR. SIMPSON: Okay.

MR. GOWDY: It won't be a trick question. It will be because I ask it inartfully.

Where do you work and how long have you worked there?

MR. SIMPSON: I work at a consulting firm here in Washington. The trade name is Fusion GPS. The entity, the legal entity is called Bean LLC. And I've been there since I believe 2010. And it's a research consulting firm.

MR. GOWDY: All right. That was my next question. What does Fusion GPS do?

MR. SIMPSON: It's a commercial research firm, sometimes also does strategy, public affairs. The primary line of work we're in is research. Generally, it specializes in public records research, other sort of journalistic style information gathering.

MR. GOWDY: When someone uses the phrase "opposition research," does that mean anything to you? Does that have any trade meaning?

MR. SIMPSON: Well, I was introduced to opposition research when I was a reporter on Capitol Hill. And so the conventional term is usually people who work on campaigns who are looking for information that will be useful in debates or other election related activities is my general historical understanding of the term.

MR. GOWDY: Does Fusion GPS do what you just described as opposition research?

MR. SIMPSON: From time to time. It's not very -- it's not a very big part of our business. Generally, we have -- we work for corporate clients and banks

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and large law firms. And most of our work is not election-related, it has to do with fraud and corruption investigations and policy disputes and high-dollar litigation.

MR. GOWDY: Were you hired by a person or entity in either 2015 or 2016 to do research into then-candidate Donald Trump?

MR. SIMPSON: Yes, we were. We were hired around October, September-October of 2015.

MR. GOWDY: By whom?

MR. SIMPSON: The Free Beacon has been publicly stated as the client or identified to the committee as the client, and I can confirm that.

MR. GOWDY: All right. I'm going to be asking you questions even though there's been public reporting. I don't want anybody in the media to take any offense, but sometimes they're right, sometimes they're not right. So --

MR. SIMPSON: I can agree with that.

MR. GOWDY: So in this instance, we can all celebrate the fact that they were correct. You were hired by the Washington Free Beacon?

MR. SIMPSON: That was the client, yes.

MR. GOWDY: All right. And what were your instructions? What were you asked to do?

MR. SIMPSON: I -- that's I think covered -- our client relationships are confidential, and so I can't get into what anyone specifically told me. I think I can speak more broadly and say that it was an open-ended look at Donald Trump's business career and his litigation history and his relationships with questionable people, how much he was really worth, how he ran his casinos, what kind of performance he had in other lines of work.

It was a very broad unfocused look, which is the way we do our business.

Essentially, we don't usually allow clients to tell us what to look at and what not to look at, because we don't think that's a smart way of trying to understand a subject. So, generally speaking, we just do an open-ended look at everything we can find.

So it starts with literature review. We obtain all the books we can on a subject and order them all, you know, used from Amazon, and all the newspaper articles, all the court records, all the public records you can lay your hands on. And only after you've digested all that information do you start to figure out, you know, where to focus your inquiries.

MR. GOWDY: Were you asked to write a report or just accumulate information?

MR. SIMPSON: Again, I need to steer clear of specific communications I had with my clients, but I can tell you that as a business practice, generally speaking, we do engagements on a 30-day basis, and at the end of the 30 days we write a report about what we found. And if there's specific things that are interesting, a particular lawsuit or a dispute or a business deal or something like that, you know, we will write a separate treatment of that issue.

But, generally speaking, for most of our clients, particularly in the beginning of an engagement, it's a 30-day assignment, and at the end of 30 days you get a report. And if you think what we told you was interesting and you want more, we can sign up again.

MR. GOWDY: Well, I really am trying to limit the number of times your lawyer has to lean over there and give you counsel, so I'm trying to stay within the parameters of what I think you feel like you're able to answer.

But are you asked to write what some of our friends may refer to as a fair

and balanced piece, or are they primarily interested in negative information?

MR. SIMPSON: Well, we've only had a very small number of political clients. So I can tell you, I mean, our methodology doesn't really change. We -- my firm is -- all the principals are former journalists, so we don't come out of the political combat industry. We come out of the, you know, journalism industry, which is all about sort of sticking to the facts and not leaping to conclusions and not trying to, you know, come up with a hit piece on anybody. So, generally speaking, you know, what we get compensated for is producing reliable treatments of whatever the subject is.

And I should just add, I mean, it doesn't -- it doesn't help us or our clients if we only look for negative information. What the clients want is all the information. And so, you know, someone -- if you're in a campaign and the, you know, other side is a businessman and you're reviewing his career, it's important information whether he's a good businessman or bad businessman. And you don't want your client trying to make an issue of his business career if he's a brilliant businessman who knows how to make money in an honest and ethical way.

MR. GOWDY: All right. Let me ask you about a couple words you just used. You just used the words "good" and "bad," which some would argue are inherently subjective; but you also used the word "facts," and what did you mean when you used the word "facts"?

MR. SIMPSON: I mean, factual information is -- a lot of what we do is gather facts. And sometimes facts are provable facts; sometimes facts are established facts; sometimes they're allegations, factual allegations. So we do all of the above. When you gather up lawsuit information, for example, you have two sides making factual allegations against each other; and what's important is that

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you have a reliable, credible basis for your information.

And, you know, it is a lot like journalism in that journalism is called the first draft of history, where essentially you're gathering up information, and your job is not to determine the truth, it's to gather credible information and to present all the possibilities and all the reliable information you can find.

But, you know, every day in the newspaper every story has two sides to it, and it's not the reporter's job to figure out who's telling the truth and who's not or who's right and who's wrong, it's to be responsible and professional in gathering up all of the facts and allegations and presenting them in a neutral way. So our method is journalistic, and our reports are written along those lines.

MR. GOWDY: Do you draw a distinction between facts and allegations?

MR. SIMPSON: Certainly.

MR. GOWDY: What is that distinction?

MR. SIMPSON: Well, I mean, a fact is something that's subjectively verifiable to all reasonable observers; and an allegation is something that hasn't been confirmed.

MR. GOWDY: All right. No offense to people that do what you do for a living, but if it is all publicly available, why do people need to hire you?

MR. SIMPSON: Well, we live in an information society, and there's a lot of information out there. Some people are good at finding it and processing it, and others not so much, or it's just a question of specialization.

So you're running a business and you're busy running your business and you think that the guy who's your main competitor is cheating or maybe paying a bribe to steal a contract from you. And that's not your main line of work. You don't know how to investigate whether someone is engaged in corruption or

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whether they've got a bad business history. And so, you know, you hire someone who specializes in that kind of work. So we specialize in finding records and reading things and digesting large volumes of information.

MR. GOWDY: If I understood your testimony correctly, you don't specialize in political opposition research?

MR. SIMPSON: It's not a major line of business for us. It's, you know, every couple of years, 3, 4, when there's a Presidential campaign we get asked to do stuff. We sometimes get asked to do stuff in California initiatives and other things.

Generally speaking, the market niche that we occupy is not the opposition research niche. I don't think our pricing structure is conducive to getting opposition research business, which is -- generally doesn't pay very well.

MR. GOWDY: Well, given that and given the fact that it's not your niche, why did the Washington Free Beacon approach you about doing the research on candidate Trump?

MR. SIMPSON: Well, one of our, you know, specialties that I think people know is that we are good at business investigations, corporate investigations, and Mr. Trump is a big businessman.

So I can't get into exactly sort of what was said, but -- and, in fact, I don't think I even remember, you know, if I had that kind of information. But I think it's reasonable to interpret that it was because we have a background doing business investigation.

MR. GOWDY: And how long were you employed by the Washington Free Beacon?

MR. SIMPSON: As I said, I think we started in September or October, and

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I think it wound down in April, sometime in the spring. As the Republican primaries came to an end, it became obvious that that work was going to end.

MR. GOWDY: Did you rely on sources or subsources during your work for the Washington Free Beacon?

MR. SIMPSON: I don't specifically remember. We may have engaged someone. Typically speaking, we engage subcontractors to gather documents in far away places. And, you know, far away in this case may be even just being California or Illinois or something like that. So I assume we had some subcontractors, for instance, but I don't specifically remember.

MR. GOWDY: At some point, did the Washington Free Beacon stop paying you for the project into then-candidate Trump? Did the business relationship end?

MR. SIMPSON: I remember that we stopped doing the Trump work for the Beacon sometime in the spring of 2016.

MR. GOWDY: Did you pick up --

[Discussion off the record.]

MR. SIMPSON: He just reminded me, I don't know the exact date of when the payments, the last payment was. And so I can tell you, generally speaking, that I -- you know, in the division of labor in my company, I don't handle the invoicing and banking stuff. So I can tell you more substantively when it stopped, but I don't -- you know, the records are not something that I'm immersed in.

MR. GOWDY: Well, let's go with that. When did the work stop?

MR. SIMPSON: I think it was April or May.

MR. GOWDY: All right. And were you retained by a subsequent client to pick up on the work that you had begun?

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MR. SIMPSON: It was the same subject. And obviously, the first work was informed by the new project. But, you know, it wasn't like a direct line continuum. It was similar work, but we obviously by then knew quite a bit about Mr. Trump and his business career and his associations and all that.

MR. GOWDY: Well, that leads me to ask were you approached by a subsequent client or did you market yourself to other people as having started this research and being willing to continue it?

MR. SIMPSON: I think that covers a client confidentiality area, but I can -- I also can tell you I don't specifically remember how it -- what the genesis of it was.

MR. GOWDY: You've got to help me here. Being approached by the first client you testified at some length about, and now I'm asking about how you were approached by the second client. So why would the second client be governed by confidentiality concerns, but the first one not?

MR. SIMPSON: It would -- it would depend on the nature of the communication. But I'm not the only person in my company, so I think the answer -- I don't think I have the answer to your question, in any event.

MR. GOWDY: Did you have a second client interested in opposition research on candidate Trump?

MR. SIMPSON: Yes, sir.

MR. GOWDY: Who was that second client?

MR. SIMPSON: I think the records indicated that it's Perkins Coie, and I can confirm that.

MR. GOWDY: And who is Perkins Coie?

MR. SIMPSON: It's a law firm. I think they're headquartered in Seattle,

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and they're a big law firm.

MR. GOWDY: Had you ever worked for them in the past?

MR. SIMPSON: I don't think I can get into the -- essentially, I haven't been released by any clients to get into my work for them.

Generally speaking, we sign confidentiality agreements with all of our clients, which is an essential part of the kind of work we do. And I haven't been released or directed to get into whether I worked for these clients before or what kind of things I did for them.

MR. GOWDY: So I assume you did not sign a confidentiality agreement with the Washington Free Beacon?

MR. SIMPSON: I actually don't know. We --

MR. GOWDY: I'll direct this to your lawyer. This is what I'm trying to avoid, picking and choosing which questions you want to answer.

MR. LEVY: Yes. Just to be clear, I think what he was trying to do in response to your questions on the Washington Free Beacon was talk as a general matter why the company would be hired. I thought he was careful to say he wasn't getting into the actual conversations or communications with the Free Beacon.

So, in that sense, he is trying to be consistent. He has not been released by either client to talk about confidential client communications, but he will tell you about the work and he's here all night for you.

[Discussion off the record.]

MR. SIMPSON: I mean, my answer for the second client would be the same as my answer for the first, which is that I worked for the Wall Street Journal for about 15 years, and I specialized in complex financial investigations, political

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corruption, that sort of thing, and it's what I'm known for.

And so, you know, I can't tell you what other people were thinking about why they hired me, but, generally speaking, people hired me because that's what they know I do.

MR. GOWDY: Well, let's try to approach it this way: When you were hired by Perkins Coie, did you consider them to be the client?

MR. SIMPSON: Yes.

MR. GOWDY: Do you recall who, if anyone, you specifically talked to at Perkins Coie?

MR. SIMPSON: I think that would be getting into client communication.

MR. GOWDY: I'm going to have to look at my colleague from California. For months and months I have been hearing about all the privileges that we do not recognize in congressional investigations, and this is a brand new one to me. So is this a privilege that we recognize?

MR. SCHIFF: I think the answer is we should get through the interview, and then we can decide whether there's a privilege we are going to recognize or whether we're going to use compulsory process. I don't know the answer, but I suggest we try to get as much information as we can voluntarily and then figure out whether we need any more than that.

MR. ROONEY: Well, this did come up, as you know, with another witness where I was in chair and this exact thing came up. And I asked the witness to answer one of your questions, because of this congressional committee not recognizing the privilege of attorney-client. And they answered the question. So we didn't wait until it was over.

MR. SCHIFF: But we had a couple interviews, one in which we asked

about other clients, and we were not allowed to get the answers because there was an objection on your side that it was beyond the scope or we shouldn't just be asking about other clients that weren't necessarily related. So we've had kind of rulings that have gone back. I don't know whether --

MR. ROONEY: That's fine, but we're just trying to get the information here. And if I was willing to make Carter Page answer a question for Mr. Swalwell that he did not want to answer and begged us not to answer, and I made him answer it, and he's trying to get some background information on his client, it's kind of like, you know, it's not a two-way street, and that's not really fair.

MR. SCHIFF: Carter Page was subpoenaed to come in, because he wouldn't cooperate otherwise. I'm not objecting to the question. I just don't know the answer. And so I'm not objecting to the question, though. And my only suggestion was we try to get all the answers we can get answered, and then we can figure out, okay, we need to go back and say we need to get answers to these questions or maybe we get what we need. That was just my suggestion. But I'm --

MR. GOWDY: All right. We'll keep trying.

MR. CONAWAY: Just to be clear, you're invoking attorney-client privilege with all these folks or just client-client privilege or just work product? I mean, what is it?

MR. LEVY: It's a voluntary interview, and so he's just respectfully declining to answer this question.

MR. CONAWAY: On what basis?

MR. LEVY: He's got a confidentiality obligation to the client. The client has not waived that confidentiality for him to get into his communications with the

client. He can, however, talk to you as long as you'd like about the work that he did, his communications with Mr. Steele, the work on the dossier. He just can't talk about communications with the client, because they are confidential, and those confidentiality considerations have not been waived.

MR. CONAWAY: I'm going to figure out a way to officially put the objection on the record so that when we revisit how we enforce the House investigatory prerogatives, we'll know what to do. So what do we do?

[REDACTED] I think what we should do is, if you can't answer the question, raise the objection.

MR. CONAWAY: He won't answer the question.

[REDACTED] He won't answer the question. So there's been an objection. And I'll just say that the witness is reminded that he may refuse to answer a question only to preserve a testimonial privilege. Neither the U.S. House of Representatives nor the committee recognizes any purported nondisclosure privileges associated with common law, including attorney-client privilege, attorney work product protections; and neither the U.S. House of Representatives or the committee recognizes any purported contractual privileges, including those supposedly deriving from nondisclosure agreements.

So we'll just raise that's the objection that's on the record. We'll move on to the next question.

MR. LEVY: And just to ask clarification just so we're making sure we're all proceeding under the same rules, are those rules for staff depositions or for voluntary interviews, which is what this is?

[REDACTED] Well, we consider this to be a -- this is a voluntary staff deposition. You're here on a voluntary basis.

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MR. LEVY: Okay. The letter that we had talked about last week said voluntary interview, which we thought was covered by a different set of rules. We're happy to follow whatever rules govern. Of course, we're going to follow the rules, but just want clarity on what they are.

MR. SCHIFF: The only thing I will say is we had this issue come up with a witness who was subpoenaed, and we read the advisement that those privileges are not -- they are not recognized.

So the only thing I would commend to you is you can assert whatever privilege you want today, but if the majority decides that they need more information, they'll have to bring you back under subpoena. Then those privileges won't be recognized.

So I think the more information you're able to give today, the greater likelihood we won't have to bring you back under a subpoena.

MR. LEVY: Understood. And that's our aim today is to cooperate as much as we can with the entire committee today. I appreciate that. And while we've not yet seen a copy of the letter, we understand that the letter was going to withdraw the subpoena. We have it now. Okay. And let me just -- no, this is not the letter.

MR. CONAWAY: No, it's one signed by me.

MR. MUSE: The subpoena has been withdrawn. We have that.

MR. LEVY: Because I believe in the other situation the members are referencing, the subpoena was not withdrawn.

MR. SCHIFF: Correct. I mean, you're not under subpoena at this moment, but my point is the more forthcoming you can be, the greater the likelihood you won't have to be brought back under subpoena.

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MR. LEVY: Understood.

MR. GOWDY: Mr. Simpson, were you aware that Perkins Coie was retained by the DNC?

MR. SIMPSON: I'm aware. I was aware of that and have been for years that they have -- they were one of the main lawyers for the Democratic party, yes. I don't have any specific awareness --

MR. GOWDY: That wasn't my precise question. With respect to this fact pattern, with respect to your firm being retained, were you aware that Perkins Coie was working on behalf of the DNC?

MR. SIMPSON: Yes. I mean, I know that they are -- the DNC is a client of Perkins Coie. I don't -- I didn't see it -- nobody gave me a document or informed me specifically of that.

MR. GOWDY: Did you think the law firm was just doing it on their own?

MR. SIMPSON: I'm sorry, I don't understand your question.

MR. GOWDY: Did you think the law firm was just doing it on their own?

MR. SIMPSON: Doing what? Doing --

MR. GOWDY: Opposition research into candidate Trump.

MR. SIMPSON: No.

MR. GOWDY: Paying you to do opposition research into candidate Trump, did you think Perkins Coie was doing that on their own?

MR. SIMPSON: No, sir. What I'm trying to explain is that I have been in Washington for several decades, and I spent a lot of time on Capitol Hill and it was well-known to me that Perkins Coie represented the DNC.

MR. GOWDY: Is that the only way that you knew that they were doing work on behalf of the DNC when they retained you in this specific fact pattern?

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MR. SIMPSON: I'm not sure I understand what you're trying to ask me, but if it's -- I'm not going to get into what discussions I had with my client about who their clients were.

MR. GOWDY: I'm looking at a release from Perkins Coie that is giving me more information than you are. Have you seen the release where they released you from some of your confidentiality obligations?

MR. SIMPSON: I would like to see a copy of that, if you don't mind.

MR. GOWDY: Do your lawyers not have it?

MR. SIMPSON: It's been a busy time. Okay. Okay. I'm sorry if I'm not giving you a clear answer. I knew it was the DNC that we were working for.

MR. GOWDY: Okay. How did you know it was the DNC?

MR. SIMPSON: I honestly don't -- I couldn't tell you if someone specifically said, this is for the DNC.

MR. GOWDY: Well, how else would you know it was for the DNC? Did you read it?

MR. SIMPSON: As I'm trying to explain, I know -- I've been in Washington for a long time, and Perkins Coie represents the DNC.

MR. GOWDY: So you knew it by habit and custom?

MR. SIMPSON: I'm -- yes.

MR. GOWDY: By habit and custom?

MR. SIMPSON: I feel like I'm in a difficult position, because I have not been released from my client -- by my client to talk about anything that we talked about, but I'm trying to give you the answer that I think you want, which is I was definitely aware that Perkins Coie represented the DNC and that they were the client in this matter.

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MR. GOWDY: Right. And I'm asking you how you knew that?

MR. SIMPSON: And I'm -- I don't know what to tell you other than that I was generally aware that Perkins Coie represented the DNC.

MR. GOWDY: Okay. So how did your work for Perkins Coie begin?

MR. SIMPSON: My recollection is we began to review what we had learned over the previous months and talk about what we would do, you know, now that we would have resources to pursue this -- some of these matters further. So it's -- when you get into that point of a piece of research, you begin to develop lines of inquiry and things that you think might be important, things you want to -- that other people are -- you know other people are interested in.

So we began to develop more specific lines of inquiry. So they would be -- so the things that we started looking at specifically were a lot of Mr. Trump's overseas business deals, his history with regard to tax disputes. We were very interested in things like his clothing line and where his -- you know, he -- I can't remember exactly when this came up, but we gradually figured out that he -- while he was running on a platform of economic nationalism that he's outsourced his clothing line to developing countries. So we were interested in the labor practices around his factories.

You know, we had gradually accumulated more and more things about his bankruptcies. And we had gotten a better sense of who his business partners were. So those were issues. So we sort of -- when we reached an agreement about, you know, funding and we thought we would have funding to do a bunch of things, we began to look for people who could help us pursue some of these things. And I guess that's a general description of what we began to do.

MR. GOWDY: Were the lines of inquiry dictated by the client or suggested

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by the client, or did you come up with those on your own?

MR. SIMPSON: Generally speaking, we seek and usually receive a lot of leeway to develop our lines of inquiry. And typically, when you're already familiar with the subject and the client isn't -- and that was obviously the case here -- you're running the investigation.

So we like to get -- we like to have a lot of freedom to pursue everything or the things that we think are important, because we have found from experience that clients, you know, generally they have something that they maybe are trying to do or have some preconceived notions about things, and we find that to be unhelpful. So I'd say, in general, we were the architects of the research and we made most of the decisions about what to look for and where to look.

MR. GOWDY: What was the budget for you to enjoy the freedom to pursue the lines of inquiry you wanted to pursue?

MR. SIMPSON: I don't remember being given a specific expenses budget. I think the fees were \$50,000 a month.

MR. GOWDY: Flat fee, \$50,000 a month?

MR. SIMPSON: That's right.

MR. GOWDY: Plus expenses, minus expenses?

MR. SIMPSON: Plus expenses, yes.

MR. GOWDY: How did you come to know Christopher Steele?

MR. SIMPSON: I met Chris in -- I left the Wall Street Journal in 2009. And in my last few years at the Wall Street Journal, I had been living in Belgium, in Brussels, and had developed a line of reporting around the former Soviet Union and crime and corruption in the former Soviet Union.

And I had written a series of articles about Vladimir Putin and a lot of

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corruption and organized crime activities sort of making its way westward from Russia, and eventually started doing a lot of work on Ukraine, corruption in Ukraine and gas trade in Ukraine, and connections to the Russian mafia. That's when I first came across Paul Manafort.

And in any event, when I decided to leave the Journal in 2009, I had developed a lot of relationships with people who worked on organized crime issues, Russian organized crime issues, and had become known as someone who specialized in that. And a mutual acquaintance of ours suggested that -- Chris had just left the British Government, and a mutual acquaintance of ours suggested that we might be able to work together or at least, you know, had a lot in common.

And so I don't remember the details, but we were introduced. We met. And, you know, it turned out we did, in fact, have a, you know, kind of obsessive interest in a pretty obscure -- what was then a pretty obscure subject. And, you know, this is 2009, so we've just come off of 8 years of focus in the national security world on al-Qa'ida, Islamic terrorism. And I had spent several years specializing on that.

And so there were very few people at that time who were interested in this issue, and so the small number of us tended to meet at conferences and that sort of thing. So over time, Chris and I would have coffee together when I was in London or he was in Washington, and we would talk about various Russian corruption issues, organized crime, oligarchs.

MR. GOWDY: How did he come to work on this project?

MR. SIMPSON: As I said, I mean, we've done other things together. And over -- well, at the very beginning of this project, one of the very first things that I focused on was Donald Trump's relationship with a convicted racketeer named

# **Exhibit 3**

EXECUTIVE SESSION  
PERMANENT SELECT COMMITTEE ON INTELLIGENCE,  
U.S. HOUSE OF REPRESENTATIVES,  
WASHINGTON, D.C.

INTERVIEW OF: JOHN PODESTA

Monday, December 4, 2017

Washington, D.C.

The interview in the above matter was held in Room HVC-304, the Capitol,  
commencing at 3:08 p.m.

Present: Representatives Conaway, Rooney, Ros-Lehtinen, Wenstrup,

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Schiff, Himes, Swalwell, and Heck.

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PROPERTY OF THE UNITED STATES HOUSE OF REPRESENTATIVES

Appearances:

For the PERMANENT SELECT COMMITTEE ON INTELLIGENCE:

[REDACTED]

For JOHN PODESTA:

GLORIA B. SOLOMON, ESQ.

ROBERT P. TROUT, ESQ.

TROUT CACHERIS & JANIS

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MR. PODESTA: I can't precisely -- I think I learned that from the public record, from reporting.

When that actually occurred I don't have fixed in my mind. It was sometime after -- I don't think I ever heard of Fusion GPS before the election, so it was sometime in the wake of the aftermath of the election.

But when Christopher Steele was identified, when precisely Fusion was identified as a company that was doing this, reporters were interested in this, they were reporting on it. I think, you know, it could have been late November, December, maybe even early January.

DR. WENSTRUP: So no knowledge of the arrangement to pay Fusion GPS for opposition research. Is that correct?

MR. PODESTA: Not during the campaign. I obviously have it now.

DR. WENSTRUP: Did you ever review expenses with the rest of the campaign in any way?

MR. PODESTA: I met weekly with the chief financial officer of the campaign, Gary Gensler, but that was at a -- that was at a very high level, to make sure we were on track, to ensure that our receipts and what we were raising was going to cover our expenses.

I was not -- I, you know, had a high-level knowledge of what our media spend was, what our social media spend was, what our head count was inside the campaign, but I was not reviewing line items in the campaign.

DR. WENSTRUP: But somebody was.

MR. PODESTA: The campaign manager.

DR. WENSTRUP: The campaign manager was. So the campaign manager would have been aware that Fusion GPS was being paid for opposition

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research.

MR. PODESTA: That is -- Mr. Elias was aware that Fusion GPS was being paid for opposition research. But he had the authority to enter in -- I mean, it has become I think common that law firms are used, particularly in the context where you have a complicated financial record of your opponent, particularly one as opaque as Mr. Trump's, particularly in the context where the normal indices of transparency are not present -- refusal to release his tax returns, et cetera -- that law firms were -- are engaged to try to unpack bankruptcies, those kinds of things, gather legal documents.

And so Mr. Elias had the authority to do that. And I believe that in that context he had the authority to enter into a vendor contract with Fusion. But I didn't know that during the course of the campaign. I didn't know that he had done that.

DR. WENSTRUP: So Mr. Elias would be the only one associated with the campaign that knew that Fusion GPS was hired for opposition research? No one else in the campaign? Mrs. Clinton?

MR. PODESTA: I didn't say that.

DR. WENSTRUP: Well, that's really what I'm asking. What I'm trying to get at is who had oversight on that?

MR. PODESTA: I think that Mr. Mook certainly had the authority to give him the authority to hire vendors, but I don't -- you asked me whether Mr. Mook knew he had hired Fusion. I don't know that, and I'm not going to testify on behalf of Mr. Mook what he knew.

DR. WENSTRUP: No, I can understand that. If you don't know, that's fair enough.

But what I'm trying to say is, just if you can help me a little bit with this. I can't imagine that, you know, you're involved with a campaign where they send a bill for a million dollars and nobody on the campaign is questioning it or looking at the details of it or wanting to see --

MR. PODESTA: Well, you know more than I do, Congressman, because you know that they sent a bill for a million dollars. I don't know --

DR. WENSTRUP: No, that's a hypothetical. I'm saying someone sends a bill. Make it \$5 million. Make it \$50. What I'm saying is that no one on the campaign then -- was there somebody on the campaign that has oversight --

MR. PODESTA: Our financial --

DR. WENSTRUP: -- over how the law firm was spending money? Because personally, if I'm getting a bill from a law firm and paying any amount of money, they're showing me their hours. They're showing me everything that they're doing. You know that.

So my question is, I find it hard to believe --

MR. PODESTA: I think we had --

DR. WENSTRUP: -- that no one associated with the campaign would know that Perkins Coie had hired Fusion GPS.

MR. PODESTA: What I'm saying is that I can only testify on what I knew, which is that I didn't review those bills or the vendor contracts. That wasn't my role in the campaign.

DR. WENSTRUP: So fair enough. Do you know from your role in the campaign who would have been reviewing those contracts?

MR. PODESTA: I think the -- I think the general authority to hire that gave the authority to Mr. Elias to hire outside vendors would have come from Mr. Mook.



# **Exhibit 4**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	CRIMINAL NO. 21-cr-_____
v.	:	
	:	
MICHAEL A. SUSSMANN,	:	VIOLATIONS:
	:	18 U.S.C. § 1001(a)(2)
Defendant.	:	(Making a False Statement)
	:	

INDICTMENT

The Grand Jury charges that:

A. Introduction and Overview

1. In or about late October 2016 – approximately one week before the 2016 U.S. Presidential election – multiple media outlets reported that U.S. government authorities had received and were investigating allegations concerning a purported secret channel of communications between the Trump Organization, owned by Donald J. Trump, and a particular Russian bank (“Russian Bank-1”).

2. According to one of these articles published by a major U.S. newspaper (“Newspaper-1”), intelligence officials possessed information concerning “what cyber experts said appeared to be a mysterious computer back channel between the Trump Organization and [Russian Bank-1].” The article further reported that the Federal Bureau of Investigation (“FBI”) had “spent weeks examining computer data showing an odd stream of activity to a Trump Organization server,” and that “[c]omputer logs obtained by [Newspaper-1]” showed “that two servers at [Russian Bank-1] sent more than 2,700 ‘look up’ messages . . . to a Trump-connected server beginning in the spring.” According to other articles, this information had been assembled by an

anonymous computer researcher who used the moniker “Tea Leaves.”

3. The FBI had, in fact, initiated an investigation of these allegations in response to a meeting that **MICHAEL A. SUSSMANN**, the defendant herein – a lawyer at a major international law firm (“Law Firm-1”) – requested and held with the FBI General Counsel on or about September 19, 2016 at FBI Headquarters in the District of Columbia. **SUSSMANN** provided to the FBI General Counsel three “white papers” along with data files allegedly containing evidence supporting the existence of this purported secret communications channel.

4. During the meeting, **SUSSMANN** lied about the capacity in which he was providing the allegations to the FBI. Specifically, **SUSSMANN** stated falsely that he was not doing his work on the aforementioned allegations “for any client,” which led the FBI General Counsel to understand that **SUSSMANN** was acting as a good citizen merely passing along information, not as a paid advocate or political operative. In fact, and as alleged in further detail below, this statement was intentionally false and misleading because, in assembling and conveying these allegations, **SUSSMANN** acted on behalf of specific clients, namely, (i) a U.S. technology industry executive (“Tech Executive-1”) at a U.S. Internet company (“Internet Company-1”), and (ii) the Hillary Clinton Presidential Campaign (the “Clinton Campaign”).

5. **SUSSMANN**’s lie was material because, among other reasons, **SUSSMANN**’s false statement misled the FBI General Counsel and other FBI personnel concerning the political nature of his work and deprived the FBI of information that might have permitted it more fully to assess and uncover the origins of the relevant data and technical analysis, including the identities and motivations of **SUSSMANN**’s clients.

6. Had the FBI uncovered the origins of the relevant data and analysis, and as alleged

below, it might have learned, among other things, that (i) in compiling and analyzing the Russian Bank-1 allegations, Tech Executive-1 had exploited his access to non-public data at multiple Internet companies to conduct opposition research concerning Trump; (ii) in furtherance of these efforts, Tech Executive-1 had enlisted, and was continuing to enlist, the assistance of researchers at a U.S.-based university who were receiving and analyzing Internet data in connection with a pending federal government cybersecurity research contract; and (iii) SUSSMANN, Tech Executive-1, and Law Firm-1 had coordinated, and were continuing to coordinate, with representatives and agents of the Clinton Campaign with regard to the data and written materials that SUSSMANN gave to the FBI and the media.

7. The FBI's investigation of these allegations nevertheless concluded that there was insufficient evidence to support the allegations of a secret communications channel with Russian Bank-1. In particular, and among other things, the FBI's investigation revealed that the email server at issue was not owned or operated by the Trump Organization but, rather, had been administered by a mass marketing email company that sent advertisements for Trump hotels and hundreds of other clients.

B. The Defendant

8. At all times relevant to this Indictment, SUSSMANN was employed at Law Firm-1. Previously, SUSSMANN was employed by the U.S. Department of Justice ("DOJ") in various capacities. In his work at the DOJ, SUSSMANN became familiar with U.S. criminal laws, including Title 18, United States Code, Section 1001, which criminalizes the making of materially false statements to U.S. officials.

9. In his work at Law Firm-1, SUSSMANN represented numerous clients in

cybersecurity, privacy, and national security-related matters. In or about April 2016, the Democratic National Committee (“DNC”) retained SUSSMANN to represent it in connection with the hacking of its email servers by the Russian government. In connection with his representation of the DNC as the victim of a hack, the defendant met and communicated regularly with the FBI, the DOJ, and other U.S. government agencies. In or around the same time period, SUSSMANN was also advising the Clinton Campaign in connection with cybersecurity issues.

C. Law Firm-1 and Its Role in the 2016 Presidential Election Campaign

10. Law Firm-1 was at all times relevant to this Indictment an international law firm based in the United States. In or about April 2015, the Clinton Campaign retained Law Firm-1 as its counsel for the 2016 U.S. Presidential election. A law partner at Law Firm-1 (“Campaign Lawyer-1”) acted as the Clinton Campaign’s General Counsel.

11. As part of its efforts to assist the Clinton Campaign and the DNC, Law Firm-1 retained a particular investigative Firm (the “U.S. Investigative Firm”) to gather information regarding Trump’s purported ties to Russia. Throughout the Presidential campaign, the U.S. Investigative Firm worked with Law Firm-1, members of the media, and others to gather and disseminate purported evidence of Trump’s ties to Russia.

D. Tech Executive-1

12. Tech Executive-1 was at all times relevant to this Indictment an executive of a particular Internet company (“Internet Company-1”), which offers various Internet-related services and products, including Domain Name System (“DNS”) resolution services, to its customers. (DNS is a naming system for devices connected to the Internet that translates recognizable domain names, *e.g.*, <http://www.google.com>, to numerical IP addresses, *e.g.*,

123.456.7.89. A DNS “lookup” refers to an electronic request by a particular computer or device to query information from another device or server.)

13. By virtue of his position at Internet Company-1 and other companies, Tech Executive-1 maintained direct or indirect access to, and the ability to provide others access to, large amounts of internet and cybersecurity data, including DNS data.

14. In or about February 2015, Tech Executive-1 retained SUSSMANN as his lawyer in connection with a matter involving an agency of the U.S. government. SUSSMANN also frequently served as outside counsel to Internet Company-1, which was a significant source of revenue for Law Firm-1 and SUSSMANN. At all times relevant to this Indictment, Tech Executive-1 served as SUSSMANN’s primary point of contact at Internet Company-1.

15. In or about November 2016, Tech Executive-1 claimed to have been previously offered a position in the government in the event Hillary Clinton won the Presidency, stating in an email days after the U.S. Presidential election: “I was tentatively offered the top [cybersecurity] job by the Democrats when it looked like they’d win. I definitely would not take the job under Trump.”

E. The Russian Bank Allegations

16. By in or around late July 2016, the aforementioned computer researcher who used the moniker “Tea Leaves” (“Originator-1”) had assembled purported DNS data reflecting apparent DNS lookups between Russian Bank-1 and an email domain, “mail1.trump-email.com” (the “Russian Bank Data”). The purported data spanned the time period from on or about May 4, 2016 through on or about July 29, 2016.

17. At all times relevant to this Indictment, Originator-1 was a business associate of

Tech Executive-1. By in or about July 2016, Tech Executive-1 and others were in possession of the Russian Bank Data.

18. Also, in or about July 2016, Tech Executive-1 alerted SUSSMANN to the Russian Bank Data.

19. Over the ensuing weeks, and as part of their lawyer-client relationship, SUSSMANN and Tech Executive-1 engaged in efforts with Campaign Lawyer-1 and individuals acting on behalf of the Clinton Campaign to share information about the Russian Bank Data with the media and others, claiming that it demonstrated the existence of a secret communications channel between the Trump Organization and Russian Bank-1.

SUSSMANN Bills the Clinton Campaign for His Communications with Tech Executive-1 and Campaign Lawyer-1.

20. From in or about late July through in or about mid-August 2016, SUSSMANN, Tech Executive-1, and Campaign Lawyer-1 coordinated and communicated about the Russian Bank-1 allegations during telephone calls and meetings, which SUSSMANN billed to the Clinton Campaign (denoted in Law Firm-1's billing records by its official corporate name, "HFACC, Inc.").

a. For example, on or about July 29, 2016, SUSSMANN and Campaign Lawyer-1 met with personnel from the U.S. Investigative Firm in Campaign Lawyer-1's office. SUSSMANN billed his time in this meeting to the Clinton Campaign under the category "General Political Advice" with the billing description "meeting with [Campaign Lawyer-1], others regarding [] confidential project." (For all of SUSSMANN's other billing entries cited herein that he billed to the Clinton Campaign, he similarly billed his time to the campaign under the category "General Political Advice").

b. On or about July 31, 2016, SUSSMANN billed the Clinton Campaign for twenty-four minutes with the billing description, “communications with [Campaign Lawyer-1] regarding server issue.”

c. On or about August 12, 2016, SUSSMANN, Campaign Lawyer-1, and Tech Executive-1 met in Campaign Lawyer-1’s office. In connection with this meeting, SUSSMANN billed his time to the Clinton Campaign with the billing description “confidential meetings with [Campaign Lawyer-1], others.”

d. In or around the same time period, SUSSMANN, Campaign Lawyer-1, and personnel from the U.S. Investigative Firm began exchanging emails with the subject line, “Connecting you all by email.”

e. On or about August 17, 2016, SUSSMANN, Campaign Lawyer-1, and Tech Executive-1 conducted an additional conference call. SUSSMANN billed this time to the Clinton Campaign with the billing descriptions “telephone conference with [Tech Executive-1], [Campaign Lawyer-1].”

f. On or about August 19, 2016, SUSSMANN and Campaign Lawyer-1 conducted an additional in-person meeting that appeared in SUSSMANN’s calendar as “Meeting with [Tech Executive-1’s first name].” SUSSMANN billed this time to the Clinton Campaign within the billing description stating, in part, “confidential meeting with [Campaign Lawyer-1], others[.]”

g. Later in or about August 2016, Tech Executive-1 exchanged emails with personnel from the U.S. Investigative Firm.

Tech Executive-1 Uses His Access at Multiple Internet Companies to Conduct Opposition Research and Create a “Narrative” Regarding Trump

21. As alleged in further detail below, in or around the same time period -- and in



furtherance of his efforts with SUSSMANN and Campaign Lawyer-1 to disseminate allegations regarding Trump – Tech Executive-1 used his access at multiple organizations to gather and mine public and non-public Internet data regarding Trump and his associates, with the goal of creating a “narrative” regarding the candidate’s ties to Russia.

22. Tech Executive-1 later shared certain results of these data searches and analysis with SUSSMANN so that SUSSMANN, in turn, could provide them to the media and the FBI.

Tech Executive-1 Obtains Internet Data Relating to Trump from Internet Company-2

a. For example, in or about early August 2016 – the same time period of his aforementioned communications with SUSSMANN and Campaign Lawyer-1 – Tech Executive-1 directed and caused employees of two companies in which he had an ownership interest (“Internet Company-2” and “Internet Company-3”) to search and analyze their holdings of public and non-public internet data for derogatory information on Trump.

b. At all times relevant to this Indictment, Internet Company-2 was a company that, among other things, collected DNS data from various points on the Internet.

c. At all times relevant to this Indictment, Internet Company-3 was owned by the same company as Internet Company-2. As part of its business, Internet Company-3 received data that had been collected by Internet Company-2 or its parent company, and then used and analyzed that data in order to advise its private sector customers on cybersecurity and business risks.

d. In or about early August 2016, Tech Executive-1 called an individual at Internet Company-3. During the call, Tech Executive-1 instructed the individual to task Internet Company-3 employees to search for any Internet data reflecting potential connections or communications between Trump or his associates and Russia.

e. In connection with this tasking, Tech Executive-1 later stated that he was working with someone who had close ties to the Democratic Party and to Hillary Clinton.

f. The aforementioned individual and other personnel at Internet Company-3 were uncomfortable regarding this tasking from Tech Executive-1 because they believed that using the companies' data in this manner was inappropriate. They complied with the tasking, however, because Tech Executive-1 was a powerful figure at both companies.

g. In connection with this tasking, Tech Executive-1 emailed to Internet Company-3 personnel a five-page document (the "Trump Associates List") listing six associates of Trump and a purported U.S.-based lobbyist for Russian Bank-1 who was also discussed in written materials prepared by the U.S. Investigative Firm that **SUSSMANN** would later provide to the FBI General Counsel. The Trump Associates List contained detailed personal information for these individuals, including, for example, their names, home addresses, personal email addresses, business names, business websites and email domains, suspected IP addresses for those domains, and information pertaining to the spouse of one of these associates. Tech Executive-1 directed that these individuals should be a focus of Internet Company-3's data queries and analysis.

h. On or about August 15, 2016, employees of Internet Company-2, acting at the request of Internet Company-3, queried their holdings of non-public Internet data against a lengthy list of more than 9,000 IP addresses, 3,000 internet domains, and 60 email addresses and domains that related or referred to Trump, the Trump Organization, the aforementioned Trump associates, and/or Russian Bank-1 (*i.e.*, the bank that was the subject of the allegations that **SUSSMANN** later conveyed to the FBI General Counsel).

i. During the same time period, employees of Internet Company-3 also drafted and

provided to Tech Executive-1 a written paper reflecting, in substance, some of the same technical observations contained in the Russian Bank-1 allegations that SUSSMANN later conveyed to the FBI.

Tech Executive-1 Tasks Originator-1 and University Researchers to Search for Internet Data  
Regarding Trump

23. Also in or around the same time period, and in connection with Tech Executive-1's joint efforts with SUSSMANN, Tech Executive-1 similarly tasked Originator-1 and two computer researchers ("Researcher-1" and "Researcher-2") who worked at a U.S.-based university ("University-1") to search broadly through Internet data for any information about Trump's potential ties to Russia. In connection with this tasking, and as alleged in further detail below, Tech Executive-1's goal was to support an "inference" and "narrative" regarding Trump that would please certain "VIPs." Moreover, and as alleged below, Tech Executive-1 provided information that he gathered through these interactions to his lawyer, SUSSMANN, so that SUSSMANN could assist in drafting and disseminating materials to the media and the FBI.

*Background on the Agency-1 Contract*

a. At the time of these exchanges in or about August 2016, a federal government agency ("Agency-1") was in the process of finalizing, but had not yet signed, a cybersecurity research contract with University-1 (the "Agency-1 Contract"). The primary purpose of the Agency-1 Contract was for University-1 researchers to receive and analyze large quantities of public and non-public data (including DNS data) from various Internet companies in order to identify the perpetrators of malicious cyber-attacks and protect U.S. national security.

b. Originator-1 was not a participant in the contract but was the founder of a company that University-1 researchers were considering as a potential data provider under the contract.

c. Tech Executive-1 and his employer, Internet Company-1, would ultimately sell large amounts of historical and ongoing DNS data to University-1 for use and analysis under the Agency-1 Contract.

d. Although the Agency-1 Contract was not signed until in or around November 2016, Internet Company-1 – through Tech Executive-1 – provided University-1 with early access to its Internet data in order to establish a “proof of concept” for work under the contract. Among the data that University-1 accessed through Internet Company-1 was the DNS data of an Executive Branch office of the U.S. government (“Office-1”), which Internet Company-1 had come to possess as a sub-contractor in a sensitive relationship between the U.S. government and another company.

e. The purpose of providing Internet Company-1’s data to University-1 during this time period was to enable researchers who worked under the Agency-1 Contract to protect U.S. networks from cyberattacks. From in or about July 2016 through at least in or about February 2017, however, Originator-1, Researcher-1, and Researcher-2 also exploited Internet Company-1’s data and other data to assist Tech Executive-1 in his efforts to conduct research concerning Trump’s potential ties to Russia, including the Russian Bank-1 allegations that SUSSMANN would later convey to the FBI.

