		e. Agam, are the facts stated in that witness statement		1
Q. Well, Mr Steele, your whole business is trading on your		Again are the facts stated in		2
		A. It is.		24
A. There is an exception for the chief of Misonly in my		signature on page 42 (C/7/4)		23 1
9	0 1	o'		2 1
and andird in as the head at the time I think to	2	op I		2
		application. Do you have a copy of that? [C/7/1]		20
O. You see, your former boss. Sir John Scarlett, in his		which is th		19
services.	18	Q. Thank you. There is also a third witness statement,		18
intelligence officers who have worked for the security	17	A. Yes.		17
A. The policy of the government is to not avow or otherwise	16	witness statement, true?	٠,	16
Q. On what basis does that understanding rest, Mr Steele?		facts in that witness statement, which was a correcting		15
that question.	14	Q. And to the best of your knowledge and belief, are the		14
 My understanding is that I'm not permitted to answer 				13
question, as you know.	12	your signature and do you recall signing it? [C/5/3]		12
Q. There is no statutory inhibition on you answering that		Q. That runs to three pages, signed on 15 March. Is that		11
A. I just have.		A. I do.		10
Q. Could you now answer the question, please?		Q. Do you have that? [C/5/1]		9
services.	α	A. Mm hmm.		00
of intelligence officers who work for the security	7	witness statement of yours.	-	7
A. The government has a policy of non-avowal or otherwise		Q. We have, at tab 5, something described as a supplemental		o)
denying it, Mr Steele?	ຫ	A. They are.		UI
Q. What inhibition do you say there is on you confirming or		to the best of your knowledge and belief?	7.00	4
that.	ω	Q. And are the facts stated in that witness statement true		ω
A. I'm not in a position, my Lordship, to confirm or	N	A. I did.		63
Q. But you formally worked for M16, didn't you?		Q. Did you sign it on 9 March?		ы
147		145		
government	25	A. It is.		25
A. It's somebody who has worked on intelligence in		Q. Is that your signature?		24
Q. What's an intelligence professional, Mr Steele?		A. I do.		23
				77
				2 2 2
[D/146/3]. Then we have It may be difficult to		and is dated 9 March 2020 [C/4/30].		20
ψ. II we go down to the next page (1)/146/2). The next one		runs to so pages and has a signature at the end of it) H
		witness statement of Christopher Steele" [C/4/1], which		, A
		corresponds, is something described as, kevised lirst	0////	, -
Q. Well, do you want to have a look at your it's				, L
professional.		tness statements		
A. I think I describe myself as a former intelligence		witness statements there, I think. We have a bundle of		14
you do it in the witness box?	13	MR MILLAR: Mr Steele, we have you have a bundle of		13
yourself as a former intelligence officer. Why won't	12	Examination-in-chief by MR MILLAR		12
Q. Mr Steele, on your company's website you describe		A. Thank you.		11
service between those dates.	10	the witness box.		10
 I was a Crown servant and I was in the diplomatic 		MR JUSTICE WARBY: Thank you, Mr Steele. Do take a seat in		9
and 2009; is that correct?	ω	SIR CHRISTOPHER STEELE (sworn)		80
officer working for the British Government between 1987	7	MR MILLAR: I call Christopher Steele.		7
MR TOMLINSON: Mr Steele, you were a former intelligence		(3.40 pm)		O
Cross-examination by MR TOMLINSON	U	(Short Break)		UI
MR JUSTICE WARBY: Yes, Mr Tomlinson.		(3.32 pm)		4
MR MILLAR: Thank you. You will be cross-examined now.	ω	MR JUSTICE WARBY: Yes, good time for a break. Ten minutes.		ω
A. They are.		writers' break.		2

time to the best of your showtenge and better:	-
They are.	, N
. JUSTICE WARBY: Yes, Mr Tomlinson.	4 0
Cross-examination by MR TOMLINSON	UI
. TOMLINSON: Mr Steele, you were a former intelligence	D
officer working for the British Government between 1987	7
and 2009; is that correct?	œ
I was a Crown servant and I was in the diplomatic	S
service between those dates.	10
Mr Steele, on your company's website you describe	11
yourself as a former intelligence officer. Why won't	12
you do it in the witness box?	13
I think I describe myself as a former intelligence	14
professional.	15
Well, do you wantto have a look at your it's at	16
[D/146/1], please.	17
Mm hmm.	18
If we go down to the next page (D/146/2). The next one	19
[D/146/3]. Then we have It may be difficult to read	20
two "former British intelligence professionals ".	21
That's correct.	22
What's an intelligence professional, Mr Steele?	23
It 's somebody who has worked on intelligence in	24
government.	25
147	
But you formally worked for MI6, didn't you?	ы
I'm not in a position, my Lordship, to confirm or deny	N
that:	ω
What inhibition do you say there is on you confirming or	4
denying it, Mr Steele?	Uπ
The government has a policy of non-avowal or otherwise	D
of intelligence officers who work for the security	7
services.	00
Could you now answer the question, please?	9
I just have.	10
There is no statutory inhibition on you answering that	11
question, as you know.	12
My understanding is that 1 m not permitted to answer	13
that question.	14
Un what basis does that understanding rest, Mr Steele?	1 5
intellidance officers who have worked for the security	1 0
Services.	4 5
You see, your former boss, Sir John Scarlett, in his	19
online biography has described his whole career at MI6	20
and ending up as the head at the time I think you were	21
working there. Do you know that?	S

