

1 was reported to me by the source appeared to be
 2 credible, given that open source record.
 3 Q. So the fact he had been to a plenary session of the
 4 Russian equivalent of the CBI was evidence that he had
 5 met Putin directly; is that what you're saying?
 6 A. No, it meant that he was at meetings which were
 7 involving Mr Putin.
 8 And you used the word "recent"?
 9 Q. "Recently" and "directly" were the words you used,
 10 Mr Steele. Not me. You used them.
 11 A. Yes, I believe that to be true.
 12 Q. And --
 13 A. Certainly what was reported to us by the source and
 14 sub-source.
 15 Q. The truth is that, like all -- I think you have now
 16 accepted all your reports, this memorandum contains
 17 a number of serious inaccuracies, doesn't it, Mr Steele?
 18 A. I think it contains one inaccuracy.
 19 Q. So, despite the evidence of the claimants in this court,
 20 you prefer the multiple hearsay evidence from your
 21 sub-source to what they say; is that what you're saying?
 22 A. I had faith, your Lordship, in my source and sub-source
 23 to report the situation as they understood it to me,
 24 faithfully and truthfully.
 25 Q. I want to now ask you about some of the -- your claim

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1 that the disclosure of this memorandum was required for
 2 national security purposes.
 3 A. Mm hmm.
 4 Q. I have already referred you to your company's formal
 5 legal further information of 1 August 2018. That's
 6 [A/12/3]. Sorry, that's the bit I want to look at, but
 7 it begins at [A/12/1]. That's signed as true on your
 8 behalf -- on behalf of Orbis by your solicitor.
 9 A. Right.
 10 Q. You have seen this document before?
 11 A. I have, yes.
 12 Q. And do you say that it's true?
 13 A. Yes.
 14 Q. So if we look at the bottom, "Under paragraph 2":
 15 "The disclosures referred to ... were required for
 16 the purpose of safeguarding the national security ..."
 17 That's the statement that Orbis makes.
 18 A. Yes.
 19 Q. And the request is, at 8:
 20 "State, so that the Claimants may understand the
 21 nature of the Defendant's case, the factual basis on
 22 which it is alleged that the [memorandum disclosures
 23 are] required for the purposes of safeguarding the
 24 national security ..."
 25 Turn over the page. And so on.

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1 Then your response is that there were allegations of
 2 Russian interference, including links between
 3 individuals associated with the Trump campaign, Russian
 4 operatives with links to the Kremlin.
 5 A. Mm hmm.
 6 Q. Any such interference would be likely to constitute
 7 a serious threat to democracy and national security in
 8 the US, and so on?
 9 A. Yes.
 10 Q. Yes?
 11 A. Yes.
 12 Q. You then say -- your company says:
 13 "Memorandum 112 was concerned with such links."
 14 That is to say links between individuals associated
 15 with the Trump campaign and Russian operatives?
 16 A. Yes.
 17 Q. That's not true, is it?
 18 A. It is, because it arose out of the tasking that came
 19 from the Trump Tower-Alfa server issue.
 20 Q. Mr Steele, let me just ask you the question again. It
 21 is a matter of ordinary English:
 22 "Memorandum 112 was concerned with such links."
 23 It was not, was it?
 24 A. It was a background context to such links. I don't know
 25 how you would describe "concerned", your Lordship, but

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1 to me, that is "link".
 2 Q. Then you -- the next answer -- unfortunately the
 3 subparagraphs aren't numbered, but the next answer seeks
 4 to explain why links between the claimants and the
 5 Russian President were material to the allegations
 6 outlined above; yes?
 7 A. Yes.
 8 Q. And then it suggests -- it says that:
 9 "Internet traffic data suggested that a computer
 10 server of an entity in which the Claimants have an
 11 interest, Alfa Bank, had been communicating with
 12 a computer server linked to the Trump Organisation."
 13 A. Yes.
 14 Q. So far, so good. Do you still maintain that the next
 15 three -- four sentences have any relevance to this case?
 16 I'll give you the opportunity to -- just read them.
 17 A. Which ones, sir?
 18 Q. The next ones:
 19 "Alfa Bank instructed an individual,
 20 Mr Brian Benzckowski, to investigate the allegations ..."
 21 And if we go over the page [A/12/5]. Do you accept
 22 that all this material about Mr Benzckowski has nothing
 23 whatever to do with the case? If you do, then we can
 24 move on.
 25 A. It was just pointing out that Mr Benzckowski had