*Research Concerning Trump*

f. For example, on or about July 29, 2016, Researcher-2 emailed to Researcher-1 the Russian Bank Data compiled by Originator-1.

g. On or about August 19, 2016, Researcher-1 queried internet data maintained by Internet Company-1 for the aforementioned mail1.trump-email.com domain that was the subject

of the allegations SUSSMANN would later convey to the FBI. Researcher-1 then emailed Tech Executive-1 and others a list of domains that had communicated with it -- none of which appeared to have links to Russia. Researcher-1 noted that the list “does not make much sense with the storyline you have,” referring to the storyline connecting Trump to Russia.

h. On or about August 20, 2016, Originator-1 emailed Tech Executive-1, Researcher-1, and Researcher-2, stating, among other things, that “even if we found what [Tech Executive-1] asks us to find in DNS, we don’t see the money flow, and we don’t see the content of some message saying ‘send the money here’.” Originator-1 then explained that it would be possible to “fill out a sales form on two websites, faking the other company’s email address in each form,” and thereby cause them “to appear to communicate with each other in DNS.” Originator-1 then concluded: “[I/] [Tech Executive-1] can take the \*inference\* we gain through this team exercise . . . then work to develop even an inference may be worthwhile. . . .It’s just not the case that you can rest assured that Hillary’s opposition research and whatever professional gov[ernments] and investigative journalists are also digging [will] come up with the same things[.]” (asterisks in original).

i. On or about the same date, Tech Executive-1 clarified in an email to Originator-1, Researcher-1, and Researcher-2 that the “task” he had given them was “indeed broad” and further stated, in part:

**Being able to provide evidence of \*anything\* that shows an attempt to behave badly in relation to this, the VIPs would be happy. They’re looking for a true story that could be used as the basis for closer examination.**

(emphasis added; asterisks in original). Regarding the Russian Bank-1 allegations that he had provided to SUSSMANN, Tech Executive-1’s email stated: “[T]he prior hypothesis was all that they needed: [a] mailserver dedicated or related to [T]rump . . . and with traffic almost exclusively

with [Russian Bank-1] was sufficient to do the job.” Tech Executive-1 continued, “Trump has claimed he and his compan[ies] have had NO dealings with .ru other than the failed Casino, and the Miss universe pageant. He claims absolutely NO interaction with any financial institutions. So any potential like that would be jackpot.”

j. On or about August 21, 2016, Tech Executive-1 emailed the recipients, urging them to push forward with additional research concerning Trump, which he stated would “give the base of a very useful narrative.” Later in the same email, Tech Executive-1 expressed his own belief that the “trump-email.com” domain (referring to the subject of the allegations that SUSSMANN conveyed to the FBI) was not a secret communications channel with Russian Bank-1, but “a red herring,” noting that the host for that domain “is a legitimate valid [customer relationship management] company.” Tech Executive-1 therefore concluded that “we can ignore it, together with others that seem to be part of the marketing world.”

k. On or about August 22, 2016, Researcher-1 emailed the aforementioned recipients, expressing continued doubt regarding the Russian Bank-1 allegations that SUSSMANN would later convey to the FBI, and raising concerns about the researchers’ bias against Trump:

Let[’]s for a moment think of the best case scenario, where we are able to show (somehow) that DNS [ ] communication exists between Trump and R[ussia]. **How do we plan to defend against the criticism that this is not spoofed [ ] traffic we are observing? There is no answer to that.** Let’s assume again that they are not smart enough to refute our “best case” scenario. [Tech Executive-1], **you do realize that we will have to expose every trick we have in our bag to even make a very weak association?** Let[’]s all reflect upon that for a moment. Sorry folks, but unless we get combine netflow and DNS traffic collected at critical points between suspect organizations, **we cannot technically make any claims that would fly public scrutiny.**

[...]

**The only thing that drive[s] us at this point is that we just do not like [Trump]. This will not fly in eyes of public scrutiny. Folks, I am afraid we have tunnel vision. Time to regroup?**

(emphasis added).

SUSSMANN and His Client Prepare a White Paper Summarizing the Russian Bank-1 Allegations

24. Despite the aforementioned views that the Russian Bank Data and allegations were a “red herring” that should be “ignored,” SUSSMANN, Tech Executive-1, Originator-1, and the University-1 researchers began to draft, review, and revise a “white paper” summarizing the Russian Bank-1 allegations that SUSSMANN would later provide to the FBI. SUSSMANN continued to bill time on these matters to the Clinton Campaign.

a. For example, on or about September 5, 2016, SUSSMANN began billing work for the drafting of the aforementioned white paper. SUSSMANN billed this work to the Clinton Campaign with a billing description that read, in part, “**work on white paper; follow-up telephone conferences and email.**” (emphasis added).

b. On or about September 6, 2016, SUSSMANN continued to work on the white paper. On or about the same date, SUSSMANN also met with representatives of the U.S. Investigative Firm and communicated with the media. SUSSMANN billed this work to the Clinton Campaign with the billing description, “**Meeting with consultant [and Campaign Lawyer-1]; revisions to white paper; meeting with expert; meeting with expert and reporter; follow-up meeting with reporter; conversations with [Campaign Lawyer-1].**” (emphasis added).

c. On or about September 7, 2016, SUSSMANN continued work on the white paper. SUSSMANN billed his time for that work to the Clinton Campaign with the billing description, “**Meetings and other communications regarding confidential project; work on written materials.**”

(emphasis added).

d. On or about September 14, 2016 -- five days before his meeting with the FBI General Counsel -- SUSSMANN continued work on the white paper. SUSSMANN also met with Tech Executive-1 in SUSSMANN's office. On or about the same date, SUSSMANN billed time to the Clinton Campaign with the billing description "**Multiple meetings** regarding confidential project, **draft white paper** [ ]," and to Internet Company-1 with the billing description, "communications regarding confidential project." (emphasis added).

e. On or about the same day -- and just five days before SUSSMANN conveyed the aforementioned allegations to the FBI -- Tech Executive-1 sent the white paper that SUSSMANN had been working on to Originator-1, Researcher-1, and Researcher-2. In an email, Tech Executive-1 sought their views as to whether the paper's allegations would be "plausible" to "security experts," even if the allegations were not demonstrably true:

Please read as if you had no prior knowledge or involvement, and you were handed this document as a security expert (NOT a dns expert) and were asked: 'Is this plausible as an explanation?' **NOT to be able to say that this is, without doubt, fact, but to merely be plausible. Do NOT spend more than a short while on this** (If you spend more than an hour you have failed the assignment). Hopefully less. :)

(emphasis added).

f. On or about the same date, Researcher-1 replied, stating that the white paper achieved Tech Executive-1's objective, but noting that the paper "smartly" avoided discussing weaknesses or "holes" in the paper's hypothesis:

A DNS expert would poke several holes to this hypothesis (primarily around visibility, about which **very smartly you do not talk about**). That being said, I do not think even the top security (non-DNS) researchers can refute your statements. Nice!



(emphasis added).

g. On or about September 15, 2016, Originator-1 responded to Tech Executive-1, stating, in part, that the paper's conclusion was "plausible" in the "narrow scope" defined by Tech Executive-1.

h. On or about the same date, Reseacher-2 replied, acknowledging that questions remained, but stating, in substance and in part, that the paper should be shared with government officials.

i. On or about September 16, 2016, Originator-1 replied to the aforementioned recipients, discussing an allegation that SUSSMANN would soon convey to the FBI regarding Russian Bank-1's alleged use of a purported "TOR exit node" (*i.e.*, a node used for anonymized internet traffic) at a particular U.S.-based healthcare company ("Healthcare Company-1") to communicate with the Trump Organization. Originator-1's email stated, in part, "[Tech Executive-1] has carefully crafted a message that could work to accomplish the goals."

SUSSMANN Shares the Russian Bank-1 Allegations with the Media

25. In or around the same time period, SUSSMANN, acting on behalf of Tech Executive-1 and the Clinton Campaign, disseminated the Russian Bank-1 allegations to the media. SUSSMANN billed this time to the Clinton Campaign.

a. For example, on about August 30, 2016, Reporter-1 – who would later author the above-referenced October 31, 2016 article about the Russian Bank-1 allegations – emailed SUSSMANN: "I'm back in town. I see Russians are hacking away. [A]ny big news?"

b. SUSSMANN replied on the same date: "Mind reader! . . . Can you meet Thurs and Fri?"

c. On or about September 1, 2016, SUSSMANN met with Reporter-1. SUSSMANN billed his time for the meeting to the Clinton Campaign under the broader billing description “confidential meetings regarding confidential project.”

d. On or about September 12, 2016, SUSSMANN spoke with Campaign Lawyer-1 via phone regarding SUSSMANN’s efforts to communicate with Newspaper-1 regarding the Russian Bank-1 allegations. SUSSMANN and Campaign Lawyer-1 each billed the call to the Clinton Campaign with Campaign Lawyer-1 using the billing description “teleconference with M. Sussmann re: [Newspaper-1],” and SUSSMANN using the description “work regarding confidential project.”

e. On or about September 15, 2016, Campaign Lawyer-1 exchanged emails with the Clinton Campaign’s campaign manager, communications director, and foreign policy advisor concerning the Russian Bank-1 allegations that SUSSMANN had recently shared with Reporter-1. Campaign Lawyer-1 billed his time for this correspondence to the Clinton Campaign with the billing entry, “email correspondence with [name of foreign policy advisor], [name of campaign manager], [name of communications director] re: [Russian Bank-1] Article.” (emphasis added).

SUSSMANN Prepares for His Meeting with the FBI

26. From on or about September 17 through on or about September 18, 2016 – *i.e.*, the weekend before SUSSMANN’s Monday meeting with the FBI General Counsel – SUSSMANN continued to work on disseminating the Russian Bank-1 allegations on behalf of Tech Executive-1 and the Clinton Campaign, and continued to bill his work to the campaign.

a. For example, on or about September 17, 2016, SUSSMANN spoke on the phone with Researcher-2. During the phone call, SUSSMANN, among other things, requested that

Researcher-2 speak on background with members of the media regarding the Russian Bank-1 allegations, which Researcher-2 did over the course of the following weeks.

b. On or about the same date, SUSSMANN sent to Researcher-2 an electronic file containing materials he would provide two days later to the FBI General Counsel, including, among other things, the aforementioned white paper that SUSSMANN had assisted in drafting, and another white paper drafted by the U.S. Investigative Firm concerning purported ties between Russian Bank-1's parent company and the Russian government.

c. SUSSMANN billed all of the aforementioned work on or about September 17, 2016 to the Clinton Campaign with the billing description "Multiple telephone conferences and **other communications with experts, media**; communications with [Campaign Lawyer-1]." (emphasis added).

d. On or about the next day -- Sunday, September 18, 2016 -- SUSSMANN continued to work on the Russian Bank-1 allegations, and to prepare for his meeting with the FBI. SUSSMANN billed this time to the Clinton Campaign with the billing description "Further communications and work regarding confidential project."

SUSSMANN's False Statement to the FBI General Counsel

27. On or about September 19, 2016, SUSSMANN met with the FBI General Counsel at FBI Headquarters in the District of Columbia to convey the Russian Bank-1 allegations. No one else attended the meeting. During the meeting, the following, in substance and in part, occurred:

a. SUSSMANN stated falsely that he was not acting on behalf of any client, which led the FBI General Counsel to understand that SUSSMANN was conveying the allegations as a

good citizen and not as an advocate for any client;

b. SUSSMANN stated that he had been approached by multiple cyber experts concerning the Russian Bank-1 allegations;

c. SUSSMANN provided the names of three cyber experts, but did not name or mention Tech Executive-1, the Clinton Campaign, or any other person or company referenced above;

d. SUSSMANN described the allegations of a secret Trump Organization server that was in communication with Russian Bank-1, including that Russian Bank-1 had used a TOR exit node located at Healthcare Company-1 to communicate with the Trump Organization;

e. SUSSMANN stated that media outlets were in possession of information about the Trump Organization's secret server, and that a story would be published on Friday of that week;

f. SUSSMANN provided to the FBI General Counsel two thumb drives and hard copy papers, which contained and were comprised of the following:

i. the aforementioned white paper that SUSSMANN had assisted in drafting, entitled *White Paper #1 Auditable V3*, which contained no date or author's name;

ii. a white paper drafted by Researcher-2, which was entitled, *White Paper Comments: Time Series Analysis of Recursive Queries*, dated September 19, 2016, and contained no author's name;

iii. the aforementioned white paper drafted by the U.S. Investigative Firm regarding Russian Bank-1 and its parent company, which contained no date or author's name; and

iv. eight files containing the Russian Bank Data and other purported data and information relating to the mail1.trump-email.com domain.

28. Immediately after the aforementioned September 19, 2016 meeting, the FBI General Counsel spoke with the Assistant Director of the FBI's Counterintelligence Division. During their conversation, the FBI General Counsel conveyed the substance of his meeting with **SUSSMANN**. The Assistant Director took contemporaneous handwritten notes which reflect, in substance, the above-referenced statements by **SUSSMANN** and state, in relevant part:

Michael Sussman[n] – Atty: [Law Firm-1] – **said not doing this for any client**

- Represents DNC, Clinton Foundation, etc.  
[]
- Been approached by Prominent Cyber People (Academic or Corp. POCs)  
People like: [three names redacted]

(emphasis added)

29. **SUSSMANN** billed his meeting with the FBI General Counsel to the Clinton Campaign with the billing description, "work and communications regarding confidential project."

30. **SUSSMANN**'s statement to the FBI General Counsel that he was not acting on behalf of any client was knowingly and intentionally false. In truth and in fact, and as **SUSSMANN** well knew, **SUSSMANN** acted on behalf of and in coordination with two specific clients of Law Firm-1, *i.e.*, Tech Executive-1 and the Clinton Campaign, in assembling and conveying these allegations. In particular, and as also alleged above, Tech Executive-1 consulted and relied on **SUSSMANN** as his lawyer to assist in disseminating the Russian Bank-1 allegations. Moreover, all or nearly all of **SUSSMANN**'s recorded time and work relating to the Russian Bank-1 allegations prior to the meeting with the FBI (including communications with the media) were billed to the Clinton Campaign. Indeed, and as **SUSSMANN** concealed and failed to disclose, (i) **SUSSMANN** had spent time drafting one of the white papers he provided to the FBI General Counsel and billed that time to the Clinton Campaign, and (ii) the U.S. Investigative Firm – which

at the time was also acting as a paid agent of the Clinton Campaign – had drafted another of those white papers.

31. In addition, and as alleged in further detail below, SUSSMANN testified under oath before Congress in 2017 that he, in fact, conveyed the Russian Bank-1 allegations to the FBI General Counsel “on behalf of my client.” See Paragraph 44, *infra*.

32. In the days following SUSSMANN’s meeting with the FBI General Counsel, and as a result of that meeting, the FBI opened an investigation of the Russian Bank-1 allegations. SUSSMANN’s false statement to the FBI General Counsel was material to that investigation because, among other reasons, it was relevant to the FBI whether the conveyor of these allegations (SUSSMANN) was providing them as an ordinary citizen merely passing along information, or whether he was instead doing so as a paid advocate for clients with a political or business agenda. Had SUSSMANN truthfully disclosed that he was representing specific clients, it might have prompted the FBI General Counsel to ask SUSSMANN for the identity of such clients, which, in turn, might have prompted further questions. In addition, absent SUSSMANN’s false statement, the FBI might have taken additional or more incremental steps before opening and/or closing an investigation. The FBI also might have allocated its resources differently, or more efficiently, and uncovered more complete information about the reliability and provenance of the purported data at issue.

#### SUSSMANN Continues to Communicate with the Media on Behalf of His Clients

33. Further demonstrating that SUSSMANN carried out the aforementioned work on behalf of his clients, SUSSMANN continued in the weeks following this meeting to coordinate with Tech Executive-1, Campaign Lawyer-1, and the U.S. Investigative Firm to disseminate the

Russian Bank-1 allegations to the media. SUSSMANN continued to bill his time for such work to the Clinton Campaign.

34. For example, on or about October 10, 2016, SUSSMANN emailed Reporter-1 a link to an opinion article which asserted, in substance and in part, that Newspaper-1's investigative reporters had not published as many stories regarding Trump as other media outlets. The subject line of SUSSMANN's email was "for your editors," and the body stated, "You should send this link to them." At or around that time, and according to public sources, Reporter-1 was working on an article concerning the Russian Bank-1 allegations, but Reporter-1's editors at Newspaper-1 had not yet authorized publication of the article.

35. On or about October 30, 2016, an employee of the U.S. Investigative Firm (the "Investigative Firm Employee") forwarded another reporter ("Reporter-2") a tweet, which indicated that the FBI Director had "explosive information about Trump's ties to Russia." The Investigative Firm Employee's email stated, "time to hurry," suggesting that Reporter-2 should hurry to publish an article regarding the Russian Bank-1 allegations. In response, Reporter-2 emailed to the Investigative Firm Employee a draft article regarding the Russian Bank-1 allegations, along with the cover message: "Here's the first 2500 words."

36. On or about the following day, October 31, 2016, both Reporter-1 and Reporter-2 published articles regarding the Russian Bank-1 allegations.

37. On or about the same date, SUSSMANN continued to communicate with several reporters about the media coverage, billing these communications to the Clinton Campaign with the billing description, "Communications regarding [Reporter-2's employer] story, [Newspaper-1] reporting; communications with [another news outlet]."

38. Soon after the 2016 U.S. Presidential election, the Clinton Campaign ceased to exist, and SUSSMANN stopped billing his recorded time on these matters to the Clinton Campaign. In the ensuing months, SUSSMANN billed some of his time on the Russian Bank-1 allegations and related matters to Tech Executive-1.

SUSSMANN Repeats His False Statement to Another Government Agency

39. In or about late 2016 and early 2017, Tech Executive-1, Originator-1, and Researcher-2 continued to compile additional information and data regarding the Russian Bank-1 allegations, and gathered other purported data allegedly involving Trump-related computer networks and Russia (collectively, the "Updated Allegations"). SUSSMANN would later convey these allegations to another U.S. government agency ("Agency-2"). In doing so, and as alleged below, SUSSMANN repeated, in substance, the same false statement he had made to the FBI General Counsel that he was not acting on behalf of a client.

*SUSSMANN Seeks a Meeting with Agency-2*

40. In or about late December 2016, SUSSMANN contacted the General Counsel of Agency-2 to set up a meeting regarding the Updated Allegations, but the meeting did not go forward.

41. Approximately one month later, SUSSMANN contacted a former employee of Agency-2 (the "Former Employee") in a further attempt to obtain a meeting at Agency-2. The Former Employee communicated with SUSSMANN on or about January 31, 2017, during which the following, in substance and in part, occurred:

a. Contrary to his prior false representation to the FBI General Counsel and a representation he would subsequently make to Agency-2 (see below), SUSSMANN advised the



Former Employee that he represented a "client."

b. SUSSMANN summarized the Updated Allegations.

c. SUSSMANN requested that the Former Employee assist him in obtaining a meeting with Agency-2 and stated that if Agency-2 was not interested, SUSSMANN's client would likely go to Newspaper-1 with the allegations.

*SUSSMANN Repeats His False Statement to Agency-2*

42. On or about February 9, 2017, SUSSMANN met with two Agency-2 employees ("Employee-1" and "Employee-2") at a location outside the District of Columbia. At the meeting, the following, in substance and in part, occurred:

a. SUSSMANN stated falsely – as he previously had stated to the FBI General Counsel – that he was "not representing a particular client." In truth and in fact, and as SUSSMAN had acknowledged to the Former Employee just days earlier, SUSSMANN was representing a client.

b. SUSSMANN disclosed that Law Firm-1 was active in representing several Democratic Party causes and officer-holders, including both the DNC and Hillary Clinton. SUSSMANN stated, however, that such work was unrelated to his reasons for contacting Agency-2.

c. SUSSMANN discussed and described the Updated Allegations, including new details concerning the Russian Bank-1 allegations that he had not provided to the FBI General Counsel.

d. SUSSMANN provided to the Agency-2 Employees (i) several white papers, and (ii) multiple data files containing purported DNS data, ranging from 2016 through early 2017.

43. After the meeting with SUSSMANN, Employee-1 and Employee-2 drafted and revised a Memorandum for the Record that reflected the above-described statements by SUSSMANN.

SUSSMANN Contradicts His False Statements in Testimony Before Congress

44. In or about December 2017, SUSSMANN testified under penalty of perjury before staffers of the House Permanent Select Committee on Intelligence, which was investigating Russian interference and other matters relating to the 2016 Presidential election. During his testimony, SUSSMANN directly contradicted his false statements to the FBI and Agency-2 that he was not acting on behalf of any client:

Q: [] When you decided to engage the two principals, one, [the FBI General Counsel] in September, and the general counsel of [Agency-2] in December, you were doing that **on your own volition**, based on information another client provided you. Is that correct?

A: **No.**

Q: So what was -- so did your client direct you to have those conversations?

A: **Yes.**

Q: Okay. And **your client also was witting** of you going to [redacted] in February to disclose the information that individual had provided you?

A: **Yes**

[...]

Q: Okay. I want to ask you, so you mentioned that **your client directed you** to have these engagements with the FBI and [redacted] and to disseminate the information that client provided you. Is that correct?

A: Well, I apologize for the double negative. It isn't not correct, but when you say my client directed me, we had a conversation, as lawyers do with their clients, about client needs and objectives and the best course to take for a client. And so it may have been a decision that we came to together. I mean, I don't want to imply that I was sort of directed to do something against my better judgment, or that we were in any sort of conflict, but this was -- **I think it's most accurate to say it was done on behalf of my client.**


(emphasis added).

COUNT ONE

45. Paragraphs 1 to 44 are incorporated by reference.

46. On or about September 19, 2016, within the District of Columbia, **MICHAEL A. SUSSMANN**, the defendant, did willfully and knowingly make a materially false, fictitious, and fraudulent statement or representation in a matter before the jurisdiction of the executive branch of the Government of the United States, to wit, on or about September 19, 2016, the defendant stated to the General Counsel of the FBI that he was not acting on behalf of any client in conveying particular allegations concerning a Presidential candidate, when in truth, and in fact, and as the defendant well knew, he was acting on behalf of specific clients, namely, Tech Executive-1 and the Clinton Campaign.

(In violation of Title 18, United States Code, Section 1001(a)(2))



JOHN H. DURHAM  
Special Counsel  
U.S. Department of Justice

A TRUE BILL:

.....  
Foreperson

Date: September 16, 2021

# **Exhibit 5**

## Trump Server Mystery Produces Fresh Conflict

A recent indictment suggested that researchers who found strange internet links between a Russian bank and the Trump Organization did not really believe their own work. They are pushing back.



By Charlie Savage and Adam Goldman

Sept. 30, 2021 Updated 1:34 p.m. ET

WASHINGTON — The charge was narrow: John H. Durham, the special counsel appointed by the Trump administration to scour the Russia investigation, indicted a cybersecurity lawyer this month on a single count of lying to the F.B.I.

But Mr. Durham used a 27-page indictment to lay out a far more expansive tale, one in which four computer scientists who were not charged in the case “exploited” their access to internet data to develop an explosive theory about cyberconnections in 2016 between Donald J. Trump’s company and a Kremlin-linked bank — a theory, he insinuated, they did not really believe.

Mr. Durham’s version of events set off reverberations beyond the courtroom. Trump supporters seized on the indictment, saying it shows that suspicions about possible covert communications between Russia’s Alfa Bank and Mr. Trump’s company were a deliberate hoax by supporters of Hillary Clinton and portraying it as evidence that the entire Russia investigation was unwarranted.

Emails obtained by The New York Times and interviews with people familiar with the matter, who spoke on the condition of anonymity to discuss issues being investigated by federal authorities, provide a fuller and more complex account of how a group of cyberexperts discovered the odd internet data and developed their hypothesis about what could explain it.

At the same time, defense lawyers for the scientists say it is Mr. Durham’s indictment that is misleading. Their clients, they say, believed their hypothesis was a plausible explanation for the odd data they had uncovered — and still do.

The Alfa Bank results “have been validated and are reproducible. The findings of the researchers were true then and remain true today; reports that these findings were innocuous or a hoax are simply wrong,” said Jody Westby and Mark Rasch, lawyers for David Dagon, a Georgia Institute of Technology data scientist and one of the researchers whom the indictment discussed but did not name.

Steven A. Tyrrell, a lawyer for Rodney Joffe, an internet entrepreneur and another of the four data experts, said his client had a duty to share the information with the F.B.I. and that the indictment “gratuitously presents an incomplete and misleading picture” of his role.

A spokesman for Mr. Durham declined to comment. It is unclear whether he has finished his investigation into the Alfa Bank issue.

Mr. Durham’s indictment provided evidence that two participants in the matter — Mr. Joffe and Michael Sussmann, the cybersecurity lawyer accused of falsely saying he had no client when he brought the findings of the researchers to the F.B.I. — interacted with the Clinton campaign as they worked to bring their suspicions to journalists and federal agents.

Mr. Durham uncovered law firm billing records showing that Mr. Sussmann, who represented the Democratic National Committee on issues related to Russia’s hacking of its servers, had logged his time on the Alfa Bank matter as work for the Clinton campaign. Mr. Sussmann has denied lying to the F.B.I. about who he was representing in coming forward with the Alfa Bank data, while saying he was representing only Mr. Joffe and not the campaign.

Mr. Durham also found that Mr. Joffe had met with one of Mr. Sussmann’s law firm partners, Marc Elias, who was then the Clinton campaign’s general counsel, and researchers from Fusion GPS, an investigative firm Mr. Elias had commissioned to scrutinize Mr. Trump’s purported ties to Russia. Fusion GPS drafted a paper on Alfa Bank’s ties to the Kremlin that Mr. Sussmann also provided to the F.B.I.

Mr. Durham was appointed in 2019 to scour the Russia investigation for any wrongdoing. Justice Department, via Associated Press

In the heat of the presidential race, Democrats quickly sought to capitalize on the research. On Sept. 15, four days before Mr. Sussmann met with the F.B.I. about the findings, Mr. Elias sent an email to the Clinton campaign manager, Robbie Mook, its communications director, Jennifer Palmieri, and its national security adviser, Jake Sullivan, whose subject line referred to an Alfa Bank article, the indictment said.

Six weeks later, after Slate ran a lengthy article about the Alfa Bank suspicions, the Clinton campaign pounced. Mrs. Clinton's Twitter feed linked to the article and ran an image stating the suspicions as fact, declaring, "It's time for Trump to answer serious questions about his ties to Russia."

The F.B.I., which had already started its Trump-Russia investigation before it heard about the possible Trump-Alfa connections, quickly dismissed the suspicions, apparently concluding the interactions were probably caused by marketing emails sent by an outside firm using a domain registered to the Trump Organization. The report by the Russia special counsel, Robert S. Mueller III, ignored the issue.

The data remains a mystery. A 2018 analysis commissioned by the Senate, made public this month, detailed technical reasons to doubt that marketing emails were the cause. A Senate report last year accepted the F.B.I.'s assessment that it was unlikely to have been a covert communications channel, but also said it had no good explanation for "the unusual activity."

Whatever caused the odd data, at issue in the wake of the indictment is whether Mr. Joffe and the other three computer scientists considered their own theory dubious and yet cynically went forward anyway, as Mr. Durham suggests, or whether they truly believed the data was alarming and put forward their hypothesis in good faith.

Earlier articles on Alfa Bank, including in Slate and The New Yorker, did not name the researchers, and used pseudonyms like "Max" and "Tea Leaves" for two of them. Mr. Durham's indictment did not name them, either.

But three of their names have appeared among a list of data experts in a lawsuit brought by Alfa Bank, and Trump supporters have speculated online about their identities. The Times has confirmed them, and their lawyers provided statements defending their actions.

The indictment's "Originator-1" is April Lorenzen, chief data scientist at the information services firm Zetalytics. Her lawyer, Michael J. Connolly, said she has "dedicated her life to the critical work of thwarting dangerous cyberattacks on our country," adding: "Any suggestion that she engaged in wrongdoing is unequivocally false."

The indictment's "Researcher-1" is another computer scientist at Georgia Tech, Manos Antonakakis. "Researcher-2" is Mr. Dagon. And "Tech Executive-1" is Mr. Joffe, who in 2013 received the F.B.I. Director's Award for helping crack a cybercrime case, and retired this month from Neustar, another information services company.

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In addition, the Alfa Bank suspicions were only half of what the researchers sought to bring to the government's attention, according to several people familiar with the matter.

Their other set of concerns centered on data suggesting that a YotaPhone — a Russian-made smartphone rarely seen in the United States — had been used from networks serving the White House, Trump Tower and Spectrum Health, a Michigan hospital company whose server had also interacted with the Trump server.

Mr. Sussmann relayed their YotaPhone findings to counterintelligence officials at the C.I.A. in February 2017, the people said. It is not clear whether the government ever investigated them.

The involvement of the researchers traces back to the spring of 2016. Darpa, the Pentagon's research funding agency, wanted to commission data scientists to develop the use of so-called DNS logs, records of when servers have prepared to communicate with other servers over the internet, as a tool for hacking investigations.

Darpa identified Georgia Tech as a potential recipient of funding and encouraged researchers there to develop examples. Mr. Antonakakis and Mr. Dagon reached out to Mr. Joffe to gain access to Neustar's repository of DNS logs, people familiar with the matter said, and began sifting them.

Separately, when the news broke in June 2016 that Russia had hacked the Democratic National Committee's servers, Mr. Dagon and Ms. Lorenzen began talking at a conference about whether such data might uncover other election-related hacking.

Ms. Lorenzen eventually noticed an odd pattern: a server called mail1.trump-email.com appeared to be communicating almost exclusively with servers at Alfa Bank and Spectrum Health. She shared her findings with Mr. Dagon, the people said, and they both discussed it with Mr. Joffe.

As a candidate in 2016, President Trump publicly called for Russia to hack Hillary Clinton. Todd Heisler/The New York Times

"Half the time I stop myself and wonder: am I really seeing evidence of espionage on behalf of a presidential candidate?" Mr. Dagon wrote in an email to Mr. Joffe on July 29, after WikiLeaks made public stolen Democratic emails timed to disrupt the party's convention and Mr. Trump urged Russia to hack Mrs. Clinton.

By early August, the researchers had combined forces and were increasingly focusing on the Alfa Bank data, the people said. Mr. Joffe reached out to his lawyer, Mr. Sussmann, who would take the researchers' data and hypothesis to the F.B.I. on Sept. 19, 2016.

Defense lawyers contend the indictment presented a skewed portrait of their clients' thinking by selectively quoting from their emails.

The indictment quotes August emails from Ms. Lorenzen and Mr. Antonakakis worrying that they might not know if someone had faked the DNS data. But people familiar with the matter said the indictment omitted later discussion of reasons to doubt any attempt to spoof the overall pattern could go undetected.

The indictment says Mr. Joffe sent an email on Aug. 21 urging more research about Mr. Trump, which he stated could "give the base of a very useful narrative," while also expressing a belief that the Trump server at issue was "a red herring" and they should ignore it because it had been used by the mass-marketing company.

The full email provides context: Mr. Trump had claimed he had no dealings in Russia and yet many links appeared to exist, Mr. Joffe noted, citing an article that discussed aspirations to build a Trump Tower in Moscow. Despite the "red herring" line, the same email also showed that Mr. Joffe nevertheless remained suspicious about Alfa Bank, proposing a deeper hunt in the data "for the anomalies that we believe exist."

He wrote: "If we can show possible email communication between" any Trump server and an Alfa Bank server "that has occurred in the last few weeks, we have the beginning of a narrative," adding that such communications with any "Russian or Ukrainian financial institutions would give the base of a very useful narrative."



Mr. Tyrrell, his lawyer, said that research in the weeks that followed, omitted by the indictment, had yielded evidence that the specific subsidiary server in apparent contact with Alfa Bank had not been used to send bulk marketing emails. That further discussion, he said, changed his client's mind about whether it was a red herring.

"The quotation of the 'red herring' email is deeply misleading," he said, adding: "The research process is iterative and this is exactly how it should work. Their efforts culminated in the well-supported conclusions that were ultimately delivered to the F.B.I."

Michael E. Sussmann during a cybersecurity conference in 2016. He was charged by Mr. Durham with lying to the F.B.I. via C-SPAN

The indictment also quoted from emails in mid-September, when the researchers were discussing a paper on their suspicions that Mr. Sussmann would soon take to the F.B.I. It says Mr. Joffe asked if the paper's hypothesis would strike security experts as a "plausible explanation."

The paper's conclusion was somewhat qualified, an email shows, saying "there were other possible explanations," but the only "plausible" one was that Alfa Bank and the Trump Organization had taken steps "to obfuscate their communications."

The indictment suggested Ms. Lorenzen's reaction to the paper was guarded, describing an email from her as "stating, in part, that it was 'plausible' in the 'narrow scope' defined by" Mr. Joffe. But the text of her email displays enthusiasm.

"In the narrow scope of what you have defined above, I agree wholeheartedly that it is plausible," she wrote, adding: "If the white paper intends to say that there are communications between at least Alfa and Trump, which are being intentionally hidden by Alfa and Trump I absolutely believe that is the case," her email said.

The indictment cited emails by Mr. Antonakakis in August in which he flagged holes and noted they disliked Mr. Trump, and in September in which he approvingly noted that the paper did not get into a technical issue that specialists would raise.

Mr. Antonakakis' lawyer, Mark E. Schamel, said his client had provided "feedback on an early draft of data that was cause for additional investigation." And, he said, their hypothesis "to this day, remains a plausible working theory."

The indictment also suggests Mr. Dagon's support for the paper's hypothesis was qualified, describing his email response as "acknowledging that questions remained, but stating, in substance and in part, that the paper should be shared with government officials."

The text of that email shows Mr. Dagon was forcefully supportive. He proposed editing the paper to declare as "fact" that it was clear "that there are hidden communications between Trump and Alfa Bank," and said he believed the findings met the probable cause standard to open a criminal investigation.

"Hopefully the intended audience are officials with subpoena powers, who can investigate the purpose" of the apparent Alfa Bank connection, Mr. Dagon wrote.

In the end, Mr. Durham came to investigate them.

# **Exhibit 6**

IN THE CIRCUIT COURT FOR  
THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA

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AO ALFA-BANK,           :
                        :
                        : Plaintiff, :
                        :
vs.                      : CASE NO.
                        :
JOHN DOE,               : 50-2020-CA-006304-XXX-MB
                        :
                        : Defendant. :
- - - - - x

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Washington, D.C.

Friday, October 8, 2021

Videotaped Deposition of LAURA ALLISON SEAGO, appearing remotely, a witness herein, called for examination by counsel for Plaintiff in the above-entitled matter, pursuant to notice, the witness being duly sworn by KAREN YOUNG, a Notary Public in and for the District of Columbia, taken at the offices of Skadden Arps Slate Meagher & Flom LLP, 1440 New York Avenue, Northwest, Washington, D.C., at 9:34 a.m. on Friday, October 8, 2021, and the proceedings being taken down by stenotype and transcribed by KAREN YOUNG.

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18

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20

Joe Townsend, Videographer (remote)

21

22

23

1 C O N T E N T S

2 THE WITNESS:

3 LAURA ALLISON SEAGO

4 By Mr. Kelly..... 6

5

6

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1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: Here begins the  
3 videotaped deposition of Laura Seago, taken in the  
4 matter of AO Alfa-Bank V John Doe in the Circuit  
5 Court for the 15th Judicial Circuit in and for Palm  
6 Beach County, Florida, Case Number  
7 50-2020-CA-006304-XXXX-MB. Today's date is October  
8 8th, 2021. The time is 9:34 a.m. eastern daylight  
9 time. This deposition is being held remotely via  
10 Zoom videoconference. The court reporter is Karen  
11 Young. I am Joe Townsend, the videocamera operator.  
12 We are both here on behalf of Henderson Legal  
13 Services. Will counsel please introduce themselves  
14 and state whom they represent.

15 MR. KELLY: Yes, this is Todd Kelly for AO  
16 Alfa-Bank, and I'm also in the room with Margaret  
17 Krawiec and Michael McIntosh, also for AO Alfa-Bank.

18 MS. CLEMINSHAW: Good morning. This is  
19 Nicole Cleminshaw also for AO Alfa-Bank.

20 MR. LEVY: Joshua Levy for nonparty Laura  
21 Seago.

22 MR. SHARP: Andrew Sharp, also with

1 Ms. Seago.

2 MS. CLATTENBURG: Rachel Clattenburg, also  
3 with Ms. Seago.

4 MR. CRENNY: Kevin Crenny, also with  
5 Ms. Seago.

6 THE VIDEOGRAPHER: Will the court reporter  
7 please administer the oath?

8 Whereupon,

9 LAURA ALLISON SEAGO,

10 called for examination by counsel for  
11 AO Alfa-Bank and having been duly  
12 sworn by the Notary Public, was examined  
13 and testified as follows:

14 - - -

15 EXAMINATION BY COUNSEL FOR AO ALFA-BANK

16 BY MR. KELLY:

17 Q. Good morning, Ms. Seago. As previously  
18 mentioned, my name is Todd Kelly. Me and my  
19 colleagues here represent AO Alfa-Bank, the  
20 plaintiffs in this lawsuit. Just so you know,  
21 throughout this deposition, we'll refer to our  
22 clients as Alfa-Bank and sometimes as Alfa. Is that



1 understood?

2 **A. Yes.**

3 Q. So the basis of our suit is that our client  
4 was the victim of a cyber attack perpetrated by yet  
5 unidentified defendants. As such, we have filed what  
6 is known as a John Doe lawsuit to allow us discovery  
7 to identify those defendants. We will refer to these  
8 defendants in this matter as the Doe defendants. Is  
9 that understood?

10 **A. Yes.**

11 Q. So unless otherwise specified, if we say  
12 "this action" or "this case," we're referring to the  
13 underlying Florida litigation. This suit was filed  
14 in Florida state court. We will also refer to Bean  
15 LLC, also known as Fusion GPS, as Fusion. Is that  
16 understood?

17 **A. Yes.**

18 Q. So there have been allegations that an  
19 Alfa-Bank server had a connection or secretly  
20 communicated with a Trump organization server. Are  
21 you familiar with this alleged secret channel of  
22 communication?

1           **A.     Yes, I am.**

2           Q.     We will refer to this alleged secret  
3 channel as the server allegations today. So today  
4 I'm going to ask you a number of questions. You must  
5 give us accurate and complete answers to each of your  
6 questions. Please ask me to clarify if you do not  
7 understand a question. I will try to speak clearly,  
8 but it is incumbent on you to ask questions if you do  
9 not understand. If you answer my question, I will  
10 assume that you understood it. So this deposition is  
11 being conducted via Zoom and will be video-recorded.  
12 A court reporter also is present to transcribe our  
13 questions and answers. Could you please confirm that  
14 there's no one in the room with you other than  
15 counsel?

16           **A.     That is correct.**

17           Q.     And could you please let me know if anyone  
18 does enter the room other than counsel?

19           **A.     Okay.**

20           Q.     We would ask that you please refrain from  
21 making any phone calls during the deposition and also  
22 refrain from sending or reading e-mails or using any

1 messaging apps on your phone or computer. Please  
2 wait until I finish talking to answer so we don't  
3 talk over each other, and I will do the same for you.  
4 As the videographer noted, this will make it much  
5 easier to proceed today. And please also give  
6 audible answers because the court reporter cannot  
7 transcribe a nod, and please try to avoid answers  
8 such as uh-huh.

9           From time to time, one of the attorneys may  
10 object to a particular question. If that happens,  
11 you must still answer the question unless your  
12 attorney instructs you not to do so on the basis of  
13 an applicable privilege. Is that all understood?

14           **A. Yes.**

15           Q. So please remember that you're under oath.  
16 Knowingly giving false testimony could result in  
17 criminal penalties. You have taken the same oath as  
18 in a court of law. You understand what I've just  
19 explained to you?

20           **A. Yes, I do.**

21           Q. So we have a lot to cover today. If you  
22 need a break at any time, please just let me know,

1 but please don't ask for one while a question is  
2 pending. And also, you can confer with your attorney  
3 today, but again, we would ask that you not do so  
4 while a question is pending. Please answer and then  
5 confer. As far as your deposition today, have you  
6 taken any medication, drugs, alcohol or anything else  
7 that would make it difficult for you to understand  
8 questions?

9 **A. No.**

10 Q. Are you sick today?

11 **A. No.**

12 Q. Is there any reason that you would not be  
13 able to fully answer questions truthfully?

14 **A. Not that I am aware of.**

15 Q. Okay. Just some quick questions about your  
16 prior experience. Have you ever been deposed before?

17 **A. Outside of this case, no.**

18 Q. Have you ever testified in court before?

19 **A. No.**

20 Q. Have you ever been a plaintiff or a  
21 defendant in a lawsuit?

22 **A. Not to my knowledge.**

1 Q. Did you bring any documents to this  
2 deposition?

3 **A. No.**

4 Q. As far as preparation, what did you do to  
5 prepare for this deposition?

6 **A. I met with my attorneys.**

7 Q. Outside of meeting with your attorneys, did  
8 you do any preparation?

9 **A. I read press reports to refresh my memory.**

10 Q. Other than these press reports, did you  
11 review any other documents to refresh your  
12 recollection outside of those presented by your  
13 attorney?

14 **A. Outside of documents presented by my  
15 attorney, no.**

16 Q. Did you review the complaint filed by the  
17 plaintiff, Alfa-Bank, in this action?

18 **A. Yes, I did.**

19 Q. So are you familiar with plaintiff's  
20 allegations?

21 **A. I am.**

22 Q. Did anyone attempt to discourage you from

1     testifying today?

2           **A.     No.**

3           Q.     And how do you feel about having to testify  
4     today?

5           **A.     Just fine.**

6           Q.     So we'll just go to some quick background  
7     information and then we can move on. Can you please  
8     state and spell your full name?

9           **A.     It's Laura Allison Seago, L-A-U-R-A,**  
10    **A-L-L-I-S-O-N, S-E-A-G-O.**

11          Q.     So we would like to make sure that we have  
12     your contact information. However, without waiving  
13     any rights or objections, if your counsel agrees that  
14     we can contact you through him or her, we can forgo  
15     asking you to put your personal contact information  
16     on the record. Is that acceptable?

17          **A.     Yes, I'd prefer that you contact me through**  
18    **counsel.**

19          Q.     Okay. Could you please state your work  
20     phone number and e-mail address?

21                   MR. LEVY: She's given you my contact  
22     information as counsel, and you can contact her

1 through me.

2 BY MR. KELLY:

3 Q. Okay, that's fine. Thank you, Mr. Levy.

4 Ms. Seago, where are you currently employed?

5 A. **Open Source Research.**

6 Q. Okay, and is that a separate entity than  
7 Fusion?

8 A. **Yes.**

9 Q. Okay. What -- is it related to Fusion?

10 A. **It has many of the same partners and  
11 employees.**

12 Q. Okay, but it's a distinct entity from  
13 Fusion?

14 A. **That is correct.**

15 Q. Okay, and what do you do at Open Source?

16 A. **The name is very descriptive. I do open  
17 source research. I gather information from the web,  
18 I locate and review public records, and I write  
19 research reports based on my findings, for example.**

20 Q. Okay. Is this primarily to service private  
21 clients or is this nonprofit work?

22 MR. LEVY: Mr. Kelly, we're here today to

1 sit for a deposition for seven hours to help you  
2 gather information about the identity of the John Doe  
3 defendants in the Alfa-Bank case you filed in  
4 Florida. Questions about what Ms. Seago does 2021  
5 don't seem to be at all relevant to that inquiry, and  
6 in any event, we would ask that any -- that this  
7 entire deposition and its recordings and transcripts  
8 be designated as confidential.

9           You may disagree with that. That's our  
10 request. Ms. Seago has noticed and appear -- excuse  
11 me. Ms. Seago has noticed an appeal of the D.C.  
12 Superior Court's order. She has not and does not  
13 waive her privileges or her arguments, including but  
14 not limited to the court's lack of subject matter  
15 jurisdiction to enforce the subpoenas, the need for a  
16 protective order, the scope of the pre-service  
17 deposition in the John Doe case, Alfa's failure to  
18 comply with the Solers decision, and Alfa's effort to  
19 use this deposition as a tool to circumvent discovery  
20 and being in the case the owners of Alfa-Bank have  
21 filed in federal district court is pending against  
22 Bean LLC, does not mean Ms. Seago will not answer



1 questions today, but we want to make sure that our  
2 request to have this deposition and any transcripts  
3 and recordings of it are deemed confidential.