Q. 1993?

Q. Lived in Russia, Mr Steele?

A. Lived in Russia?

A. Yes, that was the last time I lived in Russia, yes.

25 23

A. That's correct.

Q. So that's 11 years ago?

Q. You set up your current business with Mr Burrows

151

Q. Was that the last time you lived in Russia?

during the posting. British Embassy at that time?

A. I was third secretary and then became second secretary Q. I think you were the second secretary, Chancery, at the

18 17 16

Q. You weren't part of the senior civil service? A. No, it's the equivalent of councillor. So it depends

how you grade it.

15

Was that grade 7? Senior management assistant. Q. What was your final grade in the civil service.

government, your Lordship.

government or my jobs in government outside of permitted to discuss the specifics of my role in service and during government service that I'm not

Mr Steele?

20

I can only say, my Lordship, that I haven't visited

Russia since I left government service in 2009.

Q. When was the last time you visited Russia? I was senior management system of the civil service. A. Correct.

Q. You worked for -- you lived in Moscow for three years A. It means working abroad and outside of London,

from 1990 to 1993; correct?

basically.

that?

Q. You say in your witness statement you have had 22 years' A. It doesn't say anything about MI6 on our website or our

A. I have been told at the point when I left government

Q. But you can't tell me what it is, apart from government

other material.

experience working in the field. What do you mean by

Q. Gained when you worked for MI6?

A. It's not. It's trading on my expertise on Russia and my

former role as an MI6 officer, isn't it? That's what

partners' expertise on other parts of the world.

A. I disagree.

policy?

I suggest.

a ruling from his Lordship, because there's no

inhibition whatever on you answering those questions,

Q. 27 years ago?

149

A. Mm hmm.

a training job, weren't you?

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146

148

O

your Lordship.

The reality is, your 22 years working in the field

20 21 22 23

Q. Corporate intelligence?

That's correct.

that correct?

Amongst other things, yes.

I mean, you're a private investigator; that's you're

job, isn't it?

A. Again, I am not permitted to discuss that, Q. Were you working on Russia and CIS matters there? A. I did.

Q. You then worked in the British Embassy in Paris. Q. What field were you working in between those years? As I've said, I'm not permitted to answer that question, Q. That's not working in the field, is it, Mr -- oh, this A. I'm not permitted to answer that question, I'm afraid, Q. You ran the intelligence officers ' new entry course in I'm not permitted to answer that question. Q. From 1993 to 1998 you were based in London doing

I cannot answer that question.

15 14 13

According to your web site, you provide strategic A. No, but I have worked as a contractor for the FBI and

advice, mount intelligence gathering operations and

conduct complex, often cross-border, investigations; is

for parts of the British Government over that period.

is outside London; is that why it's in the field?

Q. Well, you don't have any official function of any kind

That's correct.

professional."

do you?

your Lordship.

Hampshire for five years?

Ö

paragraph 4 (C/4/2):

"... since then as a national security

Well, that's not -- you say in your witness statement

That has been one of my roles, yes.

evidence?

a national security professional. Is that your in 2009. Then, according to your witness statement,

since then you have worked as -- your words --

Q. Well, in due course, Mr Steele, we'll seek -- I'll seek

Q. You're not a national security professional at all?

152

I'm a private investigator who has government clients.

150

Again, I cannot answer that question, your Lordship.

different matters from Russia and the CIS, didn't it? involved at least nine years working on completely