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1 investigated this at the same time that he was involved
 2 in the Trump transition. That's all.
 3 Q. Yes, but this was six months later.
 4 A. Sure.
 5 Q. Mr Benzckowski was a partner in Kirkland and Ellis,
 6 which was a firm of lawyers which had been instructed to
 7 look at this. It has nothing whatever to do with your
 8 preparation of the memorandum, has it?
 9 A. No, it hasn't, no.
 10 Q. No. Thank you.
 11 Then it says:
 12 "Memoranda including Memorandum 112 were requested
 13 from the Defendant by individuals with official
 14 responsibilities ..."
 15 Etc, for the safeguarding.
 16 A. Yes.
 17 Q. Is that true, Mr Steele?
 18 A. Yes.
 19 Q. Just tell me, who are the individuals who requested it
 20 from you? Requested this memorandum from you?
 21 A. The FBI, who requested all our memorandum -- or
 22 memoranda --
 23 Q. Yes, well, I'll come on to the FBI.
 24 A. Sure, yeah.
 25 Q. Just put them to one side.

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1 A. And the senior British national security official who we
 2 dealt with.
 3 Q. You approached him?
 4 A. Yes, but he -- I approached him. We had a conversation
 5 and he then requested that I provided him with all our
 6 memoranda.
 7 Q. So you tout your memoranda to one of your former
 8 colleagues. That's not him requesting the memoranda
 9 from you.
 10 A. No. He specifically requested all our memoranda in hard
 11 copy.
 12 Q. After you had gone to him and said --
 13 A. Sure.
 14 Q. -- excuse me --
 15 A. There's an issue -- I'd like to --
 16 Q. -- whoever it is, Sir Humphrey: "Excuse me,
 17 Sir Humphrey, I have these memoranda which show
 18 extraordinary things about President Trump and Russia",
 19 and he says, "Give me a copy?"
 20 A. Yes. He says, "Can you --"
 21 Q. So that's at your instigation, not his?
 22 A. No, it's at his request.
 23 Q. You sought a meeting with the State Department as part
 24 of a wider effort to disseminate these memoranda to
 25 people in Washington, didn't you?

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1 A. No, I didn't. They sought a meeting with me.
 2 Q. Can you look at [D/131/154], please. Look at the second
 3 paragraph.
 4 A. Mm hmm.
 5 Q. "We asked Kavalec [that's the person who produced the
 6 note] about the meeting with Steele. She stated that
 7 Nuland did not ask to meet Steele and that Nuland
 8 requested she attend the meeting because Nuland did not
 9 want to devote time to it. It was Kavalec's
 10 understanding that Steele sought the meeting with Nuland
 11 as part of a wider effort to disseminate his election
 12 report findings to persons in Washington, DC. She
 13 stated that during the meeting Steele expressed
 14 frustration that the FBI had not acted on his reporting
 15 and explained that when he first offered information to
 16 the FBI he found a lack of interest."
 17 A. The meeting was set up by a State Department official
 18 called John Weiner.
 19 Q. At your request?
 20 A. No, at his request -- his suggestion. He invited us in
 21 to meet, as I understood it, at her request, Assistant
 22 Secretary of State Nuland.
 23 Q. As a result of your contact with the State Department,
 24 then Strobe Talbott got in touch with you and said he
 25 had heard about your memoranda and he wanted to show it

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1 to other people?
 2 A. I think Strobe Talbott had got in touch with us much
 3 earlier than that. I remember taking a phone call from
 4 him, your Lordship, earlier in the summer, in which he
 5 said that he was aware that I had -- he spoke in fairly
 6 cryptic terms, but he was aware that we had material of
 7 relevance to the US election.
 8 A little bit of background if I may, your Lordship
 9 on that.
 10 Both National Security Advisor at the time,
 11 Susan Rice, and Assistant Secretary of State,
 12 Victoria Nuland, who were the key policymakers on
 13 Russia, had been colleagues of Mr Talbott, and I had --
 14 although he didn't state it explicitly, one or either or
 15 both of them had briefed him on the work we had been
 16 doing.
 17 Q. He had been out of government for 15 years. Mr Talbott
 18 had been the Deputy Secretary of State in 2001.
 19 A. He was a Russian expert. He was consulted, I believe,
 20 by both National Security Advisor Rice and Assistant
 21 Secretary Nuland, both of whom had worked with him in
 22 the Brookings Institution, your Lordship, before they
 23 entered government under President Obama.
 24 Q. Look at paragraph 53 of your witness statement at
 25 [C/4/12], please. I mean, what you say there is:

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