4 MR. KELLY: What is the basis for this  
5 confidentiality?

6 MR. LEVY: The basis for the  
7 confidentiality is -- is that there's information  
8 that's proprietary to Ms. Seago, the company, and the  
9 fact that there's ongoing litigation in another court  
10 in this matter separate from it, Alfa's taken the  
11 position that this deposition is not a tool to  
12 circumvent discovery in that matter, and we've asked  
13 that whatever discovery Alfa-Bank gathers it keeps to  
14 itself and not to be used in the public to -- to  
15 share with the owners of the bank that are suing Bean  
16 LLC.

17 MR. KELLY: I would note that there's no  
18 applicable protective order in this case, and that we  
19 disagree with your request, and that none of the  
20 documents that were produced have been marked  
21 confidential.

22 MR. LEVY: We note your disagreement, and

1 we don't have to litigate this here. I don't want to  
2 waste your time. I know you only have seven hours.  
3 We do however make the position that we'd like to  
4 designate this entire deposition as confidential. We  
5 can -- we can discuss it after the deposition.

6 BY MR. KELLY:

7 Q. Understood. Thank you, but just to be  
8 clear for the record, we disagree with your request.  
9 I do not consent to it. So getting back to,  
10 Ms. Seago, let's discuss your employment at Fusion  
11 since that will be the relevant employee. When -- or  
12 employer. When did you join Fusion?

13 A. **July of 2015.**

14 Q. Okay. Do you recall, did you apply for an  
15 open position or were you recruited?

16 A. **I responded to an ad on a job posting web  
17 site.**

18 Q. Okay, and were you always a salaried  
19 employee or did you work as a contractor for a time?

20 A. **I did one or two contracting projects in  
21 2015 prior to joining the company full time in July.**

22 Q. Do you recall what job titles you had while

1 working at Fusion?

2 **A. I'm an analyst.**

3 Q. And did you have any other job titles  
4 before that?

5 **A. Not that I can recall.**

6 Q. To whom did you generally report to at  
7 Fusion?

8 **A. There was no single person who was my boss.  
9 I reported to all of the partners at the firm.**

10 Q. All the partners in both offices or --  
11 there's a D.C. and I believe a California office?

12 MR. LEVY: Objection, assumes facts in  
13 evidence.

14 BY MR. KELLY:

15 Q. Withdrawn. Did anyone report to you?

16 **A. No.**

17 Q. What were your general job duties at  
18 Fusion?

19 **A. I helped gather and aggregate data. As I  
20 said, I helped locate public records, locate  
21 information published to the web, analyzed that  
22 information and wrote up my analytical findings.**

1     **Another example, I sometimes created charts and**  
2     **graphs to help people understand data.**

3           Q.     And what was the normal -- did you have a  
4     particular focus or subject area that you were asked  
5     or tasked on?

6           **A.     No.**

7           Q.     Okay. I'm going to ask the court reporter  
8     to take the document marked tab 7 and mark it as  
9     Exhibit 1 and drop it into the shared folder, and if  
10    you can put that on the screen, that would be  
11    appreciated.

12           THE VIDEOGRAPHER:   Just a moment please.  
13    You said tab 7, correct?

14           MR. KELLY:   That is correct. Okay, tab 7  
15    is available in the marked exhibit folder as Exhibit  
16    1. I will share that on the screen now.

17                                   (A document was designated  
18                                   as Exhibit No. 1.)

19           BY MR. KELLY:

20           Q.     Okay, Ms. Seago, this is the book "Crime in  
21    Progress," which was written by Fusion principals  
22    Glenn Simpson and Peter Fritsch. Do you recognize

1 this book?

2 **A. Yes.**

3 Q. Have you read it?

4 **A. Yes.**

5 Q. Are you aware that you are mentioned in the  
6 book?

7 **A. Yes.**

8 Q. Did you contribute at all to the writing or  
9 editing process?

10 **A. I was asked to fact check one or two**  
11 **chapters. I don't recall which ones.**

12 Q. Were you -- did you provide any comments  
13 before it was published, do you recall?

14 **A. Not that I recall.**

15 Q. Okay. Videographer, you could switch to  
16 page 4 of the PDF? So in their book, Mr. Simpson and  
17 Mr. Fritsch refer to you as the in-house cyber ninja.  
18 You can see that, it's the third paragraph down,  
19 "Fusion's in-house cyber ninja, Laura Seago." What  
20 is your understanding of what they meant by that?

21 MR. LEVY: Objection.

22 BY MR. KELLY:

1 Q. You can answer.

2 MR. LEVY: Form.

3 **A. I can't speculate what they meant by that.**  
4 **I didn't write this passage.**

5 Q. Okay. Did you often work on  
6 computer-related or cybersecurity-related issues?

7 **A. I did work on computer-related issues.**

8 Q. Can you describe what you understand the  
9 word "cyber" to mean in layman's terms?

10 **A. Cyber means related to technology.**

11 Q. So Glenn Simpson and Peter Fritsch refer to  
12 you as their technology ninja essentially. Would you  
13 consider yourself to be a cyber ninja?

14 MR. LEVY: Objection.

15 BY MR. KELLY:

16 Q. You can answer.

17 **A. I don't know if they're referring to me as**  
18 **a technology ninja. I don't consider myself a cyber**  
19 **ninja or a technology ninja.**

20 Q. Do you understand yourself to have  
21 technology experience that might be more than the  
22 average person or others at Fusion?

1           **A.       I have experience working with computers.**  
2           **I started building web sites when I was 13 years old.**  
3           **I attended a qualitative social science Ph.D.**  
4           **program. I have experience translating technical**  
5           **subjects for a lay audience.**

6           **Q.       And do you have experience with researching**  
7           **data or doing data analysis?**

8           **A.       Yes.**

9           **Q.       Can you explain or provide more background**  
10          **on that please?**

11          **A.       Like many social science Ph.D. programs,**  
12          **mine involved data analysis, taking existing data**  
13          **sets and making inferences from that information, and**  
14          **I continued to do some data analysis for my work at**  
15          **Fusion.**

16          **Q.       And I know you mentioned you -- a program**  
17          **you entered, but what certifications or degrees do**  
18          **you have related to technology or cyber issues or**  
19          **data analysis?**

20          **A.       None of my certifications or degrees**  
21          **directly relate to technology or cyber issues. I**  
22          **left my Ph.D. program with an M.A. in political**

1 **science.**

2 Q. Do you belong to any cybersecurity trade  
3 groups?

4 **A. No.**

5 Q. Have you published any articles or topics  
6 on security or data analysis?

7 **A. No.**

8 Q. So prior to joining Fusion, did you have  
9 any experience with intelligence research?

10 **A. No.**

11 Q. Did you have any experience with raw  
12 intelligence?

13 **A. No.**

14 Q. And then prior to joining Fusion, what  
15 other experience did you have related to  
16 cybersecurity other than what you just mentioned?

17 **A. Other than what I mentioned, none.**

18 Q. So prior to joining Fusion, can you go  
19 through your employment history?

20 **A. Certainly. My first job was cleaning**  
21 **toilets at a fishing camp. In college, I worked as**  
22 **an administrative assistant for a nonprofit**



1 associated with University Hospital. Then I worked  
2 as a development director for a small -- rights  
3 nonprofit in Chicago. Then I worked as a research  
4 associate at the Brennan Center for Justice in New  
5 York. Then I spent five years at the University of  
6 Michigan in the Ph.D. program, where I did teach  
7 undergrads, but mostly received fellowships to do my  
8 own research on human rights issues.

9 Q. And could you please provide your  
10 educational background in undergraduate or graduate  
11 degrees?

12 A. Certainly. I attended the University of  
13 Chicago and graduated in 2007 with a double major in  
14 international studies and Latin American studies, and  
15 then I attended University of Michigan and  
16 matriculated in a joint Ph.D. program in public  
17 policy and political science. I received an M.A.  
18 three years in, and I achieved Ph.D. candidacy but  
19 chose not to complete my dissertation.

20 Q. Okay, thank you. So I want to move into  
21 your knowledge of some relevant computer-related  
22 topics. Are you familiar with domain name system or

1 DNS?

2 **A. I've heard the term "DNS," yes.**

3 Q. Are you familiar with how it works?

4 **A. In the broadest possible sense, yes, I know**  
5 **that the domain name system translates IP addresses,**  
6 **numerical address to the internet into human-readable**  
7 **text.**

8 Q. Have you worked with DNS data previously?

9 **A. No.**

10 Q. And so you have no experience with DNS  
11 data.

12 MR. LEVY: Objection.

13 BY MR. KELLY:

14 Q. You can answer.

15 MR. LEVY: Assumes facts in evidence.

16 BY MR. KELLY:

17 Q. Have you ever worked with DNS data?

18 **A. Outside of reviewing the allegations made**  
19 **in 2016 about the relationship between the Trump**  
20 **organization and Alfa-Bank, no, that is my only**  
21 **experience reviewing DNS data.**

22 Q. So are you familiar with any passive DNS

1 collection systems?

2 **A. No.**

3 Q. Did you have access to any historical or  
4 passive DNS data in 2016?

5 **A. I reviewed data that was published to the  
6 open web relating to communications between Alfa-Bank  
7 and the Trump organization, but that is the only data  
8 I had access to.**

9 Q. So -- and this was -- we'll -- we'll get to  
10 that. So you did not have access to any data other  
11 than the data that was published to the internet?

12 MR. LEVY: I'm going to instruct the  
13 witness not to answer that question because the  
14 answer could implicate the attorney-client privilege  
15 and the attorney work product doctrine.

16 MR. KELLY: On what basis?

17 MR. LEVY: The work she -- the work --  
18 inasmuch as she received data or information in the  
19 course of her work for Bean LLC under a Kovel letter  
20 with Perkins Coie, that work would be protected by  
21 the attorney-client privilege and the attorney work  
22 product doctrine, and our position is set forth in

1 papers in federal court.

2 MR. KELLY: So you're instructing her not  
3 to answer?

4 MR. LEVY: I just did.

5 MR. KELLY: So why don't we take a break  
6 for five minutes.

7 MR. LEVY: Sure.

8 MR. KELLY: Videographer, if you could take  
9 us off the record?

10 THE VIDEOGRAPHER: Going off the record at  
11 9:56 a.m.

12 (Recessed at 9:56 a.m.)

13 (Reconvened at 10:01 a.m.)

14 THE VIDEOGRAPHER: Going back on the record  
15 at 10:01 a.m.

16 MR. KELLY: So Mr. Levy, you previously  
17 instructed the witness not to answer a question. I  
18 would note that it was a purely factual question, and  
19 therefore, your answer -- or your instruction not to  
20 answer was inappropriate. I'd also ask the court  
21 reporter to read back the previous question and  
22 answer before Mr. Levy instructed not to answer.

1 THE REPORTER: Question: "Did you have  
2 access to any historical or passive DNS data in  
3 2016?"

4 Answer: "I reviewed data that was  
5 published to the open web relating to communications  
6 between Alfa-Bank and the Trump organization, but  
7 that is the only data I had access to."

8 MR. KELLY: Mr. Levy, she had already  
9 answered the question and represented that she had no  
10 access to any other data. I asked her to confirm  
11 that, and you instructed her not to answer. It's a  
12 factual question. There's no basis for your  
13 objection. I would ask, did Ms. Seago communicate  
14 with attorneys on this matter?

15 MR. LEVY: On this matter --

16 MR. KELLY: On the -- you're saying --  
17 well, what is the basis for your claim of privilege?

18 MR. LEVY: What she was saying, and she can  
19 clarify this on the record. I'm not sworn, was that  
20 she explained the access she had outside of  
21 privileged communications.

22 MR. KELLY: She did not say that. She said

1 --

2 MR. LEVY: Well, she can -- she can clarify  
3 it for you.

4 THE WITNESS: I would like to correct the  
5 record. I was testifying to data I reviewed that was  
6 not covered by attorney-client privilege. I should  
7 have been less equivocal.

8 MR. KELLY: Okay. Mr. Levy, would you  
9 again state the basis for your claim of privilege?

10 MR. LEVY: My understanding is that you  
11 asked her a question about her access to information.  
12 Inasmuch as she accessed information pursuant to her  
13 work through -- for Fusion GPS and its engagement  
14 with Perkins Coie, that's going to be privileged.

15 MR. KELLY: How -- this data is not  
16 privileged. This is a factual question, so how is it  
17 possible that this could be a privileged assertion?

18 MR. LEVY: Inasmuch as she received  
19 information through the course of her work for Fusion  
20 GPS under its contract with Perkins Coie, that is  
21 going to be protected by the attorney-client  
22 privilege and the attorney work product doctrine, and

1 at the beginning of this deposition, you advised the  
2 witness that she is to answer your questions unless  
3 her attorney instructs her that an answer is covered  
4 by the attorney-client privilege or any other  
5 privilege, and that's what we're doing.

6 MR. KELLY: So Mr. Levy, how would  
7 underlying data be privileged? That's not a  
8 communication to or from an attorney.

9 MR. LEVY: If she had access to something  
10 that was through an attorney or an attorney's  
11 contractor like Fusion GPS under an engaged piece of  
12 work, it's going to be privileged. I don't want to  
13 take up your time. This is your time. You have  
14 seven hours, debating what's privileged or not. It's  
15 up to you. We can continue to discuss this.

16 BY MR. KELLY:

17 Q. Ms. Seago, were you subject to a litigation  
18 hold at any point?

19 A. I'm sorry, a litigation hold?

20 Q. Yes, were you instructed to retain your  
21 documents related to research that you did for Fusion  
22 related to the server allegations?

1           **A.     We received document preservation orders**  
2 **passed on to us from counsel in this matter and have**  
3 **complied with all of those.**

4           Q.     And when did you receive that notice?

5           **A.     I don't recall.**

6           Q.     Did you have a litigation retention hold in  
7 2016?

8           **A.     Not that I can recall.**

9           Q.     Did you have a litigation hold in 2017  
10 prior to the lawsuit filed by -- did you have a  
11 litigation hold in 2017?

12          **A.     I don't recall the date.**

13          Q.     Okay, but you did not have a litigation  
14 hold in 2016, so --

15                 MR. LEVY:  Objection.  That's not what she  
16 said.  She said she didn't recall.

17                 MR. KELLY:  Court reporter, could you  
18 please read back her -- the question and answer about  
19 whether she had a litigation hold in 2016?

20                 MR. LEVY:  Mr. Kelly, I think we're going  
21 to be better off if you asked her questions.

22                 MR. KELLY:  Mr. Levy, I'm conducting this



1 deposition, so I will conduct it as I see fit.

2 THE REPORTER: Question: "Did you have a  
3 litigation retention hold in 2016?"

4 Answer: "Not that I can recall."

5 BY MR. KELLY:

6 Q. Ms. Seago, did you ever delete or destroy  
7 any documents related to the server allegations?

8 **A. Not that I can recall.**

9 Q. Is there a document retention policy  
10 generally at Fusion?

11 **A. It varies by the client. We tend to follow  
12 the client's request as to what we do with the  
13 documents at the end of an engagement.**

14 Q. So -- so what client would you say you were  
15 researching this DNS data for?

16 **A. My understanding of the client was Perkins  
17 Coie.**

18 Q. The client was Perkins Coie, the law firm.

19 **A. Yes.**

20 Q. Did you review DNS data for anyone other  
21 than Fusion or Perkins Coie?

22 **A. No.**

1 Q. Sorry, from anyone other than Fusion or  
2 Perkins Coie.

3 MR. LEVY: Can you restate the question?

4 BY MR. KELLY:

5 Q. Yeah, sorry. Did you review DNS data from  
6 anyone other than Fusion or Perkins Coie?

7 A. **As previously stated, there was data that**  
8 **was posted to the web. I did also review that data.**  
9 **I don't know who that came from.**

10 Q. Okay. Going back to the retention policy,  
11 are e-mails automatically deleted from your in box at  
12 Fusion?

13 A. **No.**

14 Q. They're retained, so you have all of your  
15 e-mails related to this matter from 2016?

16 A. **As I said, we tend to follow the client's**  
17 **requests. We may have deleted communications, client**  
18 **communications regarding this matter in 2016 before**  
19 **there was a document preservation order. I don't**  
20 **recall the exact details.**

21 Q. And again, 2016 was before you received a  
22 document preservation order?

1 MR. LEVY: Objection, assumes facts in  
2 evidence.

3 BY MR. KELLY:

4 Q. You can answer.

5 A. **I don't recall when we received a**  
6 **preservation order.**

7 Q. Did you ever communicate directly with an  
8 attorney related to the server allegations?

9 MR. LEVY: I'm going to instruct the  
10 witness not to answer that question because the  
11 answer would implicate the attorney-client privilege  
12 and the attorney work product.

13 MR. KELLY: The mere fact of a  
14 communication is a factual question. It is not  
15 privileged. Are you going to stick by your  
16 instruction not to answer?

17 MR. LEVY: You asked her about a subject  
18 matter, not just a communication with an attorney.

19 MR. KELLY: That is incorrect. This is a  
20 factual question about whether she ever communicated  
21 with an attorney on -- related to the server  
22 allegations. Ms. Seago --

1           MR. LEVY: Were she to answer that factual  
2 question, the answer would implicate privileges.  
3 Instruct her not to answer.

4           BY MR. KELLY:

5           Q. Ms. Seago, are you going to follow his  
6 instruction?

7           **A. Yes.**

8           Q. I would just note again for the record it's  
9 a yes or no question and it's factual and your  
10 instruction not to answer is improper, but I will  
11 move on. Did you ever communicate with Perkins Coie  
12 at all?

13          **A. Yes.**

14          Q. Who at Perkins Coie did you communicate  
15 with?

16          **A. I met with Marc Elias and Michael Sussmann.**

17          Q. Did you communicate with Perkins Coie in  
18 2016?

19          **A. Yes.**

20          Q. When did you meet with Mr. Sussmann?

21          **A. I don't recall the exact date. It would**  
22 **have been the summer of 2016.**

1 Q. And when did you meet with Mr. Elias?

2 A. **It was the same meeting. I don't recall**  
3 **the exact date. It would have been the summer of**  
4 **2016.**

5 Q. Okay. Was this the July 29th meeting?

6 A. **I don't recall the date.**

7 Q. Okay. Did you meet with them more than  
8 once?

9 A. **No.**

10 Q. What did you discuss with Mr. Sussmann and  
11 Mr. Elias?

12 MR. LEVY: I'm going to instruct the  
13 witness not to answer that question because the  
14 answer would implicate the attorney-client privilege  
15 and the attorney work product doctrine.

16 BY MR. KELLY:

17 Q. And are you going to follow that  
18 instruction, Ms. Seago?

19 A. **Yes.**

20 Q. So next I wanted to move on to understand  
21 some -- some background about your understanding of  
22 Alfa-Bank. When did you first hear of Alfa-Bank?

1           **A.       I don't recall the exact date. I believe**  
2           **it would have been sometime in 2016.**

3           Q.       Sometime in 2016. Can you be any more  
4           specific than that?

5           **A.       I'm afraid I can't.**

6           Q.       Was it before or after your meeting with  
7           Mr. Elias and Mr. Sussmann?

8           **A.       I'm not sure.**

9           Q.       Could you venture a guess?

10          MR. LEVY: Objection.

11          BY MR. KELLY:

12          Q.       So you're not sure. Had you heard of  
13          Alfa-Bank prior to joining Fusion?

14          **A.       Not that I can recall.**

15          Q.       Okay. Have you performed any research on  
16          Alfa-Bank or related individuals for Fusion prior to  
17          Fusion's research into then-candidate Donald Trump?

18          MR. LEVY: Can you repeat the question  
19          please?

20          BY MR. KELLY:

21          Q.       Yes. Did you perform any research on  
22          Alfa-Bank or related individuals for Fusion prior to

1 Fusion's research into then-candidate Donald Trump?

2 **A. Not that I can recall.**

3 Q. Did you perform any research on -- or Alfa  
4 or related individuals for Fusion outside of your  
5 work on the Donald Trump 2015-2016 investigation?

6 MR. LEVY: Sorry. Can you repeat that  
7 question?

8 BY MR. KELLY:

9 Q. Sorry. Did you perform any research on  
10 Alfa-Bank or related individuals separate from  
11 Fusion's engagement with the DNC and Clinton campaign  
12 in 2015 and 2016?

13 **A. Not that I can recall.**

14 Q. Not that you recall. Who first told you  
15 about Alfa-Bank?

16 **A. I don't recall.**

17 Q. Was it someone at Fusion?

18 MR. LEVY: Objection to form.

19 BY MR. KELLY:

20 Q. Sorry. Did someone at Fusion first tell  
21 you about Alfa-Bank?

22 **A. I don't recall. I don't want to speculate.**

1 Q. Did someone at Perkins Coie first tell you  
2 about Alfa-Bank?

3 A. I don't recall who told me.

4 Q. Do you recall the context? Was it a  
5 meeting that you were in?

6 A. I don't recall.

7 Q. So who have you discussed Alfa-Bank with at  
8 Fusion?

9 MR. LEVY: I'm going to instruct the  
10 witness not to answer that question because the  
11 answer would implicate the attorney-client privilege  
12 and the attorney work product doctrine.

13 MR. KELLY: I'm sorry, that -- who she  
14 discussed this with is a factual question. Fusion is  
15 not an attorney as far as I know, and therefore, your  
16 instruction not to answer is inappropriate.

17 MR. LEVY: Mr. Kelly, all of the answers  
18 that would be covered by privilege would be answers  
19 to factual questions, but -- I think they'd all be  
20 facts, but the facts would be covered by the  
21 privileges, and so I am instructing the witness not  
22 to answer the question.



1 MR. KELLY: So you're saying that even  
2 underlying -- strictly factual questions you're going  
3 to say are privileged.

4 MR. LEVY: I'm not sure of the distinction  
5 you're making about a strictly factual question and a  
6 question about a fact that the disclosure of which  
7 would implicate a privilege, so the answer to that  
8 question could violate the privilege. We've not been  
9 authorized to waive that privilege, so I'm  
10 instructing the witness not to answer that question.

11 BY MR. KELLY:

12 Q. Ms. Seago, what is your opinion of  
13 Alfa-Bank?

14 MR. LEVY: What -- an opinion?

15 BY MR. KELLY:

16 Q. Yes, Ms. Seago, what is your general  
17 understanding and opinion of Alfa-Bank?

18 MR. LEVY: Objection. She's here to answer  
19 factual questions.

20 BY MR. KELLY:

21 Q. You can answer.

22 A. **I don't have deep knowledge of Alfa-Bank.**

1 **My opinion of them is that they appear to have ties**  
2 **to the Russian government.**

3 Q. Did you do any research on Alfa-Bank when  
4 Fusion was engaged by the Washington Free Beacon?

5 **A. I'm sorry?**

6 Q. Did you do any research on Alfa-Bank when  
7 Fusion was originally engaged to investigate Donald  
8 Trump by the Washington Free Beacon?

9 **A. I don't know who the client was and whether**  
10 **or not it was the Washington Free Beacon.**

11 Q. So you don't know for which client you were  
12 researching Alfa-Bank?

13 **A. I don't always know who the client is in a**  
14 **case.**

15 Q. So did you understand then to be working  
16 for a law firm at any point?

17 MR. LEVY: Objection. When you mean then,  
18 what are you referring to?

19 BY MR. KELLY:

20 Q. So if you -- if you can't be sure which  
21 client you were researching Alfa-Bank for, did you  
22 ever understand to be researching Alfa-Bank for a law

1 firm?

2 MR. LEVY: Objection. That's not what her  
3 testimony was.

4 BY MR. KELLY:

5 Q. You can answer.

6 **A. I did not do substantive research into**  
7 **Alfa-Bank at any point other than looking into the**  
8 **communications between Alfa-Bank and the Trump**  
9 **organization, so I didn't do other research that I**  
10 **can speak to.**

11 Q. Okay, and when you're doing that research,  
12 were you told that it was on behalf of a law firm or  
13 in anticipation of litigation?

14 **A. The research that I was doing looking into**  
15 **the server communications was on behalf of a law**  
16 **firm. That was my understanding, yes.**

17 Q. Were you instructed this?

18 **A. Yes.**

19 Q. And who instructed you of this?

20 MR. LEVY: That's privileged. I'm going to  
21 instruct her not to answer that question.

22 BY MR. KELLY:

1 Q. Are you going to stick by -- are you going  
2 to listen to your attorney's instruction?

3 A. Yes.

4 Q. So you said that you did not perform any  
5 substantive research on Alfa-Bank. Did anyone at  
6 Fusion conduct substantive research on Alfa-Bank, to  
7 your knowledge?

8 MR. LEVY: I'm going to instruct the  
9 witness not to answer that question because the  
10 answer would implicate privilege.

11 MR. KELLY: So Mr. Levy, let's take a break  
12 for five more minutes again please.

13 MR. LEVY: Sure.

14 THE VIDEOGRAPHER: Going off the record at  
15 10:17 a.m.

16 (Recessed at 10:17 a.m.)

17 (Reconvened at 10:22 a.m.)

18 THE VIDEOGRAPHER: Going back on the record  
19 at 10:22 a.m.

20 BY MR. KELLY:

21 Q. Okay, thank you. Ms. Seago, I believe  
22 where we left off is I asked you who first told you

1 about Alfa-Bank.

2 **A. My recollection is that we already -- I**  
3 **already answered that question. I don't recall.**

4 Q. You don't recall, and did you discuss  
5 Alfa-Bank -- or who did you discuss Alfa-Bank with at  
6 Fusion?

7 MR. LEVY: I'm going to instruct the  
8 witness not to answer that question.

9 MR. KELLY: Mr. Levy, I would just note  
10 that who you communicated with is basic information  
11 that you would include on a privilege log. Who you  
12 communicated with would not be something that would  
13 be privileged. You'd produce that as a normal  
14 privilege log in the course to be able to ascertain  
15 the applicable privilege, and therefore, I say that  
16 your instruction that this is privileged is  
17 inappropriate, so do you maintain your instruction  
18 not to answer?

19 MR. LEVY: Inasmuch as the answer would  
20 cover a period of time under the engagement that's  
21 going to be privileged. If you recall communications  
22 with people at Fusion outside the period of the

1 engagement about Alfa, you can answer the question.

2 THE WITNESS: I don't recall any specific  
3 communications outside the period of the engagement  
4 right offhand.

5 BY MR. KELLY:

6 Q. Okay. Ms. Seago, we're going to move on.  
7 I'm going to ask the videographer, Joe, to mark tab  
8 13 as Exhibit 2. So this is Franklin Foer's October  
9 31st article that publicizes the server allegations.  
10 Ms. Seago, do you know Mr. Foer?

11 (A document was designated  
12 as Exhibit No. 2.)

13 MR. LEVY: Can you hold on a second? I  
14 don't have the exhibit in the folder. There it is.

15 BY MR. KELLY:

16 Q. Ms. Seago, do you know Mr. Foer?

17 **A. I have met Frank Foer.**

18 Q. When did you meet Frank Foer?

19 **A. I don't recall the exact date.**

20 Q. Did you meet with Mr. Foer in 2016?

21 **A. Yes, I did.**

22 Q. Was it in the summer of 2016?

1           **A.     I don't recall the exact date. Summer of**  
2           **2016 sounds right.**

3           Q.     Was it in relation to this article?

4           **A.     Yes.**

5           Q.     Outside --

6           **A.     Actually, I want to correct the record. I**  
7           **know -- recall -- I believe I met Mr. Foer in the**  
8           **fall.**

9           Q.     In the fall of 2016.

10          **A.     Yes.**

11          Q.     Could you be any more specific than that?

12          **A.     I don't recall the exact date.**

13          Q.     Okay. So you met Mr. Foer in 2016.

14          Outside of this meeting in -- was this an in-person  
15          meeting or was this a call?

16          **A.     It was an in-person meeting.**

17          Q.     Who else attended this meeting?

18          **A.     As I recall, it was myself, Peter Fritsch,**  
19          **Frank Foer and Jake Berkowitz.**

20          Q.     Okay, and was this before or after the  
21          publication of the article?

22          **A.     It was before the publication of the**

1 **article.**

2 Q. Okay, and what was the substance of this  
3 meeting?

4 **A. We were discussing with Mr. Foer the claims**  
5 **that Alfa-Bank and the Trump organization were**  
6 **communicating via a server.**

7 Q. Do you recall whether Fusion was the one  
8 who presented these claims to Mr. Foer?

9 **A. I recall that at this meeting, we discussed**  
10 **these claims. I don't know who initially presented**  
11 **the claims to Mr. Foer.**

12 Q. What sort of preparation did you do for  
13 this meeting?

14 **A. I reviewed information published to the web**  
15 **that -- discussing these claims. I reviewed analyses**  
16 **of these claims made by computer scientists. I**  
17 **reviewed the attached data that was also made**  
18 **publicly available about this information, and I**  
19 **focused on translating some information for a lay**  
20 **audience.**

21 Q. Okay. So did you communicate with Mr. Foer  
22 prior to this meeting?



1           **A.     I don't recall.**

2           Q.     Did you bring anything with you to this  
3 meeting?

4           **A.     I don't recall.**

5           Q.     Did you provide Mr. Foer with any data?

6           **A.     I don't recall.**

7           Q.     You do not recall whether you provided Mr.  
8 Foer with any data either before or after this  
9 meeting?

10          **A.     I don't recall.**

11          Q.     Do you know if anyone else at Fusion  
12 provided Mr. Foer with data?

13          **A.     I don't know.**

14          Q.     Do you know whether anyone else at Fusion  
15 provided Mr. Foer with analysis from computer  
16 scientists?

17                   MR. LEVY:  Objection, form.

18                   BY MR. KELLY:

19          Q.     You can answer.

20          **A.     I don't know.**

21          Q.     Okay.  So you met to discuss the server  
22 allegations.  Was Mr. Foer already drafting his

1 article at this time?

2 MR. LEVY: Objection, form.

3 BY MR. KELLY:

4 Q. You may answer.

5 **A. I don't know.**

6 Q. So you stated that you were translating  
7 information into layman's terms. What information  
8 were you translating into layman's terms?

9 **A. The claims made about the communications**  
10 **between Alfa-Bank and the Trump organization were in**  
11 **technical language. Because of my familiarity with**  
12 **programming languages, the learning curve for me is a**  
13 **little less steep and understanding these concepts**  
14 **and being able to break them down for a nontechnical**  
15 **audience.**

16 Q. So you were acting as -- would you say you  
17 were acting as a technical liaison then of sorts?

18 **A. I wouldn't attribute that term to myself.**  
19 **I was explaining technical concepts.**

20 Q. But you do not have any experience with  
21 DNS; is that correct?

22 MR. LEVY: Objection, form.

1 BY MR. KELLY:

2 Q. You may answer.

3 **A. That is correct.**

4 Q. Did Mr. Foer tell you who else he was  
5 speaking to in relation to this article?

6 **A. Not that I can recall.**

7 Q. Did anyone at Fusion tell you who Mr. Foer  
8 was speaking to in relation to this meeting?

9 **A. Not that I can recall.**

10 Q. So you mentioned that you were doing --  
11 translating technical information into layman's  
12 terms. Did you speak to any computer scientists  
13 prior to this meeting?

14 MR. LEVY: I'm going to instruct the  
15 witness not to answer that question because the  
16 answer would implicate the attorney-client privilege  
17 and the attorney work product doctrine.

18 MR. KELLY: I'm sorry, is -- what is the  
19 basis of this privilege?

20 MR. LEVY: Inasmuch as she had  
21 communications with computer scientists under the  
22 engagement, that's covered by the privilege.

1           MR. KELLY: Are any -- what -- Mr. Levy,  
2 these computer scientists would be considered third  
3 parties, therefore, there would be a waiver as to any  
4 communications that Ms. Seago had. Are you claiming  
5 that these computer scientists were agents of the  
6 same law firm -- or the same client that Ms. Seago  
7 was working for?

8           MR. LEVY: No, but were -- were a lawyer or  
9 a paralegal or an investigator to consult a librarian  
10 or a translator, it would be part of the work product  
11 at the direction of counsel in anticipation of  
12 litigation. It's attorney work doctrine, it's  
13 covered by Kovel letter, reserving attorney-client  
14 privilege, and these positions are set forth in our  
15 papers filed with the federal court.

16           BY MR. KELLY:

17           Q. Ms. Seago, are you a lawyer?

18           A. No.

19           Q. Do you work for a law firm?

20           A. **It depends on who the client is. In this**  
21 **case our client was a law firm.**

22           Q. Are you a paralegal -- are you a direct

1 employee of a law firm?

2 **A. No.**

3 Q. So you were communicating with a third-  
4 party computer scientist; is that correct?

5 MR. LEVY: Again, I'm going to instruct the  
6 witness not to answer that question because the  
7 answer would implicate the attorney-client privilege  
8 and the attorney work product doctrine.

9 BY MR. KELLY:

10 Q. Are you going to follow that instruction,  
11 Ms. Seago?

12 **A. Yes.**

13 Q. Ms. Seago, to the extent you spoke with  
14 them, did you share that information with Mr. Foer?

15 MR. LEVY: I'm going to instruct the  
16 witness not to answer that question because of the  
17 predicate that you included in it, which she didn't  
18 testify to and which I instructed her not to answer  
19 because an answer would implicate privilege. You  
20 want to ask it a different way, feel free.

21 Q. Ms. Seago, did you discuss conversations  
22 with any computer scientists with Franklin Foer?

1           **A.     I don't recall.**

2           Q.     Did you receive any assistance from  
3 computer scientists with regards to your technical  
4 analyses that you were conducting for Mr. Foer?

5           MR. LEVY: I'm going to instruct the  
6 witness not to answer that question because it would  
7 implicate the attorney-client privilege and the  
8 attorney work product doctrine.

9           MR. KELLY: Again, Mr. Levy, I'm going to  
10 state that her communications with third parties are  
11 clearly not privileged and that this is an improper  
12 instruction. Are you sticking by your instruction?

13          MR. LEVY: Are you asking me or the  
14 witness?

15          MR. KELLY: I'm asking you.

16          MR. LEVY: Am I sticking by my instruction?

17          MR. KELLY: Yes.

18          MR. LEVY: My instruction is proper. I  
19 disagree with you.

20          BY MR. KELLY:

21          Q.     And Ms. Seago, are you going to follow this  
22 instruction?

1           **A.     Yes.**

2           Q.     Ms. Seago, who put you in contact with any  
3 computer scientists?

4           MR. LEVY:   Going to instruct the witness  
5 not to answer that question because the answer would  
6 implicate the attorney-client privilege and the  
7 attorney work product doctrine.

8           BY MR. KELLY:

9           Q.     Ms. Seago -- so in your technical analysis,  
10 did you do any research on any computer scientists  
11 who might be able to assist you independently of  
12 receiving any information from Fusion or Perkins  
13 Coie?

14           **A.     I researched the claims that were published**  
15 **to the web made by somebody purporting to be Tea**  
16 **Leaves, but I don't know if that person was a**  
17 **computer scientist.**

18           Q.     Did you reach out to any computer  
19 scientists independently of receiving instruction to  
20 do so from Fusion or Perkins Coie?

21           **A.     No.**

22           Q.     So in the meeting with Mr. Foer, you

1 discussed the server allegations. Was Fusion's  
2 stance that Mr. Foer should go forward and publish  
3 this article about the server allegations?

4 MR. LEVY: Objection to form.

5 BY MR. KELLY:

6 Q. You can answer.

7 **A. I don't speak for the firm.**

8 Q. Okay. Did anyone in the meeting suggest  
9 that Mr. Foer should publish this article?

10 **A. I don't recall.**

11 Q. Do you recall if Mr. Foer expressed any  
12 doubts about the underlying server allegations?

13 **A. I don't recall.**

14 Q. Do you recall whether Mr. Foer had  
15 discussed any conversations he had with computer  
16 scientists?

17 **A. I don't recall.**

18 Q. So can you just tell me what you do recall  
19 about the meeting?

20 **A. I recall meeting with Frank Foer. I recall**  
21 **that Peter Fritsch and Jake Burkowitz were also**  
22 **there, and I recall discussing the communications**



1     **between Alfa-Bank and the Trump organization.**

2           Q.     Okay. Did you provide any of your own  
3 insights during this meeting?

4           **A.     I don't recall.**

5           Q.     So you prepared technical analysis to help  
6 laymen understand in advance of this meeting, but you  
7 don't recall whether you shared that information?

8           MR. LEVY: Objection, argumentative.

9           BY MR. KELLY:

10          Q.     You may answer.

11          **A.     I don't recall what technical analysis I**  
12 **prepared, and I don't recall what I presented to Mr.**  
13 **Foer.**

14          Q.     What did you discuss about the  
15 communications?

16          **A.     I don't recall.**

17          Q.     What did Mr. Foer discuss about the  
18 communications?

19          **A.     I don't recall.**

20          Q.     What did any of the other Fusion  
21 representatives discuss about the communications?

22          **A.     I don't recall.**

1 Q. And just to be clear, was there anyone in  
2 the meeting other than Franklin Foer or the Fusion  
3 people that you previously stated?

4 A. **Not that I can recall.**

5 Q. Was the Clinton campaign or the Democratic  
6 National Committee mentioned during this meeting?

7 A. **I don't recall.**

8 Q. How long was the meeting?

9 A. **I don't recall.**

10 Q. Do you remember where the meeting was?

11 A. **Yes.**

12 Q. Where was the meeting held?

13 A. **Frank Foer's home.**

14 Q. Frank Foer's home, okay. And so -- so what  
15 was Fusion's interest in meeting with Mr. Foer?

16 MR. LEVY: Objection, form.

17 BY MR. KELLY:

18 Q. You may answer.

19 A. **Again, I don't speak for the company. I  
20 was asked by my supervisor to attend the meeting.**

21 Q. And who was your supervisor?

22 A. **Peter Fritsch.**

1 Q. Okay. Do you know who initially requested  
2 the meeting?

3 A. No.

4 Q. Did you have any meetings with anyone at  
5 Fusion prior to this meeting about the upcoming  
6 meeting with Mr. Foer?

7 A. I don't recall.

8 Q. Are there any documents that summarize the  
9 meeting?

10 A. Not that I'm aware of.

11 Q. Did you take notes during the meeting?

12 A. Not that I can recall.

13 Q. Do you recall anyone else taking any notes  
14 during the meeting?

15 A. Not that I can recall.

16 Q. Was it standard practice to summarize a  
17 meeting afterwards?

18 A. Summarize how?

19 Q. Was it standard practice to write a memo to  
20 file?

21 A. No.

22 Q. Was it standard practice to distribute a

1 summary e-mail about a meeting at Fusion afterwards?

2 **A. No.**

3 Q. Do you recall whether a memo to file about  
4 this meeting was written?

5 **A. Not that I can recall.**

6 Q. Do you recall an e-mail being circulated at  
7 Fusion about this meeting?

8 **A. Not that I can recall.**

9 Q. And do you recall who asked for this  
10 meeting?

11 **A. I don't recall. I believe I already  
12 answered that.**

13 Q. You said that Mr. Fritsch asked you to  
14 attend the meeting. What did he tell you about the  
15 meeting ahead of time?

16 **A. I don't recall the specifics.**

17 Q. Did he tell you why you were meeting?

18 **A. I don't recall.**

19 Q. Were you aware of the server allegations  
20 prior to this meeting?

21 MR. LEVY: Objection, asked and answered.

22 BY MR. KELLY:

1 Q. Why do you think you were meeting?

2 A. **Why do I think we were meeting now or --**

3 Q. No, why do -- why do you think you were  
4 meeting Mr. Foer? Sorry, I didn't mean to talk over  
5 you. Ms. Seago, why -- what is your understanding of  
6 why you were meeting with Mr. Foer in October of  
7 2016?

8 A. **My understanding at the time?**

9 Q. Yes.

10 A. **To discuss the server allegations.**

11 Q. And was it so Mr. Foer could write this  
12 article?

13 A. **I knew that he was interested in reporting  
14 on this issue. I did not know about any specific  
15 article he planned to write.**

16 Q. And what was significant about these server  
17 allegations?

18 A. **Highly credible computer scientists had  
19 claimed that there were communications between the  
20 Trump organization and Alfa-Bank as discussed in the  
21 story that we have here in front of us. These  
22 credible computer scientists thought these**

1 **communications looked suspicious and looked hard to**  
2 **falsify and suggested a secret channel of**  
3 **communication.**

4 Q. Thank you, and who were these highly  
5 credible computer scientists?

6 A. **They're named in the article. L. Jean Camp**  
7 **is one name. Paul Vixie is another. I don't recall**  
8 **other names.**

9 Q. So Mr. Foer mentioned L. Jean Camp and Paul  
10 Vixie during this meeting?

11 A. **I don't recall if they were mentioned**  
12 **during the meeting, but I know they're mentioned in**  
13 **the article and in subsequent press reports.**

14 Q. So I asked you what was significant about  
15 the server allegations as pertaining to this meeting,  
16 and you mentioned that highly credible scientists.  
17 So it your understanding going into this meeting that  
18 highly credible scientists supported these server  
19 allegations?

20 MR. LEVY: Objection, asked and answered.

21 BY MR. KELLY:

22 Q. No, you may answer.

1           **A.       The claims about the server allegations**  
2           **have already been published to the web at this time,**  
3           **and there was already discussions surrounding them at**  
4           **this time, including blog posts by well known**  
5           **cybersecurity bloggers that thought there might be**  
6           **something to these claims.**

7           Q.       So outside of these published bloggers,  
8           what was your understanding of any credible  
9           scientists who supported the server allegations?

10           MR. LEVY: Outside of communications that  
11           are privileged, you can answer that question.

12           **A.       Outside of communications that are**  
13           **privileged, I've already discussed the searches that**  
14           **I was aware of.**

15           MR. KELLY: I would again note that  
16           communications with third parties would be not  
17           privilege, and that's an improper instruction not to  
18           answer.

19           MR. LEVY: Mr. Kelly, you're -- you're  
20           presuming who the communications were with. The  
21           communications -- she had information from privileged  
22           communications. She's not talking about those

1 privileged communications, and she's told you about  
2 what's not privileged.

3 BY MR. KELLY:

4 Q. Okay. So you mentioned cybersecurity  
5 bloggers. Who are you referring to?

6 A. **A name that I can recall off the top of my  
7 head is a blogger who goes by Krypt3ia.**

8 Q. And were you in contact with Krypt3ia?

9 A. **No.**

10 Q. You were not in contact with Krypt3ia,  
11 okay. So what was your understanding of Krypt3ia as  
12 a credible computer scientist?

13 A. **I knew of that person from reputation. I  
14 follow the computer science community on Twitter and  
15 the internet. I know this person to be respected.**

16 Q. So you had heard of Krypt3ia before the  
17 server allegations.

18 A. **Yes.**

19 MR. KELLY: And I would ask that whoever's  
20 phone keeps going off, please turn it off. In  
21 addition to the ringing, we're also hearing a number  
22 of pings, and I'd also ask is this deposition being



1     streamed by anyone?

2                   MR. LEVY:   No.

3                   MR. KELLY:   So --

4                   MR. LEVY:   It's my -- it's my phone.  It's  
5     my apology, and we fixed the technology.  I've  
6     bricked the phone.  It's off.  It's just my inability  
7     to figure out.  My apologies.

8                   BY MR. KELLY:

9           Q.     So Ms. Seago, going back to this meeting  
10    with Franklin Foer, did he indicate when he planned  
11    to publish an article on the server allegations?

12           A.     **I don't recall.**

13           Q.     Do you remember anyone suggesting that he  
14    move forward with the server allegations?

15           A.     **I don't recall.**

16           Q.     So you mentioned Krypt3ia, and you said  
17    that he was a credible security -- cybersecurity  
18    blogger who supported the allegations, but wasn't he  
19    critical of the underlying server allegations?

20           A.     **As I recall, he pointed out that he didn't  
21    have access to the raw data, and I believe he may  
22    have had communications with somebody else who**

1 provided him with more data, and he thought that it  
2 was a very interesting allegation. He did not  
3 distance it out of hand. He found it credible at the  
4 time.

5 Q. Okay. Did you have access to the raw data?

6 A. No.

7 Q. Did Fusion have access to the raw data?

8 MR. LEVY: Objection to form.

9 BY MR. KELLY:

10 Q. You may answer.

11 A. I don't know if anybody else did. My  
12 understanding is that they did not.

13 Q. So outside of reading Krypt3ia, what was  
14 your understanding of the credibility of the server  
15 allegations?