March 17, 2020

A. I established that Mark Elias was one of the foremost

Q. When did you establish that, Mr Steele?

election litigators in the United States

When? When did you establish it? By looking at the web--

Opus 2 International 25 19 20 21 22 23 17 15 10 11 12 A. I believe that is true, yes. Q. I now want to come to the events of 2016. As A. Tends to be the case, yes. No, because Russians travel outside of Russia. Q. But you haven't been able personally to go to Russia to A. I have not personally been to Russia. It doesn't mean Q. So your Russian sources are developed at a time when you Q. So those are sources that you have developed since 20093 A. I thought it was two weeks, but I concede you may be Q. I mean, the Hushmail account that you used to So when you give evidence about these matters, you are Q. And all the email traffic relating to the Fusion Q. The evidence, I think, is that the Hushmail account was A. That's on the Orbis server, as opposed to the Hushmail I believe it was December 2016, actually. So you have not been in a position to go to Russia to That is correct. Yes, and also memories of others I was working with at So the Russians you deal with are ones who you meet in That is correct. deleted three weeks after its last use. communicate with Fusion was deleted sometime in notes or emails, save for your notes of interactions I understand your position, you have no contemporaneous cultivate sources, you have to rely on other people; I have been unable to meet Russian sources or to recruit say they are? meet sources in Russia or to check out they are who they have not actually visited the country? your Lordship. relying entirely on your memory? assignment was deleted on 5 January 2017? with the FBI; is that right? London or in other non-Russian venues? Russian sources outside of Russia. right, three weeks. I'm pretty sure it's two weeks early 2017; correct? 154 19 18 10 11 12 13 14 15 17 25 25 25 25 25 25 25 25 25 12 14 15 16 17 10 9 9 Q. What were the terms of that oral contract? Q. And you say formalising the engagement. Was there Ö Q. No discussion about money? The words that were used were simply that we were to Tell me the words that you remember being used to A. There was an initial one-month engagement on a retainer A. And that it was covered by the confidentiality agreement Q. That was it? There was an oral contract. I had a conversation with one of the directors Yes. The terms of the oral contract were the same as previous Obviously he went back to clear his ground with his --So when you say at paragraph 14 of your witness For this particular engagement of Orbi So let's begin with Indeed we are. We're now talking a conclude the contract, Mr Steele. presumably his clients and also his colleagues before Heathrow Airport, does it? Simpson, to me in late May 2016." statement: [C/4/3] probably a week later, engaging us on this project. and that was followed up by a phone call from him, Fusion, Glenn Simpson, at Heathrow Airport in May 2016 which would be fed to a client of Fusion, which was collect intelligence from our sources on Trump-Russia we had signed five or six years earlier with Mr Simpson oral contracts we had had with Fusion and, in formalising the engagement. communicated by one of Fusion's founders, Mr Glenn of £20,000. that we had signed previously. a law firm, Washington-based. issues and interference in the US presidential campaign particular, covered by a confidentiality agreement that "Orbis was engaged via a telephone instruction That post-dates the meeting at Carluccio's at 156 transcripts@opus2.com Of,

														•								
"Orbis was engaged via a telephone instruction	statement: [C/4/3]	So when you say at paragraph 14 of your witness	probably a week later, engaging us on this project.	and that was followed up by a phone call from him,	Fusion, Glenn Simpson, at Heathrow Airport in May 2016	I had a conversation with one of the directors of	Yes.	For this particular project?	engagement of Orbis by Fusion. How did that take place?	So let's begin with your engagement with the	Indeed we are.	ago.	We're now talking about events of three and a half years	That is correct.	don't have your own?	not in a position to disagree with them because you	So if someone else has contemporaneous records, you're	we discussed these matters.	That's true, but obviously with my colleagues and so on	in your witness statement.	Well, you don't mention any reliance on their memories	
22	21	20	19	18	17	16	15	14	13	12	11	10	9	8	7	Q	Uī	4	ω	2	Н	
A	O	A			o	A	o	A			o		A		Ö	P	Ó	A	O	P	0	
A. Obviously at the outset I didn't know it	For their clients?	When I found	campaigning purposes?	a privileged setting which they then used	Did you know that what they did was obtain	No.	Directly or indirectly through Fusion?	No.	matters?	obtaining of intelligence in relation to	Q. I mean, had you worked for Perkins Coie be	itself had a client. That's right.	A. I yes, I did know there was a client	client?	Q. But you knew that that law firm wasn't the	In late July 2016, although I can't say th	When did you learn the identity of that la	Yes.	You mentioned a Washington law firm.	Not that I can think of particularly.	Any more terms of the contract?	

 A. They don't come from my time as a Crown servant, Q. But those are sources that don't come from your time at

MI6; correct?

Q. One of your selling points is that you have a network of

sources; is that right? issues, my Lordship.

o

The government clients task us on national security

Ö

A. Obviously at the outset I didn't know it was Q. Did you know that what they did was obtain reports in a privileged setting which they then used for to meeting them and ascertained their role, or likely I looked up obviously the website of the company prior Perkins Coie. When I found out it was Perkins Coie, he ultimate the exact date. pefore on the -- the law firm political 25 20 21 22 23 19 18 A. It has always been the case that he was in an adjacent A. Ö Q. Let me ask you the question again. Q. It's not in your witness statement. It's not in your A. Mr Elias was in an adjacent room the first time It's not in your first witness statement, is it? 11 September? Direct --According to your first witness statement, you first It's not in my first witness statement. Yes. It's always been the case. When did you first remember that? Well, in late July when I became aware that Perkins Coie Directly met him, yes. Not -- in fact, it's I visited Perkins Coie, on 29 July, I believe, 2016. But you didn't meet Mr Elias at that time? was the client of Fusion. Mr Elias in September; correct? first witness statement, is it? met

22 September, the first time I physically methim in 159

Q. And they gather -- they instruct investigators to obtain They effectively work as the legal arm of the Democratic Q. And in that witness statement you say that he gave you Then you looked him up on the internet? That's true, yes. his business card?

A. Once I had read their website and met them, yes.

Party, do you know that?