16 MR. LEVY: Outside of privileged  
17 communications, you can answer that question.

18 A. Outside of privileged communications, there  
19 was other discussion in the computer science  
20 community on the web about the allegations that had  
21 been posted to the open web, and they all seemed to  
22 suggest that there's a possibility of communication

1     **there. I did look at the text files that had been**  
2     **posted to the web and saw what appeared to be DNS**  
3     **look-ups between these two servers and saw no reason**  
4     **to believe that this data was incorrect or that the**  
5     **conclusions that posters had drawn were incorrect.**

6           Q.     Okay. So you mentioned that you accessed  
7     the data that was posted to the web. Do you recall  
8     when that was?

9           **A.     I don't recall.**

10          Q.     Were you looking for the -- the data at the  
11     time?

12                  MR. LEVY:   What time?

13                  BY MR. KELLY:

14          Q.     At the time that you accessed it, do you --  
15     sorry. So you -- sorry, excuse me. Were you alerted  
16     that data about the server allegations might be  
17     posted to the internet? Excuse me.

18           **A.     I don't recall, I don't recall.**

19          Q.     I'm sorry, give me a second. So just to be  
20     clear, you don't recall whether anyone alerted you to  
21     the fact that there might be a secret communication  
22     between a presidential candidate and a Russian bank

1 that was going to be posted to the internet?

2 MR. LEVY: I'm going to object to form, but  
3 I'm also going to instruct the witness not to answer  
4 that question because the answer would implicate the  
5 attorney-client privilege and the attorney work  
6 product doctrine.

7 BY MR. KELLY:

8 Q. I'm going to say that's an inappropriate  
9 objection. Ms. Seago, are you going to follow his  
10 instruction?

11 A. I will follow my attorney's instructions.

12 Q. And again, I would note that -- that's  
13 fine. So -- do you recall where you first accessed  
14 this data?

15 A. I don't --

16 MR. LEVY: Objection, form. When you say  
17 this data, what do you mean?

18 BY MR. KELLY:

19 Q. The data that you previously discussed that  
20 you accessed on the server allegations that was  
21 posted to the internet, do you recall where you found  
22 it?



1 **referred to in my previous answer, yes, or discussing**  
2 **the Reddit post, I should say.**

3 Q. Okay. So the -- the -- the 1:44 p.m.  
4 message, FYI, found this published on the web, super  
5 interesting in context of our discussion, that is the  
6 MediaFire web site that you found, or that's the web  
7 site where you found the server allegations?

8 **A. My understanding and best recollection is**  
9 **that MediaFire is a file hosting site, and that there**  
10 **was a Reddit post with a link to this MediaFire site.**

11 Q. Okay. In the top e-mail, it says, "Our  
12 tech maven says it was first posted via Reddit." Are  
13 you -- do you understand yourself to be the tech  
14 maven that Mr. Fritsch refers to?

15 MR. LEVY: Objection to form.

16 BY MR. KELLY:

17 Q. You can answer.

18 **A. I didn't write this e-mail. I don't want**  
19 **to speculate about what Mr. Fritsch meant. It might**  
20 **have been me.**

21 Q. But you previously stated that you were  
22 generally the person at Fusion who handled technology

1 or computer-related issues?

2 **A. Yes.**

3 Q. Okay. Is there anyone else at Fusion you  
4 can think of who would be referred to as a tech  
5 maven?

6 **A. No, but once again, I didn't write this  
7 e-mail.**

8 Q. Okay. So Mr. Fritsch writes that this is  
9 super interesting in the context of our discussions.  
10 What is your understanding -- or what do you think he  
11 meant by this?

12 MR. LEVY: Objection to form.

13 **A. I don't know what Mr. Fritsch meant.**

14 Q. Let's take a step back. Who -- are you  
15 familiar with Eric Lichtblau?

16 **A. I know the name.**

17 Q. And who is Eric Lichtblau?

18 **A. He's a journalist. He was at the New York  
19 Times. Then I believe he briefly went to CNN. I  
20 don't know where he works now.**

21 Q. Have you ever communicated with Eric  
22 Lichtblau?

1           **A.     I recall meeting him once or twice. I**  
2           **don't recall the context.**

3                   MR. LEVY: Excuse me, Mr. Kelly, another  
4 person just joined the call, and I don't know who  
5 this person is. Maybe --

6                   MR. KELLY: Oh, I'm sorry, that's another  
7 associate at our firm. She's with us. Apologies.

8                   MS. MURDAY: Hi, and I'm happy to introduce  
9 myself for the record. Apologies for the  
10 interruption. My name is Rebecca Murday on behalf of  
11 plaintiff, Alfa-Bank.

12                   MR. LEVY: Thank you.

13                   BY MR. KELLY:

14           Q.     So Eric Lichtblau -- you met him once or  
15 twice. Do you recall when you met Eric Lichtblau?

16           **A.     I don't recall.**

17           Q.     Was it in 2016?

18           **A.     My best recollection is sometime after the**  
19 **election in 2016.**

20           Q.     Sometime after the election? What was the  
21 -- why did you meet with Eric Lichtblau?

22           **A.     I don't recall.**



1 Q. Was it in regards to a client matter or was  
2 this a personal meeting?

3 **A. My recollection is I met him at the Fusion**  
4 **offices. I don't recall the purpose of the meeting.**

5 Q. So he was in the Fusion offices.

6 **A. Yes.**

7 Q. Your recollection is that this was after  
8 the election of 2016, so after November 4th.

9 **A. That is correct, my recollection is he was**  
10 **already at CNN at the time.**

11 Q. Who else was meeting with Lichtblau?

12 **A. I don't recall.**

13 Q. Did you attend a meeting with Eric  
14 Lichtblau or was this just you met him as he was  
15 walking by, coming or going?

16 **A. To the best of my recollection, I was in**  
17 **our conference room. I assume it was a meeting.**

18 Q. You were in a conference room with Eric  
19 Lichtblau and other people?

20 **A. Yes, that is my recollection.**

21 Q. Is your -- sorry, that sounds like a  
22 meeting. So did you discuss the server allegations

1 with Eric Lichtblau?

2 **A. Not that I can recall.**

3 Q. Did you discuss the article that Eric  
4 Lichtblau wrote on the server allegations, or that  
5 referred to the server allegations on October 31st,  
6 2016?

7 MR. LEVY: Objection to form, and if  
8 there's an article you want to put before her, you  
9 may.

10 BY MR. KELLY:

11 Q. Yeah, we can -- we'll get to that. So you  
12 said you met with Eric Lichtblau once or twice, so  
13 the first -- this was the first meeting you had with  
14 him, this post-election meeting, or the second.

15 MR. LEVY: Objection. I don't know if you  
16 said once or twice. If you can just ask her  
17 questions and not recapitulate or try to characterize  
18 or mischaracterize her testimony, it'd be helpful.

19 BY MR. KELLY:

20 Q. Ms. Seago, how many times did you meet with  
21 Eric Lichtblau?

22 **A. I don't recall the exact number. One or**

1     **two.**

2           Q.     So if it was one or two, you only recall  
3     one meeting though.  When was this other possible  
4     meeting you might have -- that might have happened?

5           **A.     I'm trying to answer you truthfully.  I**  
6     **don't want to conflate memories.  I only have one**  
7     **clear recollection of meeting Eric Lichtblau.  I**  
8     **can't say for sure I never met him again.**

9           Q.     So your testimony is that you only recall  
10    meeting with Eric Lichtblau once.

11          **A.     To the best of my recollection, all I can**  
12    **recall is meeting him in the Fusion offices after the**  
13    **election when he worked for CNN.**

14          Q.     Do you remember any calls or e-mails with  
15    Eric Lichtblau?

16          **A.     No.**

17          Q.     Are you aware of any meetings that Fusion  
18    had with Eric Lichtblau outside --

19                   MR. LEVY:  Objection to form.

20                   BY MR. KELLY:

21          Q.     -- outside of this meeting after the  
22    election?

1 MR. LEVY: Objection to form.

2 BY MR. KELLY:

3 Q. You may answer.

4 **A. I certainly don't know every meeting that**  
5 **goes on between my colleagues and other people, but I**  
6 **have no awareness of meetings that I was not party**  
7 **to.**

8 Q. Do you ever help Peter Fritsch or others  
9 prepare for meetings? Do you ever prepare --

10 **A. Sometimes.**

11 Q. So you are sometimes aware of meetings of  
12 which you're not present.

13 **A. Sometimes I am, yes.**

14 Q. So are you aware of any meetings with Eric  
15 Lichtblau or calls with Eric Lichtblau other than  
16 this post-election meeting in 2016?

17 **A. I don't recall being made aware of any**  
18 **meetings with Eric Lichtblau before this**  
19 **post-election meeting.**

20 Q. Did you discuss Alfa-Bank with Eric  
21 Lichtblau?

22 **A. At the post-election meeting --**

1 Q. Yes.

2 **A. Not that I can recall.**

3 Q. Do you recall Eric Lichtblau being upset  
4 about the article he wrote which mentioned the server  
5 allegations?

6 MR. LEVY: Objection to form, and again, if  
7 you can put an article in front of her so that she  
8 can know what you're talking about, it would be  
9 helpful.

10 BY MR. KELLY:

11 Q. You may answer.

12 **A. I don't recall the substance of the**  
13 **meeting, as I've said.**

14 Q. So the e-mail, going back to this e-mail,  
15 says that it was posted via Reddit. So is that  
16 accurate, that you found this information on Reddit?

17 MR. LEVY: Objection to form.

18 BY MR. KELLY:

19 Q. You may answer.

20 **A. I did not write this e-mail. As I**  
21 **testified to previously, I do recall seeing some data**  
22 **about the server allegations posted to Reddit.**

1 Q. Okay. And is that where you originally  
2 found the server allegations, was on this Reddit  
3 post?

4 MR. LEVY: I'm going to instruct the  
5 witness not to answer that question because the  
6 answer could implicate the attorney-client privilege  
7 or the attorney work product doctrine.

8 BY MR. KELLY:

9 Q. Did you independently find this data prior  
10 to finding it on this Reddit post mentioned in this  
11 e-mail?

12 MR. LEVY: If you can answer that outside  
13 of privileged communications, go ahead.

14 **A. I don't know that I can speak to other**  
15 **encounters with this data outside of privileged**  
16 **communications.**

17 Q. So were you specifically looking for this  
18 Reddit post?

19 **A. My understanding is that was work that was**  
20 **done at the instruction of an attorney.**

21 MR. LEVY: Meaning she doesn't have to  
22 answer that question because it's privileged. I'm

1 going to instruct her not to answer that question.

2 BY MR. KELLY:

3 Q. So you were not just generally searching  
4 the web and happened to come across this Reddit post?

5 **A. This was not something I was doing in my  
6 free time, no.**

7 Q. But were you searching for this specific  
8 Reddit post on the server allegations?

9 MR. LEVY: I'm going to instruct the  
10 witness not to answer that question because the  
11 answer could implicate the attorney-client privilege  
12 and the attorney work product doctrine.

13 BY MR. KELLY:

14 Q. Who alerted you to this Reddit post?

15 MR. LEVY: I'm going to instruct the  
16 witness not to answer the question because the answer  
17 could implicate the attorney-client privilege and the  
18 attorney work product doctrine.

19 BY MR. KELLY:

20 Q. Just did you find this Reddit post  
21 independently on your own?

22 MR. LEVY: Asked and answered.

1 BY MR. KELLY:

2 Q. You may answer.

3 MR. LEVY: Objection.

4 **A. This is not something I was doing in my**  
5 **spare time.**

6 Q. Did you find this Reddit post independently  
7 on your own?

8 MR. LEVY: I'm going to instruct the  
9 witness not to answer this question because the  
10 answer would implicate the attorney-client privilege,  
11 the attorney work product doctrine, and I'm going to  
12 object to the question because she's now tried,  
13 notwithstanding my instructions, to answer you twice.

14 MR. KELLY: She has not answered the  
15 question, Mr. Levy. It is a simple yes or no  
16 question that is not privileged. The underlying  
17 issue, it's not a privileged communication. It is a  
18 mere question of whether you found this independently  
19 or not. It does not implicate privilege, and it is  
20 an improper instruction telling her not to answer.  
21 Are you going to stick by your instruction not to  
22 answer this question?



1           MR. LEVY: Disagree with your  
2           mischaracterization of the instruction, and I am  
3           going to continue to instruct her not to answer your  
4           question because the answer may implicate the  
5           attorney-client privilege and the attorney work  
6           product doctrine.

7           MR. KELLY: And just so we're clear, on  
8           work product, what is the anticipated litigation?

9           MR. LEVY: Our positions are clear in our  
10          papers that are filed with the federal court that  
11          your law firm's been following for two years.

12          MR. KELLY: I'm sorry, which communication  
13          you're talking about? This matter is in Florida  
14          state court, and the subpoena's out of the D.C.  
15          Superior Court, so if you could please provide some  
16          more information as to what you're saying?

17          MR. LEVY: Yeah, there's a privilege that  
18          our client has asserted in *Fridman V Bean*, a lawsuit  
19          that the three collective majority owners of  
20          Alfa-Bank have filed in federal court against Bean  
21          LLC. We responded to document requests from the  
22          plaintiffs and included a privilege log, and the

1 plaintiffs filed a motion to compel, and we've  
2 responded. It's fully litigated I think before the  
3 court. We're expecting a ruling, and the positions  
4 are set forth in those papers, and we --

5 MR. KELLY: However, Alfa-Bank -- I'm  
6 sorry, Mr. Levy. I didn't mean to interrupt you.

7 MR. LEVY: That's okay. Go ahead.

8 MR. KELLY: Alfa-Bank is not a party to  
9 that litigation, so I would appreciate it if you'd  
10 inform me, what is the litigation that is forming the  
11 basis of your attorney work product claim here?

12 MR. LEVY: I refer you to our papers. I  
13 don't want to spend the time -- you get seven hours.  
14 I don't want to waste the time here litigating  
15 something that we have perfected in our papers filed  
16 in federal court, and your client, Alfa-Bank, moved  
17 to intervene in that case, and it's following it  
18 closely, your law firm, who represents Alfa-Bank and  
19 other third parties in that case, including Richard  
20 Burke. You know exactly what I'm speaking --

21 MR. KELLY: So are you refusing --

22 MR. LEVY: The firm --

1           MR. KELLY: Are you refusing to answer my  
2 question, Mr. Levy? Are you refusing to divulge what  
3 litigation you're referring to?

4           MR. LEVY: I have answered your question,  
5 and I've referred you to the position in our paper.

6           MR. KELLY: We respectfully disagree that  
7 you have not answered my question and you're refusing  
8 to provide that information. So you have not  
9 asserted any anticipated or ongoing litigation, yet  
10 you're asserting work product. This is a simple yes  
11 or no question that is not subject to the attorney  
12 work client privilege, and I again would suggest that  
13 this is an improper instruction and ask if you've  
14 entered these papers you referred to in this  
15 litigation?

16           MR. LEVY: We've not had an occasion to,  
17 Mr. Kelly, and I disagree with your position. We  
18 have asserted the privileges. At the beginning of  
19 this deposition, you -- you instructed the witness  
20 that she was to answer your questions unless counsel  
21 instructed her not to answer the questions because  
22 they would implicate a privilege. You did not say

1 that only -- she should follow my instructions if you  
2 agreed with those instructions.

3 I'm aware, you are not, the privileges have  
4 been litigated in federal court. The positions have  
5 been made clear in the papers. I've referred you to  
6 those positions. It's -- it's going to be a complete  
7 waste of time for us to litigate every question here,  
8 and I would encourage you to ask her additional  
9 questions and move on.

10 MR. KELLY: Mr. Levy, I appreciate your  
11 continued advice. However, I would just note for the  
12 record that you're refusing to answer my question and  
13 I'm going to request a 15-minute break.

14 MR. LEVY: I want to respond to one more  
15 thing, and then I'll be happy to take a break. The  
16 litigation anticipated is set forth in the Kovel  
17 letter, it's set forth in our papers, and this is a  
18 legal discussion that shouldn't have to consume this  
19 deposition. Happy to take a break.

20 MR. KELLY: It's a simple question, what is  
21 the litigation, that would not consume this  
22 deposition if you would just answer it, and those

1 papers were filed in federal court, not the D.C.  
2 Superior Court or the Florida state court, where this  
3 action's happening. However, Joe, we're going to go  
4 on break for 15 minutes.

5 THE VIDEOGRAPHER: All right, going off the  
6 record at 11:03 a.m.

7 (Recessed at 11:03 a.m.)

8 (Reconvened at 11:19 a.m.)

9 THE VIDEOGRAPHER: Going back on the record  
10 at 11:19 a.m.

11 MR. KELLY: Mr. Levy, I believe you  
12 suggested that you were willing to discuss the  
13 anticipated litigation that is the subject of your  
14 work product claims?

15 MR. LEVY: I already have, and I'll  
16 elaborate on it. I just wanted to read from our  
17 papers that I referenced when responding to your  
18 questions previously, to wit Fusion was retained in  
19 direct response to Perkins Coie's subjectively held  
20 and objectively reasonable concern that statements  
21 made during the 2016 election campaign might result  
22 in defamation litigation.

1           As Fusion has explained in a sworn  
2 declaration substantiating their privileged  
3 communications, at the time Perkins secured  
4 defendant's services, meaning Fusion's services,  
5 Perkins, quote, "Anticipated the potential for libel,  
6 defamation or other claims implicating the accuracy  
7 of public information in connection with its  
8 representation of the DNC and HFACC," end of quote,  
9 "and retained Fusion," quote, "to facilitate and  
10 provide information necessary," end quote, "to inform  
11 Perkins'," quote, "legal advice concerning those  
12 potential litigation risks," end of quote.

13           BY MR. KELLY:

14           Q.     Thank you. Ms. Seago, were you ever  
15 informed that the work you were conducting was in  
16 anticipation of litigation?

17           A.     **I was informed that the client was a law  
18 firm and that the work product was privileged.**

19           Q.     But you were not informed it was in  
20 anticipation of litigation.

21           A.     **Not that I can recall.**

22           MR. KELLY:   And -- okay. So Joe, we're

1 going to ask you to mark tab 70, that's seven zero,  
2 as the next exhibit, which I believe will be Exhibit  
3 4.

4 (A document was designated  
5 as Exhibit No. 4.)

6 BY MR. KELLY:

7 Q. And just while he's bringing that up,  
8 Ms. Seago, Fusion was conducting opposition research  
9 and is an opposition research firm; is that correct?

10 MR. LEVY: Objection to form.

11 BY MR. KELLY:

12 Q. Sorry. Fusion is an opposition research  
13 firm. Is that correct, Ms. Seago?

14 MR. LEVY: Objection to form.

15 BY MR. KELLY:

16 Q. You may answer.

17 **A. Fusion is not an opposition research firm.**  
18 **Fusion is a research firm that conducts open source**  
19 **research on a variety of matters. We are not, nor**  
20 **have we ever called ourselves an opposition research**  
21 **firm.**

22 Q. Okay. Did you perform -- did Fusion

1 perform opposition research for the Clinton campaign  
2 in 2016?

3 MR. LEVY: Objection to form.

4 BY MR. KELLY:

5 Q. You may answer.

6 **A. My understanding is that Perkins Coie**  
7 **retained us to do research on Donald Trump and**  
8 **Russia. We looked at everything related to that**  
9 **matter.**

10 Q. So you were asked to do opposition -- or  
11 research on the Clinton campaign's opposition?

12 **A. We were asked to do research on Donald**  
13 **Trump, yes.**

14 Q. And is it your understanding that Fusion  
15 GPS did opposition research on behalf of Barack Obama  
16 in the 2012 election?

17 MR. LEVY: I'm going to object to that  
18 question, and I don't understand its relevance to the  
19 identity of the John Doe defendants.

20 MR. KELLY: Sir, Mr. Levy, I'm just  
21 establishing that Fusion GPS performs opposition  
22 research because, as you should know, opposition



1 research is not shielded by privilege, and I'm  
2 establishing the basis for that.

3 MR. LEVY: I disagree with your legal  
4 position, but if you want to ask questions, go ahead.

5 BY MR. KELLY:

6 Q. You may answer.

7 **A. Please restate the question.**

8 Q. Is it your understanding that Fusion GPS  
9 performed opposition research on behalf of the Barack  
10 Obama campaign in 2012?

11 MR. LEVY: Objection to form.

12 BY MR. KELLY:

13 Q. You may answer.

14 **A. I joined the company in 2015. 2012 was**  
15 **well before my time. I was not aware of any**  
16 **activities the company was doing before I joined the**  
17 **firm.**

18 Q. So you were not aware that Fusion GPS  
19 performed opposition research in 2012.

20 MR. LEVY: Objection, asked and answered.

21 BY MR. KELLY:

22 Q. I don't believe that it was. You answer.

1           **A.**     **I read press reports regarding work that**  
2     **Fusion GPS did on Mitt Romney. I don't know if that**  
3     **was opposition research. I don't know who the client**  
4     **was. I don't know anything beyond what I've read in**  
5     **the press.**

6           **Q.**     Are you aware that John Podesta testified  
7     that Fusion GPS performed opposition research on  
8     behalf of the Clinton campaign in 2016?

9           **MR. LEVY:** Objection to form. If you want  
10    to show her testimony, I think that will be fair to  
11    the witness.

12                    **BY MR. KELLY:**

13           **Q.**     Are you aware of that testimony, Ms. Seago?

14           **A.**     **No.**

15           **Q.**     Okay. So Exhibit 4 is the indictment of  
16    Michael Sussmann. Are you aware that Michael  
17    Sussmann, an attorney at Perkins Coie, was issued an  
18    indictment by a grand jury on September 16th, 2021?

19           **A.**     **Yes.**

20           **Q.**     Have you read the indictment?

21           **A.**     **Yes.**

22           **Q.**     Are you aware that the indictment is

1 related to Mr. Sussmann allegedly misleading the FBI  
2 regarding the server allegations?

3 MR. LEVY: Objection to form, assumes facts  
4 in evidence.

5 BY MR. KELLY:

6 Q. You may answer.

7 **A. I'm aware that the indictment concerns**  
8 **Michael Sussmann's actions. I don't know whether or**  
9 **not the allegations in the indictment are true.**

10 Q. I didn't ask if the allegations were true.  
11 I just asked whether you were aware that the  
12 indictment concerned allegations that Michael  
13 Sussmann lied with regard to the server allegations  
14 to the FBI.

15 MR. LEVY: Objection to form, assumes facts  
16 in evidence.

17 BY MR. KELLY:

18 Q. You may answer.

19 MR. LEVY: You want to point her to the  
20 allegation you're talking about, I think it would be  
21 more helpful. Go ahead.

22 BY MR. KELLY:

1 Q. Well, can you scroll down a little bit,  
2 Joe? Actually, that's just -- Joe, scroll to page 4,  
3 and we're going to look at paragraph 11. So we'll  
4 just move on. So the Sussmann indictment refers to a  
5 particular investigative firm as U.S. investigative  
6 firm that was hired by the Clinton campaign, the DNC,  
7 law firm-1, to gather information regarding Trump's  
8 purported ties to Russia, and that investigative firm  
9 worked with law firm-1 and members of the media to  
10 gather and disseminate purported evidence of Trump's  
11 ties to Russia. Investigative firm has been publicly  
12 identified as Fusion GPS. Do you have any reason to  
13 doubt that investigative firm is Fusion GPS?

14 **A. I didn't write this indictment. I don't**  
15 **know. I have no particular reason to doubt that**  
16 **claim.**

17 Q. Okay. Joe, can you scroll to page 22?  
18 Okay. It says, "On or about October 30, 2016, an  
19 employee of the U.S. investigative firm forwarded  
20 another reporter, reporter-2, a tweet, which  
21 indicated that the FBI director had explosive  
22 information about ties to Russia." So there was a

1 tweet indicating the FBI director had explosive ties  
2 to Russia, and then --

3 MR. LEVY: I'm sorry, Mr. Kelly, you're  
4 going very fast. We're just getting with page 22.  
5 What -- what paragraph are you --

6 BY MR. KELLY:

7 Q. Paragraph 35, and Joe, while that's  
8 working, I'm going to ask you to enter into -- give  
9 me one second. Joe, I'm going to ask you to enter  
10 tab 31 as the next exhibit, but please wait to pull  
11 it up to the screen until Mr. Levy -- or Ms. Seago,  
12 have you had a chance to read paragraph 35?

13 (A document was designated  
14 as Exhibit No. 5.)

15 THE WITNESS: Just one moment. Let me  
16 finish reviewing it. Okay.

17 BY MR. KELLY:

18 Q. So it mentions U.S. investigative firm  
19 employee e-mailed a reporter a tweet about the FBI  
20 director, explosive information, and that the said --  
21 quote, time to hurry, and that reporter-2 e-mailed  
22 the investigative firm employee a draft article,

1 quote, "Here's the first 2,500 words." Joe, if you  
2 could switch over to Exhibit 5 now, and scroll down.

3 So this is an e-mail between Peter Fritsch,  
4 an employee of Fusion, and Franklin Foer. Mr. Foer  
5 is a reporter I believe. Joe, keep scrolling. Keep  
6 going. Next page. So Tom Catan of Fusion e-mailed  
7 Mr. Fritsch a tweet, and Reid says he's talked with  
8 top NatSec officials who say that Comey, quote,  
9 possesses explosive information.

10 Then Mr. Fritsch sent an e-mail to Franklin  
11 Foer, quote, "Time to hurry." Joe, can you scroll  
12 back up to the top? And then Franklin Foer responded  
13 with section 1. So can we switch back to the tab 70  
14 please, Exhibit 4? So would you agree that  
15 investigative firm is Fusion GPS?

16 **A. I agree that this e-mail exists, and it**  
17 **appears to contain the same language as is in the**  
18 **indictment.**

19 Q. Okay. So the indictment refers to campaign  
20 lawyer-1, who is the Clinton campaign's general  
21 counsel. Marc Elias, a partner in Perkins Coie, is  
22 publicly identified as Clinton campaign general

1 counsel, and he's been identified as campaign lawyer-  
2 1 in this indictment. So according to the indictment  
3 -- we're going to go back to page 6.

4 **A. In the indictment?**

5 Q. Yes, in the indictment.

6 MR. LEVY: Page 6?

7 BY MR. KELLY:

8 Q. Page 6. It's not paragraph 6. So page 6,  
9 and then we're looking at paragraph 20A, which is  
10 down at the bottom, Joe. So on July 29th, Sussmann  
11 and Marc Elias met with personnel from U.S.  
12 investigative firm, that's Fusion GPS, in campaign  
13 lawyer-1's office, and Sussmann billed his time, and  
14 this is related to the server allegations. So were  
15 you aware of this July 29th meeting between Sussmann  
16 and personnel at Fusion GPS?

17 **A. Not that I can recall.**

18 Q. Were you aware of this meeting after it  
19 happened?

20 **A. Not that I can recall.**

21 Q. Did anyone ever discuss this meeting with  
22 you?

1           **A.     Not that I can recall.**

2           Q.     Has anyone at Fusion ever discussed the  
3     Sussmann indictment with you?

4           **A.     Discussed the Sussmann indictment?**

5           Q.     Yes.

6           **A.     No.**

7           Q.     No one at Fusion has talked -- discussed  
8     the Sussmann indictment with you?

9           **A.     We sent it around. There was no discussion  
10    of it.**

11          Q.     Sorry. Either no one's discussed it or you  
12    sent it around and there's been e-mails about this.

13                 MR. LEVY: Outside of privileged  
14    communications, she said that there's no --

15                 MR. KELLY: And what is the -- I'm sorry,  
16    what is the basis for this privilege? I don't  
17    believe you were working for Perkins Coie in 2021.

18                 MR. LEVY: I'm sorry, maybe I misunderstood  
19    your question.

20                 MR. KELLY: Yeah, I said has anyone at  
21    Fusion discussed the Sussmann indictment with  
22    Ms. Seago.



1 MR. LEVY: Anyone at Fusion discussed the  
2 indictment with Ms. Seago.

3 MR. KELLY: Yes.

4 MR. LEVY: Right, and so I think outside of  
5 privileged communications, there would not have been,  
6 meaning Fusion's counsel would discuss that. There  
7 would not have been nonprivileged discussions about  
8 that, is what she said.

9 BY MR. KELLY:

10 Q. Okay, Ms. Seago, outside the presence of  
11 counsel, have you discussed the Sussmann indictment  
12 with anyone at Fusion GPS?

13 **A. Outside of the presence of counsel, no. We**  
14 **sent the link around, which is not discussion.**  
15 **There's a link to the indictment itself. We're still**  
16 **all working remotely. People read it. I didn't have**  
17 **any discussions with anybody about it.**

18 Q. And were there any further communications  
19 about the Sussmann indictment among the Fusion people  
20 once this link was sent around all -- over e-mail?

21 **A. Not that I'm aware.**

22 MR. LEVY: Wait for him to answer the --

1 THE WITNESS: I'm sorry.

2 MR. LEVY: Finish the question.

3 BY MR. KELLY:

4 Q. Was there any further discussions over  
5 e-mail?

6 **A. Not that I'm aware.**

7 Q. What was your reaction to the indictment?

8 **A. I'm not an attorney, but my reaction was  
9 that this seems to be a rather tenuous claim.**

10 Q. Okay. So going back to the July 29th, 2016  
11 meeting, did you help anyone prepare for that  
12 meeting?

13 **A. Not that I can recall.**

14 Q. And did anyone discuss the meeting with you  
15 before or after?

16 **A. I believe I've answered this. Not that I  
17 can recall.**

18 Q. Okay. So the Sussmann indictment states  
19 that tech executive-1 brought the server allegations  
20 to Michael Sussmann. That's on the same page, and  
21 Joe, if you want to scroll up to paragraph 18, tech  
22 executive-1 has been publicly identified as Rodney

1 Joffe, an executive at Neustar. Are you aware that  
2 tech executive-1 has been publicly identified as  
3 Rodney Joffe?

4 **A. I've read the press reports making that**  
5 **claim.**

6 Q. Okay, that's -- have you ever communicated  
7 with Rodney Joffe?

8 **A. Yes.**

9 Q. When did you communicate with Rodney Joffe?

10 **A. I don't remember the exact date. Late**  
11 **summer of 2016.**

12 Q. And who else was on these communications?

13 **A. There was a meeting that occurred, and as I**  
14 **testified, Marc Elias, Michael Sussmann, Peter**  
15 **Fritsch were also at that meeting.**

16 Q. I'm sorry, I don't believe you previously  
17 mentioned Rodney Joffe attending this meeting. You  
18 mentioned a meeting --

19 **A. I apologize. Yeah, I want to correct the**  
20 **record. This is a meeting at which I met with Marc**  
21 **Elias and Michael Sussmann was the same meeting at**  
22 **which I met with Rodney Joffe.**

1 Q. Okay. Would you like to refresh the record  
2 any more? Is there anyone else that you failed to  
3 recollect at the time we were discussing this  
4 earlier?

5 MR. LEVY: I'm going to object to the  
6 question. She didn't fail. You didn't ask her who  
7 else was at the meeting.

8 MR. KELLY: I believe that I did.

9 MR. LEVY: You did not.

10 BY MR. KELLY:

11 Q. Okay, was there anyone else --

12 MR. LEVY: You asked her who else from  
13 Perkins Coie was at the meeting. She answered that  
14 question completely. You did not ask her who else  
15 was at the meeting, and now you've asked her a direct  
16 question and she's answering you.

17 BY MR. KELLY:

18 Q. Okay. Other than the people you've already  
19 stated, is there anyone else who attended this  
20 meeting?

21 A. No.

22 Q. So what was discussed at this meeting in

1 the fall of 2016 among Rodney Joffe, Michael  
2 Sussmann, Marc Elias and the Fusion personnel you  
3 discussed?

4 MR. LEVY: I'm going to object to form.  
5 She did not say fall of 2016. I'm also going to  
6 instruct the witness not to answer the question  
7 because the communications at that meeting were  
8 protected by the attorney -- and are protected by the  
9 attorney-client privilege and the attorney work  
10 product doctrine.

11 BY MR. KELLY:

12 Q. And I apologize. Yes, you said late fall  
13 of 2016, so I apologize about that. Was Rodney Joffe  
14 a client -- I'm sorry, late summer, I'm sorry, I  
15 apologize. I apologize again. You said -- you --  
16 just for the record, when was the meeting with Rodney  
17 Joffe, Marc Elias, Michael Sussmann and the Fusion  
18 people?

19 MR. LEVY: Asked and answered, objection.  
20 Go ahead.

21 BY MR. KELLY:

22 Q. Sorry, I was just trying to clean up the

1 record from my own mistakes. I apologize.

2 Ms. Seago, was Rodney Joffe a client of Fusion GPS?

3 **A. No.**

4 Q. Are you aware of any agreements regarding  
5 confidentiality or shared privilege with Rodney  
6 Joffe?

7 **A. I am not aware of any. We were meeting**  
8 **with Rodney Joffe in the presence of who I understood**  
9 **to be his attorney.**

10 Q. So on whose -- on whose basis are you  
11 claiming privilege of this meeting if Rodney Joffe is  
12 a third party?

13 MR. LEVY: I'm claiming a privilege. The  
14 meeting was between Fusion and Perkins Coie and among  
15 another Perkins Coie attorney and his client, and the  
16 entire meeting was privileged and under common  
17 interest.

18 MR. KELLY: So you're -- there's a common  
19 interest agreement between Rodney Joffe and Fusion  
20 and the other of Fusion's clients?

21 MR. LEVY: For that meeting, yes.

22 MR. KELLY: Is there a signed agreement

1 that you're aware of?

2 MR. LEVY: Not that I'm aware of.

3 MR. KELLY: And has Perkins Coie relayed  
4 that -- this common interest agreement to you?

5 MR. LEVY: I just told you I'm not aware of  
6 a written agreement, but there was an agreement.

7 MR. KELLY: So what is your understanding  
8 of when this common interest agreement was entered  
9 into?

10 MR. LEVY: I don't know.

11 MR. KELLY: And what is the purpose of the  
12 common interest?

13 MR. LEVY: I -- to -- I don't know.

14 MR. KELLY: What is the common interest?

15 MR. LEVY: I'm not sure except to -- except  
16 to discuss confidential material that was of interest  
17 to both clients, here was the server communications.

18 MR. KELLY: So again, you don't have any  
19 knowledge of a common interest agreement and you  
20 don't know when it was entered into, what the purpose  
21 was or what the common interest was, but you're  
22 instructing her not to answer on the basis of a

1 common interest privilege?

2 MR. LEVY: That's not true. I told you  
3 that their communications were privileged. I told  
4 you that there was a common interest agreement. I  
5 told you what the common interest was, and I -- I  
6 asserted that privilege. It's the attorney-client  
7 privilege, the attorney work product doctrine and --  
8 and a common interest privilege.

9 MR. KELLY: Did you specifically discuss a  
10 common interest agreement with Perkins Coie?

11 MR. LEVY: Me?

12 MR. KELLY: Yes, you.

13 MR. LEVY: I'm not -- I'm not sworn here.

14 MR. KELLY: I'm trying to understand the  
15 basis for you claiming privilege, and --

16 MR. LEVY: Right.

17 MR. KELLY: You're saying there's a common  
18 interest privilege of which you appear to have no  
19 knowledge, so I would like to understand the basis  
20 for that.

21 MR. LEVY: There's several privileges here.  
22 There's the attorney-client privilege and the



1 attorney work product doctrine, which are covered by  
2 the Kovel letter, and I've explained this to you and  
3 it's set forth in our papers, and Fusion was acting  
4 as a contractor under Kovel letter. This was part of  
5 the work it was doing, and this was a confidential  
6 meeting that was pursuant to that -- those two  
7 privileges. In addition, there was a common  
8 interest.

9 MR. KELLY: And who are the parties to the  
10 Kovel letter?

11 MR. LEVY: Fusion GPS and Perkins Coie on  
12 behalf of Perkins Coie's clients, Marc Elias'  
13 clients, DNC and the Clinton campaign.

14 MR. KELLY: So Rodney -- just to be clear,  
15 Rodney Joffe is not a member of this Kovel letter or  
16 a party to it.

17 MR. LEVY: That I don't know. Rodney  
18 Joffe, no, he was not.

19 BY MR. KELLY:

20 Q. Okay. So did you discuss the server  
21 allegations at this meeting?

22 MR. LEVY: I'm going to instruct the

1 witness not to answer the question because the  
2 question would implicate privileges.

3 BY MR. KELLY:

4 Q. Do you know who suggested the meeting?

5 A. No.

6 Q. What did you understand about Rodney Joffe  
7 prior to this meeting?

8 A. I don't know. I don't recall being told  
9 who he was prior to the meeting.

10 Q. So did you have any idea who Rodney Joffe  
11 was before this meeting?

12 A. Not that I can recall.

13 Q. So no one mentioned Rodney Joffe to you  
14 prior to this meeting.

15 A. Not that I can recall.

16 Q. Okay. Why was your understanding of why  
17 you were -- what is your understanding of why you  
18 were meeting with Rodney Joffe?

19 A. I don't recall being told the purpose of  
20 the meeting in advance.

21 Q. Okay, and I know you said late summer. Was  
22 this meeting before or after you found -- or that you

1 located the server allegations data and analysis of  
2 the Reddit?

3 MR. LEVY: I'm sorry, can you repeat that  
4 question?

5 BY MR. KELLY:

6 Q. Yeah. Was this meeting before or after you  
7 found the server allegations were posted to Reddit on  
8 October 5th, 2016?

9 **A. I believe the meeting occurred before I saw**  
10 **these reports surface on the web.**

11 Q. Okay. And what were your impressions of  
12 Rodney Joffe from the meeting?

13 MR. LEVY: I'm going to instruct the  
14 witness not to answer that question. It would  
15 implicate the attorney-client privilege and the  
16 attorney work product doctrine based on privileged  
17 communication.

18 BY MR. KELLY:

19 Q. What are your independent impressions of  
20 Rodney Joffe from this meeting?

21 **A. He seemed highly reputable and well placed**  
22 **to have knowledge and information about these**

1 **communications.**

2 Q. So you did discuss the communications with  
3 Rodney Joffe?

4 MR. LEVY: I'm going to instruct the  
5 witness not to answer the question because the  
6 answers would implicate the attorney-client privilege  
7 and the attorney work product doctrine.

8 BY MR. KELLY:

9 Q. And are you going to follow that  
10 instruction, Ms. Seago?

11 **A. Yes.**

12 Q. So earlier, you mentioned that they were  
13 credible scientists who supported the server  
14 allegations when you met with Mr. Foer. Was Rodney  
15 Joffe one of these credible scientists who you  
16 believe supported the server allegations?

17 **A. I want to be clear here. I -- I don't know**  
18 **that I testified to telling Mr. Foer about any**  
19 **scientists in advance. His -- his article quotes**  
20 **scientists. I don't believe I gave him those names,**  
21 **but was Rodney Joffe a computer scientist who I spoke**  
22 **to in advance, yes.**

1 Q. And was your understanding that he  
2 supported the server allegations?

3 **A. That is my understanding.**

4 Q. Did Mr. Joffe refer to himself as -- under  
5 a pseudonym or did you just -- at the meeting?

6 **A. Not that I can recall.**

7 Q. So he didn't use the name Max?

8 **A. Not that I can recall.**

9 Q. So other than this meeting that you had,  
10 did you have any other communications with Rodney  
11 Joffe?

12 **A. My recollection is that we exchanged  
13 e-mails after the meeting.**

14 Q. Around when?

15 **A. I don't recall the exact date.**

16 Q. Was it shortly after the meeting? Was  
17 there a delay?

18 **A. I don't recall the date of the meeting, so  
19 it's hard for me to say.**

20 Q. Were these e-mails before or after October  
21 5th, when the server allegations were posted to  
22 Reddit?

1           **A.     I don't recall.**

2           Q.     Were they in 2016?

3           **A.     Yes.**

4           Q.     Were they before or after the election?

5           **A.     Before the election.**

6           Q.     So you exchanged e-mails.  What was the  
7 subject of these e-mails?

8                   MR. LEVY:  I'm going to instruct the  
9 witness not to answer that question because the  
10 answers would implicate privileges.

11                   BY MR. KELLY:

12           Q.     And this is -- sorry.  Again, Rodney Joffe  
13 was not a client of Fusion GPS; is that correct,  
14 Ms. Seago?

15           **A.     He was not our client.**

16           Q.     Okay.  And you're not aware of any  
17 privilege agreement with Rodney Joffe and Fusion GPS?

18           **A.     Again, I'm --**

19                   MR. LEVY:  I'm going to object to that  
20 question.  It calls for a legal conclusion.

21                   BY MR. KELLY:

22           Q.     You can answer.

1           MR. LEVY: I'm going to instruct the  
2 witness not to answer that question because it would  
3 be protected by the attorney-client privilege and the  
4 attorney work product doctrine.

5           BY MR. KELLY:

6           Q.     So the -- okay. Who was on these e-mails  
7 other than you and Mr. Joffe?

8           A.     **I don't --**

9           MR. LEVY: Objection to form.

10          BY MR. KELLY:

11          Q.     You may answer.

12          A.     **I don't recall.**

13          Q.     Okay. Were there any attorneys present on  
14 these e-mails between you and Mr. Joffe?

15          A.     **I don't recall.**

16          Q.     Do you still have these e-mails?

17          A.     **I don't know. I haven't looked for them**  
18 **recently.**

19          Q.     But you do not recall specifically deleting  
20 these e-mails?

21          A.     **I do not recall specifically deleting these**  
22 **e-mails.**

1 Q. Wouldn't -- would these e-mails be subject  
2 to the data preservation hold you previously  
3 mentioned that you received in 2017?

4 A. I'm not aware. I would imagine so, but as  
5 I testified earlier, you know, we sometimes do  
6 destroy client communications if there's no  
7 preservation hold in effect, so I don't know if I  
8 still have these e-mails.

9 Q. And what -- I assume when you got the  
10 preservation notice, there was some sort of  
11 indication that you had to comply somehow. So what  
12 was your understanding of communications that you  
13 would not be able to delete at that point?

14 A. At that point, my understanding was that we  
15 were to follow the preservation order and not delete  
16 any e-mails mentioning the terms. I don't have the  
17 preservation order in front of me so I don't want to  
18 speculate, but we did -- or I personally did my best  
19 to comply with the preservation order to the best of  
20 my ability. My understanding is my colleagues did  
21 the same.

22 Q. So the Sussmann indictment arose out of the



1 investigation by special counsel John Durham. Has  
2 Fusion had to produce any information to Special  
3 Counsel Durham?

4 MR. LEVY: I'm going to instruct the  
5 witness not to answer that question on the basis of  
6 the grand jury privilege.

7 BY MR. KELLY:

8 Q. Would this e-mail be among the information  
9 that Fusion provided to Mr. Durham?

10 MR. LEVY: I'm going to object to form, and  
11 I'm also going to instruct the witness not to answer  
12 the question on the basis of grand jury privilege.

13 BY MR. KELLY:

14 Q. And Ms. Seago, are you going to follow that  
15 instruction?

16 **A. Yes.**

17 MR. KELLY: I would just -- so the fact of  
18 the production is not covered by Rule 6(e), nor would  
19 grand jury secrets be revealed by the mere fact of a  
20 production, so I'm going to suggest that your  
21 instruction not to answer is inappropriate. Would  
22 you like to withdraw your instruction, Mr. Levy?

1 MR. LEVY: No, thank you.

2 BY MR. KELLY:

3 Q. And Ms. Seago, are you going to continue to  
4 not listen -- or not answer?

5 **A. Yes.**

6 Q. Okay. So communications with Rodney Joffe.  
7 Were there any other third parties on any of these  
8 communications with Rodney Joffe?

9 **A. As discussed, I don't recall.**

10 Q. Okay. So Mr. Joffe was an executive at  
11 Neustar. Did anyone -- do you recall anyone  
12 discussing Neustar?

13 MR. LEVY: I'm going to instruct the  
14 witness not to answer that question because it would  
15 implicate privileges.