No, I had already looked him up on the internet. I had taken a look at all the firm's website.

10 9 Q. So -- well, let's look at your witness statement about original evidence about meeting Mr Elias: this. I think it is paragraph 19 (C/4/4). This is your "He ... told me that he was a partner of

They wanted to obtain information and they wanted to

monitor irregularities in the election campaign.

Q. How was it represented to you?

That was not how it was represented to me.

Democratic Party. Did you know that?

setting so it can then be used for campaigning by the material about political opponents in a privileged

14 15 16 same. In light of the context ..." Perkins Cole and his business card made reference to the Sorry, yes, the third line, it says: "... I subsequently ascertained from the firm's

website was chair of its Political Law Practice ..."

14 15 13 12 11 10

Q. Is that -- so that's another of those -- you have

It's not in there.

Where do you deal with that in your witness statement?

20 18 19 As soon as -- as soon as I found out that Perkins Coie were the ultimate client -- sorry, not the ultimate meeting with Mr Elias? So that's wrong, is it? It's not subsequent to your

I didn't record in my witness statement, your Lordship.

position, Mr Steele?

have remembered another relevant fact. Is that the remembered, three and a half years after the event, you

every single thing that was said to me at every moment

23 Q. So what's this evidence doing here in paragraph 19? Can client -- Fusion's client, I looked at their website.

22

o

But you did recall in your witness statement that you

had looked at the website and formed the view that they

were going to use this information for the purposes of

legal advice?

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during this contract, this project.

24 A. Well, when I met him, Mr Elias, finally, in September, you explain that?

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10 11 12 13 14 15 16 20 21 22 23 24 19 12 13 14 15 15 17 10 Ö Q. You say in that paragraph, 16, that you didn't ask A. Not everything is in my -- I don't, no, but not Q. So you thought that was -- is that how you would work A. Through Fusion and the fact that Fusion had previously A. I looked -- initially , when I found out Perkins Coie Q. So you're saying you looked at him on the website twice: A. I was told at one point who the ultimate client was, And I think -- is it your evidence you never asked about Q. How did you satisfy yourself of the trustworthiness of A. I believed it was the campaign, yes. Q. You knew it was the leadership of the Clinton A. I thought it was the campaign, but I didn't know Q. So, just tell me, in early July, who were you -- who did A. I was not aware of the ultimate client in the sense that Q. I mean, in fact, we know that you knew the identity of I also asked -- sorry, the answer is yes, but I also You don't mention that in your witness statement Correct. So presumably you trusted them? So you say in your witness statement, at paragraph 16 you think the ultimate client was? out whether someone is trustworthy or not? worked with Perkins Cole. Perkins Coie, Mr Steele? trustworthiness of both Fusion and Perkins Coie. Now I looked again at his entry. several times, and in particular after I metMr Elias then I subsequently revisited their website after that and he gave me his card, I obviously then looked at hin the ultimate client by early July 2016, don't we? the identity of the ultimate client? you had worked with Fusion for some years by this stage [C/4/4], that you satisfied yourself as to the were the client, I obviously looked at the website, and presidential campaign, didn't you? of it being the DNC that was actually the client of indicated that, but I was not aware of the technicality it was the Clinton campaign, and Glenn Simpson had the DNC, I believe, was the ultimate client. I presumed later on. I don't think I pressed them with a question Fusion about the identity of its ultimate client. everything is in the witness statement. whether they were a decent, respectable law firm. clients in the UK who were aware of Perkins Coie as to answered -- sorry, I also asked a couple of my legal 162 8 10 11 25 A. I think Glenn had mentioned it. o With the FBI, yeah. Yes. You see, you know what I'm refe And you also understood that H Where you say, you record, you aware of what you were doing? Fine, the leadership of the car don't you? Your own note of yo The leadership of the Clinton findings in your reports, didn't you? but you gave presentations to the journalists about your 164 transcripts@opus2.com

H	Ç	where you say, you record, Joursell , mean, it o Jour
12		note so we assume it is accurate.
13	P	Yes.
14	Ó	In paragraph 3:
15		we explained that Glenn Simpson, GPSFusion was
16		our commissioner but the ultimate client were the
17		leadership of the Clinton presidential campaign and that
18		we understood the candidate herself was aware of the
19		reporting at least, if not us"
20	P	Yeah.
21	O	So a political campaign had commissioned research into
22		its opponent. You had no idea as to whether or not that
23		was going to be used for political campaigning purposes,
24		legal purposes or some other purpose, did you?
25	A	I wasn't certain, although there were no indications
		163
Н		that it was going to be used for campaigning purposes.
2	Ó	And there were no indications it was going to be used
ω		for legal purposes either, were there, Mr Steele?
4	P	At that stage, given that I didn't know who the
ហ		Perkins Coie firm were, no; but, later, when I met them,
Ø		it became clear to me that our reporting wasn't,
7		your Lordship, being used in the campaign itself.
æ	Ö	How did that become clear?
9	A	Because they never deployed any of it in the campaign.
10	o	No, they went they hawked it round every journalist
11		in Washington, Mr Steele, didn't they?
12	P	Perkins Cole?
13	0	No, Fusion, at Perkins Cole's request, gave your
14		material to a whole host of journalists, didn't they?
15	A	Could you when you say gave my material, could you
16		expand on that?
17	O	Well, you attended when you went to Washington on
18		21 September, there was a whole range of meetings
19		arranged by Mr Simpson with you and journalists, wasn't
20		there?
21	A	Yes, there was,
22	Ó	And you gave presentations you didn't I'm not
23		suggesting you gave physical copies of your memorandum,
2		but you days presentations to the journalists about your

compaids?	ب	-	A. I discussed the issues that were in the reports with
	s		a select droup of journalists off the record: that's
and bandan			
Hillary Clinton herself was	ω		correct.
	4	Ò	Q. Mr Steele, if you want to bandy words, you gave
t, but I wasn't clear.	ы		presentations, but the point of this was to tell
ferring to, Mr Steele,	σ		journalists what you had found about candidate Trump and
our meeting	7		his doings in Russia, wasn't it?
	œ	7	A. It was to discuss the issues that came out of the
	9		reporting. It wasn't to share the reporting with
	10		journalists .
urself I mean, it's your	11	o	Q. You think that that's a legal that's for the purpose
ite.	12		of legal proceedings, do you? Is that your evidence?
	13	P	 I don't know the answer to that.
	14	O	Q. Well, the answer is obvious, isn't it, Mr Steele? That
nn Simpson, GPSFusion was	15		was for the purpose of political campaigning. It was to
nate client were the	16		try and get this stuff into the public domain to the

20 21 22 19 18

Q. It wasn't intended to benefit candidate Trump, was it? A. It was to try and get the journalist to investigate the

It wasn't intended to reflect well on him? issues, is how I would put it, your Lordship. detriment of candidate Trump, wasn't it?

Q. Well, I assume you believed it was accurate?

A. Yes, I did

Q. So if you believed it was accurate, and you were the purpose of damaging candidate Trump, weren't you? presenting it to journalists, you were doing that for

A. I don't agree with that. I think, your Lordship, that Q. Mr Steele, let me make it clear: I'm not suggesting you arisen out of our work. is too simplistic. I was airing the issues which had

were trying to promote some kind of anti-Trump agenda understand me. I'm not even suggesting that in doing was being used for political purposes, namely to advance What I am suggesting is that you knew that this material this work you were trying to -- I'm not suggesting you were antipathetic to towards candidate Trump. You

That may have been one of the purposes, and only in the event that the information, the leads, were correct. the interests of the Clinton campaign.

Q. Well, you were being presented as a serious and

these journalists as someone who was worth listening to experienced former intelligence officer whose research could be trusted and you were being presented to all weren't you?

20 19 18 17

That's true.

Q. Mr Simpson wasn't saying, "Here's my old friend

made up quite a lot of stuff but maybe you want to Christopher Steele, he's a bit of a fantasist and he's investigate as well", was he?

Yes. This was therefore being used for political No, he was presenting me as somebody who was a serious

I think that's too crude a way of putting it. Mr Steele? campaigning purposes. It's obvious, isn't it,

How many reports did you produce for the Clinton presidential campaign?

Within the bounds of the contract?

olitical campaigning. It was to 15 Ö You see, the numbers run from 80 to 166. So there 16, I believe. are they about? appear to be 70 missing reports in that sequence. What

A. Within Orbis every report, no matter which project it is that were going into other project work. missing, if you like, are numbers that refer to reports there is no significance in -- the numbers that are being produced on, is given a consecutive number. So

There were 16 memos produced subject to the contract. There was a note at the end of November that referred to

Q. Are you sure that these are the only reports?

A. It depends whether it is true or not, whether the

material was correct, whether it was accurate.

It was intended to reflect badly on him, wasn't it?

23

13 December, which was after the contract had expired a December memorandum that was produced, I think Mitt Romney becoming Secretary of State, and there was

What about number 87?

I wouldn't know offhand, sorry, which --

Q. You see, number 87 isn't in the reports published by If you look at your --BuzzFeed, but it appears to be one you gave to the FBI

11 12 10 9 Yes, if you look at your note at [D/55.1/1]. I think it Could you expand on that? Because I'm not -is still up now. If we have a list here, we were

13 A. Oh, yes. presented with reports 2016/88, 2016/87 --

Q. -- 86 and 80?

15 A. Yeah. Yeah, yeah.

17 16 A. Can I explain that? Q. Now -

18

Q. Yes.

20 21 22 19 They are pursuant to different work for the FBI. They the Trump-Russia issue. It was some other issue, as are not relevant to -- that report was not concerning

was

by BuzzFeed, but 87 isn't.

Q. Well, all the other numbers are in the reports published

88, presumably.