16 BY MR. KELLY:

17 Q. Do you recall anyone discussing Packet  
18 Analytics?

19 **A. I don't recall.**

20 Q. So outside of your communications, are you  
21 aware of anyone else at Fusion communicating with Mr.  
22 Joffe?

1           **A.     Not to my knowledge.**

2           Q.     Are you aware of any other meetings that  
3 Fusion had with Mr. Joffe that you did not attend?

4           **A.     Not to my knowledge.**

5           Q.     Are you aware of any e-mail communications  
6 with Mr. Joffe other than the ones that you mentioned  
7 that you were on?

8           MR. LEVY:  Objection to form.

9           BY MR. KELLY:

10          Q.     You may answer.

11          **A.     I'm sorry, can you repeat the question?**

12          Q.     Yes.  Are you aware of any e-mail  
13 communications among individuals at Fusion with Mr.  
14 Joffe other than the ones you mentioned on which you  
15 were copied?

16          MR. LEVY:  Same objection.

17          **A.     No, I'm not aware of anything I wasn't  
18 copied on.**

19          Q.     Did you ever send any e-mails to Mr. Joffe?

20          **A.     I don't recall.**

21          Q.     Do you recall, were you generally copied on  
22 these e-mails or were you a participant in these

1 conversations?

2 **A. I don't recall. This is five years ago. I**  
3 **-- all I recall is that we e-mailed.**

4 Q. But you did refresh your recollection for  
5 this deposition today?

6 **A. I'm sorry, I read the documents that we**  
7 **produced.**

8 Q. But you didn't go back and look at any  
9 e-mails from 2016?

10 **A. No.**

11 Q. So the Sussmann indictment states that Mr.  
12 Joffe was --

13 MR. LEVY: Just, Mr. Kelly, was your  
14 question did she look at any e-mails from 2016 that  
15 we produced?

16 MR. KELLY: No, it was whether she --  
17 outside of -- she's claiming she doesn't remember the  
18 substance of these communications which seemed  
19 relevant, so I was inquiring whether she had looked  
20 at communications which might allow her to  
21 effectively answer our questions today.

22 MR. LEVY: And I think earlier in the

1 deposition, she said that she had reviewed documents  
2 with counsel to prepare for the deposition. I don't  
3 -- I just want to make sure she's -- she's responded  
4 to your question accurately, and I want to make sure  
5 I understand the question.

6 BY MR. KELLY:

7 Q. My question was whether she reviewed any  
8 e-mails from 2016 I guess --

9 **A. I reviewed e-mails presented to me by**  
10 **counsel. I did not go and search my computer**  
11 **independently, no.**

12 Q. So did you review any documents that were  
13 -- other than those that were produced?

14 **A. Other than things that were presented to me**  
15 **by counsel, the press reports, no.**

16 Q. So the Sussmann indictment states that Mr.  
17 Joffe was alerted to the server allegations by  
18 originator-1, who uses the pseudonym Tea Leaves. So  
19 this is -- Joe, around page 5, can you scroll up a  
20 little bit? Okay, yeah, it's paragraph 16, if you  
21 want to review that.

22 **A. Okay.**

1 Q. So originator-1 has been publicly  
2 identified as April Lorenzen. Are you aware that  
3 Ms. Lorenzen has been publicly identified as  
4 originator-1, also known as Tea Leaves?

5 **A. I've read press reports suggesting that.**

6 Q. Have you ever communicated with  
7 Ms. Lorenzen?

8 **A. No, not to my knowledge.**

9 Q. Have you ever communicated with Tea Leaves?

10 **A. I --**

11 MR. LEVY: I'm going to instruct the  
12 witness not to answer that question because the  
13 answer would implicate the attorney-client privilege  
14 and the attorney work product doctrine.

15 BY MR. KELLY:

16 Q. Do you recall anyone discussing  
17 Ms. Lorenzen in 2016?

18 MR. LEVY: I'm going to instruct the  
19 witness not to answer that question because the  
20 answer would implicate the attorney-client privilege  
21 and the attorney work product doctrine.

22 BY MR. KELLY:

1 Q. Do you recall anyone discussing  
2 Ms. Lorenzen after the election in 2016, at which  
3 point the engagement with Perkins Coie ended?

4 **A. Not that I can recall. I hadn't**  
5 **encountered the name until recent press reports.**

6 Q. So you -- okay. When did you first become  
7 aware that Ms. Lorenzen was Tea Leaves?

8 **A. I don't know that she is Tea Leaves. I**  
9 **became aware of the claim that she is Tea Leaves**  
10 **within the last month or two.**

11 Q. So I will rephrase my question. When was  
12 the first time you learned that April Lorenzen was  
13 associated with the name Tea Leaves?

14 **A. Again, within the last month or so.**

15 Q. Was Tea Leaves a client of Perkins Coie, to  
16 your knowledge?

17 **A. Not to my knowledge.**

18 Q. Do you know who Tea Leaves is, if you don't  
19 know it's Ms. Lorenzen?

20 **A. I don't know who Tea Leaves is.**

21 Q. Do you have any reason to doubt that it's  
22 Ms. Lorenzen, as identified publicly?

1           **A.     No, I have no reason to doubt that. I just**  
2           **don't know the identity of that person.**

3           Q.     Is Tea Leaves a member of this Kovel letter  
4           that Fusion is engaged in with Perkins Coie?

5           MR. LEVY: To your knowledge.

6           **A.     Not to my knowledge, no, or I don't know.**

7           Q.     Are you aware of a common interest  
8           agreement between Tea Leaves and Fusion?

9           **A.     Not that I'm aware of.**

10          Q.     So you communicated with Tea Leaves,  
11          correct?

12          MR. LEVY: Again, I'm going to instruct the  
13          witness not to answer that question because the  
14          answer would implicate the attorney-client privilege  
15          and the attorney work product doctrine.

16          BY MR. KELLY:

17          Q.     Are you aware of anyone else at Fusion  
18          communicating with Ms. Lorenzen or Tea Leaves in  
19          2016?

20          **A.     I am not aware of any other communications,**  
21          **no.**

22          Q.     So had you heard the name Tea Leaves before



1 she posted the server allegations to the internet in  
2 October 2016?

3 **A. The first time I saw reference to it was**  
4 **posts relating these allegations on the internet.**  
5 **That's the first time I saw this name.**

6 Q. So according to the Sussmann indictment --  
7 and again, how did you find the posts relating to Tea  
8 Leaves -- that Tea Leaves posted?

9 **A. I don't recall how I found it, but I**  
10 **believe that previous evidence shows that I saw it on**  
11 **Reddit.**

12 Q. And were you specifically looking for these  
13 posts from Tea Leaves?

14 **A. I was not searching the name "Tea Leaves,"**  
15 **if that's the question.**

16 Q. So again, how did you come across these  
17 posts?

18 MR. LEVY: Objection, asked and answered.

19 BY MR. KELLY:

20 Q. You may answer.

21 **A. I don't recall.**

22 Q. You don't recall how you came across these

1 posts? Were you generally searching the internet or  
2 were you told specifically to look for these posts?

3 **A. I don't recall.**

4 Q. So according to the Sussmann indictment,  
5 Mr. Joffe and Ms. Lorenzen were working with two  
6 researchers on the server allegations in the fall of  
7 2016. These --

8 **A. Sorry. What paragraph are we looking at?**

9 Q. So let me find it. Well, Ms. Seago, are  
10 you aware that -- a public reporting that David Dagon  
11 and Manos Antonakakis have been identified as  
12 researcher-1 and researcher-2 in the Sussmann  
13 indictment? It's paragraph 23. I apologize for  
14 that, but regardless, are you aware that David Dagon  
15 and Manos Antonakakis have been identified as  
16 researcher-1 and researcher-2?

17 MR. LEVY: Hold on. Let us just get to  
18 paragraph 23. Sorry.

19 **A. Thank you. Okay.**

20 Q. Are you aware -- I'm sorry. Go ahead. Are  
21 you aware that David Dagon and Manos Antonakakis have  
22 been publicly identified as researcher-1 and

1 researcher-2?

2 MR. LEVY: Do you want to show her where  
3 that's been publicly identified?

4 MR. KELLY: Sure. Joe, could you please  
5 put Exhibit -- or tab 71 up as the next exhibit,  
6 which -- and can you remind me what our next exhibit  
7 number is? I believe it's 6. I'm not positive.

8 THE VIDEOGRAPHER: Yes, this will be  
9 Exhibit 6.

10 (A document was designated  
11 as Exhibit No. 6.)

12 BY MR. KELLY:

13 Q. And if you could scroll down to page 2, so  
14 -- keep going. Scroll down a little further. The --  
15 if we look at the paragraph right above the sign up  
16 for politics break, the indictment's -- you can read  
17 it if you want. The indictment's researcher-1 is  
18 another computer scientist at Georgia Tech, Manos  
19 Antonakakis, researcher-2 is Mr. Dagon, and tech  
20 executive-1 is Mr. Joffe.

21 A. Okay.

22 Q. Okay? So they -- have you ever

1     communicated with David Dagon?

2           **A.     Not to my knowledge.**

3           Q.     Have you ever communicated with Manos  
4     Antonakakis?

5           **A.     Not to my knowledge.**

6           Q.     Has anyone at Fusion communicated with  
7     David Dagon?

8           **A.     Not to my knowledge.**

9           Q.     And has anyone at Fusion communicated with  
10    Manos Antonakakis?

11          **A.     Not to my knowledge.**

12          Q.     When did you first hear the name David  
13    Dagon?

14          **A.     I'm not sure. I heard it before I read  
15    this article.**

16          Q.     Did you hear the name David Dagon in 2016?

17          **A.     I believe I did. I don't recall exactly  
18    when.**

19          Q.     What was the context?

20          **A.     I don't recall.**

21          Q.     Do you remember who first mentioned the  
22    name David Dagon to you?

1           **A.     No.**

2           Q.     Had you heard the name Manos Antonakakis  
3 before?

4           **A.     No.**

5           Q.     So this is the first time you've ever heard  
6 the name Manos Antonakakis?

7                   MR. LEVY:   This being?

8                   BY MR. KELLY:

9           Q.     Sorry.  When you read -- so you previously  
10 read this article --

11           **A.     Correct.**

12           Q.     -- I assume?  So was that the first time  
13 you heard the name Manos Antonakakis?

14           **A.     This article was the first time I'd seen  
15 that name, yes.**

16           Q.     Did you communicate with any researchers  
17 who were maintaining their anonymity in 2016?

18                   MR. LEVY:  Objection, asked and answered  
19 and instruct the witness not to answer that question  
20 because it would implicate the attorney-client  
21 privilege and attorney-client work product doctrine.

22                   BY MR. KELLY:

1 Q. So along these lines, when did you first  
2 learn the name April Lorenzen?

3 A. **Again, I believe I testified to this.**  
4 **Within the last month or so, recently.**

5 Q. So -- so you're not aware of any meetings  
6 that occurred with either David Dagon or Manos  
7 Antonakakis.

8 A. **I was not party to any of those meetings.**

9 Q. Are you aware of any?

10 A. **No.**

11 Q. And you're not aware of any calls or  
12 communications between Fusion employees and David  
13 Dagon or Manos Antonakakis?

14 MR. LEVY: Object to form. Go ahead and  
15 answer.

16 A. **I'm not aware of any meetings or**  
17 **communications with individuals.**

18 Q. If we could flip back to the tab 70, the  
19 Sussmann indictment, and scroll to page 9, paragraph  
20 G. So it states that tech executive-1, who's Rodney  
21 Joffe, e-mailed to internet company-3 a five-page  
22 document, the Trump associates list, listing six

1 associates of Trump and a purported U.S.-based  
2 lobbyist for Russian bank-1, who also was discussed  
3 in written materials prepared by U.S. investigative  
4 firm that -- which is Fusion GPS, that Sussmann would  
5 later provide to the FBI general counsel. So the  
6 Trump associates list contained detailed personal  
7 information for these individuals, including, for  
8 example, their names, home addresses, personal e-mail  
9 addresses, business names, business web sites and  
10 e-mail domain, despite the fact the addresses for  
11 those domains and information pertaining to the  
12 spouse of one of these associates. Tech executive-1  
13 directed by these -- okay, sorry, that last sentence  
14 was unimportant. Are you familiar with a document  
15 matching this description?

16 **A. I don't recall a document matching this**  
17 **description.**

18 Q. Did you draft a document that listed Trump  
19 associates?

20 **A. Not that I can recall.**

21 Q. Are you aware of anyone else at Fusion  
22 drafting a list of Trump associates?

1           MR. LEVY: I'm going to instruct the  
2 witness not to answer that question because the  
3 answer would implicate the attorney-client privilege  
4 and the attorney work product --

5           BY MR. KELLY:

6           Q.     Who at Fusion would have drafted such a  
7 document? Was there someone who was considered a  
8 Trump expert?

9           MR. LEVY: Objection to form, and I'm going  
10 to instruct the witness not to answer that question  
11 because the answer would implicate the  
12 attorney-client privilege and the attorney work  
13 product doctrine.

14          BY MR. KELLY:

15          Q.     Is it your impression that there was  
16 someone at Fusion in 2016 who would have been  
17 considered a Trump expert?

18          MR. LEVY: I'm going to object to that  
19 question and instruct the witness not to answer that  
20 question because the answer would implicate the  
21 attorney-client privilege and the attorney work  
22 product doctrine.



1 BY MR. KELLY:

2 Q. In your personal opinion, is there someone  
3 at Fusion who would have considered a Trump expert in  
4 2016?

5 MR. LEVY: Going to object to the question,  
6 form, and instruct the witness not to answer the  
7 question, as it would implicate the attorney-client  
8 privilege and the attorney work product doctrine.

9 MR. KELLY: I was asking for her personal  
10 impression, therefore, I do not believe any privilege  
11 would be implicated, and I believe that's an improper  
12 instruction. Are you standing by your instruction?

13 MR. LEVY: Give a personal impression of  
14 whether there's a Trump expert at Fusion, you can  
15 answer the question.

16 THE WITNESS: A lot of people worked on  
17 Trump-related research and developed expertise in  
18 particular areas.

19 BY MR. KELLY:

20 Q. And who would those people be?

21 A. In particular, Glenn Simpson, Peter  
22 Fritsch, Jake Burkowitz.

1 Q. Anyone else?

2 A. Again, many people at Fusion worked on  
3 small parts of this case or large parts of this case.  
4 I don't have full insight into everything everyone  
5 did.

6 Q. But your impression -- personal impression  
7 is that Glenn Simpson, Peter Fritsch and Jacob  
8 Berkowitz were the main individuals working on Trump-  
9 related research in 2016.

10 MR. LEVY: Objection, form.

11 BY MR. KELLY:

12 Q. You may answer.

13 A. Yes, I testified that that's my personal  
14 opinion.

15 Q. In your personal opinion, is there someone  
16 who would be considered an Alfa-Bank expert at Fusion  
17 GPS?

18 MR. LEVY: Going to object to form of the  
19 question and I'm going to instruct the witness not to  
20 answer that question, attorney-client privilege,  
21 attorney work --

22 MR. KELLY: Again, this is a personal

1 impression that I'm asking for, so I would say that  
2 that's an improper instruction. Are you sticking by  
3 your instruction not to answer?

4 MR. LEVY: I'm going to object to form.

5 BY MR. KELLY:

6 Q. You may answer.

7 **A. My personal opinion, the same three**  
8 **individuals were probably the ones who knew most**  
9 **about Alfa-Bank, but I was not heavily involved in**  
10 **the Alfa Bank research.**

11 Q. And that would be Glenn Simpson, Peter  
12 Fritsch and Jacob Berkowitz?

13 **A. That's correct.**

14 Q. In your personal opinion, would you have  
15 been considered an expert on Trump at Fusion in 2016?

16 MR. LEVY: Objection to form.

17 BY MR. KELLY:

18 Q. You may answer.

19 **A. I worked on various aspects of the Trump**  
20 **case. I was not as deeply involved in it as those**  
21 **three individuals.**

22 Q. In your personal opinion, would you have

1     been considered an Alfa-Bank expert in 2016?

2           **A.     No.**

3           Q.     What work was being performed related to  
4     Alfa-Bank in 2016?

5           MR. LEVY:   In 2016, inasmuch as that answer  
6     involves the engagement with Perkins Coie, I'm going  
7     to instruct the witness not to answer that question  
8     because it would implicate the attorney-client  
9     privilege and the attorney work product doctrine.

10          BY MR. KELLY:

11          Q.     Outside of that engagement where work was  
12     being done in regards to Alfa-Bank?

13          **A.     In 2016?**

14          Q.     Or later.

15          **A.     I do recall there was research into Alfa-**  
16     **Bank. I was not closely personally involved in it,**  
17     **so I don't know the substance.**

18          Q.     And who was conducting that research?

19          **A.     Again, my knowledge is Peter Fritsch, Glenn**  
20     **Simpson, Jake Burkowitz.**

21          Q.     And what was this research?

22          **A.     I don't know.**

1 Q. Who was this research for?

2 A. I don't know.

3 Q. So you're unaware of any particular client  
4 or entity for which Alfa-Bank research was performed  
5 outside of the Perkins Coie engagement.

6 A. I am not sure what went to which client.

7 Q. So is it your understanding that Fusion was  
8 just conducting its own independent research on Alfa-  
9 Bank for no client?

10 MR. LEVY: I will note in that -- in May of  
11 2017, the owners of your client threatened to sue our  
12 clients, and any research that was conducted after  
13 that point in time is going to be privileged. Beyond  
14 that, you can answer the question.

15 A. I don't always know who our clients are,  
16 and I don't recall exactly who -- any Alfa-Bank  
17 research was done for any particular client.

18 Q. You say -- I'm sorry, I didn't mean to talk  
19 over. You said "exactly who," but do you have any  
20 idea of who this might have been or a general sense?

21 MR. LEVY: Objection to form, calls for  
22 speculation.

1 BY MR. KELLY:

2 Q. You may answer.

3 A. I don't know who the client was in between  
4 the privilege periods.

5 MR. LEVY: We've been going for some time.  
6 Do you mind if we take a break soon?

7 MR. KELLY: Yeah, that's fine with me. How  
8 long would you like?

9 MR. LEVY: Maybe ten minutes. I don't know  
10 if you're planning on taking a lunch break today, but  
11 maybe it's a good time to think about it now.

12 MR. KELLY: I will admit to not knowing  
13 what time it is, but if you would like to -- would  
14 you like to take a lunch break?

15 THE WITNESS: I'm fine with ten minutes  
16 now, and then we can go for another little bit and  
17 then take a lunch break.

18 MR. LEVY: Okay.

19 THE WITNESS: We'll make the next break  
20 after this be lunch.

21 MR. KELLY: Okay, we'll stop for lunch.

22 Thank you.

1 MR. LEVY: No, I'm sorry.

2 MR. KELLY: No, I'm sorry, I'm sorry.

3 You're right, we'll stop for ten minutes, and then  
4 stop for lunch later. My apologies.

5 MR. LEVY: Okay. Thank you.

6 THE VIDEOGRAPHER: Going off the record at  
7 12:10 p.m.

8 (Recessed at 12:10 p.m.)

9 (Reconvened at 12:22 p.m.)

10 THE VIDEOGRAPHER: Going back on the record  
11 at 12:22 p.m.

12 BY MR. KELLY:

13 Q. Thank you. So Ms. Seago, we were  
14 discussing this five-page document on Trump  
15 associates. Were you aware that there was a targeted  
16 search for Trump associates within the DNS data that  
17 served as the basis for these allegations?

18 **A. Not that I can recall.**

19 Q. What was your understanding of how this  
20 data was identified?

21 MR. LEVY: Objection to form. This data --  
22 what are you referring to?

1 BY MR. KELLY:

2 Q. What was your understanding of how the data  
3 supporting the server allegations were identified?

4 A. My --

5 MR. LEVY: I'm going to -- I'm going to  
6 instruct the witness to answer that question inasmuch  
7 as it doesn't implicate the attorney-client privilege  
8 and the attorney work product doctrine. If there's  
9 information you have outside of the engagement, then  
10 you may answer the question.

11 A. My understanding from press reports is that  
12 NALA researchers, cybersecurity researchers who  
13 routinely get access to DNS data had access to this  
14 -- identified this pattern.

15 Q. Did you have an understanding of how this  
16 data was identified outside of those press reports?

17 MR. LEVY: Inasmuch as the answer doesn't  
18 implicate the privilege, answer the question.

19 A. Not outside of privilege and the press  
20 reports, no.

21 Q. Did you discuss the identification of this  
22 data with any attorneys?



1                   MR. LEVY: I'm going to instruct the  
2 witness not to answer that question because the  
3 answer would implicate the attorney-client privilege,  
4 the attorney work product doctrine.

5                   BY MR. KELLY:

6           Q.     Did you discuss the identification of the  
7 data with anyone at Fusion?

8                   MR. LEVY: I'm going to instruct the  
9 witness not to answer that question inasmuch as those  
10 discussions occurred at Fusion in 2016 under the  
11 engagement of Perkins Coie because those discussions  
12 would be privileged. What was discussed -- these  
13 communications with Fusion outside of the engagement,  
14 she can answer the question.

15                  BY MR. KELLY:

16           Q.     Did you discuss the identification of the  
17 data with any -- when someone other than a member of  
18 Fusion or Perkins Coie was present, any third  
19 parties?

20           **A.     No.**

21           Q.     What did you understand the data to consist  
22 of?

1           **A.       The data consisted of DNS logs, is my**  
2           **understanding.**

3           Q.       So going back to the indictment, Joe, if  
4           you could bring that up, page 14, and then while  
5           we're bringing that up, was the data that you -- your  
6           understanding of the DNS files, were they text files?

7           **A.       My understanding was that the people -- or**  
8           **person or people who were making the initial claims**  
9           **had access to raw DNS data. The only data I ever saw**  
10          **was in the form of text files. I also want to**  
11          **clarify the record. As I previously testified,**  
12          **Rodney Joffe was present for some of my**  
13          **communications, so that -- to the extent that counts**  
14          **as a third party, he was present.**

15          Q.       That counts as a third party, so thank you  
16          for that clarification. Were there any other third  
17          parties present for any of these communications?

18                   MR. LEVY: When you say these  
19          communications, what do you mean?

20                   MR. KELLY: These communications about the  
21          identification of the data underlying the server  
22          allegations.

1 MR. LEVY: At what point in time?

2 BY MR. KELLY:

3 Q. We'll start with fall 2016, fall or summer  
4 2016. Sorry, prior -- let me rephrase that. Before  
5 the 2016 election.

6 **A. I spoke with Frank Foer about these**  
7 **communications as well, and I believe we've discussed**  
8 **that too.**

9 Q. Anyone else?

10 MR. LEVY: Beyond that would be covered by  
11 the privileges.

12 MR. KELLY: Are you asserting privileges on  
13 behalf of third parties who aren't Fusion or Perkins  
14 Coie?

15 MR. LEVY: People who she contacted as part  
16 of her work in anticipation of litigation at the  
17 direction of counsel under the attorney-client  
18 privilege covered by the Kovel letter, yes.

19 BY MR. KELLY:

20 Q. Again, a communication is not privileged.  
21 It's information that would show up -- the to, from,  
22 cc, bcc, that is information that would be available

1 on a privilege log. The mere identification of a  
2 communication and who you might have discussed it  
3 with is not privileged. We are not -- I'm not asking  
4 about the substance of any of these communications.  
5 I'm just asking who you communicated with.

6 **A. And all I can recall is communications**  
7 **between myself and Rodney Joffe and discussion with**  
8 **Frank Foer.**

9 MR. KELLY: And is it your position that  
10 conversations with third parties are privileged?

11 MR. LEVY: In a certain context, they can  
12 be, yes. I will object to the question as posed to  
13 the witness because it calls for a legal conclusion.

14 MR. KELLY: So you're objecting -- you're  
15 claiming privilege on behalf of conversations with  
16 third parties.

17 MR. LEVY: Yes.

18 BY MR. KELLY:

19 Q. Thank you. So that was before the 2016  
20 election. Who -- what third parties did you  
21 communicate with about the DNS server allegations --  
22 or DNS server data after the 2016 election?

1           **A.       The only one I can recall is Dexter**  
2 **Filkins.**

3           Q.       Dexter Filkins.  And what were these  
4 communications with Mr. Filkins?

5           **A.       I don't recall the date.  I know it was**  
6 **after the election.**

7           Q.       Was it before or after Mr. Filkins' 2018  
8 article?

9           **A.       I believe it was before.**

10          Q.       Okay.  And what was the context of this  
11 discussion?

12          **A.       I recall that we discussed server**  
13 **communications.  I don't remember the specifics of**  
14 **the meeting.**

15          Q.       So what was the purpose of the  
16 communications?

17          **A.       The purpose of my communications with**  
18 **Dexter Filkins?**

19          Q.       Dexter Filkins, yes.

20          **A.       To discuss the server allegations.**

21          Q.       Previously with Mr. Foer, you said that you  
22 were doing technical analysis and helping to explain

1 things in layman's terms. Were you doing a similar  
2 function here? Were you providing other information?  
3 Can you provide more context as to your conversations  
4 with Mr. Filkins?

5 MR. LEVY: Objection to form. Ms. Seago's  
6 testimony speaks for itself. There's no need to try  
7 to characterize it, mischaracterize it. Repeat the  
8 question.

9 BY MR. KELLY:

10 Q. Ms. Seago, what was the purpose of your  
11 communications with Dexter Filkins?

12 **A. Again, I don't remember specifics. I do**  
13 **remember that we discussed the Trump organization to**  
14 **Alfa-Bank communications.**

15 Q. Why did Mr. Filkins want to speak to you  
16 personally?

17 MR. LEVY: Objection to form.

18 BY MR. KELLY:

19 Q. You may answer.

20 **A. I don't know his state of mind. I don't**  
21 **want to speculate.**

22 Q. What was your understanding of why Dexter

1 Filkins wanted to speak to you?

2 MR. LEVY: Objection to form.

3 BY MR. KELLY:

4 Q. You may answer.

5 **A. Again, I don't know.**

6 Q. Were these e-mail communications?

7 MR. LEVY: Objection to form.

8 BY MR. KELLY:

9 Q. Were these e-mail communications with  
10 Dexter Filkins?

11 **A. I recall meeting in person.**

12 Q. Who else attended this meeting?

13 **A. I don't recall.**

14 Q. Was anyone from Fusion in this meeting?

15 **A. I don't recall.**

16 Q. Was anyone other than Fusion personnel in  
17 this meeting?

18 **A. Not that I can recall.**

19 Q. Was there anyone other than you and Mr.  
20 Filkins in this meeting?

21 **A. Yes, but I don't recall specifically who.**

22 Q. Were they Fusion employees?

1           **A.       I would have to speculate here. I don't**  
2           **recall who was in the meeting besides myself and Mr.**  
3           **Filkins.**

4           Q.       Who asked for the meeting?

5           **A.       I don't recall.**

6           Q.       And what about the server allegations was  
7           discussed at the meeting?

8           **A.       I don't recall the specifics of the**  
9           **meeting.**

10          Q.       And circling back to that Foer meeting,  
11          were you provided a draft of Mr. Foer's article  
12          before it was published?

13          **A.       I don't recall him sending anything to me.**

14          Q.       Do you recall him sending a draft to anyone  
15          else?

16          **A.       I believe that the Sussmann indictment**  
17          **suggests that he sent a draft to Peter Fritsch.**

18          Q.       Are you aware of him sending that draft to  
19          Peter Fritsch outside of the Sussmann indictment?

20          **A.       I have recollection of him saying that he'd**  
21          **received some copy.**

22          Q.       And did Mr. Fritsch ask you to do anything



1 in relation to that draft?

2 **A. Not that I can recall.**

3 Q. Did he ask you for any advice on technical  
4 matters in relation to the draft?

5 **A. Not that I can recall.**

6 Q. Did he ask you to confirm or deny anything  
7 in the draft?

8 **A. Not that I can recall.**

9 Q. So why would you take the time to meet with  
10 Mr. Filkins or other reporters about the server  
11 allegations?

12 MR. LEVY: Objection to form.

13 BY MR. KELLY:

14 Q. You may answer.

15 **A. In the course of my job, I'm often asked to**  
16 **meet with people to explain my research, and as I**  
17 **believe I've already stated, I did analyze the**  
18 **information that had been published about the server**  
19 **communications, and I was happy to discuss my**  
20 **research on that matter with Mr. Filkins.**

21 Q. So you discussed your research with Mr.  
22 Filkins on the server allegations.

1           **A.     Yes.**

2           Q.     And how would you describe that research?

3           **A.     Again, I analyzed the communications that**  
4 **were posted to the web and I analyzed analyses --**  
5 **other people's third-party analyses of those**  
6 **communications and helped explain technical language**  
7 **in terms that'd be easy for somebody to understand.**

8           Q.     And you were directed to do this by whom?

9           **A.     I don't recall exactly who directed me to**  
10 **do that.**

11          Q.     And who -- I'm sorry, just so we're clear,  
12 who -- did Mr. Filkins reach out to you personally?

13          **A.     I don't recall.**

14          Q.     Do you recall who put you in touch with Mr.  
15 Filkins?

16          **A.     I don't recall.**

17          Q.     Did Mr. Filkins provide you a draft or any  
18 questions that he asked you to answer before his  
19 article was published?

20          **A.     No.**

21          Q.     So other than Franklin Foer and Dexter  
22 Filkins, did you -- did you have any meetings with

1 journalists about the server allegations?

2 **A. Not that I can recall.**

3 Q. Other than Dexter Filkins and Franklin  
4 Foer, did you have any communications with  
5 journalists?

6 **A. Communications with journalists about what?**

7 Q. About the server allegations.

8 **A. Not that I can recall.**

9 Q. Did you want the reporters to write stories  
10 about the server allegations?

11 **A. I thought that this information was a  
12 matter of national security, and I thought it was  
13 important that it became public, but I did not want  
14 any specific reporter to write any specific story.**

15 Q. Was it your understanding that Fusion was  
16 presenting these data -- or this data and allegations  
17 to reporters on behalf of a client?

18 MR. LEVY: Objection to form.

19 BY MR. KELLY:

20 Q. You may answer.

21 **A. My understanding was that our client had  
22 directed us to do this research.**

1 Q. Was it your understanding that your client  
2 directed you to share it with reporters?

3 A. I don't know.

4 Q. Did Mr. -- did anyone at Fusion ever  
5 discuss getting reporters to publish -- or publish  
6 stories about the server allegations?

7 MR. LEVY: Can you repeat the question?

8 BY MR. KELLY:

9 Q. Yeah. Did anyone at Fusion ever discuss a  
10 goal or objective of having reporters publish stories  
11 about these server allegations?

12 MR. LEVY: Objection to form.

13 BY MR. KELLY:

14 Q. You may answer.

15 A. I recall being asked to meet with  
16 journalists, so we did talk about these matters with  
17 somebody who could publish a story about it.

18 Q. And you were asked to meet with journalists  
19 on behalf of clients, as part of paid client work.

20 A. I was asked to meet with journalists by my  
21 superiors at Fusion. They did not explicitly tell me  
22 on behalf of clients or was it as part of paid client

1 **work.**

2 Q. Was it your understanding that you were  
3 performing works as part of your job duties?

4 **A. Yes.**

5 Q. For clients. Sorry, for specific clients.

6 MR. LEVY: Objection to form.

7 BY MR. KELLY:

8 Q. Was it your understanding when you met with  
9 reporters that you were doing work on behalf of  
10 specific clients?

11 MR. LEVY: Objection to form.

12 BY MR. KELLY:

13 Q. You may answer.

14 MR. LEVY: Are you talking in general terms  
15 or on this matter?

16 MR. KELLY: On the server allegations.

17 MR. LEVY: Is that what you're asking  
18 about?

19 MR. KELLY: Yes.

20 THE WITNESS: I don't know if the client  
21 specifically directed Fusion to meet with reporters.

22 BY MR. KELLY:

1 Q. What was your understanding? I'll -- I'll  
2 rephrase the question. Was it your understanding  
3 that when you met with reporters, you were doing so  
4 on behalf of specific clients for Fusion GPS?

5 MR. LEVY: Objection, asked and answered.

6 BY MR. KELLY:

7 Q. You may answer.

8 **A. Again, I don't know if the client**  
9 **instructed us to do this.**

10 Q. I'm asking you for your understanding,  
11 Ms. Seago.

12 **A. I take instructions from Peter Fritsch.**

13 Q. And is it your understanding that Peter  
14 Fritsch was asking you to meet with reporters on  
15 behalf of specific clients for Fusion GPS?

16 MR. LEVY: Objection, asked and answered.

17 BY MR. KELLY:

18 Q. You may answer.

19 **A. I don't know.**

20 Q. And so your understanding is that you were  
21 doing this on behalf of Fusion.

22 **A. That is who I answer to, yes.**

1 Q. So this was part -- so meeting with  
2 reporters was part of your workday.

3 **A. Yes, in this context, yes.**

4 Q. How -- do you bill time to specific  
5 clients?

6 **A. No.**

7 Q. So you just -- sorry, you're generally  
8 salaried, and there's not a specific mechanism to log  
9 time that you work on specific clients?

10 **A. That's correct, we don't bill by the hour.**

11 Q. Were -- were you working on matters for  
12 other clients in 2016?

13 **A. Yes.**

14 Q. Were you working on matters for other  
15 clients at the same time you were investigating the  
16 server allegations?

17 **A. Yes.**

18 Q. So going back to the indictment I believe,  
19 we're on tab 70, which is Exhibit 4, and we're going  
20 to look at page 14.

21 THE VIDEOGRAPHER: Which paragraph?

22 BY MR. KELLY:

1 Q. Paragraph 24B. It says, "On or about  
2 September 6th, 2016, Sussmann continued to work on  
3 the white paper. On or about the same date, Sussmann  
4 also met with representatives of the U.S.  
5 investigative firm," which is Fusion GPS, "and  
6 communicated with the media." Are you aware of this  
7 meeting with Michael Sussmann on September 6th, 2016?

8 A. No.

9 Q. Did you participate in this meeting?

10 A. Not to my knowledge.

11 Q. Do you know who participated in this  
12 meeting?

13 A. No.

14 Q. Did you prepare any meetings for anyone --  
15 or prepare any materials for this meeting?

16 A. Not to my knowledge.

17 Q. Are you aware of anyone at Fusion having  
18 meetings with the media on or around September 6th,  
19 2016?

20 A. My colleagues meet with the media often. I  
21 don't know of any specific meetings around this time.

22 Q. Did you have any meetings with the media in



1 or around September 6th, 2016?

2 **A. I don't recall any meetings specifically**  
3 **around this time.**

4 Q. If we want to -- if we could scroll up to  
5 page 2?

6 MR. LEVY: Which paragraph?

7 BY MR. KELLY:

8 Q. Paragraph 3. Paragraph 3 mentions a  
9 September 19th, 2016 meeting between Michael Sussmann  
10 and the FBI. Are you aware that this September 19th  
11 meeting between Mr. Sussmann and the FBI happened?

12 MR. LEVY: I'm sorry, Mr. Kelly, just give  
13 us a moment to read the paragraph. Thank you. Go  
14 ahead.

15 BY MR. KELLY:

16 Q. Okay. Are you aware that this meeting  
17 happened before -- are you aware that this meeting  
18 happened?

19 MR. LEVY: Objection to form. Which  
20 meeting?

21 BY MR. KELLY:

22 Q. Are you aware that the September 19th --

1 I'm sorry, 2016 meeting between Michael Sussmann and  
2 James Baker occurred?

3 **A. The indictment is the first I became aware**  
4 **of this meeting.**

5 Q. So no one mentioned a meeting between  
6 Michael Sussmann and the FBI in 2016.

7 **A. Not that I can recall.**

8 Q. Do you recall anyone discussing a meeting  
9 with the FBI in September of 2016?

10 **A. Not that I can recall.**

11 Q. So if we flip to pages 18 and 19 of the  
12 indictment --

13 MR. LEVY: Which paragraph?

14 BY MR. KELLY:

15 Q. It is -- on page 18, we're going to look at  
16 paragraph B.

17 **A. Paragraph B --**

18 Q. It's just B. It's right there. Joe has  
19 it. It says that on this -- "On or about the same  
20 date, Michael Sussmann sent to researcher-2," David  
21 Dagon, "an electronic file containing materials he  
22 would provide two days later to the FBI general

1 counsel, including, among other things, the  
2 aforementioned white paper that Sussmann had assisted  
3 in drafting, and another white paper drafted by U.S.  
4 investigative firm concerning purported ties between  
5 Russian Bank's-1 parent company and the Russian  
6 government." So U.S. investigative firm is Fusion  
7 GPS. Are you aware of this document?

8 **A. No.**

9 Q. Are you aware that Fusion's work was shared  
10 with the federal government?

11 MR. LEVY: Objection to form.

12 BY MR. KELLY:

13 Q. Are you aware that Fusion's work related to  
14 the Alfa-Bank server allegations was shared with the  
15 federal government?

16 MR. LEVY: Objection to form.

17 BY MR. KELLY:

18 Q. You may answer.

19 **A. I was not aware of that until I read this**  
20 **indictment.**

21 Q. Are you aware that Fusion -- or did you  
22 understand that certain materials related to

1 Alfa-Bank were intended to be shared with law  
2 enforcement?

3 MR. LEVY: Objection to form.

4 **A. I don't know if they were intended to be**  
5 **shared with law enforcement.**

6 Q. Did you ever have an understanding that  
7 certain materials prepared about the server  
8 allegations by Fusion GPS were intended to be shared  
9 with law enforcement?

10 **A. That was never my understanding.**

11 Q. Do you know what work product is being  
12 addressed in the indictment?

13 MR. LEVY: Objection to form.

14 BY MR. KELLY:

15 Q. You may answer.

16 **A. I don't know what this white paper refers**  
17 **to, no.**

18 Q. Joe, if you could bring up tab 30,  
19 Ms. Seago, at any point did you work on a white paper  
20 about the server allegations?

21 MR. LEVY: I'm going to instruct the  
22 witness -- well, first, I'm going to object to form.

1 Not sure what white paper is, but I'm going to  
2 instruct the witness not to discuss any work product  
3 created in the engagement with Perkins Coie because  
4 it's privileged.

5 BY MR. KELLY:

6 Q. Ms. Seago, did you ever -- did you ever  
7 work on what you understood to be a white paper  
8 related to Alfa-Bank?

9 MR. LEVY: I'm going to instruct the  
10 witness not to answer the question because any work  
11 product created in the time period for Perkins Coie  
12 would be subject to privilege.

13 BY MR. KELLY:

14 Q. Ms. Seago, are you aware of working on any  
15 work product about Alfa-Bank that was shared with  
16 reporters?

17 **A. I don't recall what was shared with**  
18 **reporters.**

19 Q. Are you aware of any white paper or work  
20 product on the server allegations that were shared  
21 with reporters?

22 **A. Again, I don't recall what was shared with**

1 **reporters.**

2 Q. Okay. So this is a e-mail produced by  
3 Fusion GPS. You can see that Peter Fritsch sent it  
4 to Mark Hosenball on October 5th, 2016, and it has an  
5 attachment called the Alfa Group Overview, 9.1.16.  
6 Joe, if you could scroll down to the attachment?

7 THE VIDEOGRAPHER: And this tab 30 is  
8 available in the marked exhibits folder as Exhibit 7.

9 (A document was designated  
10 as Exhibit No. 7.)

11 BY MR. KELLY:

12 Q. Thanks, Joe. Ms. Seago, are you familiar  
13 with this document?

14 **A. Yeah. Can I take a moment to read it**  
15 **please?**

16 Q. Certainly.

17 MR. LEVY: Take your time.

18 MR. KELLY: So Joe, can you remind me what  
19 exhibit this is?

20 THE VIDEOGRAPHER: Number 7.

21 BY MR. KELLY:

22 Q. Thank you. Ms. Seago, are you familiar

1 with this document?

2 **A. It looks familiar to me. I may have seen**  
3 **it before.**

4 Q. Did you assist in drafting this document?

5 **A. Not to my recollection.**

6 Q. Did you assist in drafting any other  
7 iterations of this document?

8 **A. Not to my recollection.**

9 Q. Do you know who drafted this document?

10 **A. I don't know.**

11 Q. This was drafted by Fusion GPS, correct?

12 MR. LEVY: Objection to form.

13 BY MR. KELLY:

14 Q. Is it your understanding it is Fusion work  
15 product?

16 **A. My best understanding is this is Fusion**  
17 **work product.**

18 Q. Do you have a belief as to who would have  
19 drafted this document?

20 MR. LEVY: Objection to form.

21 BY MR. KELLY:

22 Q. You may answer.

1           **A.       Once again, Peter Fritsch, Glenn Simpson,**  
2           **Jake Burkowitz were our Alfa experts. It may have**  
3           **been one of them. I don't know.**

4           Q.       Do you know why this document was created?

5                   MR. LEVY:  Objection to form.

6                   BY MR. KELLY:

7           Q.       You may answer.

8           **A.       No.**

9           Q.       Do you know for which client this document  
10          was created?

11          **A.       No.**

12          Q.       Did you provide any of the underlying  
13          research for this document?

14                   MR. LEVY:  Objection to form.

15                   BY MR. KELLY:

16          Q.       You may answer.

17          **A.       I don't recall providing underlying**  
18          **research for this document.**

19          Q.       To your knowledge, was the Alfa Group  
20          overview the Fusion white paper that was shared with  
21          FBI general counsel, James Baker?

22                   MR. LEVY:  Objection to form, assumes facts



1 in evidence.

2 BY MR. KELLY:

3 Q. You may answer.

4 A. I don't know what was provided.

5 Q. Do you know any clients for which Fusion  
6 did Alfa-Bank research?

7 A. Once again, I don't necessarily always know  
8 who the client is, and I also know that after the  
9 U.S. election, we decided internally that we would  
10 continue to pursue our research on Trump's ties to  
11 Russia because it was a matter of national importance  
12 and national security, and we would figure the client  
13 part out later. There may have been no client. I  
14 simply don't know.

15 Q. So you occasionally produced research on  
16 Alfa for no client?

17 A. I don't know if we produced Alfa on  
18 research -- excuse me. I don't know if we produced  
19 research on Alfa for no client, but I do know that we  
20 produced research on Donald Trump's ties to Russia  
21 occasionally for our own education and knowledge.

22 Q. So the title of this document is Alfa Group

1 Overview 9.11.6, so were you aware of any -- which  
2 clients were you performing Alfa research on in 2016?

3 MR. LEVY: Objection, asked and answered.

4 BY MR. KELLY:

5 Q. I don't believe it was, so which clients  
6 were you performing Alfa -- which -- which clients  
7 was Fusion producing Alfa research on in 2016?

8 **A. As discussed --**

9 MR. LEVY: I'm going to instruct the  
10 witness not to answer that question. The answer  
11 would implicate the attorney-client privilege and the  
12 attorney work product doctrine.

13 BY MR. KELLY:

14 Q. Other than Fusion's engagement with DNC and  
15 the Hillary campaign, were there any other clients  
16 for which Fusion conducted Alfa-Bank research in  
17 2016?

18 MR. LEVY: Objection to form.

19 BY MR. KELLY:

20 Q. You may answer.

21 **A. Outside of our engagement with Perkins**

22 **Coie, I am not aware of any other clients for whom**

1 **we've produced Alfa-Bank research in 2016.**

2 Q. And you mentioned that after the 2016  
3 election, you decided to continue and conduct  
4 additional research. Was this research pro bono?  
5 Was it out of the goodness of your hearts or were you  
6 paid by an entity to do this research?

7 MR. LEVY: Objection, asked and answered.

8 BY MR. KELLY:

9 Q. You may answer.

10 **A. As stated, we did produce research. If you**  
11 **wish to use the term "Out of the goodness of our**  
12 **hearts," we did continue to do this research without**  
13 **a client after the election.**

14 Q. Were you compensated for this research?

15 **A. I continued to receive a salary, yes.**

16 Q. Was it your understanding that Fusion was  
17 continued to be compensated for this research?

18 MR. LEVY: Objection to form.

19 BY MR. KELLY:

20 Q. You may answer.

21 **A. My understanding is that there were later**  
22 **clients interested in Trump and Russia, but not**

1 **immediately after the election.**

2 Q. And were there any other commercial clients  
3 for which you performed research on Alfa-Bank other  
4 than the DNC and the Clinton campaign?