A. Could I explain again, just to be clear, your Lordship,

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170	Mm hmm.	You assess that the sources were trustworthy; yes?	That's yes.	Is that a correct description of the position?	Yes.	That's at paragraph 28. [C/4/6]	Mm hmm.	relevant information. Is that	who have had personal knowledge or direct access to the	intermediaries to debrief trusted Russian sub-sources	You say in your witness statement that you asked trusted	much a transcript, your Lordship, of a debriefing.	It hasn't been analysed at all so it would be pretty	from a source, so it has not been analysed.	I understand it, is something that is passed directly	I mean, the definition of raw intelligence, as	before we issued the report.	something we had checked the movements of those two	the former Ukrainian president, near Volgograd was	between reported between Mr Putin and Mr Yanukovych,	For example if I can give an example the meeting	a source, and so they were informed by other knowledge.	intelligence is the transcript, my Lord, of a debrief of	I'm not sure they were raw intelligence, because raw	But that they were raw intelligence?	169	Yes.	research in your judgments as intelligence professional?	And you say that they were informed by background	Yes, yes.	You understand I'm quoting your words to you, Mr Steele?	Up to a point, yes.	And, up to a point, were uncorroborated intelligence?	That's fair, yes.	single-source reporting?	It is fair to say that your memoranda were mostly	So 17 plus a memo, 16 within the contract.	Yes.	Then there was a further one, yeah.	And then the yes, and then a later one?	Then there was a memo	And then	contract.	There were 16 that were produced subject to the	evidence?	So there were only 16 that were produced; that's your	refer to those other projects.	sharing the reports there are the Orbis reports which	Trump-Russia work we were doing for Fusion, and so I was	at that time which were separate and independent of the	that we were working on a number of projects for the FBI	
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172	How do you assess the trustworthiness of the	It happens from time to time.	unreliability?	How often do you get rid of your sources due to	I just wondered how rigorous your procedures were.	MR TOMLINSON: Well, I'll return to that point, Mr Steele.	a problem. So the answer obviously is no.	Sorry, your Lordship, slightly confused there. Not	MR JUSTICE WARBY: Different case altogether.	MR MILLAR: That's for later, my Lord!	Mr Govorun.	MR TOMLINSON: Sorry, I'm so sorry, my mistake entirely:	Sorry?	MR MILLAR: Mr Gubarev?	Mr Putin in the 1990s?	Mr Gubarev(sic) meeting giving illicit cash to	Did you discontinue the sources that told you about	discontinued.	embellishing or making things up, then they are	I disagree with that because if they are caught out	Mr Steele?	employing them. Obviously that's right, isn't it,	to make things up or embellish them so you carry on	a month to produce intelligence, they have an incentive	suggesting is that if you are paying someone \$5,000	171	No, I'm not suggesting for a moment it is, but what I am	your Lordship, they were working on at the time.	other project work. This is not the only project,	Yes, but that is true, but they were paid also to do	information that was interesting; correct?	So they had a financial incentive to feed you	That is an average, yes.	\$5,000 a month?	You paid the sources a retainer of between \$3,000 and	supported by other source reporting.	the ground in the real world, and whether it was	previous reporting, whether it had stood up to events on	Judging by the track record, your Lordship, of their	Yes.	Perhaps I could expand on that a little bit?	trustworthiness, does it?	Mr Steele. Long-standing relationship doesn't indicate	Well, they might have been deceiving you for many years,	main	Because we had long-standing relationships with the	The sources.	The sources or the sub-sources?	How did you do that?	Yes.	Yes?	

also on the basis of their reporting track record.

A. On other projects, in other words.

 The majority of them live and work in Russia Q. And do you actually meet your sub-sources?

Sometimes yes, sometimes no.

Q. And some that you meet when they are visiting from Q. I mean, there's some that you have never met? A. Correct.

Q. You say in your witness statement that these Russian A. Yes. Russia; correct?

sub-sources would have personal knowledge or direct access to information?

14 73 Q. What do you mean by "would have"?

15

Q. Do you mean they did have?

16 A. Yes. But also, I think, your Lordship, I'm implying there that judging by their official positions or their

Q. But you don't actually know whether they actually do the point. job or their relationship with the intelligence. That's have access; you just assume that they have access?

A. Again, your Lordship, I have to be slightly careful here them I can see from the open source record that they with jigsaw identification, but in the case of some of

would have access to the relevant information.

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A. I don't assume. I am told they have access and then

cases you just assume they have access?

So in some cases you know they have access and in other

Q. Well, it may or may not be tested, because it may be

for so you have to rely on them being accurate, something that you can't obtain any other corroboration it's tested.

Usually by the nature of -- the nature and length of their relationship with the source, your Lordship, but

Q. -- you rely on the source to tell you how good the

sub-source is?

 A. Only partly. The source will obviously describe their your Lordship, objective as possible about that, because relationship with the sub-source and hopefully be,

the basis of other source reporting and the track record it reflects on them too, and then they will be judged on

> 12 10

correct?

I mean, they may have direct knowledge or they may just

be repeating rumours to you that they have heard;

A. That is correct, but a rare situation, your Lordship.

Mr Steele.

13

A. It's possible

MR TOMLINSON: My Lord, I am about to move on to a wholly

new topic. I'm very happy to do it but I'm in

your Lordship's hands.

of their own reporting.

The sub-sources were Russian; correct? They were --

17 A. Yes, yes. That -- I think -- I have a slight problem of Q. I think that was your evidence? Jigsaw identification here, your Lordship, but what

17

to schedule.

MR JUSTICE WARBY: I think that is probably a good point to

stop. It's between 4.15 and 4.30 and we're keeping up

Q. And are they located in Russia or in London or in I can say is that the vast majority of them are Russian.

Europe, Western Europe?

Q. Well, do they live in Russia -- live and work in Russia A. Located? or do they live and work elsewhere?

> 24 22 19 20 21

you weren't here yesterday, but while you are giving

175

heard me say -- you may not have heard me say because

Now, you're still in the witness box. You have

MR JUSTICE WARBY: Yes. Right. Well, 10.30 tomorrow then. MR TOMLINSON: My Lord, there's absolutely no doubt whatever

that this witness will be finished tomorrow.

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 I do you understand that, your Lordship. evidence, don't talk to anyone else about the case.

MRMILLAR: My Lord, I am grateful for the indication from my learned friend. Is it still the case that we're

even if he finishes early tomorrow, or will we go going to have set piece closing submissions on Thursday,

MR MILLAR: Well, it would be my preference to --MR TOMLINSON: It's not a matter for me.

MR JUSTICE WARBY: Your preference would be to have time to prepare submissions?

MR MILLAR: Yes.

MR JUSTICE WARBY: Well, I think if we're not under pressure

of time, that will be good. I think they will be more evidence with some time to reflect. useful to me if they are prepared in the light of the

17 MR TOMLINSON: My Lord, it's been suggested to me by informed sources that by Thursday we might have to deal

with it all on paper and ...

MR JUSTICE WARBY: Well, I don't know any more, but I hope I don't know any less, than you do about that.

MRMILLAR: We speak repeatedly of a rapidly evolving

situation these days, I think.

MR TOMLINSON: But, my Lord, I think certainly what I had in MR JUSTICE WARBY: That's true.

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Day 2

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(4.25 pm) MR MILLAR: I am grateful. MR JUSTICE WARBY: Yes. We'll plan on that basis. the benefit of written submissions. mind was to, when we finish the evidence, then adjourn and reconvene at some convenient time on Thursday with (The court adjourned until 10.30 am on Wednesday, 18 March 2020) 177 14 13 12 11 10 15 MR MIKHAIL FRIDMAN (continued) SIR CHRISTOPHER STEELE (sworn) Application MR GERMAN KHAN (affirmed) MR PETR AVEN (affirmed) Submissions in reply by MR MILLAR Submissions by MR TOMLINSON Submissions by MR MILLAR Cross-examination by MR MILLAR Examination-in-chief by MR TOMLINSON Cross-examination by MR MILLAR Examination-in-chief by MR TOMLINSON Cross-examination by MR MILLAR (continued)1 Cross-examination by MR TOMLINSON Examination-in-chief by MR MILLAR 179 178 ...19 ...97 ..84 147 ...130142 ...21 145 ..145

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Petr Aven, Mikhail Fridman and German Khan v Orbis Business Intelligence Limited

Day 3

March 18, 2020

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> March 18, 2020 Petr Aven, Mikhail Fridman and [...] Business Intelligence Limited

MR TOMLINSON: Good morning, Mr Steele. (10.30 am) A. Good morning, Mr Tomlinson. Cross-examination by MR TOMLINSON (continued) MR CHRISTOPHER STEELE (continued) Wednesday, 18 March 2020 A. Mm hmm. Q. -- by an article in Slate. I'm not sure if it is Q. Possibly both. By Mr Foer A. Possibly both a magazine or a website, but whatever it is -- I think it may be a magazine.

instructed to provide it. Memorandum 112, the circumstances in which you were

Q. In the first two versions of your witness statement, A. Mm hmm.

15 14 you?

Q. And that was wrong?

17 A. It was wrong.

Q. You said -- you now say that these instructions were given at the July meeting, the July meeting you had

previously mentioned with Mr Sussman?

114 115 116 117 118 119 119 120 221 221 23

domain had Trump in its name ..."

Q. Very well. And so at the July -- according to you, at

23

connection between the server at Alfa Group and the

Mr Steele? server at Trump Tower. Is that still your evidence,

Q. You then say that Mr Simpson instructed you to produce A. That is my recollection, yes.

Memorandum 112 soon after that meeting?

But you can't remember when?

 I have no record of it. Q. You have no record of anything, have you?