5 MR. LEVY: Objection to form. When you say  
6 "you," are you referring to Ms. Seago, are you  
7 referring to the company?

8 BY MR. KELLY:

9 Q. Were there any other personal clients for  
10 which Fusion conducted research on Alfa-Bank other  
11 than the Clinton campaign and DNC?

12 **A. I don't know if we ever had a client for**  
13 **our other Alfa-Bank research.**

14 Q. So I just want to go through -- so in -- if  
15 we could go up to -- actually, we'll come back to  
16 that. I want to go back to the Sussmann indictment  
17 and then we can break for lunch, because I know we've  
18 been going for a while, and we'll break soon. So the  
19 Sussmann indictment, as we previously mentioned,  
20 relates to an alleged misrepresentation by Mr.  
21 Sussmann to the FBI regarding the server allegations.  
22 So the lie -- the alleged lie regarding the political

1 nature of Sussmann's decision to take the server  
2 allegations to the FBI, what is your personal opinion  
3 on whether Mr. Sussmann provided the FBI with  
4 information to benefit the Hillary Clinton campaign?

5 MR. LEVY: Mr. Kelly, are you referring to  
6 a particular part of the indictment? It looked like  
7 you were reading from something. I don't know if you  
8 were reading part of --

9 BY MR. KELLY:

10 Q. I was not. The Sussmann indictment  
11 generally alleges that Mr. Sussmann misled the FBI in  
12 regards to the server allegations, so in respect to  
13 not informing the FBI that he was representing the  
14 Clinton campaign, so Ms. Seago, I'm just asking for  
15 your personal opinion on whether Mr. Sussmann  
16 provided the FBI with information to benefit the  
17 Hillary Clinton campaign.

18 MR. LEVY: Can you rephrase the question or  
19 restate it? You don't have to rephrase it. Just  
20 restate the question.

21 BY MR. KELLY:

22 Q. Ms. Seago, what is your opinion on whether

1 Mr. Sussmann provided the FBI with information to  
2 benefit the Hillary Clinton campaign?

3 MR. LEVY: Her opinion? She's a fact  
4 witness. What --

5 MR. KELLY: Are you instructing her not to  
6 answer, Mr. Levy?

7 MR. LEVY: Are you asking for her knowledge  
8 of Mr. Sussmann?

9 MR. KELLY: Are you instructing her not to  
10 answer, Mr. Levy?

11 MR. LEVY: Repeat the question please.

12 BY MR. KELLY:

13 Q. What is your opinion on whether Mr.  
14 Sussmann provided the FBI with information to benefit  
15 the Hillary Clinton campaign, based on your  
16 knowledge?

17 **A. I don't have any special knowledge of this**  
18 **issue. I don't know any of the allegations in the**  
19 **indictment to be true, and in fact, that New York**  
20 **Times story we discussed earlier suggests that some**  
21 **of them might not be, and I never knew Michael**  
22 **Sussmann's client to be the Hillary Clinton campaign.**

1     **I don't know if it was.**

2           Q.     But you met with Mr. Sussmann and are  
3     claiming privilege over that communications, and your  
4     client was the Hillary Clinton campaign.

5           MR. LEVY:  Objection, assumes facts in  
6     evidence, and she -- the question calls for  
7     speculation.  Go ahead, repeat the question please.

8           BY MR. KELLY:

9           Q.     I'll try a different question.  Who did you  
10    understand to be Mr. Sussmann's client?

11          **A.     Rodney Joffe.**

12          Q.     And at no point -- and you're saying Mr.  
13    Sussmann did not represent the Clinton campaign.

14          **A.     I don't know whether he did or didn't.  My**  
15    **understanding was that he was there in his capacity**  
16    **as Rodney Joffe's counsel.**

17          Q.     If we could scroll up to page 3 of the  
18    indictment, I'll give you the paragraph in one  
19    second.  It's kind of the top half paragraph, it  
20    says, "In compiling and analyzing the Russian bank-1  
21    allegations, tech executive-1" -- that's Rodney Joffe  
22    -- "had exploited his access to nonpublic data and

1 multiple internet companies to conduct opposition  
2 research concerning Trump." Was it your  
3 understanding that Mr. Joffe was using nonpublic data  
4 in regards to the server allegations?

5 MR. LEVY: You're speaking very fast,  
6 reading through a whole -- part of a whole paragraph.  
7 Just let her read the whole paragraph and then she  
8 can answer the question.

9 **A. Okay, go ahead.**

10 Q. Was it your understanding that Mr. Joffe  
11 had access to nonpublic data and was using that date  
12 in regards to server allegations?

13 MR. LEVY: I'm going to instruct the  
14 witness not to answer that question inasmuch as the  
15 answer might implicate the attorney-client privilege  
16 and the attorney work product doctrine.

17 BY MR. KELLY:

18 Q. Did you ever discuss the providence of the  
19 data with Mr. Joffe?

20 MR. LEVY: I'm going to instruct the  
21 witness not to answer that question because the  
22 answer might implicate the attorney-client privilege



1 and attorney work product doctrine.

2 BY MR. KELLY:

3 Q. Is it your understanding that there was a  
4 coordinated effort on behalf of Rodney Joffe, Michael  
5 Sussmann and Fusion GPS to publicize the server  
6 allegations?

7 MR. LEVY: Objection to form.

8 BY MR. KELLY:

9 Q. You may answer.

10 **A. No, I would not describe it coordinated**  
11 **effort.**

12 Q. Was there an effort to publicize the server  
13 allegation with Fusion -- by Fusion GPS?

14 MR. LEVY: Can you restate the question  
15 please?

16 BY MR. KELLY:

17 Q. Was there an effort to publicize the server  
18 allegations by Fusion GPS?

19 **A. As discussed, I did meet with Frank Foer,**  
20 **and other representatives of Fusion were there.**  
21 **Frank Foer's a journalist. He did write a story**  
22 **about the matter.**

1 Q. And the intention was for the reporters to  
2 publish stories about the server allegations.

3 MR. LEVY: Objection to form.

4 BY MR. KELLY:

5 Q. You may answer.

6 **A. That was my understanding at the meeting,**  
7 **that Frank Foer was going to publish a story.**

8 Q. Is it your understanding that Fusion was  
9 working in coordination with the Clinton campaign in  
10 its efforts to publicize stories regarding the server  
11 allegations?

12 MR. LEVY: Objection, asked and answered.

13 BY MR. KELLY:

14 Q. You may answer. Was Fusion acting on  
15 anyone else's behalf in its efforts to publicize the  
16 server allegations?

17 MR. LEVY: Objection, asked and answered.

18 BY MR. KELLY:

19 Q. You may answer.

20 **A. I don't speak for the whole firm, but I was**  
21 **not aware of any other effort.**

22 Q. Was Fusion involved in an effort to take

1 the server allegations to law enforcement, including  
2 the FBI?

3 MR. LEVY: Objection to form.

4 BY MR. KELLY:

5 Q. You may answer.

6 **A. I don't know.**

7 Q. Did you have any discussions regarding  
8 taking the server allegations to law enforcement,  
9 including the FBI?

10 **A. Not that I can recall.**

11 Q. Do you understand that there was an attempt  
12 on the part of the researchers to create a narrative  
13 about Donald Trump's links to the Russian entities  
14 using DNS data?

15 MR. LEVY: Objection to form. When you're  
16 referring to researcher, who -- to whom are you  
17 referring?

18 BY MR. KELLY:

19 Q. Is it your understanding that there was an  
20 effort by Rodney Joffe, April Lorenzen, David Dagon  
21 and Manos Antonakakis regarding -- to create a  
22 narrative about Donald Trump's ties to Russia's --

1 Russia?

2 MR. LEVY: And are you asking what's her  
3 understanding in 2016?

4 BY MR. KELLY:

5 Q. Yes.

6 **A. I had no awareness of any communications**  
7 **between any of those individuals.**

8 Q. But when you spoke to Mr. Joffe, so were  
9 you aware -- sorry, I'll retract. Were you  
10 personally aware of an effort to create a narrative  
11 using DNS data that Trump -- Donald Trump had ties to  
12 Russia?

13 MR. LEVY: Objection to form.

14 **A. I don't really know what creating a**  
15 **narrative means here. Can you restate?**

16 Q. Where did you understand -- I will take a  
17 different tack. Where did you understand Mr. Joffe  
18 got his DNS data from?

19 MR. LEVY: I'm going to instruct the  
20 witness -- first I'm going to object to the question  
21 because it's -- well, objection to form, and I'm  
22 going to instruct the witness not to answer the

1 question because the answer could -- I'm instructing  
2 the witness -- question because the answer would  
3 implicate privileges.

4 BY MR. KELLY:

5 Q. Did you understand the data that Mr. Joffe  
6 presented regarding the server allegations to be raw  
7 and complete data or did you understand the data to  
8 have been manipulated or sifted in some way?

9 MR. LEVY: I'm going to instruct the  
10 witness not to answer the question because it would  
11 implicate privileges.

12 BY MR. KELLY:

13 Q. If we could go to page 12 of the  
14 indictment, and I will give you a paragraph number in  
15 one minute. So down in the middle of paragraph I --  
16 Joe, can you scroll down a little bit? There's an  
17 e-mail quoted from Rodney Joffe in which he says,  
18 quote, "Being able to provide evidence of anything  
19 that shows an attempt to behave badly in relation to  
20 this, the VIPs would be very happy." Ms. Seago, do  
21 you have an understanding of who these VIPs would be?

22 MR. LEVY: Object to form.

1 BY MR. KELLY:

2 Q. You may answer.

3 **A. I don't know. I don't want to speculate.**  
4 **I was not a party to this communication.**

5 Q. Ms. Seago, are you aware of Michael  
6 Sussmann having a meeting with another government  
7 agency in late 2016 or early 2017 regarding the  
8 server allegations?

9 MR. LEVY: Objection to form, assumes facts  
10 in evidence.

11 BY MR. KELLY:

12 Q. You may answer.

13 **A. I don't recall. I read the indictment, but**  
14 **I don't recall if it mentions a second meeting.**

15 Q. Outside of the indictment, did you have an  
16 understanding that Michael Sussmann or any other --  
17 did you have an understanding Michael Sussmann met  
18 with a government agency other than the FBI in late  
19 2016 or early 2017?

20 **A. No, I have no knowledge of that, and the**  
21 **first thing, that's not necessarily true, so I don't**  
22 **know if that meeting occurred.**

1 Q. Did Fusion ever discuss -- did anyone at  
2 Fusion ever discuss Michael Sussmann having a meeting  
3 with a government agency in late 2016 or early 2017  
4 regarding the server allegations?

5 MR. LEVY: Objection to form. I'm not sure  
6 how she's going to know every communication Fusion  
7 had.

8 BY MR. KELLY:

9 Q. Are you aware of anyone at Fusion  
10 discussing Michael Sussmann meeting with another  
11 government agency in late 2016 or early 2017  
12 regarding the server allegations?

13 A. I'm not aware of any discussions of that.

14 Q. And is it your understanding that data that  
15 Rodney Joffe had is duplicative or the same data  
16 that's available on the internet, that was posted to  
17 the internet?

18 MR. LEVY: Objection to form. Can you  
19 restate the question?

20 BY MR. KELLY:

21 Q. Yes. Was the data that Rodney Joffe had  
22 duplicative of the data available on the internet?

1           MR. LEVY:  Objection to form, and I'm going  
2 to instruct the witness that she not disclose any  
3 communications with Rodney Joffe, as that would  
4 implicate the attorney-client privilege and the  
5 attorney work product doctrine.

6           BY MR. KELLY:

7           Q.     Can you describe the data that Rodney Joffe  
8 had?

9           MR. LEVY:  Again, I'm going to instruct the  
10 witness not to answer the question because any  
11 communications she would have had with him in 2016  
12 while working under the engagement would be covered  
13 by the privileges.

14          BY MR. KELLY:

15          Q.     Did you understand Rodney Joffe to have  
16 access to government data in 2016?

17          MR. LEVY:  Again, I'm going to object to  
18 the -- well, first I'm going to object to the form.  
19 I'm not sure what you mean by government data, but  
20 I'll instruct the witness not to answer the question  
21 because the answer would implicate privileges.

22          MR. KELLY:  Okay, I think that is a good



1 stop to break for lunch.

2 MR. LEVY: Okay.

3 THE WITNESS: Great.

4 THE VIDEOGRAPHER: Going off the record at  
5 1:05 p.m.

6 (Recessed at 1:05 p.m.)

7 (Reconvened at 1:37 p.m.)

8 THE VIDEOGRAPHER: Going back on the record  
9 at 1:37 p.m.

10 MR. KELLY: Thank you. Joe, if you could  
11 please pull up tab 35 as the next exhibit, which I  
12 believe will be Exhibit 8.

13 THE VIDEOGRAPHER: Okay, tab 35 is in the  
14 marked exhibits folder. I will mark that as Exhibit  
15 8. I shared it.

16 (A document was designated  
17 as Exhibit No. 8.)

18 BY MR. KELLY:

19 Q. Ms. Seago, this was a document that was  
20 produced by Fusion. It is an e-mail from Peter  
21 Fritsch to Matthew Mosk. Do you -- are you aware of  
22 Matthew Mosk?

1           **A.       I met Matthew Mosk before.**

2           Q.       When did you meet Matthew Mosk?

3           **A.       I don't recall the date.**

4           Q.       Was it in 2016?

5           **A.       I don't recall.**

6           Q.       Do you recall if it was before or after the  
7 2016 election?

8           **A.       I don't recall.**

9           Q.       What was the context of your meeting with  
10 Matthew Mosk?

11          **A.       I don't recall.**

12          Q.       Was your meeting with Matthew Mosk  
13 concerning the server allegations?

14          **A.       I don't recall the substance of the  
15 meeting, just that I met Mr. Mosk.**

16          Q.       Do you recall if you met him more than  
17 once?

18          **A.       I don't recall.**

19          Q.       Do you recall who was in the meeting with  
20 you and Mr. Mosk?

21          **A.       No, I don't recall.**

22          Q.       Other than this meeting, do you recall --

1 did you have any communications with Matthew Mosk?

2 **A. Not that I can recall.**

3 Q. So this e-mail on October 5th, Mr. Fritsch  
4 sends Mr. Mosk an e-mail copying Glenn Simpson. The  
5 subject is, "Dude, this is huge," and he attaches the  
6 GDD dot zip file, and it's a lengthy document, but if  
7 you need to scroll the attachments, you can. My  
8 question will be if these attachments are the data  
9 and analysis that you downloaded from the Reddit site  
10 on October 5th, 2016.

11 **A. I'm going to need to take a minute to look**  
12 **through all this.**

13 Q. I mean, it's several hundred pages, so I  
14 don't think you need to look through the entire  
15 thing, but --

16 MR. LEVY: It's not loading yet.

17 **A. Not even the first page is loading, so I**  
18 **really can't speak to it. I would want to take a**  
19 **look at least at a couple pages.**

20 Q. Was it your understanding that Mr. Fritsch  
21 sent the documents that you downloaded on October  
22 5th, 2016 to several reporters, including Matthew

1 Mosk?

2 MR. LEVY: Can you restate the question  
3 please?

4 BY MR. KELLY:

5 Q. Yes. You previously stated that you found  
6 information -- analysis and data regarding the server  
7 allegations on October 5th, 2016, correct?

8 MR. LEVY: Objection to form.

9 BY MR. KELLY:

10 Q. You may answer.

11 **A. Did I download information from the**  
12 **internet --**

13 Q. Yes.

14 **A. -- regarding server communications? Yes.**

15 Q. And did you send that information to Mr.  
16 Fritsch?

17 **A. I don't recall who I sent it to.**

18 Q. Was it your understanding that Mr. Fritsch  
19 or others at Fusion provided this information you  
20 downloaded to reporters?

21 **A. I don't know if that was my understanding**  
22 **at the time. I don't recall.**

1 Q. Is it your understanding now that Mr.  
2 Fritsch provided the documents that you sent him --  
3 or that you downloaded to reporters or others?

4 MR. LEVY: Objection, assumes facts in  
5 evidence.

6 BY MR. KELLY:

7 Q. You may answer.

8 **A. I do recall downloading a file with the**  
9 **title GDD dot zip, and I do see in this e-mail that**  
10 **Peter Fritsch is sending it to a reporter.**

11 Q. And sorry, just -- that's the document that  
12 you -- the documents that you downloaded regarding  
13 the server allegations.

14 MR. LEVY: Restate the question please?

15 Q. Yes, you mentioned that you downloaded a  
16 GDD zip. I just wanted to be clear for the record  
17 that that download was regarding the server  
18 allegations.

19 **A. My recollection is that that was the file**  
20 **name of one of the archives that was posted to the**  
21 **internet regarding server allegations.**

22 Q. So here we have Mr. Fritsch distributing

1 the information that you downloaded to third parties,  
2 who are not privileged, and have been produced, so I  
3 would ask again, where -- how did you find the server  
4 -- the data?

5 MR. LEVY: I'm going to object to form.  
6 I'm going to move to strike. Your attempt to  
7 characterize the witness' testimony is unproductive.  
8 We've gone over this a few times during this  
9 deposition. Just ask a question. It'll be helpful.

10 BY MR. KELLY:

11 Q. Ms. Seago, how did you find this  
12 information that Mr. Fritsch passed on to Matthew  
13 Mosk?

14 MR. LEVY: Objection to form, assumes facts  
15 in evidence.

16 A. Once again, you know, this isn't loading on  
17 our side. I can't see the data. I do recognize the  
18 file name as something that is the same as the file  
19 name of something I downloaded from the internet. I  
20 -- I found it on line.

21 Q. And were you directed to find it?

22 A. I don't recall if I was directed to find it

1 **or if I found it independently.**

2 Q. Do you recall -- so were you looking for  
3 these specific files, or this specific post?

4 **A. Not that I can recall.**

5 Q. Okay. Are you still having technical  
6 issues loading the document?

7 MR. LEVY: We are.

8 MR. KELLY: Okay. How about we go off the  
9 record while the document downloads, and then we come  
10 back on in five minutes.

11 MR. LEVY: Another fix is to have Joe  
12 scroll down on his version, and maybe we can all see  
13 it.

14 MR. KELLY: Would that be adequate? Joe,  
15 if you want to scroll down?

16 THE VIDEOGRAPHER: Yeah, I can also drop it  
17 in the Zoom chat, and it might load a little bit  
18 faster from there.

19 MR. LEVY: We're just going to try to  
20 download it and see if we can do it that way as well.

21 THE VIDEOGRAPHER: Okay, let me stop  
22 sharing for one moment. I'm going to drop tab 35

1 into the Zoom chat.

2 MR. KELLY: Joe, I think we should be off  
3 the record for this.

4 THE VIDEOGRAPHER: Okay. Going off the  
5 record at 1:44 p.m.

6 (Discussion off the record)

7 THE VIDEOGRAPHER: Going back on the record  
8 at 1:44 p.m.

9 THE WITNESS: Sorry, we are going to  
10 consult the version in the Zoom chat.

11 BY MR. KELLY:

12 Q. So Ms. Seago --

13 A. Okay.

14 Q. Was this the GDD zip that you downloaded on  
15 October 5th, 2016? Are these the same contents?

16 MR. LEVY: And Mr. Kelly?

17 MR. KELLY: Uh-huh.

18 MR. LEVY: Just so we're -- we're clear  
19 we're looking at the same document, it looks like  
20 it's a lot of machine language through page 82 of the  
21 document.

22 MR. KELLY: This was --



1 MR. LEVY: Mr. Kelly --

2 MR. KELLY: Was there an encryption in the  
3 download?

4 MR. LEVY: Objection. Which download?

5 BY MR. KELLY:

6 Q. So -- okay, so we are looking at the same  
7 document. It has a number -- see, this was produced,  
8 but just -- Ms. Seago, is it your understanding that  
9 this is the same GDD zip that you downloaded on  
10 October 5th?

11 MR. LEVY: Objection, assumes facts in  
12 evidence.

13 BY MR. KELLY:

14 Q. You previously -- you can answer.

15 **A. This file doesn't bear a resemblance to**  
16 **anything I remember downloading.**

17 Q. Were you aware that Mr. Fritsch or others  
18 at Fusion were planning to distribute the GDD zip  
19 file that you downloaded on October 5th?

20 MR. LEVY: Objection, assumes facts in  
21 evidence.

22 BY MR. KELLY:

1 Q. You may answer.

2 A. **I don't recall if I was aware of what they**  
3 **were doing with it.**

4 Q. So Mr. Fritsch writes that some scientists  
5 posted this to the web a while ago. Was it your  
6 understanding on October 5th that scientists had  
7 posted the GDD zip file to the internet?

8 A. **I didn't know who posted it.**

9 Q. Was it your understanding that scientists  
10 had posted it?

11 A. **I didn't know who the author was, whether**  
12 **they were scientists or not.**

13 Q. So you had no information as to who posted  
14 the GD zip file to the internet.

15 A. **That is correct.**

16 Q. Okay, and again, it was shared with third  
17 parties, including Mr. Mosk and others, so I would  
18 ask again, how did you find this information that was  
19 passed on?

20 MR. LEVY: Can you restate the question?

21 BY MR. KELLY:

22 Q. Yes. I would ask how you came about to

1 find this GDD zip file that was downloaded.

2 MR. LEVY: Objection, asked and answered.

3 A. And again, I want to be very careful here.

4 This attachment in this exhibit does not resemble  
5 anything I'm familiar with, and so I don't want to  
6 claim that I ever downloaded this file.

7 Q. Uh-huh.

8 A. Can you restate the question please?

9 Q. Yes. So the GDD zip file that you  
10 downloaded, again, I would ask how you found it.  
11 Were you generally searching the internet or did  
12 someone direct you to that specific post, or were you  
13 looking for a specific post on the server  
14 allegations?

15 MR. LEVY: Objection, asked and answered.

16 THE WITNESS: Yes, my understanding is that  
17 I testified already that I don't recall how I came  
18 across it.

19 BY MR. KELLY:

20 Q. Joe, if you could pull up tab 40? So this  
21 is a communication between Peter Fritsch -- I'm  
22 sorry, I'll go back. Just real quick on Matthew

1 Mosk, you mentioned him. What communications had you  
2 had with Mosk outside of the one meeting that you  
3 mentioned?

4 **A. Don't recall any other communications.**

5 Q. And you don't -- and was that meeting  
6 regarding the server allegations?

7 **A. I don't recall.**

8 Q. Do you recall who requested the meeting?

9 **A. I believe we've discussed it before. No, I**  
10 **don't recall.**

11 Q. So going to this tab, so this is an e-mail  
12 from Peter Fritsch to Mark Hosenball. Joe, if you  
13 could scroll down to the 11:01 a.m. meeting? So this  
14 is October 18th -- that's good, Joe. Thank you, and  
15 Mr. Fritsch writes, "Meantime, do the fucking  
16 Alfa-Bank secret comms story. It is hugely  
17 important."

18 **A. I'm just reviewing this document here.**

19 **Okay.**

20 Q. So Mr. Fritsch writes, "Do the fucking  
21 Alfa-Bank comms story." Who's Mark Hosenball? Is he  
22 a reporter? Is it your understanding he's a

1 reporter?

2 MR. LEVY: Objection. Can you just state  
3 the question? You asked three questions.

4 BY MR. KELLY:

5 Q. Is your understanding that Mark Hosenball  
6 is a reporter?

7 **A. Yes.**

8 Q. So why -- what is your understanding of why  
9 Mr. Fritsch was pressing Mr. Hosenball to do the  
10 Alfa-Bank secret comms story?

11 MR. LEVY: Objection to form, calls for  
12 speculation.

13 BY MR. KELLY:

14 Q. You may answer.

15 **A. I don't want to speculate about what Mr.  
16 Fritsch's intentions were.**

17 Q. So he says it's -- it is hugely important.  
18 Why do you think Mr. Fritsch wrote that?

19 MR. LEVY: Objection. Same objection.

20 **A. Again, I don't want to speculate about why  
21 he thought something was important.**

22 Q. Is it your understanding that Mr. Fritsch

1 was acting on behalf of a client when he was  
2 requesting that reporters print the Alfa-Bank story?

3 MR. LEVY: Same objection.

4 **A. I don't know.**

5 Q. Did you ever request a reporter print the  
6 Alfa-Bank story?

7 **A. I'm sorry, can you repeat the question?**

8 Q. Did you ever send an e-mail requesting or  
9 suggesting that a reporter should publish the  
10 Alfa-Bank -- an Alfa-Bank story?

11 **A. Not that I can recall.**

12 Q. Do you think that the Alfa-Bank story was  
13 hugely important?

14 **A. Again, I thought it was a matter of  
15 national security, and it was important that these  
16 allegations came to light and were thoroughly  
17 examined.**

18 Q. Okay. Joe, if you could scroll up just a  
19 little bit, if we're looking at the 11:04 a.m.  
20 e-mail, Mr. Hosenball writes, "The problem with the  
21 Alfa-Bank story at this point is that my cyber expert  
22 colleagues cannot satisfy themselves about the

1 authenticity of some of the key data, which they say  
2 from what they can tell is not public data." Are you  
3 aware of anyone raising concerns about the  
4 authenticity of the server data?

5 **A. I am aware of blog posts around this time**  
6 **that point out that the data that had been published**  
7 **to the web is not raw data and it was difficult to**  
8 **validate.**

9 Q. Are you aware of any internal Fusion  
10 discussions regarding the authenticity of the data?

11 MR. LEVY: Inasmuch as she can answer that  
12 question, it would be protected by the  
13 attorney-client privilege, the attorney work product  
14 doctrine.

15 **A. I don't believe I can answer that question**  
16 **outside of the privileged context.**

17 Q. What did you do to verify the accuracy of  
18 the data?

19 MR. LEVY: Inasmuch as that answer would  
20 call for privilege, I'm going to instruct the witness  
21 not to answer the question.

22 **A. I don't believe I can answer the question**

1 **outside the privileged context.**

2 Q. What did anyone else at Fusion do to verify  
3 the accuracy of the data?

4 MR. LEVY: Objection to form, calls for  
5 speculation.

6 **A. I don't know if anybody else attempted to**  
7 **validate the data at Fusion.**

8 Q. Was the story important to Fusion's client?

9 MR. LEVY: Objection, form, calls for  
10 speculation.

11 **A. I don't know if it was important to the**  
12 **client.**

13 Q. Was it your -- sorry. Was it your  
14 understanding that it was important to Fusion's  
15 client?

16 **A. I don't --**

17 MR. LEVY: Objection to form. She answered  
18 your question.

19 BY MR. KELLY:

20 Q. You may answer.

21 **A. I didn't speak to the client about whether**  
22 **or not this was important to them. I don't know.**



1 Q. Did anyone at Fusion ever relay to you that  
2 this was important to Fusion's clients?

3 **A. Not that I can recall.**

4 Q. Moving on, Mr. Hosenball says, "We are in  
5 contact with your experts via different channels."  
6 Who do you understand Mr. Hosenball to mean, your  
7 experts?

8 MR. LEVY: Objection to form, calls for  
9 speculation.

10 BY MR. KELLY:

11 Q. You may answer.

12 **A. I don't know who he means.**

13 Q. Did you understand Fusion to have experts  
14 with which it was conferring on the server  
15 allegations?

16 MR. LEVY: Inasmuch as an answer calls for  
17 privileged material, I'm going to instruct the  
18 witness not to answer that question.

19 **A. I don't have any testimony outside the  
20 privileged context.**

21 Q. Who do you think Fusion's experts were?

22 MR. LEVY: Same -- same instruction.

1 BY MR. KELLY:

2 Q. You may answer.

3 MR. LEVY: And objection to form. What do  
4 you mean by Fusion's experts?

5 BY MR. KELLY:

6 Q. Mr. Hosenball refers to your experts. He's  
7 talking to Peter Fritsch, so who do you think he may  
8 be referring to here?

9 MR. LEVY: Objection, calls for  
10 speculation.

11 BY MR. KELLY:

12 Q. You may answer.

13 **A. I don't know who he's referring to. I**  
14 **don't know who this e-mail's about.**

15 Q. He says he's encountered them via different  
16 channels. Why was it necessary to contact these  
17 experts using different channels?

18 MR. LEVY: Objection, calls for  
19 speculation, assumes facts in evidence.

20 BY MR. KELLY:

21 Q. You may answer.

22 **A. I -- I don't know.**

1 Q. To your understanding, was Fusion obscuring  
2 its role in the dissemination of the server  
3 allegations?

4 MR. LEVY: Objection.

5 A. No. In fact, it seems quite clear from  
6 this communication that our -- we were public about  
7 our role with people who needed to know.

8 Q. So when you discussed with reporters such  
9 as Franklin Foer and Eric Lichtblau, did you mention  
10 that you had met with Michael Sussmann and Rodney  
11 Joffe regarding the server allegations?

12 A. I don't recall.

13 Q. Do you recall whether Fusion was -- told  
14 reporters that they had received the data from  
15 Michael Sussmann?

16 MR. LEVY: Objection to form, calls for  
17 speculation, assumes facts in evidence.

18 A. I don't recall.

19 Q. So when you say that they were open about  
20 it, you -- they were therefore very forward with the  
21 fact that they were meeting with various scientists  
22 when they discussed this with reporters, because --

1                   MR. LEVY: Can you repeat the question  
2 please?

3                   BY MR. KELLY:

4           Q.       Withdrawn. So Joe, if you could scroll up  
5 a little bit? So Mr. Fritsch suggests that Mr.  
6 Hosenball call David Dagon at Georgia Tech. We  
7 previously discussed that Mr. Dagon has been  
8 identified as one of the researchers working with  
9 Rodney and April Lorenzen. So does this refresh any  
10 recollection about whether you had any communications  
11 with David Dagon in 2016?

12                   MR. LEVY: First I'm going to move to  
13 strike your statement. I don't think anything's been  
14 established about Mr. Dagon, and whatever Ms. Seago's  
15 testimony is speaks for itself. Feel free to ask her  
16 a question.

17                   BY MR. KELLY:

18           Q.       Does this refresh your recollection about  
19 whether you had any communications with David Dagon  
20 in 2016?

21                   MR. LEVY: And by you, you mean Ms. Seago?

22                   BY MR. KELLY:

1 Q. I mean Ms. Seago, yes.

2 **A. Unfortunately, no, I don't recall any**  
3 **conversations with David Dagon.**

4 Q. Are you aware of any communications anyone  
5 at Fusion had with David Dagon in 2016?

6 MR. LEVY: Objection, calls for  
7 speculation.

8 **A. No.**

9 MR. KELLY: Okay, so Joe, if we can move to  
10 tab 43? I'm sorry, yeah, tab 43.

11 (A document was designated  
12 as Exhibit No. 10.)

13 BY MR. KELLY:

14 Q. So this is Mr. Fritsch -- this is another  
15 e-mail produced by Fusion, so Mr. Fritsch is  
16 e-mailing Tom Hamburger, and the subject is "Server,"  
17 and it's -- the date is October 31st, 2016.

18 Ms. Seago, are you aware of Tom Hamburger?

19 **A. I've met Tom Hamburger, yes.**

20 Q. When did you meet Tom Hamburger?

21 **A. I don't recall the first time we met.**

22 Q. How many times did you meet Mr. Hamburger?

1           **A.       I met him several times.**

2           Q.       Can you be more specific?

3           **A.       Tom Hamburger has visited Fusion's offices**  
4 **several times on a number of different matters. I --**  
5 **I don't recall the first time we met or -- or what we**  
6 **discussed.**

7           Q.       Did you ever meet with Mr. Hamburger  
8 regarding the server allegations?

9           **A.       I don't recall.**

10          Q.       Did you meet with Mr. Hamburger in the fall  
11 of 2016?

12          **A.       I don't recall.**

13          Q.       When you met with -- did you ever  
14 communicate with Mr. Hamburger outside of meetings?

15          **A.       Yes, I believe I've e-mailed and exchanged**  
16 **messages with Mr. Hamburger.**

17          Q.       Were any of these e-mails concerning the  
18 server allegations?

19          **A.       Not that I can recall.**

20          Q.       Did you ever have any phone conversations  
21 with Mr. Hamburger?

22          **A.       Yes, as I recall, we've spoken on the**

1 **phone.**

2 Q. Were any of these phone conversations  
3 regarding the server allegations?

4 **A. Not that I can recall.**

5 Q. So have you ever communicated with Mr.  
6 Hamburger in any way regarding the server  
7 allegations?

8 **A. Not that I can recall.**

9 Q. So here Mr. Fritsch is writing, "Way OTR.  
10 Big story on the Alfa Trump server dropping early  
11 this afternoon. The USG absolutely is investigating  
12 this campaign" -- "Just FYI, if you want to follow,  
13 campaign I'm sure will light this up." So is this --  
14 and is your understanding that this is in reference  
15 to the Franklin Foer article that was published on  
16 October 31st?

17 MR. LEVY: Objection, calls for  
18 speculation.

19 **A. I didn't write this e-mail. I don't know  
20 what Mr. Fritsch meant.**

21 Q. What is OTR mean in your understanding?

22 MR. LEVY: Objection, calls for

1 speculation.

2 **A. Again, I don't know what Mr. Fritsch meant**  
3 **by this.**

4 Q. Would you --

5 **A. I didn't write the e-mail.**

6 Q. Would you agree it means off the record?

7 **A. Generally yes, that is my understanding.**

8 Q. Okay. Why would Mr. Fritsch feel the need  
9 to make a statement about the server story dropping  
10 off the record?

11 MR. LEVY: Objection, calls for  
12 speculation. She did not write this e-mail.

13 **A. I don't know.**

14 Q. It says USG -- "The USG's absolutely  
15 investigating." Do you understand that to mean the  
16 U.S. government?

17 MR. LEVY: Objection, calls for  
18 speculation.

19 **A. I don't know.**

20 Q. Were you aware that the U.S. government was  
21 investigating this as of October -- were you aware  
22 that the U.S. government was investigating the server



1 allegations as of October 31st, 2016?

2 **A. Not that I can recall.**

3 MR. KELLY: Joe, if we could move to tab  
4 34?

5 (A document was designated  
6 as Exhibit No. 11.)

7 BY MR. KELLY:

8 Q. So this is another e-mail from Mr. Fritsch  
9 on October 5th, and this is -- Ms. Seago, is this the  
10 MediaFire link that we previously identified that you  
11 found on the internet on October 5th?

12 **A. Allow me to read this document.**

13 MR. LEVY: And I'm going to object. The  
14 continued objection, Mr. Kelly, is that you keep  
15 saying that she found this on October 5th, and I  
16 don't know that she said the date in which she found  
17 anything, and I don't know if she found this either.  
18 She'll tell me.

19 **A. Okay, I'm ready. Can you please restate  
20 the question?**

21 Q. Yes, Ms. Seago, is this the link to the  
22 information that you found in early October regarding

1 the server allegations?

2 MR. LEVY: Objection to form.

3 BY MR. KELLY:

4 Q. You may answer.

5 **A. This link looks familiar to me. It appears**  
6 **to be the same link.**

7 Q. And is this information the same -- appear  
8 to be the same information that you found in that  
9 server -- in the information that was posted to the  
10 internet in early October?

11 MR. LEVY: Can you restate the question?

12 BY MR. KELLY:

13 Q. Is this information appear to be the same  
14 information that you found on the internet in early  
15 October regarding the server allegations?

16 **A. This text here does resemble information I**  
17 **saw posted to the internet. I don't of course have**  
18 **perfect recall what that said five years later, but**  
19 **this looks like what I recall retrieving from the**  
20 **internet. I don't know what's in the contents of the**  
21 **zip file. I don't have access to that here.**

22 Q. And number 4 does say leave questions at

1 Tea dot Leaves at Tuta dot IO, so this would appear  
2 to be from Tea Leaves. Did you ever try to contact  
3 the Tea Leaves Tutanota account?

4 **A. Yes, I did contact the Tea Leaves Tutanota**  
5 **account.**

6 Q. Did Tea Leaves respond?

7 **A. As I recall, yes.**

8 Q. What was the substance of those  
9 communications?

10 MR. LEVY: I'm going to instruct the  
11 witness not to discuss the substance of those  
12 communications because of privilege.

13 BY MR. KELLY:

14 Q. Is Tea Leaves a client of Fusion GPS?

15 MR. LEVY: No, this is part of our attorney  
16 work product, part of the working under the  
17 engagement of Perkins Coie covered by Kovel letter,  
18 attorney-client privilege and attorney work product  
19 doctrine.

20 BY MR. KELLY:

21 Q. And did you have any idea as to the  
22 identity of Tea Leaves at the time?

1           **A.     No.**

2           Q.     Joe, if we could just scroll down a little  
3 bit? So there under comments, it says, "Trump's FEC  
4 filings fail to disclose any foreign bank account."  
5 Do you recall doing any research related to Trump's  
6 FEC filings?

7           MR. LEVY: Inasmuch as that answer would be  
8 covered during the period of time when Fusion was  
9 working under its Kovel letter for Perkins Coie, I'm  
10 going to instruct the witness not to answer that  
11 question as to privileges.

12           **A.     I did do research on Trump's FEC filings**  
13 **after the election. I believe that's all I'm able to**  
14 **discuss.**

15           Q.     Did you do any before the election?

16           **A.     Not that --**

17           MR. LEVY: I'm going to instruct the  
18 witness not to answer that question inasmuch as that  
19 research -- any research occurred -- was conducted  
20 during the period of time of Perkins Coie's  
21 engagement of Fusion and pursuant to --

22           BY MR. KELLY:

1 Q. Okay. And did you do -- Joe, scroll down a  
2 little bit more if you could to the other frequent  
3 connection. So did you ever do any research in  
4 regards to connections between Alfa-Bank and the  
5 Devos family, or Betsy Devos?

6 A. Not that I can recall.

7 Q. Did you ever do any --

8 MR. LEVY: When you're -- Mr. Kelly, when  
9 you say "you," you're talking about Ms. Seago  
10 personally?

11 BY MR. KELLY:

12 Q. Ms. Seago, yes. Are -- did -- Ms. Seago,  
13 did you ever do any research in regards to Spectrum  
14 Health?

15 A. Not that I can recall.

16 MR. KELLY: Joe, if you could bring up tab  
17 36?

18 (A document was designated  
19 as Exhibit No. 12.)

20 BY MR. KELLY:

21 Q. So this is another document produced by  
22 Fusion. Mr. Fritsch is sending the GDD zip file and

1 the link to Jonathan Winer. Ms. Segal, are you aware  
2 of Jonathan Winer?

3 **A. No.**

4 Q. Is this the same GDD zip link that we  
5 previously discussed?

6 MR. LEVY: Objection, calls for  
7 speculation.

8 **A. I don't know. I notice that this file is a  
9 different length than the previous one that purported  
10 to have the contents of the zip file suggests to me  
11 it's not.**

12 Q. Did you recall any discussions with anyone  
13 at Fusion regarding sharing this information with  
14 anyone at the Department of State?

15 **A. No.**

16 MR. KELLY: Joe, we're going to move on to  
17 tab 18.

18 (A document was designated  
19 as Exhibit No. 13.)

20 BY MR. KELLY:

21 Q. So this is another document produced by  
22 Fusion. It's a conversation between Peter Fritsch

1 and Tom Hamburger, and the subject is forward Reddit  
2 post, and it was October 10th, 2016. Tom, if you  
3 could scroll down to the beginning of the attachment,  
4 I believe it's on page 3. So Ms. Seago, I believe  
5 you previously mentioned Krypt3ia and -- as a well  
6 respected security blogger with which you're  
7 familiar?

8 **A. That is what I recall, yes.**

9 Q. When did you first -- have you seen this  
10 post before?

11 **A. Yes.**

12 Q. When did you first become aware of this  
13 post?

14 **A. I don't recall the exact day.**

15 Q. Do you recall discussing this post with  
16 anyone at Fusion?

17 MR. LEVY: Objection, form, and instruct  
18 the witness not to answer the question because of  
19 privilege.

20 BY MR. KELLY:

21 Q. What was your reaction to the post?

22 **A. You know, I don't recall my reaction at the**

1 **time sitting here five years later.**

2 Q. If we could -- Tom, if we could scroll --  
3 or Joe, if we could scroll up to the -- to the  
4 message itself, so -- actually, scroll down to the  
5 4:40 message. So Tom says, "Please don't circulate.  
6 Just wanted you to have this." That's the 2:25  
7 message. She sends it to Peter Fritsch. Fritsch  
8 appears to have forwarded it to Mr. Simpson at 4:00  
9 p.m., and then Mr. Simpson says, "Can you check this  
10 out, Laura?" And then if we could scroll up to  
11 Ms. Seago's message a little bit, if you'd like time  
12 to review this, please go ahead.

13 **A. Thank you. Okay.**

14 Q. Okay. Does this refresh your recollection  
15 as to whether you had any conversations about the  
16 Krypt3ia posts with anyone at Fusion?

17 **A. Yes, I now recall this e-mail exchange.**

18 Q. Okay. Did you discuss it with anyone else  
19 other than Mr. Fritsch and Mr. Simpson?

20 **A. Not that I can recall.**

21 Q. Did they respond to this e-mail at any  
22 point?



1           **A.       Not that I can recall. I don't see a**  
2 **thread.**

3           **Q.       What was their reaction to your e-mail? Do**  
4 **you recall?**

5           **A.       I don't know. I don't know how they felt.**

6           **Q.       Okay. What steps did you take to draft**  
7 **this analysis?**

8           **A.       To draft this analysis?**

9           **Q.       Uh-huh.**

10          **A.       As I recall, I read the post, I read all of**  
11 **the source documents the post was linking to. I read**  
12 **discussion on fact forums about this post, and this**  
13 **e-mail appears to be a summary of my top-line**  
14 **findings.**

15          **Q.       Okay. You write that Krypt3ia seems to be**  
16 **warming to the idea that this is legit. What led you**  
17 **to that conclusion?**

18          **A.       I don't recall. I don't know exactly,**  
19 **again, what my reasoning was because so much time has**  
20 **elapsed, but from reviewing this blog post now, it**  
21 **does seem that he finds these claims to be credible**  
22 **despite some limitations in the data.**

1 Q. He does, as you note in your e-mail, he  
2 says, "These are the key files in the new dump, but  
3 the problem I have is that they are just text files.  
4 Anyone with the know-how could recreate these to look  
5 legit enough but yet still be questioned. I see no  
6 actual log-in to the shell and queries being run  
7 here, so really it could have just done a  
8 find/replace on another query on any server you have  
9 access to." Does that seem to be stating that these  
10 server allegations are legitimate?

11 MR. LEVY: Objection to form.

12 BY MR. KELLY:

13 Q. You may answer.

14 **A. This particular passage describes the**  
15 **limitations of the data. It does not suggest that**  
16 **the allegations as a whole are illegitimate, and I'd**  
17 **just like to point out that in subsequent news**  
18 **stories about this issue that have interviewed**  
19 **computer scientists, they had said this data would be**  
20 **very hard to falsify, it would be hard to fabricate**  
21 **the find/replace and had the right kind of noise.**

22 Q. But you wrote that he was warming to the

1 idea that it was legit, however, he seemed -- doesn't  
2 this passage imply that the text files can be  
3 manipulated because they were just text files?

4 MR. LEVY: Objection, argumentative.

5 BY MR. KELLY:

6 Q. You may answer.

7 **A. I think I included that "but" there as an**  
8 **important caveat that my colleagues should be aware**  
9 **of, but my top-line finding was that he was warming**  
10 **to the idea of -- that he didn't receive more**  
11 **information from Tea Leaves and thought that there**  
12 **might be something here.**

13 Q. Joe, if you could scroll to page 10 of the  
14 PDF, and scroll down a little bit. Sorry, next page,  
15 Joe, and keep scrolling. Go down -- next page.  
16 Okay, there we are. So Krypt3ia writes, "At the end  
17 of the day, in a week of old dumps by Wikileaks and  
18 Guccifer, I am unimpressed with this attempt unless  
19 someone can come up with something more concrete.  
20 One does wonder though who might be trying to tack  
21 this attempt to cause Donny trouble. It seems a half  
22 assed attempt at best, or perhaps they are not

1 finished with it yet." Does this square with your  
2 statement that he was warming to the idea that this  
3 is legit?

4 **A. If you look at the next paragraph after he**  
5 **says all of that, he says, "Ehhhh, nah, I don't buy**  
6 **that." So he actually contradicts what you read in**  
7 **the previous paragraph. I'd also like to point out**  
8 **that there's an update below in which he said that he**  
9 **received more information that supported these**  
10 **claims.**

11 Q. I believe we'll get to another update to  
12 that later. So if we can scroll back up to the  
13 message, page 1 of the PDF, Joe, you wrote, "Also,  
14 this is rather on the nose. Why then the tip-off  
15 e-mail to someone who got in touch with me? Someone  
16 I spoke to about this alluded to maybe that was the  
17 plan, for me to blog about this from the start," and,  
18 "Nah, I don't buy that." What did you mean by this  
19 was on the nose?

20 **A. I don't recall what I meant five years**  
21 **later.**

22 Q. Were you aware of any attempts to tip off

1 Krypt3ia about the blog posts?

2 **A. No, I was not. It looks like I actually am**  
3 **pointing to the nah, that I don't buy that part,**  
4 **which I also quote in my e-mail.**

5 Q. Are you -- did you ever communicate with  
6 Krypt3ia?

7 **A. No.**

8 Q. Did anyone at Fusion ever communicate with  
9 Krypt3ia?

10 MR. LEVY: Objection, form, calls for  
11 speculation.

12 **A. Not to my knowledge.**

13 Q. Okay. Joe, if you could scroll up to the  
14 very top, so Fritsch writes, "Bottom line, this  
15 blogger thinks" -- "thinks this stuff is legit but  
16 doesn't know it. As discussed, this isn't helpful  
17 from the standpoint of clarity." Do you think that  
18 is in line with Krypt3ia's posts that this was  
19 legitimate?

20 MR. LEVY: Objection, form.

21 **A. I don't know what Mr. Fritsch meant, but**  
22 **you can see my statement below that I suggest that --**

1     **might legitimate.**

2           Q.     Okay, thanks.  Joe, could you please pull  
3     up tab 28?  Actually, Joe, before we do that, you  
4     write, Ms. Seago, that I think we continue to move in  
5     the direction of having a leg to stand on.  What did  
6     you mean by that?

7           A.     **I don't recall what I meant five years ago.**

8           Q.     Were you trying to put forward a specific  
9     objective in regards to the Krypt3ia post?

10          A.     **I don't -- I don't recall what I meant.**

11          Q.     Was anyone concerned that this undermined  
12     the server allegations at Fusion?

13                 MR. LEVY:  Objection, calls for  
14     speculation.

15          A.     **I can't speak to my colleagues and  
16     concerns.  I do not feel that this undermined the  
17     allegations in a serious way.**

18                 MR. KELLY:  All right, Joe, if you could  
19     then switch to tab 28?

20                                 (A document was designated  
21                                 as Exhibit No. 14.)

22                 BY MR. KELLY:

1 Q. So this is a subsequent post by Krypt3ia  
2 that was posted on November 1st. Ms. Seago, do you  
3 recall seeing this post ever?

4 MR. LEVY: It's five pages. Can you give  
5 her time to read it please?

6 BY MR. KELLY:

7 Q. Sure.

8 A. **Thank you.**

9 Q. I'm just asking if she's familiar with it.  
10 She doesn't need to read it in detail. I can point  
11 her to specific sections if she would like.

12 A. **I would like to read it. Thank you. Okay.**

13 Q. So I would direct your attention to the  
14 bottom of the first page where Krypt3ia says in  
15 relation to the server allegations, "I then did the  
16 due diligence and began looking into it more and  
17 wrote a blog post, but in the end, after a couple of  
18 updates, dismissed Tea as a fabricator and moved on  
19 with your life" -- or "moved on with my life."  
20 Doesn't this imply that Mr. -- or Krypt3ia's earlier  
21 posts in fact was not supportive of the server  
22 allegations?

1           **A.     I don't want to speculate about what the**  
2 **author means, but I agree that that's what's written**  
3 **on the post.**

4           Q.     Have you ever seen this post before?

5           **A.     It looks familiar to me.**

6           Q.     Did you see this post in the fall of 2016  
7 when it was posted?

8           **A.     I don't recall exactly when I saw it, but I**  
9 **believe I read it.**

10          Q.     Did you raise this -- did you -- or did you  
11 inform anyone else at Fusion about this post that  
12 undermined Krypt3ia's earlier analysis which you  
13 suggested supported the server allegations?

14          **A.     I don't recall.**

15          Q.     And then did you discuss this post with Tea  
16 Leaves?

17          **A.     I don't recall.**

18          Q.     If we go down to the second page, it says,  
19 "Evidence. There was none. There was a lot of  
20 speculation and theory, but what Tea Leave had put on  
21 the dark net and had been shopping around was not  
22 forensically proven, and in fact, all the metadata



1 that may have existed had been stamped out of all the  
2 documents or never existed in the first place, as  
3 they were using text files." And at the bottom of  
4 that paragraph, it says, "Clearly they do not want to  
5 or could not answer any of my direct questions about  
6 authenticity." So again, doesn't this undermine the  
7 statements you made that Krypt3ia suggested that the  
8 server allegations were legitimate?

9 MR. LEVY: I'm going to object to the  
10 question. Go ahead and answer.

11 BY MR. KELLY:

12 Q. You may answer.

13 **A. I don't think that it undermines my**  
14 **statements about the legitimacy of DNS.**

15 Q. But you were citing Krypt3ia, who you  
16 claimed was a well respected cybersecurity blogger,  
17 as someone who was supporting these server  
18 allegations, and here that same well respected  
19 cybersecurity blogger is raising legitimate concerns  
20 about the server allegations, so didn't this give you  
21 any pause regarding the server allegations?

22 MR. LEVY: And objection, argumentative.

1 You're -- you're asking her if her interpretation of  
2 a blog post before -- a exhibit before her was  
3 written was accurate, and this -- this blog post  
4 wasn't available when she wrote the first e-mail.  
5 I'm trying to understand this question.

6 BY MR. KELLY:

7 Q. I -- well, I asked her if she had followed  
8 up with anyone about this subsequent blog post, so  
9 Ms. Seago, I'll ask again, did you follow up with  
10 anyone about this subsequent blog post when you  
11 discovered it?

12 MR. LEVY: Objection, asked and answered.

13 **A. As I stated, I don't recall, and this blog**  
14 **post had not been written at the time I wrote that**  
15 **e-mail, so I don't know how I could have taken this**  
16 **post into that analysis.**

17 Q. So Fusion had sent around your analysis to  
18 reporters in -- and essentially stated that Krypt3ia  
19 was a well respected cybersecurity blogger who  
20 supported the server allegations. Are you aware of  
21 anyone at Fusion circulating this subsequent post to  
22 correct the record that Krypt3ia did not in fact

1 support the server allegations?

2 MR. LEVY: First I'm going to move to  
3 strike the two or three sentences you just provided  
4 in your -- you can't testify. The witness has been  
5 here for four hours testifying. Please just ask a  
6 question, Mr. Kelly.

7 BY MR. KELLY:

8 Q. Are you aware of anyone at Fusion  
9 circulating this subsequent blog post by Krypt3ia  
10 which undermines the server allegations?

11 MR. LEVY: Objection, calls for  
12 speculation.

13 **A. I don't recall.**

14 Q. Okay. Did this post give you any concern  
15 about the authenticity of the server allegations?

16 MR. LEVY: Objection, form.

17 **A. This post was one of many calling into**  
18 **question the authenticity of the server allegations.**  
19 **At the same time, many reputable computer scientists**  
20 **at this point had been posted saying that the**  
21 **allegations seemed very credible.**

22 Q. And who are those respected computer

1 scientists?

2 **A. Paul Vixie and L. Jean Camp have been**  
3 **quoted in the media as supporting this theory.**

4 Q. Did you communicate with Franklin Foer  
5 about Krypt3ia at all?

6 **A. I don't recall.**

7 Q. Do you remember if anyone at Fusion  
8 communicated with Franklin Foer about Krypt3ia?

9 MR. LEVY: Objection, calls for  
10 speculation.

11 **A. I don't know.**

12 Q. Do you remember Krypt3ia being mentioned in  
13 the meeting you had with Franklin Foer?

14 **A. I don't recall.**

15 Q. Did you ever speak directly to Paul Vixie  
16 or Jean Camp?

17 **A. Not to my recollection.**

18 Q. So did you ever communicate in any way with  
19 Paul Vixie?

20 **A. Not to my recollection.**

21 Q. Did you ever have any communication in any  
22 way with Jean Camp?

1           **A.     Not that I can recall.**

2           Q.     Did anyone at Fusion ever communicate with  
3 Paul Vixie?

4           MR. LEVY:  Objection, calls for  
5 speculation.

6           **A.     I don't know.**

7           Q.     Did anyone at Fusion ever communicate with  
8 Jean Camp?

9           MR. LEVY:  Objection, calls for  
10 speculation.

11          **A.     I don't know.**

12          Q.     Okay.  Yeah, so we're going to move on and  
13 move to another section.

14          MR. LEVY:  Mr. Kelly?

15          MR. KELLY:  Yes.

16          MR. LEVY:  Are you in the same document or  
17 are you going to a different exhibit?

18          MR. KELLY:  We're going to go to a  
19 different exhibit.  I was pulling it up.  You can  
20 take it down.

21          MR. LEVY:  Yeah, well, if you're going to  
22 another exhibit, I think we've been on for an hour

1 since the lunch break. Can -- is it appropriate to  
2 take another ten-minute break here?

3 MR. KELLY: That's fine by me. Thank you.

4 MR. LEVY: Okay, and how long have we been  
5 on the record?

6 THE VIDEOGRAPHER: Just a second. Let me  
7 go off the record and I can tabulate the time.

8 MR. LEVY: Thank you.

9 THE VIDEOGRAPHER: Going off the record at  
10 2:30 p.m.

11 (Recessed at 2:30 p.m.)

12 (Reconvened at 2:37 p.m.)

13 THE VIDEOGRAPHER: Going back on the record  
14 at 2:37 p.m.

15 BY MR. KELLY:

16 Q. Thank you. Ms. Seago, are you familiar  
17 with Daniel Jones?

18 A. Yes.

19 Q. Who's Daniel Jones?

20 A. Daniel Jones was instrumental in writing  
21 the torture report. He later started a consultancy  
22 called Penn Quarter Group, and he was associated with

1 **Democracy Integrity Project.**

2 Q. When did you first meet Mr. Jones?

3 **A. I don't recall the exact date. It would**  
4 **probably have been sometime in 2017.**

5 Q. Early 2017, late 2017?

6 **A. I don't recall.**

7 Q. What was the context of your first meeting?

8 **A. I don't recall.**

9 Q. Was it related to your work at Fusion or  
10 was this a personal meeting?

11 **A. I met him through Fusion.**

12 Q. And why was Fusion meeting with Daniel  
13 Jones in 2017?

14 MR. LEVY: Objection, calls for  
15 speculation.

16 **A. I don't know why they set up that meeting.**

17 Q. What was the -- who attended the meeting  
18 with you?

19 **A. I don't recall.**

20 Q. What was discussed at the meeting?

21 **A. I don't recall the first time I met Daniel**  
22 **Jones, so I -- I don't have a specific meeting in my**

1 **mind.**

2 Q. Do you recall -- what -- I'm sorry,  
3 withdrawn. Are you familiar with the Democracy  
4 Integrity Project?

5 **A. Yes.**

6 Q. I'm going to refer to that as TDIP. Is  
7 that okay with you?

8 **A. Yes.**

9 Q. What is TDIP?

10 **A. My understanding is that TDIP is a**  
11 **nonprofit that researches election integrity and**  
12 **government accountability issues in western**  
13 **democracies.**

14 Q. Okay, and how are you familiar with TDIP?

15 **A. My understanding is that Fusion GPS was a**  
16 **contractor to TDIP.**

17 Q. Is it your understanding that Fusion was  
18 involved in the creation of TDIP?

19 MR. LEVY: Objection, form.

20 BY MR. KELLY:

21 Q. You may answer.

22 **A. I don't know.**



1 Q. Is it your understanding that Fusion is  
2 involved in fund raising for TDIP?

3 MR. LEVY: Objection, form.

4 A. I don't know.

5 Q. Have you ever done any fund raising on  
6 behalf of TDIP?

7 A. No.

8 Q. Did you perform any work either directly or  
9 indirectly for TDIP related to Alfa-Bank or related  
10 individuals?

11 MR. LEVY: Objection to form. Go ahead and  
12 answer the question.

13 A. As I stated, I don't know which client  
14 particular work products were actually destined for.  
15 I might have researched individual related to  
16 Alfa-Bank for TDIP, but I didn't do a lot of  
17 substantive research on Alfa-Bank at all for any  
18 client.

19 Q. What was the nature of this work?

20 MR. LEVY: Objection.

21 BY MR. KELLY:

22 Q. Ms. Seago, you just stated that you've done

1 work in relation to Alfa-Bank. You're not entirely  
2 sure if it's for TDIP, but it's not for -- this is  
3 work outside of the engagement with Perkins Coie?

4 **A. Yes.**

5 Q. And did you understand that you -- did you  
6 ever understand that you were doing work for TDIP for  
7 Fusion?

8 MR. LEVY: Can you restate the question  
9 please?

10 BY MR. KELLY:

11 Q. Yes. Sorry. I'm going to go back to my  
12 original question. Did you ever perform any work,  
13 either directly or indirectly, for TDIP related to  
14 Alfa-Bank or related individuals?

15 **A. Again, I'm not sure if TDIP was the**  
16 **ultimate client. I looked at some social media**  
17 **profiles of Alfa-Bank principals. I aggregated data**  
18 **on many players in the Trump Russia orbit.**

19 Q. So what -- you mentioned social media  
20 profiles. What other work did you do?

21 **A. Nothing that's specific that I can recall.**

22 Q. Okay. So who did you understand the client

1 to be?

2 MR. LEVY: Objection, asked and answered.

3 A. As I said, it was not always clear to me  
4 who the client was. I may very well have done some  
5 work for TDIP. It may have been for some other  
6 client. There may not have been a client.

7 Q. You say it's not always clear to you, but  
8 at any point was it clear that you were doing work  
9 for TDIP?

10 A. I'm sorry?

11 Q. You said it's not always clear to you who  
12 your ultimate client is, but was it ever clear to you  
13 at any point that you were doing work for TDIP?

14 A. Yes.

15 MR. LEVY: With regard -- with regard to  
16 the Alfa work or in general?

17 BY MR. KELLY:

18 Q. That's my follow-up question for you. And  
19 was it ever clear to you that you were doing work for  
20 TDIP for Alfa-Bank or related individuals?

21 A. Not that I can recall.

22 Q. Do you recall when you were doing this work

1 related to Alfa-Bank, possibly?

2 MR. LEVY: Objection, form, this work.

3 **A. I don't recall the exact dates. 2017 or**  
4 **2018.**

5 Q. Are you aware of work -- any work that  
6 Fusion has done for any other entities connected to  
7 Daniel Jones?

8 **A. Not to my knowledge.**

9 Q. So you said you can't be sure that you were  
10 working for TDIP on this Alfa-Bank-related research,  
11 but who were the other potential clients that you  
12 might have been working on Alfa-Bank-related research  
13 for?

14 MR. LEVY: Objection to form.

15 **A. I don't know. Once again, I don't always**  
16 **know who the client is.**

17 Q. I'm asking you if you did know though.

18 **A. I don't have any other potential client**  
19 **names at the ready.**

20 Q. So as far as you know, the only client that  
21 you may have done work for other than Perkins Coie or  
22 the DNC Hillary is TDIP related to Alfa-Bank?

1                   MR. LEVY: Objection, form. She's not  
2 testified that she knew she was working for TDIP when  
3 she was working on Alfa-Bank.

4                   MR. KELLY: Let's -- Joe, let's bring up  
5 tab 51.

6   (A document was designated  
7   as Exhibit No. 15.)

8                   BY MR. KELLY:

9                   Q.     So this is a spreadsheet that was produced  
10 by Fusion. So this first page I will represent is  
11 the metadata for this particular document, just so  
12 you can know that the custodian is Glenn Simpson, and  
13 the title, Joe, if you could scroll down, the title  
14 of this particular -- up a little bit. I'm sorry.  
15 The -- the meta file name is TDIP Projects Month 2,  
16 GS 3.21.17, and then Joe, if you scroll down to the  
17 spreadsheet, which should be page 3, Ms. Seago, are  
18 you familiar with this document?

19                   A.     No.

20                   Q.     Have you ever seen a spreadsheet of  
21 projects for TDIP before?

22                   MR. LEVY: Objection to form, assumes facts

1 in evidence.

2 BY MR. KELLY:

3 Q. Have you ever seen -- have you ever seen a  
4 spreadsheet containing projects for TDIP, Ms. Seago?

5 **A. No.**

6 Q. If we look at the staff column, you are  
7 mentioned under several of these projects, for  
8 example, line 3 and 4. Were these projects that you  
9 performed for TDIP?

10 MR. LEVY: Objection, form, assumes facts  
11 in evidence.

12 BY MR. KELLY:

13 Q. You may answer.

14 **A. I don't know. We don't particularly give**  
15 **our projects titles like Cyber Propaganda**  
16 **Investigation, and I don't know if we did this work**  
17 **for TDIP.**

18 Q. Did you ever do any research on cyber  
19 propaganda?

20 **A. As I recall, I did some research on fake**  
21 **social media posts --**

22 Q. Which --

1           **A.       -- and dissemination of information on**  
2 **line.**

3           Q.       And was that work for TDIP?

4           **A.       I don't know.**

5           Q.       Okay. Under subcolumn 1 next to that, it  
6 says Mikey D. Do you know who Mikey D is?

7                   MR. LEVY: Objection, calls for  
8 speculation.

9           **A.       I didn't write this document.**

10          Q.       Do you know who Mikey D is?

11          **A.       I -- again, I didn't write this document.**  
12 **I don't know who they meant by that.**

13          Q.       Did you ever work with someone named Mikey  
14 D?

15          **A.       I did work with Mikey Dickerson.**

16          Q.       Okay, and did you work with Mikey Dickerson  
17 on this cyber propaganda research?

18          **A.       I don't recall what we worked on. He was a**  
19 **contractor to Fusion.**

20          Q.       Okay. If we look down at line 4, it says  
21 Alfa-Bank -- I'm sorry, did you say Mikey Dickerson  
22 was a contractor for Fusion?

1           **A.       I want to correct the record on that. He**  
2           **was a contractor. I don't know if he was our**  
3           **contractor or the client's contractor.**

4           Q.       Okay, but you did work with Mikey  
5           Dickerson?

6           **A.       Yes, we discussed this project, or a**  
7           **project, I should say. I actually don't know if it**  
8           **was this specific project.**

9           Q.       Do you recall any other projects you worked  
10          with Mr. Dickerson on?

11          **A.       Not that I can recall.**

12          Q.       Okay. If we scroll down to line 6, it  
13          says, "Alfa-Bank Detailed Backgrounder and Links."  
14          The description is "Secret server and ties to Putin,"  
15          and the lead is Fritsch slash Simpson. The staff  
16          column is blank, however. Did you work on this  
17          project?

18                   MR. LEVY: Objection, form.

19          **A.       Again, it's really difficult to know if the**  
20          **projects that are listed in this document are**  
21          **actually projects that I did work on. Do I recall**  
22          **working on the secret server and ties to Putin after**



1 **the election, yeah.**

2 Q. And what was the nature of that work?

3 **A. I just said I did not recall working on**  
4 **that.**

5 Q. Oh, I'm sorry, you said you do not recall  
6 working on the -- do you recall working on the server  
7 allegations after the 2016 election?

8 MR. LEVY: Objection, asked and answered.

9 **A. No, I do not.**

10 Q. Okay. Are you aware of anyone else working  
11 on the Alfa Backgrounder project?

12 MR. LEVY: Objection to form.

13 **A. I'm sorry, I was looking at the sheet.**  
14 **That was the same project? I don't know. I don't**  
15 **know what this project is.**

16 Q. I'm sorry, I just -- did you say that TDIP  
17 was a Fusion client?

18 **A. That was my understanding.**

19 Q. Okay, that TDIP was a client of Fusion?  
20 Are you aware that Fusion was paid \$3.3 million by  
21 TDIP in 2017?

22 **A. I don't recall the exact figure. I've**

1     **looked at their 990.**

2           Q.     So you are familiar with the 990. Does  
3 Fusion do a lot of work for TDIP?

4           **A.     I don't know.**

5           Q.     Okay. What is the sort of arrangement as  
6 far as work goes, if there -- sorry, what is your  
7 understanding of the relationship between TDIP and  
8 Fusion?

9                   MR. LEVY: Objection, asked and answered.

10          **A.     My understanding is that TDIP is a client**  
11 **of Fusion. We are a contractor of theirs.**

12          Q.     Okay. Joe, could you pull up tab 72? So  
13 -- and just to go into this relationship a little bit  
14 more, what was TDIP doing for Fusion?

15                   MR. LEVY: Objection to form, assumes facts  
16 in evidence.

17          **A.     I don't know. I don't work for TDIP. I**  
18 **work for Fusion. I know what we did for them, and**  
19 **even that, I don't know everything.**

20                                   **(A document was designated**  
21 **as Exhibit No. 16.)**

22                   BY MR. LEVY:

1 Q. Joe, if you could scroll down a little bit?  
2 So this is another document produced by Fusion. It's  
3 from Jake Burkowitz. This is called the Alfa Group  
4 Backgrounder 8/24. The author is DJJ, and Joe, if  
5 you could scroll down to the first page of the  
6 document, up a little bit. Sorry, just to the title.  
7 So this is the Backgrounder: Russia's Alfa Group.  
8 Are you familiar with this document, Ms. Seago?

9 MR. LEVY: Look at --

10 **A. Yeah, I'd like to take time to look through**  
11 **it. Okay.**

12 Q. Are you familiar with this document?

13 **A. I don't recall that I've seen this**  
14 **document.**

15 Q. Have you seen other versions of this  
16 document?

17 **A. Not that I can recall.**

18 Q. Did you assist in drafting this document?

19 **A. Not that I can recall.**

20 Q. Do you know who did draft this document?

21 **A. No.**

22 Q. Did you contribute any research to this

1 document?

2 **A. Not as far as I know.**

3 Q. Do you know who did contribute research to  
4 this document?

5 **A. I don't know.**

6 Q. So the metadata for this document indicates  
7 that DJJ is the author. Is that for Daniel J. Jones?

8 MR. LEVY: Objection to form, calls for  
9 speculation.

10 **A. I don't know.**

11 Q. Does Fusion often collaborate with TDIP on  
12 work product?

13 MR. LEVY: Objection to form.

14 **A. I -- I don't know.**

15 Q. Have you ever collaborated with TDIP on  
16 work product?

17 **A. TDIP is our client. We produce work  
18 product for them, and I don't know what they've done  
19 with it.**

20 Q. But is it a -- a process where you work  
21 with TDIP, sort of a back and forth, or do they give  
22 you an assignment and you just produce finish

1 product?

2 **A. We -- with many of our clients we produce**  
3 **documents and exchange versions of those documents.**  
4 **That's not unusual for us.**

5 Q. To your knowledge, was the -- the contents  
6 of this Backgrounder document used in any  
7 deliverables for any other clients other than TDIP?

8 **A. I don't know.**

9 MR. KELLY: Joe, if we could pull up tab  
10 73?

11 (A document was designated  
12 as Exhibit No. 17.)

13 BY MR. KELLY:

14 Q. So this is a document from the custodial  
15 files of Jake Berkowitz and Glenn Simpson. Joe, if  
16 you could scroll down, the name is Alfa 2017 08-28,  
17 and Joe, if you can go down to the first page of the  
18 document again, so this is Backgrounder: Russia's  
19 Alfa Group, US Influence Operations & Benczkowski  
20 Nomination. Are you familiar with this document,  
21 Ms. Seago?

22 MR. LEVY: It's -- it's 16 pages. Can she

1 just review it?

2 BY MR. KELLY:

3 Q. Yes. We don't need a detailed discussion,  
4 so just a quick skim should be sufficient.

5 **A. Thank you.**

6 MR. LEVY: What exhibit number is this?

7 THE VIDEOGRAPHER: Seventeen.

8 MR. LEVY: Thank you.

9 THE WITNESS: Okay.

10 BY MR. KELLY:

11 Q. Ms. Seago, are you familiar with this  
12 document?

13 **A. No, I'm not.**

14 Q. It's a similar document to the one we just  
15 looked at. This one added U.S. Influence Operations  
16 & Benczowski Nomination. Did you do any research for  
17 Fusion or TDIP about Russia's Alfa Group and U.S.  
18 influence operations?

19 **A. Not that I can recall.**

20 Q. Do you recall discussing the Benczowski  
21 nomination?

22 **A. Not that I can recall.**

1 Q. Was it your understanding that Alfa-Bank  
2 documents created with TDIP were meant to be passed  
3 along to law enforcement?

4 A. No.

5 Q. What did you understand the ultimate  
6 purpose of producing these documents for TDIP to be?

7 MR. LEVY: Objection, assumes facts in  
8 evidence.

9 A. I don't know what our clients do with the  
10 documents we pass along to the clients, and they can  
11 use them at their discretion.

12 Q. Do you have any insight into the end goal  
13 of why TDIP paid Fusion GPS \$3.3 million to do  
14 research including on Alfa-Bank?

15 MR. LEVY: Objection, calls for  
16 speculation, assumes facts in evidence.

17 A. I don't know.

18 Q. Do you know who drafted this document?

19 A. No.

20 Q. Who at Fusion would have drafted a document  
21 related to Russia's Alfa Group and U.S. influence  
22 operations?





1           MR. LEVY: It's -- it's 687 pages, and I'm  
2 going to object to the question. I don't know how  
3 she would know what TDIP produced, but go ahead,  
4 review it, answer the question.

5           BY MR. KELLY:

6           Q. Are you aware that TDIP generated a report  
7 on the server allegations?

8           **A. Is this a TDIP report on server**  
9 **allegations? This document's new to me.**

10          MR. LEVY: He hasn't testified. It's okay.  
11 You --

12          BY MR. KELLY:

13          Q. Prior to this deposition -- sorry. Prior  
14 to this deposition, were you aware that TDIP had  
15 generated a report on the server allegations?

16          **A. No.**

17          Q. Were you aware that Fusion generated any  
18 research for this report?

19          MR. LEVY: Objection, calls for speculation  
20 and assumes facts in evidence.

21          **A. I don't know, and I want to correct the**  
22 **record. I did read the New Yorker story that Dexter**

1 **Filkins wrote that I believe references some report**  
2 **that TDIP commissioned on server allegations. I'm**  
3 **not sure if this is that document.**

4 Q. But you've never been provided a report by  
5 TDIP before.

6 **A. No.**

7 Q. Do you know who Kirk McConnell is?

8 **A. No.**

9 Q. Joe, if we could scroll down to the index,  
10 which I believe should be the next page. Keep going.  
11 Okay, so in the appendix -- keep going down. Sorry,  
12 it's the next page, Joe. It's a long index. It's  
13 the Alfa Group research book, if you could keep going  
14 down, and if you could maybe zoom out a little bit?  
15 Okay, so in the index, you have the Alfa Group  
16 research book, which is an appendix to this report.  
17 Daniel Jones has testified that Fusion provided the  
18 bulk of the information that was included in this  
19 report. Are you aware of working on the Alfa Group  
20 research book in 2017?

21 MR. LEVY: I'm going to -- I'm going to  
22 object to the question, move to strike your

1 statement. If there's testimony from Mr. Jones that  
2 you want to share with her, you should put that in  
3 front of her. Your recapitulation or attempt to  
4 characterization or mischaracterization of his  
5 testimony is -- is insufficient.

6 MR. KELLY: Are you instructing her not to  
7 answer?

8 MR. LEVY: I -- why don't you restate the  
9 question, but I'm going to move to strike your  
10 statement as testimony.

11 BY MR. KELLY:

12 Q. Ms. Seago, did you -- are you aware that  
13 Fusion produced any research for the -- this TDIP  
14 report?

15 A. I don't know.

16 Q. So the -- the first section is Alfa --  
17 overview of Russia's Alfa Group. Did you do any  
18 research on Russia's Alfa Group in 2017 or 2018?

19 MR. LEVY: Objection, asked and answered.

20 A. Again, I did not do a lot of substantive  
21 research into Alfa Group in 2017 or 2018.

22 Q. But did you do any research on Alfa Group

1 in 2017 and 2018?

2 **A. Beyond looking at social media accounts and**  
3 **aggregating data, no.**

4 Q. And who did you provide that work product  
5 to?

6 **A. I don't recall.**

7 Q. Was it -- and was it your understanding  
8 that the work was for TDIP?

9 **A. I don't recall.**

10 Q. So the second section is significant and  
11 credible allegations against Alfa Group. Do you  
12 recall doing any research into any of these matters  
13 that are listed here?

14 MR. LEVY: Where are you pointing to?

15 MR. KELLY: I'm pointing to Backgrounder,  
16 significant and credible allegations against Alfa  
17 Group. It's line 321, and then it lists a number --

18 MR. LEVY: So this is -- we're looking at a  
19 table of contents now?

20 MR. KELLY: Yes. As you noted, it's a 600-  
21 page document. I don't think we have time for us to  
22 read the entire thing.

1           MR. LEVY: Yeah, I just wanted to get  
2 clarity about what the question is. What's your  
3 question?

4           BY MR. KELLY:

5           Q. My question is, Ms. Seago, do you -- did  
6 you do any research on any of these items listed here  
7 under the Backgrounder: Significant and Credible  
8 Allegations Against Alfa Group in 2017 or 2018?

9           A. **Not that I can recall.**

10          Q. Did you do any research on any of these  
11 prior to 2017 or 2018?

12          A. **Not that I can recall.**

13          Q. And I will just state that this index notes  
14 that the Alfa research appended to the TDIP report  
15 spans over 250 pages. Is that correct?

16          A. **Again, I'm looking at this document for the  
17 first time. It looks like it starts on page 312 and  
18 it ends on page 559.**

19          Q. And then the second section, Backgrounder:  
20 Alfa Group's Alleged Connections to Organized Crime  
21 and Criminal Behavior and Corruption, did you ever do  
22 any research of Alfa Group's alleged connections to

1 organized crime, criminal behavior and corruption?

2 **A. Not that I can recall.**

3 Q. Either before or after the U.S. election?

4 **A. Not that I can recall.**

5 Q. Do you recall anyone else at Fusion doing  
6 any research on Alfa Group's alleged connections to  
7 organized crime, criminal behavior and corruption?

8 MR. LEVY: Inasmuch as that would cover  
9 conversations or communications covered in 2016 under  
10 the engagement with Perkins Coie, I'm going to  
11 instruct the witness not to answer because of  
12 privilege.

13 **A. After the engagement with Perkins Coie, I  
14 recall that research on Alfa-Bank was taking place.  
15 I don't recall exactly what they were working on. I  
16 wasn't working on that project.**

17 Q. Joe, if we could scroll down to the next  
18 page, the next section is Backgrounder: Alfa Group's  
19 Ties to Vladimir Putin and the Kremlin, do you recall  
20 doing any research on Alfa Group's ties to Vladimir  
21 Putin and the Kremlin?

22 **A. Not that I can recall.**

1 Q. And do you recall others at Fusion doing  
2 research on Alfa Group's ties to Vladimir Putin and  
3 the Kremlin?

4 MR. LEVY: Same instruction. If it would  
5 call for privileged material, don't answer the  
6 question. Otherwise feel free.

7 A. Again, my answer is the same. I know that  
8 Alfa-Bank research was taking place at this time. I  
9 don't know the specifics of it or the substance --  
10 substantive subject areas they were looking at.

11 Q. And is it your understanding that the same  
12 three people you previously mentioned would generally  
13 be doing this research, and that would be Glenn  
14 Simpson, Peter Fritsch and Jake Berkowitz?

15 MR. LEVY: Objection, calls for  
16 speculation.

17 A. I don't know. It may have been one of  
18 them. It may have been a contractor. I just don't  
19 know.

20 Q. Okay, and the last section is Backgrounder:  
21 Effects of Alfa Group's Influence in the United  
22 States. Did you ever do any research on Alfa Group's

1 influence in the United States?

2 **A. Not that I can recall.**

3 Q. Did anyone else at Fusion ever do any  
4 research on the effects of Alfa Group's influence in  
5 the United States?

6 MR. LEVY: Objection, calls for  
7 speculation, and inasmuch as that answer would be  
8 covered by the attorney-client privilege and the  
9 attorney work product doctrine for work conducted in  
10 2016 under the engagement of Perkins Coie, I'm going  
11 to instruct the witness not to answer those portions.

12 **A. I don't know.**

13 Q. Let's flip back to tab 52.

14 **A. Sorry. Which one?**

15 Q. Sorry, one second. I don't believe I asked  
16 -- so who would have done research on the effects of  
17 Alfa Group's influence in the United States? Would  
18 it be the same three individuals, which would be  
19 Glenn Simpson, Jake Berkowitz and Peter Fritsch?

20 MR. LEVY: Same objections, and now  
21 objection, asked and answered.

22 MR. KELLY: Okay.



1 MR. LEVY: It's the same question you just  
2 asked.

3 THE WITNESS: I don't know who worked on  
4 this issue.

5 BY MR. KELLY:

6 Q. Okay. Do you know why the Alfa Group  
7 Backgrounder was appended to the TDIP report?

8 MR. LEVY: Objection, calls for  
9 speculation.

10 **A. No, I don't know why.**

11 Q. Are you aware of anyone at Fusion doing any  
12 work related to the TDIP report?

13 **A. I don't know.**

14 MR. KELLY: Okay. So let's go ahead and  
15 flip to tab 52 and enter it as an exhibit. I'm  
16 sorry.

17 (A document was designated  
18 as Exhibit No. 19.)

19 MR. KELLY: And Joe, is it correct that  
20 this is Exhibit 19?

21 THE VIDEOGRAPHER: Yes, that's correct.

22 BY MR. KELLY:

1 Q. Ms. Seago, are you familiar with this  
2 document?

3 MR. LEVY: It's six pages. Just give her a  
4 chance to --

5 **A. Okay, go ahead.**

6 Q. Ms. Seago, are you familiar with this  
7 document?

8 **A. I don't recall this e-mail chain, but I'm  
9 on it, so I was at one time it seems.**

10 Q. It appears that you and Jake Burkowitz were  
11 working on a project for Mr. Jones in March of 2017.  
12 Is that what this e-mail reflects?

13 MR. LEVY: Objection to form.

14 **A. It appears that Jake and Dan Jones and I  
15 are communicating.**

16 Q. What was the nature of the project?

17 MR. LEVY: Objection, form.

18 **A. Sitting here five years later, I don't know  
19 the exact nature of the project. It looked like we  
20 were discussing a network graph.**

21 Q. And what would a network graph be?

22 **A. A network graph is a way of visualizing**

1 **connections between individuals or entities.**

2 Q. And what -- or who was the ultimate client  
3 for this project?

4 **A. I don't know.**

5 Q. What was the purpose of the project?

6 **A. I don't know.**

7 Q. Can you describe the graph that you were  
8 creating?

9 **A. Again, I don't have the images here.**

10 **Looking at the structure data below, it looks like it**  
11 **would have shown connections between these entities**  
12 **here, but I don't want to speculate.**

13 Q. Do you have a final copy of the graphic in  
14 hard copy or soft copy?

15 **A. I don't know.**

16 Q. And again, was this project for TDIP?

17 **A. I don't know.**

18 Q. But it was with Dan Jones.

19 **A. I know that --**

20 MR. LEVY: Objection to form.

21 BY MR. KELLY:

22 Q. You were collaborating with Dan Jones on

1 this project?

2 MR. LEVY: Objection to form.

3 **A. We were communicating with Dan Jones about**  
4 **this. I don't know if it was a collaboration. I**  
5 **don't know if he's the client.**

6 Q. Would you have communicated with Dan Jones  
7 about projects for another client?

8 **A. I don't know.**

9 Q. So it says in the -- I'm sorry, in the  
10 attachment, Joe, if you could scroll down, Alfa-Bank  
11 is mentioned, if you would keep scrolling down, I  
12 think it's the last page. Keep -- one more page. So  
13 it says, "Alfa-Bank, can we add?" So do you recall  
14 who suggested adding Alfa-Bank?

15 **A. No, I don't recall.**

16 Q. And then again, this appears to be a  
17 connection. Do you remember what network map you  
18 were creating or who the connections were between?

19 **A. I don't recall. I don't want to speculate.**

20 Q. Were you doing a lot of these network maps  
21 in -- during this time?

22 **A. I did make a lot of charts and graphs. I**

1 **always have.**

2 Q. For TDIP?

3 MR. LEVY: Objection, assumes facts in  
4 evidence.

5 **A. I believe I made some charts for TDIP.**

6 Q. And were they mostly related to -- or were  
7 they mostly related to the Russian investigation?

8 MR. LEVY: Objection to form.

9 **A. As I recall, yes, most of the graphs I --**  
10 **related to that investigation.**

11 Q. So what was the interest in adding Alfa-  
12 Bank to this network map?

13 MR. LEVY: Objection to form.

14 **A. I don't know.**

15 Q. And -- and again, was this map intended for  
16 any ultimate project or was it a stand-alone graphic?

17 MR. LEVY: Objection, form.

18 **A. I don't know.**

19 Q. So what was the goal of, you know, creating  
20 these network maps in regards to investigating  
21 Russia, as you stated?

22 **A. I don't know. I was just helping them with**

1     **technical aspects of it.**

2           Q.     So you didn't have any -- did you have any  
3     understanding of the ultimate goal with TDIP's asking  
4     for these -- with creating these network maps in  
5     TDIP?

6           MR. LEVY:   You want to restate the  
7     question?

8           BY MR. KELLY:

9           Q.     Yes, that's fine.   What was -- did you have  
10    any understanding of the ultimate goal or intent of  
11    these projects?   For example, who was this meant to  
12    be shared with?

13          MR. LEVY:   Objection to form and calls for  
14    speculation.

15          BY MR. KELLY:

16          Q.     Who was the ultimate audience of this  
17    project?

18          A.     **I don't --**

19          MR. LEVY:   Objection to form.

20          A.     **I don't know.**

21          Q.     Who was the ultimate audience of other  
22    projects you worked on for TDIP?

1 MR. LEVY: Objection to form.

2 A. I don't know.

3 Q. Do you recall if Alfa-Bank was added to  
4 this chart?

5 A. I don't recall.

6 MR. KELLY: I believe that is good, and can  
7 we take a ten-minute break? Would that be okay?

8 MR. LEVY: Yes.

9 THE VIDEOGRAPHER: Going off the record at  
10 3:15 p.m.

11 (Recessed at 3:15 p.m.)

12 (Reconvened at 3:26 p.m.)

13 THE VIDEOGRAPHER: Going back on the record  
14 at 3:26 p.m.

15 BY MR. KELLY:

16 Q. Thank you. Ms. Seago, are you familiar  
17 with Randy Bush?

18 A. No.

19 Q. Are you familiar with Ilya Zaslavskiy? I  
20 can spell --

21 A. No.

22 Q. Are you familiar with David Schiminovich?

1           **A.     No.**

2           Q.     Are you familiar with Nicholas Feamster,  
3 with an F?

4           **A.     No.**

5           Q.     Are you familiar with Sameer Bhalotra?

6           **A.     No.**

7           Q.     Are you familiar with Matthew Weaver?

8           **A.     Yes.**

9           Q.     How so?

10          **A.     I met Matthew Weaver probably for the first**  
11 **time in 2016.**

12          Q.     And was this part of your work for Fusion  
13 or was this a personal meeting?

14          **A.     My understanding is that Matthew Weaver was**  
15 **an associate of Mikey Dickerson's, and as stated,**  
16 **they were a contractor. I'm not sure to whom.**

17          Q.     And you met with them in 2016?

18          **A.     Oh, I'm sorry, no, it wouldn't have been**  
19 **2016. It would have been 2017 or later.**

20          Q.     What did you understand -- so Mr. Weaver  
21 works for a company, Layer Aleph. Does that sound  
22 familiar?



1 MR. LEVY: Objection to form.

2 **A. I've heard the name.**

3 Q. So what did you understand Layer Aleph to  
4 be doing or Mr. Dickerson and Mr. Weaver to be doing  
5 when you met with them?

6 **A. Layer Aleph is a consulting firm. I knew  
7 that they did some social media analysis. That's all  
8 I can recall.**

9 Q. Was their work related to Alfa-Bank?

10 MR. LEVY: Objection to form, calls for  
11 speculation.

12 **A. Not to my knowledge.**

13 Q. To your knowledge, was their work related  
14 to the server allegations?

15 MR. LEVY: Same objection.

16 **A. Not to my knowledge.**

17 Q. And then what was the context of you  
18 meeting them?

19 **A. I met them. They were contractors working  
20 on a project analyzing this information in social  
21 media.**

22 Q. Are you familiar with Richard Clayton?

1           **A.     No.**

2           Q.     Are you familiar with Chris Davis?

3           **A.     No.**

4           Q.     Are you familiar with Nicholas Weaver or  
5 Nick Weaver?

6           **A.     No.**

7           Q.     I want to go back to something we discussed  
8 earlier. You said that you contacted Tea Leaves, and  
9 that she responded. How many times did you  
10 communicate with Tea Leaves?

11           **A.     I don't know Tea Leaves' gender, first of**  
12 **all. I recall sending an e-mail -- I actually -- if**  
13 **I testified that I received a response, I'm not sure**  
14 **actually that I received a response. I don't know.**

15           Q.     So -- so your testimony is now that you're  
16 not sure that you received a response from Tea  
17 Leaves?

18           **A.     I don't recall. I'm sorry, I -- I recall**  
19 **sending a Tutanota message. That's all I can recall.**

20           Q.     Do you recall any communications with Tea  
21 Leaves that you had other than sending an e-mail in  
22 Tutanota?

1           **A.       Other than the Tutanota e-mails, no.**

2           Q.       How many e-mails -- or how many Tutanota  
3 e-mails did you send her -- send Tea Leaves?

4           **A.       I don't recall.**

5           Q.       And you -- just to be clear because --  
6 you're not -- you do not recall getting a response.

7           **A.       I don't recall whether or not I got a  
8 response.**

9           Q.       Are you familiar with the company  
10 Zetalytics?

11          **A.       No.**

12          Q.       Do you recall -- sorry, did anyone else at  
13 Fusion contact the Tea Leaves Tutanota?

14               MR. LEVY:  Objection to form, calls for  
15 speculation.

16          **A.       Not to my knowledge.**

17          Q.       Do you have a Tutanota address?

18          **A.       At present, no.**

19          Q.       Did you have one when you were contacting  
20 Tea Leaves?

21          **A.       Yes.**

22          Q.       What was it?

1           **A.     I don't recall.**

2           Q.     Did you ever e-mail or communicate with the  
3     -- sorry, what was -- and what was Tea Leaves'  
4     address?

5           **A.     I don't recall.**

6           Q.     Did you ever communicate with the Fusion --  
7     Research at Fusion GPS e-mail address?

8           **A.     Did I ever communicate with the -- that**  
9     **e-mail address?**

10          Q.     Yes.

11          **A.     To the best of my recollection, that was an**  
12     **e-mail channel that contacted all of our research**  
13     **staff. I probably sent all staff e-mails. I don't**  
14     **recall any specific e-mails.**

15          Q.     So that's -- can you explain what the  
16     Research at Fusion GPS e-mail address is?

17          **A.     As I recall, that was an e-mail address**  
18     **that sent a message to the partners and the analysts.**

19          Q.     A specific set or the entire company?

20          **A.     All the research staff.**

21          Q.     And who would be separate from the research  
22     staff?

1           **A.     The office administrator.**

2           Q.     Okay.  Have you been contacted by Special  
3 Counsel John Durham?

4                   MR. LEVY:  Going to instruct the witness  
5 not to answer that question on the basis of grand  
6 jury privilege.

7                   MR. KELLY:  Again, I would state that the  
8 fact of a communication to her without revealing any  
9 substantive would not reveal any grand jury secrecy  
10 issues, and therefore, it is an improper instruction.  
11 Are you going to insist on your instruction not to  
12 answer?

13                   MR. LEVY:  I disagree with you, and I'm  
14 going to renew my instruction to the witness.

15                   BY MR. KELLY:

16           Q.     Ms. Seago, are you going to follow that  
17 instruction?

18           **A.     Yes.**

19           Q.     Do you recall discussing the Durham  
20 investigation with anyone at Fusion?

21                   MR. LEVY:  Outside of a privileged  
22 communication, you can answer that question.

1           **A.     Not outside of privileged communications.**

2           Q.     And do you know if anyone at Fusion has  
3     been contacted by Durham, Special Counsel Durham?

4           MR. LEVY:  Objection to form, calls for  
5     speculation, and I am going to instruct the witness  
6     not to answer the question based on the grand jury  
7     privilege and the attorney-client -- the attorney  
8     work product doctrine.

9           MR. KELLY:  Okay, so reserving all rights,  
10    we are going to keep this deposition open.  We have  
11    found your instructions not to answer to be both  
12    improper and obstructive and we're going to move to  
13    compel Ms. Seago to respond to these questions.  Mr.  
14    Levy, I assume you do not consent to this motion, and  
15    further, we do not consent to your request for a  
16    confidentiality designation on this deposition.  
17    There's no basis for that.  There's no protective  
18    order in this case and we are under no obligation to  
19    treat this deposition as confidential.

20           MR. LEVY:  We oppose your motion and we  
21    renew our request to mark the entirety of the  
22    deposition or recordings, transcript and the exhibits

1 confidential. We note your disagreement with that  
2 position.

3 MR. KELLY: Okay. And just to be clear, we  
4 are keeping this deposition open in order to seek a  
5 motion to compel Ms. Seago to answer, and we'll go  
6 off the record.

7 MR. LEVY: Is the witness excused?

8 MR. KELLY: Yes.

9 THE VIDEOGRAPHER: Sorry. Going off the  
10 record at 3:35 p.m.

11 (Whereupon, at 3:35 p.m., the deposition  
12 was adjourned.)

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1 ACKNOWLEDGMENT OF DEPONENT

2

3 I, \_\_\_\_\_, do hereby  
4 acknowledge that I have read and examined the  
5 foregoing testimony, and the same is a true, correct  
6 and complete transcription of the testimony given by  
7 me, and any corrections appear on the attached Errata  
8 Sheet signed by me.

9

10 \_\_\_\_\_

11 (DATE)

\_\_\_\_\_

(SIGNATURE)

12

13 NOTARIZATION (If Required)

14 State of \_\_\_\_\_

15 County of \_\_\_\_\_

16 Subscribed and sworn to (or affirmed) before me on  
17 this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, by  
18 \_\_\_\_\_, proved to me on the  
19 basis of satisfactory evidence to be the person who  
20 appeared before me.

21 Signature: \_\_\_\_\_

22

(Seal)



1 UNITED STATES OF AMERICA )

2 ss:

3 DISTRICT OF COLUMBIA )

4 I, KAREN C. YOUNG, a Notary Public within  
5 and for the District of Columbia, do hereby certify  
6 that the witness whose deposition is hereinbefore set  
7 forth was duly sworn and that the within transcript  
8 is a true record of the testimony given by such  
9 witness.

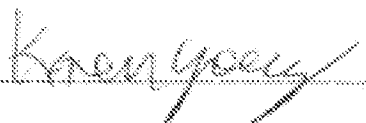
10 I further certify that I am not related to  
11 any of the parties to this action by blood or  
12 marriage and that I am in no way interested in the  
13 outcome of this matter.

14 IN WITNESS WHEREOF, I have hereunto set my  
15 hand this 11th day of October, 2021.

16

17

18

  
\_\_\_\_\_

19

20 My Commission Expires:

21 July 31, 2024

22

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# **Exhibit 7**

**From:** Peter Fritsch <pfritsch@fusiongps.com>  
**Sent:** Wednesday, October 5, 2016 5:21 PM  
**To:** Michael Isikoff <misikoff@yahoo-inc.com>  
**Subject:** important

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<http://www.mediafire.com/file/qc68pt5k6wn9f64/gdd.zip>

and if you look at the item in the index marked "index," you will find the material below. But is there more ? tks mh

## Global DNS Data

This site provides neutral, factual DNS data, showing how networks communicate with each other.

1. [Lookups for mail1.trump-email.com](#)  
This data shows communications between Trump, Spectrum, and Russian Alfa Bank networks.
2. [Network Diagram Scenario](#)  
This diagram (png file: 183769 bytes) shows how parties communicated via email using different servers.
3. [Check back for more](#)
4. [Leave questions at tea.leaves@tuta.io](#)

### Summary:

- Trump and Russia's largest private bank communicate via hidden server since at least 2016 May
- Confronted with questions by NYT reporter, Alfa Bank denies any relationship
- Hidden server belonging to Trump then disappears (no one but Alfa Bank was asked)
- Deleted host name [mail1.Trump-Email.com](#) is replaced with [trump1.contact-client.com](#)
- Russian Alfa Bank is the first host seen to contact the new trump1. server

### Comments:

Trump's [FEC filings](#) fail to disclose any foreign bank account in Russia or relationship with the [Russian Alfa Bank](#).

Network logs show a distinctively human pattern of communications between a hidden server dedicated for use by the Trump Organization and the Russian financial company Alfa Bank, which has close ties to the Kremlin. [Trump campaign advisors](#) also have relationships with [Alfa Bank](#) and related [Alfa-Group / LetterOne](#).

The other frequent connection to Trump's hidden server with the same distinctive human pattern is Spectrum Health, a Michigan hospital with close ties to the DeVos family (<http://www.spectrumhealth.org/locations/helen-devos-childrens-hospital>). The DeVos family founded Amway / Alticor which operates in Russia including transactions with Alfa Bank such as buying insurance for 800 Alticor employees from Alfa Bank's insurance subsidiary. The DeVos family has given millions of dollars in the past few months to conservative super PACs ([www.fec.gov](http://www.fec.gov)). One member of the DeVos family was a founder of [Blackwater](#).

Trump's hidden server appears to be a specially configured outbound email server. The email server type normally would handle outbound bulk advertising or transactional mail for a large enterprise to customers, powerful enough to deliver millions of emails per day. (<http://www.marketerspublishinggroup.com/PMTA-UsersGuide-4.0.pdf>). Different in every way from traffic seen on adjacent servers managed by the same server company, this specially configured server has been exclusively corresponding with Alfa-Bank and Spectrum since at least May 2016 with a cadence and rate of a human conversation. See the graph of the connections [here](#).

The stealth server has had two different names:

[mail1.Trump-Email.com](#) (zone deleted on Friday, 2016-Sept-23 after the Russian Alfa-Bank was asked by the New York Times to explain the communications)

and on 2016-Sept-27 a new name showed up:

[trump1.contact-client.com](#)

When a reporter from the New York Times (NYT) asked the Russian Alfa Bank for

comment about the apparent communications, Alfa Bank denied any relationship with the Trump Organization. The NYT reporter communicated with no one other than the Russian Alfa Bank - yet the [Trump-Email.com](http://Trump-Email.com) domain began showing signs of panicked reconfiguration within hours of the New York Times asking the Russian Alfa Bank why they were making connections to [Trump-Email.com](http://Trump-Email.com). While no errors were seen in all the months prior to this question from the reporter - suddenly errors appeared. Two of the authoritative name server hosts deleted the zone, while the third authoritative just erased the IP from the configuration line and continued to answer authoritatively. This mistake can still be demonstrated at the time of this writing.

The Trump Organization deleted the [Trump-Email.com](http://Trump-Email.com) zone shortly before 10 AM Eastern US time on Friday Sept 23rd after the NYT reporter called Alfa Bank. This suggests a cover-up attempt by Trump and Alfa Bank. It suggests communication from Alfa Bank warning the Trump Organization to take action to remove the evidence of the hidden server domain, [mail1.Trump-Email.com](http://mail1.Trump-Email.com).

The physical server itself was never changed; just the hostname [mail1.Trump-Email.com](http://mail1.Trump-Email.com) stopped pointing to that physical server and the hostname was effectively deleted from the global Domain Name System (DNS).

By September 27th 2016, the Trump Organization had created a new host [trump1.contact-client.com](http://trump1.contact-client.com) pointing to the exact same physical server previously operating as [mail1.Trump-Email.com](http://mail1.Trump-Email.com).

The Russian Alfa Bank was the first to contact the newly renamed host, strongly indicating again that Trump and Alfa Bank are coordinating with each other and have a very close relationship. After this discovery, they are likely moving conversations to a new channel.

Trump has a bank account with the Russian Alfa Bank, which may explain the need for hidden server communications. Alfa Bank / Alfa Group / LetterOne has expressed interest in [investing billions in US health care companies](http://investingbillions.com), which could include Michigan's Spectrum Health or could be regarding the financial relationships Amway/Alticor has with the Russian Alfa Bank insurance company.

#### F.A.Q.

##### **Are you sure the [Trump-Email.com](http://Trump-Email.com) domain really belongs to the Trump Organization?**

We have 100% confidence. You can verify the complete whois record by going to the [Godaddy.com](http://Godaddy.com) website and clicking on WHOIS. While whois records can be forged, we also judge authenticity based on the resources used by each domain name. A very detailed analysis has been made of thousands of Trump Organization domain names, vendors and hosting resources, confirming that this domain without question belongs in the same group.

##### **Excerpt from [Trump-Email.com](http://Trump-Email.com) whois record:**

```
Registrant Name: Trump Orgainzation
Registrant Organization: Trump Orgainzation
Registrant Street: 725 Fifth Avenue
Registrant City: New York
Registrant State/Province: New York Registrant State/Province: New York
Registrant Postal Code: 10022
Registrant Country: US Registrant Country: US
Registrant Phone: +1.2128322000
```

# **Exhibit 8**

**From:** Peter Fritsch <pfritsch@fusiongps.com>  
**Sent:** Wednesday, October 5, 2016 5:36 PM  
**To:** Matthew Mosk <matthew.mosk@abc.com>  
**Cc:** Glenn Simpson <gsimpson@fusiongps.com>  
**Subject:** dude this is huge  
**Attach:** gdd.zip

---

<<...>

some scientists posted this to web a while ago



Shift Start Date

## **Document Available in Native Format**

## **Document Available in Native Format**

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and on 2016-Sept-27 a new name showed up:

trump1.contact-client.com

When a reporter from the New York Times (NYT) asked the Russian Alfa Bank for comment about the apparent communications, Alfa Bank denied any relationship with the Trump Organization. The NYT reporter communicated with no one other than the Russian Alfa Bank - yet the Trump-Email.com domain began showing signs of panicked reconfiguration within hours of the New York Times asking the Russian Alfa Bank why they were making connections to Trump-Email.com. While no errors were seen in all the months prior to this question from the reporter - suddenly errors appeared. Two of the authoritative name server hosts deleted the zone, while the third authoritative just erased the IP from the configuration line and continued to answer authoritatively. This mistake can still be demonstrated at the time of this writing.

The Trump Organization deleted the Trump-Email.com zone shortly before 10 AM Eastern

US time on Friday Sept 23rd after the NYT reporter called Alfa Bank. This suggests a cover-up attempt by Trump and Alfa Bank. It suggests communication from Alfa Bank warning the Trump Organization to take action to remove the evidence of the hidden server domain, mail1.Trump-Email.com.

The physical server itself was never changed; just the hostname mail1.Trump-Email.com stopped pointing to that physical server and the hostname was effectively deleted from the global Domain Name System (DNS).

By September 27th 2016, the Trump Organization had created a new host trump1.contact-client.com pointing to the exact same physical server previously operating as mail1.Trump-Email.com.

The Russian Alfa Bank was the first to contact the newly renamed host, strongly indicating again that Trump and Alfa Bank are coordinating with each other and have a very close relationship. After this discovery, they are likely moving conversations to a new channel.

Trump has a bank account with the Russian Alfa Bank, which may explain the need for hidden server communications. Alfa Bank / Alfa Group / LetterOne has expressed interest in [investing billions in US health care companies](#), which could include Michigan's Spectrum Health or could be regarding the financial relationships Amway/Alticor has with the Russian Alfa Bank insurance company.

#### **F.A.Q.**

#### **Are you sure the Trump-Email.com domain really belongs to the Trump Organization?**

We have 100% confidence. You can verify the complete whois record by going to the Godaddy.com website and clicking on WHOIS. While whois records can be forged, we also judge authenticity based on the resources used by each domain name. A very detailed analysis has been made of thousands of Trump Organization domain names, vendors and hosting resources, confirming that this domain without question belongs in the same group.

#### **Excerpt from Trump-Email.com whois record:**

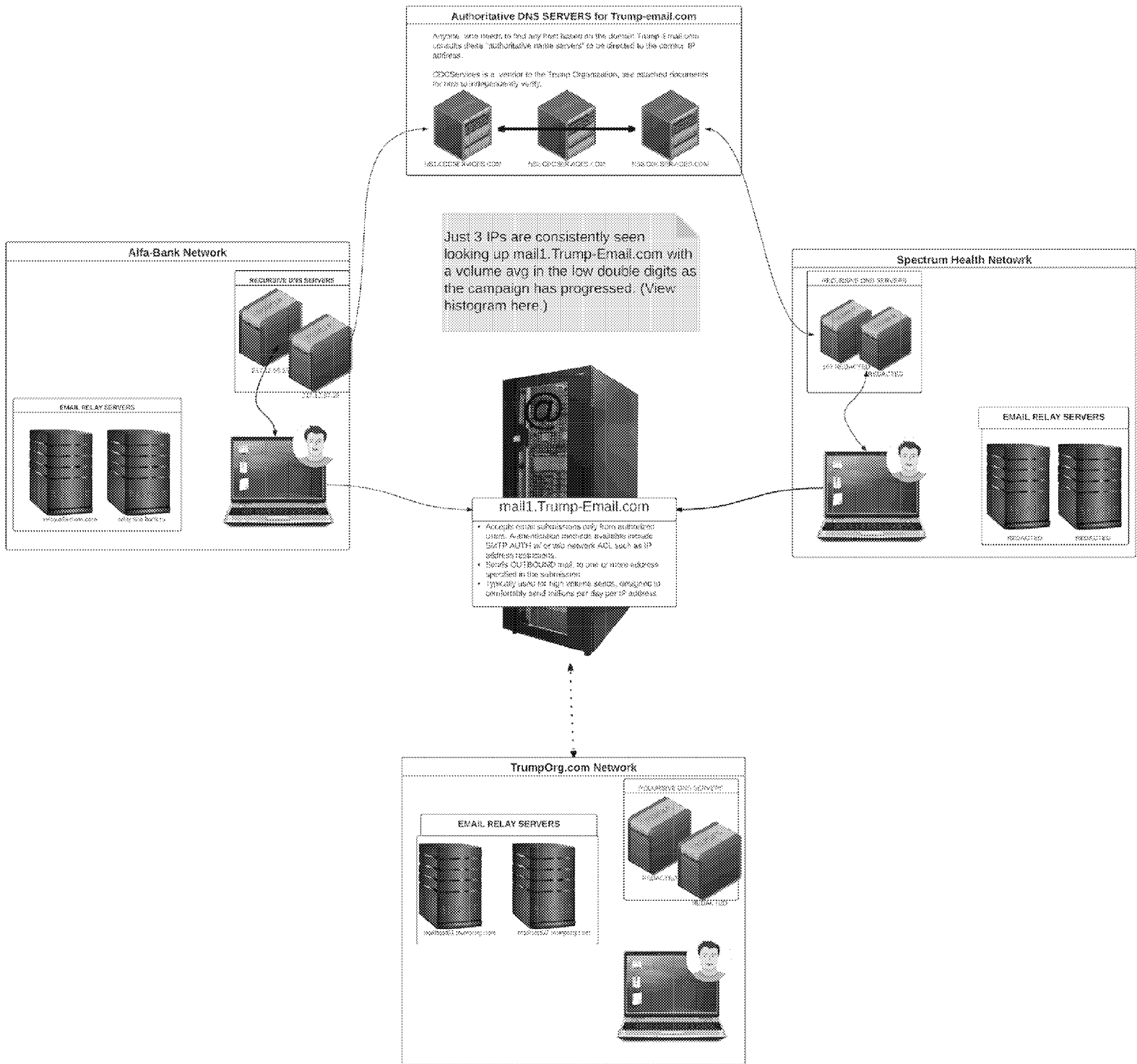
```
Registrant Name: Trump Orgainzation
Registrant Organization: Trump Orgainzation
Registrant Street: 725 Fifth Avenue
Registrant City: New York
Registrant State/Province: New York Registrant State/Province: New York
Registrant Postal Code: 10022
Registrant Country: US Registrant Country: US
Registrant Phone: +1.2128322000
```

# Global DNS Data

This site provides neutral, factual DNS data, showing how networks communicate with each other.

1. [Back to Home](#)





**Empty File**



# **Exhibit 9**

**From:** Peter Fritsch <pfritsch@fusiongps.com>  
**Sent:** Wednesday, October 5, 2016 5:14 PM  
**To:** tom.hamburger@washpost.com  
**Subject:** look

---

<http://www.mediafire.com/file/qc68pt5k6wn9f64/gdd.zip>

and if you look at the item in the index marked "index," you will find the material below. But is there more ? tks mh

## Global DNS Data

This site provides neutral, factual DNS data, showing how networks communicate with each other.

1. [Lookups for mail1.trump-email.com](#)  
This data shows communications between Trump, Spectrum, and Russian Alfa Bank networks.
2. [Network Diagram Scenario](#)  
This diagram (png file: 183769 bytes) shows how parties communicated via email using different servers.
3. [Check back for more](#)
4. [Leave questions at tea.leaves@tuta.io](#)

### Summary:

- Trump and Russia's largest private bank communicate via hidden server since at least 2016 May
- Confronted with questions by NYT reporter, Alfa Bank denies any relationship
- Hidden server belonging to Trump then disappears (no one but Alfa Bank was asked)
- Deleted host name [mail1.Trump-Email.com](#) is replaced with [trump1.contact-client.com](#)
- Russian Alfa Bank is the first host seen to contact the new trump1. server

### Comments:

Trump's [FEC filings](#) fail to disclose any foreign bank account in Russia or relationship with the [Russian Alfa Bank](#).

Network logs show a distinctively human pattern of communications between a hidden server dedicated for use by the Trump Organization and the Russian financial company Alfa Bank, which has close ties to the Kremlin. [Trump campaign advisors](#) also have relationships with [Alfa Bank](#) and related [Alfa-Group / LetterOne](#).

The other frequent connection to Trump's hidden server with the same distinctive human pattern is Spectrum Health, a Michigan hospital with close ties to the DeVos family (<http://www.spectrumhealth.org/locations/helen-devos-childrens-hospital>). The DeVos family founded Amway / Alticor which operates in Russia including transactions with Alfa Bank such as buying insurance for 800 Alticor employees from Alfa Bank's insurance subsidiary. The DeVos family has given millions of dollars in the past few months to conservative super PACs ([www.fec.gov](http://www.fec.gov)). One member of the DeVos family was a founder of [Blackwater](#).

Trump's hidden server appears to be a specially configured outbound email server. The email server type normally would handle outbound bulk advertising or transactional mail for a large enterprise to customers, powerful enough to deliver millions of emails per day. (<http://www.marketerspublishinggroup.com/PMTA-UsersGuide-4.0.pdf>). Different in every way from traffic seen on adjacent servers managed by the same server company, this specially configured server has been exclusively corresponding with Alfa-Bank and Spectrum since at least May 2016 with a cadence and rate of a human conversation. See the graph of the connections [here](#).

The stealth server has had two different names:

[mail1.Trump-Email.com](#) (zone deleted on Friday, 2016-Sept-23 after the Russian Alfa-Bank was asked by the New York Times to explain the communications)

and on 2016-Sept-27 a new name showed up:

[trump1.contact-client.com](#)

When a reporter from the New York Times (NYT) asked the Russian Alfa Bank for

comment about the apparent communications, Alfa Bank denied any relationship with the Trump Organization. The NYT reporter communicated with no one other than the Russian Alfa Bank - yet the [Trump-Email.com](#) domain began showing signs of panicked reconfiguration within hours of the New York Times asking the Russian Alfa Bank why they were making connections to [Trump-Email.com](#). While no errors were seen in all the months prior to this question from the reporter - suddenly errors appeared. Two of the authoritative name server hosts deleted the zone, while the third authoritative just erased the IP from the configuration line and continued to answer authoritatively. This mistake can still be demonstrated at the time of this writing.

The Trump Organization deleted the [Trump-Email.com](#) zone shortly before 10 AM Eastern US time on Friday Sept 23rd after the NYT reporter called Alfa Bank. This suggests a cover-up attempt by Trump and Alfa Bank. It suggests communication from Alfa Bank warning the Trump Organization to take action to remove the evidence of the hidden server domain, [mail1.Trump-Email.com](#).

The physical server itself was never changed; just the hostname [mail1.Trump-Email.com](#) stopped pointing to that physical server and the hostname was effectively deleted from the global Domain Name System (DNS).

By September 27th 2016, the Trump Organization had created a new host [trump1.contact-client.com](#) pointing to the exact same physical server previously operating as [mail1.Trump-Email.com](#).

The Russian Alfa Bank was the first to contact the newly renamed host, strongly indicating again that Trump and Alfa Bank are coordinating with each other and have a very close relationship. After this discovery, they are likely moving conversations to a new channel.

Trump has a bank account with the Russian Alfa Bank, which may explain the need for hidden server communications. Alfa Bank / Alfa Group / LetterOne has expressed interest in [investing billions in US health care companies](#), which could include Michigan's Spectrum Health or could be regarding the financial relationships Amway/Alticor has with the Russian Alfa Bank insurance company.

#### F.A.Q.

##### **Are you sure the [Trump-Email.com](#) domain really belongs to the Trump Organization?**

We have 100% confidence. You can verify the complete whois record by going to the [Godaddy.com](#) website and clicking on WHOIS. While whois records can be forged, we also judge authenticity based on the resources used by each domain name. A very detailed analysis has been made of thousands of Trump Organization domain names, vendors and hosting resources, confirming that this domain without question belongs in the same group.

##### **Excerpt from [Trump-Email.com](#) whois record:**

```
Registrant Name: Trump Orgainzation
Registrant Organization: Trump Orgainzation
Registrant Street: 725 Fifth Avenue
Registrant City: New York
Registrant State/Province: New York Registrant State/Province: New York
Registrant Postal Code: 10022
Registrant Country: US Registrant Country: US
Registrant Phone: +1.2128322000
```

# **Exhibit 10**

**From:** Peter Fritsch <pfritsch@fusiongps.com>  
**Sent:** Tuesday, October 18, 2016 4:02 PM  
**To:** Mark Hosenball <Mark.Hosenball@thomsonreuters.com>  
**Subject:** Re: i heard

---

it's everyone's problem. call david dagon at georgia tech

> On Oct 18, 2016, at 11:12 AM, Mark.Hosenball@thomsonreuters.com wrote:

>  
> Yes I know but the problem is that the nature of the data is way above my level of competence....

>  
> -----Original Message-----

> From: Peter Fritsch [mailto:pfritsch@fusiongps.com]

> Sent: Tuesday, October 18, 2016 11:10 AM

> To: Hosenball, Mark J. (Reuters News)

> Subject: Re: i heard

>  
> Ugh.

>  
> Sent from my iPhone

>> On Oct 18, 2016, at 11:04 AM, "Mark.Hosenball@thomsonreuters.com" <Mark.Hosenball@thomsonreuters.com> wrote:  
>>

>> the problem with the Alfa bank story at this point is that my cyber expert colleagues cannot satisfy themselves about the authenticity of some of the key data, which they say from what they can tell is NOT public data. We are in contact with your experts via different channels but my colleague Joe Menn in Silicon Valley still hasn't got the confidence he says he needs to understand where all the data originated. If you can help more with this pls do....

>>  
>> -----Original Message-----

>> From: Peter Fritsch [mailto:pfritsch@fusiongps.com]

>> Sent: Tuesday, October 18, 2016 11:01 AM

>> To: Hosenball, Mark J. (Reuters News)

>> Subject: Re: i heard

>>  
>> when is he coming?

>>  
>> meantime, do the fucking alfa bank secret comms story. it is hugely important. forget the wikileaks sideshow

>>> On Oct 18, 2016, at 10:59 AM, Mark.Hosenball@thomsonreuters.com wrote:  
>>>

>>> we all get together when he arrives.

>>>  
>>> anything new Russkie/Donald wise ?

>>>  
>>> -----Original Message-----

>>> From: Peter Fritsch [mailto:pfritsch@fusiongps.com]

>>> Sent: Tuesday, October 18, 2016 10:59 AM

>>> To: Hosenball, Mark J. (Reuters News)

>>> Subject: Re: i heard

>>>  
>>> awesome. he's a great dude. known him for 25 years

>>>> On Oct 18, 2016, at 10:57 AM, Mark.Hosenball@thomsonreuters.com wrote:  
>>>>

>>>> oh definitely. he's our new bureau chief. haven't worked with him that much but when I have he seemed like a great guy....

>>>>  
>>>> -----Original Message-----

>>>> From: Peter Fritsch [mailto:pfritsch@fusiongps.com]

>>>> Sent: Tuesday, October 18, 2016 10:56 AM

>>>> To: Hosenball, Mark J. (Reuters News)

>>>> Subject: i heard

>>>>  
>>>> a good pal of mine is moving to reuters in DC: kieran murray. you heard that?

>>>>  
>>>>

# **Exhibit 11**

**From:** Franklin Foer <flfoer@gmail.com>  
**Sent:** Sunday, October 30, 2016 10:46 PM  
**To:** Peter Fritsch <pfritsch@fusiongps.com>  
**Subject:** Re: Reid

---

Here's the first 2500 words

The greatest miracle of the Internet is that it exists—the second greatest is that it persists. Every so often we're violently reminded that bad actors wield great skill and have little conscience about the harm they inflict on the world's digital nervous system. They feverishly invent viruses, botnets, and sundry species of malware. There's good money to be made deflecting these incursions, but profit motive alone isn't enough to sustain the relentless efforts required to fend off such creative adversaries. That's why a small, tightly-knit community of computer scientists—some at cyber-security firms, some in academia, some with close ties to three-letter federal agencies—wraps its work in a sense of shared idealism and considers itself the benevolent posse that chases off the rogues and rogue states that try to purloin sensitive data and infect the Internet with their bugs. "We're the Union of Concerned Nerds," in the wry formulation of the University of Indiana computer scientist L. Jean Camp.

In late spring, this community of malware hunters placed itself in a high state of alarm. Word arrived that Russian hackers had infiltrated the servers of the Democratic National Committee, an attack persuasively detailed by the respected cyber-security firm [CrowdStrike](#). The computer scientists posited a logical hypothesis, which they set out to rigorously test: If the Russians were worming their way into the DNC, they might very well be attacking other entities central to the presidential campaign, including Donald Trump's many servers. "We wanted to help defend both campaigns, because we wanted to preserve the integrity of the election," says one of the academics, who works at a university that asked him not to speak with reporters because of the sensitive nature of his work.

Protecting the Internet requires highly-specialized knowledge of the intricacies of the Domain Name System (DNS)—the protocol that allows us to type e-mail addresses and website names to initiate communication. DNS enables our words to set in motion a chain of connections between servers that delivers the results we desire. To create a usable, collective archive of malware, computer scientists have built a set of massive DNS databases, which provide fragmentary histories of communications flows. These databases give a useful, though far from comprehensive, snapshot of traffic across the Internet. The most trusted DNS specialists—an elite group of malware hunters, who work for private contractors—have access to a truly comprehensive logs of communication between servers. They work in close concert with Internet Service Providers, the systems most vulnerable to massive attacks. To extend the traffic metaphor, these are scientists with cameras posted on the Internet's stoplights and overpasses. They are entrusted with something close to the complete real-time record of all the servers of the world connecting with each other.

In late July, one of these scientists—who asked to be referred to as Tea Leaves, a pseudonym that would protect his relationship with the networks and banks that employ him to sift their data—found what looked like malware emanating from Russia. That the destination domain had Trump in its name, which, of course, attracted Tea Leaves' attention. But his discovery of the data was pure happenstance—a surprising needle in a much larger haystack of DNS lookups on his screen. "I have an outlier here that connects to Russia in a strange way," he wrote in his notes. He couldn't quite figure it out at first. But what he saw was a bank in Moscow that kept irregularly pinging a server registered to the Trump Organization on Fifth Avenue.

More data was needed, so he began carefully keeping logs of the Trump server's DNS activity. As he collected the logs, he would circulate them to colleagues in the cybersecurity world. Six of them began scrutinizing them for clues.

(I communicated extensively with Tea Leaves and two of his closest collobotators, who spoke with me on the condition of anonymity, since they also work for firms trusted by banks and law enforcement to analyze sensitive data. They persuasively demonstrated some of their analytical methods to me—and showed me academic-style white papers that track the evolution of their analysis. I also spoke with academics who vouched for Tea Leaves' integrity and his unusual access to information. "Without him, your inbox would be full of spam and the web would be shut down by malicious attack," according to Jean Camp.)

The researchers' quickly dismissed the initial fear of a malware attack. The communication wasn't the work of bots. The irregular pattern of server lookups actually resembled the pattern of human conversation; conversations that began during office hours in New York and continued during office hours in Moscow. It dawned on the researchers that this wasn't an attack, but a sustained relationship between a server registered to the Trump organization and two servers registered to an entity called Alfa Bank.

The researchers had initially stumbled in their diagnosis, because of the odd configuration of Trump's server. "I've never seen a server set up like that," says [Christopher Davis](#), who runs the cybersecurity firm, HYAS InfoSec Inc, and won a FBI Director Award for Excellence for his work tracking down the authors of the world's nastiest [botnet](#) attack. "It looked weird and it didn't pass the sniff test." The server was first registered to Trump's business in 2009, and was set up to run consumer marketing campaigns. It had a history of sending mass emails on behalf Trump-branded properties and products. Researchers were ultimately convinced that the server indeed belonged to Trump. (Click [here](#) to see the server's registration record.) But now this capacious server handled a strangely small load of traffic, such a small load that it would be hard for a company to justify the expense and trouble it would take to maintain it. "I get more mail in a day than the server handled," Davis says. But that wasn't the only oddity. When the researchers pinged the server, they received error messages. They concluded that the server was set to accept only incoming communication from a very small handful of IP addresses. "It's pretty clear that it's not an open mail server," Jean Camp told me. "These organizations are communicating in a way designed to block other people out."

(A small portion of the logs showed communication with a server belonging to Michigan-based Spectrum Health, a company owned by the Devos family, founders of Amway and long-time benefactors of the Republican party. Eighty-seven percent of DNS look up, however, were directed to the two Alfa servers.)

Earlier this month, the group passed the logs to [Paul Vixie](#). In the world of DNS experts, there's no higher authority. Vixie wrote central strands of the DNS code that makes the Internet work. After studying the logs, he concluded, "The parties were communicating in a secretive fashion. The operative word is secretive. This is more akin to what criminal syndicates do if they are putting together a project." Put differently, the logs suggested that Trump and Alfa had configured something like a digital hotline connecting the two entities, shutting out the rest of the world, and designed to obscure its own existence. Over the summer, the scientists observed the communications trail from a distance. As they watched, their suspicions of collaboration were confirmed in the most unexpected ways.

## DROP CAP

While the researchers went about their work, the conventional wisdom about Russian interference in the campaign began to shift. There were reports that the Trump campaign had ordered the Republican Party to re-write its platform position on Ukraine, maneuvering the GOP towards a policy preferred by Russia. (At the time, the campaign was being run by Paul Manafort, who had done extensive work for the Kremlin-backed Ukrainian president Victor Yanukovich.) Then Trump announced in an interview with the *New York Times* his unwillingness to spring to the defense of NATO allies in the face of a Russian invasion. These events changed the question that the researchers were asking about the DNS logs. Perhaps Russian hackers weren't just sniffing about for intelligence; perhaps they weren't indiscriminately sowing paranoia and chaos. Evidence mounted that Putin might actively be rooting for Trump to win—and there was a circumstantial, highly speculative case building that the campaign might even be coordinating with the Kremlin. (I wrote about this possibility in early July.)

In the face of these accusations, Trump issued categorical statements. "I mean I have nothing to do with Russia," he told one reporter, a flat denial that he repeated over and over. Of course, it's possible that these statements are sincere, and even correct. When the computer scientists poured over the logs, they couldn't believe that Trump would be so categorical in his descriptions. (The Cambridge University cybersecurity researcher Richard Clayton, who reviewed an analysis of the data circulated by Tea Leaves' colleagues, quipped, "If they say, then I have never heard of Russia, then that would be a bit thin.")

But in the parlance that has become familiar since the Edward Snowden revelations, we're in the realm of metadata. We can see the trail of the transmissions on the logs, but we can't see the actual substance of the communications. And we can't even say with complete certitude that the servers exchanged email. One scientist who spoke to me on background ticked off a list of other possibilities: an errant piece of spam caroming between servers, a misdirected email that kept trying to reach its destination, which created the impression of sustain communication. He noted that certain key pieces of data—namely a set of mail exchanger records—were missing, which prevented him from reaching a conclusive judgement. "I'm seeing a preponderance of the evidence, but not a smoking gun." Richard Clayton acknowledges those theoretical objections, but considers them improbable. "I think mail is more likely, because it's going to a machine running a mail server and [the host] is called mail. Dr Occam says you should rule out mail before pulling out the more exotic explanations."

When I put the question to the University of California's Nicholas Weaver, he told me, "I can't attest to the logs themselves, but assuming they are legitimate they do indicate effectively human-level communication limited to just between the Russian Bank, the health-care company, and trump-email.com." Are the logs authentic, the implicit uncertainty embedded in the hedging of Weaver's statement? Computer scientists are careful about vouching for evidence that emerges from unknown sources—especially since the logs were pasted in a text file, where they could conceivably have been edited. (Unfortunately, there's no other way to copy the data other than to stick them in a text file.)

Still, I asked nine computer scientists—some of whom agreed to speak on the record, some who asked for anonymity—if the DNS logs could be forged or manipulated. They considered it nearly impossible. Of course, it would be easy enough to fake one or maybe even a dozen records of DNS lookups. But in the aggregate the thousands of records contained nuances and patterns that not even the most skilled programmers would be able to recreate, especially not on this scale. Paul Vixie told me, "The data has got the right kind of fuzz growing on it. It's the inter packet gap, the spacing between the conversations, the total volume. If you look at those time stamps, they are not simulated. This bears every indication that it was collected from a live link." I asked him if they was any chance that he was wrong about their authenticity. He told me, "This passes the reasonable person test. No reasonable person would come to the conclusion other than the one I've come to." Others were equally emphatic. "It would be really, really hard to fake these," Christopher Davis said. According to Jean Camp, "When the technical community examined the data, the conclusion was pretty obvious."

## DROP CAP

The researchers were seeing clear patterns in the data—and the Trump organization's potential interlocutor itself was suggestive. Alfa Bank emerged in the messy post-Soviet scramble to create a private economy. Its founder was a Ukrainian called Mikhail Fridman. He erected his empire in a frenetic rush—in a matter of TK years, he rose from washing windows to the purchase of the Bolshevik Biscuit Factory to the co-founding of his bank with some friends from university. Fridman could be charmingly open when describing this era. In 2003, he told the *Financial Times*, "Of course we benefitted from events in the country over the past 10 years. Of course we understand that the distribution of state property was not very objective. . . . I don't want to lie and play this game. To say one can be completely clean and transparent is not realistic."

To build out the bank, Fridman recruited a skilled economist and shrewd operator called Pytor Aven. In the early nineties, Aven worked with Vladimir Putin in the St Petersburg government—and according to several accounts, helped Putin wiggle out of accusations of corruption that might have derailed his ascent. (Karen Dawisha recounts this history in her book, *Putin's Kleptocracy*.) Over time, Alfa built one of the world's most lucrative enterprises. Fridman became the second richest man in Russia, valued by *Forbes* at \$15.3 billion.

Alfa's oligarchs occupied an unusual position in Putin's firmament. They were insiders, but not in the closest ring of power. "It's like they were his judo pals," one former US government official who knows Fridman told me. "They were always worried about where they stood in the pecking order and always feared expropriation." Fridman and Aven, however, are adept at staying close to power. As the geostrategic intelligence firm Stratfor has described Fridman, "His friends (few) and enemies (many) describe him as slick, nimble, evolving, patient, calculating, combative, vindictive, and above all, underestimated. Fridman has repeatedly outmaneuvered far more politically and economically powerful rivals to end up on top, crushing his foes in the process. His skilled allies, impeccable business acumen, lack of a temper and utter absence of emotional attachment to his business holdings has made him rich, and will keep him so for a long time to come."

Unlike other Russian firms, Alfa has operated smoothly and effortlessly in the West. It has never been slapped with sanctions. Fridman and Aven have cultivated a reputation as beneficent philanthropists. They endowed a fellowship program that sponsors internships at the State Department. The Woodrow Wilson Center, the American-government funded think tank, gave Aven its award for "Corporate Citizenship" in 2015. To protect its interests in Washington, Alfa hired top Republican lobbyists, including Richard Burt, who helped Trump write the speech laying out his foreign policy and former Reagan administration official Ed Rogers. The branding campaign has worked wonders. During the first Obama term, Fridman and Aven met with officials in the White House on two occasions, according to visitor logs.

Alfa has significant business interests to promote in the West. One of its holding companies, LetterOne, has vowed to invest \$3 billion in US health care. Last year, it sank \$200 million into Uber. This is, of course, money that might otherwise be invested in Russia. According to a former US official, Putin tolerates this condition because Alfa does his bidding. It presses western governments to roll back sanctions on Russian business --and promotes itself as an avatar of Russian prowess. "It's our moral duty to become a global player, to prove a Russian can transform into an international businessman," Fridman told the *FT* last year.



American officials who have dealt with Fridman and Aven describe a maddening dynamic. Nearly as soon as the conversations finished, American intelligence would report that the contents of the conversations had been instantly relayed to the Kremlin. "This is how they and everyone else in their position stays in the good graces of the Kremlin," a former official told me. "They must act as an agent of the state."

On Oct 30, 2016, at 6:31 PM, Peter Fritsch <[pfritsch@fusiongps.com](mailto:pfritsch@fusiongps.com)> wrote:

Time to hurry

Sent from my iPhone

Begin forwarded message:

**From:** Thomas Catan <[tcatan@fusiongps.com](mailto:tcatan@fusiongps.com)>

**Date:** October 30, 2016 at 6:24:08 PM EDT

**To:** Peter Fritsch <[pfritsch@fusiongps.com](mailto:pfritsch@fusiongps.com)>, Glenn Simpson <[gsimpson@fusiongps.com](mailto:gsimpson@fusiongps.com)>

**Subject:** Reid



**Sam Stein** (@[samsteinhp](https://twitter.com/samsteinhp))

10/30/16, 5:48 PM

Reid says he's talked w/ top NatSec officials who say that Comey "possesses explosive information" about Trump's ties to Russia

[Download the Twitter app](#)

Sent from my iPhone

# **Exhibit 12**

**From:** Franklin Foer <flfoer@gmail.com>  
**Sent:** Saturday, October 22, 2016 3:13 PM  
**To:** Peter Fritsch <pfritsch@fusiongps.com>  
**Subject:**

---

Peter,  
My editors are very excited about this piece. We've been at the vanguard of the Russia story and they want to keep aggressively pushing. They can't understand the tentativeness of the Times. We know that we need to move quickly. Anything you can do to help connect me with the source would help immensely. This is a big deal story. One of the biggest of the election.

Sent from my iPhone

# **Exhibit 13**

**From:** Peter Fritsch <pfritsch@fusiongps.com>  
**Sent:** Friday, October 28, 2016 4:15 PM  
**To:** Frank Foer <ffoer@gmail.com>  
**Subject:** mandiant

---

Phone: +1-408-324-8300  
media.relations@fireeye.com

# **Exhibit 14**

**From:** Peter Fritsch <pfritsch@fusiongps.com>  
**Sent:** Thursday, November 3, 2016 3:01 PM  
**To:** Frank Foer <ffoer@gmail.com>  
**Subject:** tea leaves

---

shores you up re cendyn

<http://gdd.i2p.xyz/intranet/>  
<http://gdd.i2p.xyz/cendynbank/>

# **Exhibit 15**



Washington, DC

Page 1

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

INTERVIEW OF: GLENN SIMPSON

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

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

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

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

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

19 BY MS. SAWYER:

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

25 A. I can only estimate it.

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

3 A. Spring of 2016.

4 MR. LEVY: Don't guess.

5 MR. SIMPSON: I'm sorry.

6 BY MS. SAWYER:

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

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

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

14 A. Yes.

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

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

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

20 A. Nothing.

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

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

25 MR. LEVY: Privilege.

1 MS. SAWYER: Okay.

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

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

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

9 MS. SAWYER: Okay.

10 BY MS. SAWYER:

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

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

18 MR. LEVY: Sure.

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

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

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

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

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION**

AO ALFA-BANK,

Plaintiff,

v.

JOHN DOE, *et al.*,

Defendants.

Civil Action No. 2021 CA 000683 2  
Judge Heidi Pasichow

*(Case is pending in the Circuit Court  
for the Fifteenth Judicial Circuit in and  
for Palm Beach County, Florida, Case  
No. 50-2020-CA-006304-XXXX-MB)*

**[PROPOSED] ORDER**

Upon consideration of AO Alfa-Bank’s Motion to Compel the Deposition Testimony of Laura Seago Improperly Withheld as Privileged (“Motion”), it is hereby **ORDERED** that the Motion is **GRANTED**.

It is further **ORDERED** that the information that Seago withheld on the basis of privilege at her October 8, 2021 deposition is not privileged.

It is further **ORDERED** that Seago provide complete responses to the questions that she refused to answer on the basis of privilege at her October 8, 2021 deposition, which are located at the following portions of the transcript of her deposition testimony:

- 25:10 - 11
- 33:7 - 8
- 35:10 - 11
- 38:7 - 8
- 41:19
- 42:4 - 7
- 43:4 - 6
- 49:12 - 13
- 51:3 - 4
- 51:13 - 14
- 52:2 - 4
- 53:2 - 3

- 61:7 - 9
- 64:13 - 15
- 65:20 - 66:1
- 76:1 - 3
- 76:9 - 11
- 76:17 - 18
- 77:7 - 8
- 77:14
- 78:6 - 7
- 98:22 - 99:3
- 103:20 - 21
- 105:11 - 12
- 106:2 - 3
- 108:6 - 7
- 108:16 - 17
- 110:22 - 111:3
- 111:8 - 9
- 112:10 - 12
- 116:9
- 116:16 - 17
- 118:10 - 11
- 123:16 - 17
- 125:21 - 22
- 126:6 - 8
- 126:15 - 17
- 128:15 - 17
- 130:3 - 4
- 134:2 - 3
- 134:15 - 16
- 134:21 - 22
- 135:6 - 7
- 136:16 - 17
- 154:19 - 20
- 155:6 - 8
- 160:6 - 7
- 166:10 - 12
- 166:18 - 19
- 170:17 - 18
- 171:5 - 8
- 173:21 - 22
- 174:7 - 8
- 174:15 - 16
- 189:9 - 10
- 189:17 - 18



- 191:13 - 15
- 191:21
- 201:8 - 9
- 202:3 - 6
- 202:15
- 205:15 - 16
- 244:5 - 7
- 245:1 - 3
- 246:3 - 5
- 259:2 - 3
- 259:19 - 20
- 260:2 - 3

It is further **ORDERED** that Seago provide complete responses to follow-up questions associated with testimony responsive to the questions that she improperly refused to answer.

It is further **ORDERED** that Seago appear for the continuation of her deposition within seven days of entry of this order.

It is further **ORDERED** that AO Alfa-Bank be given two additional hours to depose Seago, for a total of nine hours of examination time.

It is further **ORDERED** that Seago and her counsel, Joshua A. Levy, are sanctioned for their abuse of the discovery process.

It is further **ORDERED** that Seago pay the costs and attorneys' fees associated with preparing, filing, and arguing the Motion.

So ordered this \_\_\_\_ day of \_\_\_\_\_, 2021.

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Judge Heidi M. Pasichow

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