A. I haven't got any records relating to the creation of 112.

Q. Or indeed any of the other memoranda?

Q. Yes. Yes. You see, I suggest that you're wrong about No, they were wiped in early January 2017. your recollection that the server link was mentioned to

A. I think it's possible, but I don't think it's correct. you in July 2016. Do you think that might be correct?

Q. You see, do you know when the -- the first time this allegation was made public?

A. I think it was in October.

Q. On 31 October, wasn't it?

Q. Can we have a look at (D/76/1), please. This was the first time that this was put into the public domain -

A. Mm hmm.

Q. I want to now ask you about the compilation of

Q. He described it -- are you familiar with this article?

Q. He described how a computer scientist, using the

pseudonym Tea Leaves, had found some connections in late

Yes, I am.

signed by a statement of truth, you said that those

instructions were given on 11 September 2016, didn't

12

A. Mm hmm.

July.

A. Yes, I do. Q. Do you remember that?

Q. Look at the second page, please (D/76/2). The bottom

paragraph:

to be referred to as Tea Leaves ... found what looked

"In late July, one of those scientists -- who asked

like malware emanating from Russia. The destination

A. That's not the case. I was given the instruction sometime after that meeting by Mr Simpson.

the July meeting, Mr Sussman mentioned to you the

Yes.

Do you see that?

logs of the Trump server's DNS activity ."

"More data was needed, so he began carefully keeping Then if you go over the page: [D/76/3]

Q. So Mr Tea Leaves, who was at least one of the sources of this story, didn't actually know there was a connection

in late July, did he?

A. I think he did.

Q. No, no, it says here, clearly, he first became suspicious in late July, then he began carefully keeping

over a period. That's what the article outlines.

logs and so on. It was then some research took place

Mm hmm.

Q. But in late July all he had seen was suspicious server activity.

A. I believe he passed that information on to the Fusion

They were in possession of that information in client in late July, if it was him that passed it on.

17 Q. Well, that's what you say, Mr Steele, but your and I'm suggesting it is wrong again. Do you understand recollection has already been proved to be wrong once late July.

I do understand that, but there is a logic to this, my Lord, if I may. There are some things I'm clearer

mentioned the Trump server issue, Alfa server issue, was I'm very clear is that the first person that ever

about in my mind from that period than others, and what

Mr Sussman. I only ever met Mr Sussman twice, and the

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))		
your Lordship to direct the witness to answer.	23	Correct.	A	23	
MR TOMLINSON: My Lord, that's a question I would ask	22	14 September 2016.		22	
A. It is realistic, I'm afraid.	21	instructed to produce the memorandum at some date before		21	
Q. Mr Steele, that's just not realistic, is it?	20	Well, all we know for certain is that you must have been	Ö	20	
A. From passenger manifest, yes.	19	that's what I was told in late July.		19	
your source might be?	18	Well, that's what I was my recollection is that	A	18	
who travels around Europe and can work out from that who	17	this supposed server connection in late July, is there?		17	
MR TOMLINSON: So the FSB has a total rundown on everybody	16	a shred of evidence anywhere that anybody was aware of		16	
identification issues.	15	the material the background to this. There's not		15	
A. Okay. Yes, I do object to that because of travel and	14	You see, you're very familiar, I know, Mr Steele, with	Ö	14	
you should say, and then we'll get another question.	13	where Mr Sussman's intelligence came from.		13	
answering the question on that basis, then that's what	12	are several sources here of this story and I'm not sure		12	
identification of the source and that you object to	11	Mr Sussman had for the story. I'm not it seems there		11	
want to say that giving the answer would risk	10	I don't know who the source original source that	A	10	
MR JUSTICE WARBY: Well, it's not for me to comment. If you	9	in July, apart from your recollection?		9	
question in terms of this jigsaw	ω	FBI anywhere else that the FBI were informed		œ	
A. Your Lordship, would you care to comment on that	7	But there's absolutely no evidence, is there, that the	Ö	7	
I wasn't asking for their address.	თ	That's right, yes.	P	σ	
What country were they living in, Mr Steele?	υı	in July.		UI	
right.	4	Mr Sussman told you that the FBI had been informed		4	
MR TOMLINSON: I'm so sorry, your Lordship is absolutely	ω	You see, according to your first recollection,		w	
So we have established	N	And so on,		N	
You said where.	Н	a roomful"		Н	
7		ı			
MR JUSTICE WARBY: You didn't actually ask what country.	22	"At the meeting, in late September, 2016,		25	
are living in, can you?	2 4	It is the middle paragraph:	0	24	
possibly identify someone by saying what country they	2 4	Times.		23	
and your instruct is to be secret, but you can t	4 6	Yeah, they went to the FBI at that time, The New York	P	2 2 2	
Q. Mr Steele, I know that you had a career in intemgence) h	over the page to page 5. [D/121/5]	8)	
	2 6	late September 2016. Do you remember that? If you go		2 0	
because it is part of the issue of Jigsaw	2 4	The New York Times then subsequently go to the FBI in	Ö		
A. I d rather not answer that question, your Lordship,	. μ α	Yes.			
) \	in August 2016?			
	1 0	So Max goes to the New York Limes, Mr Enc Lichtbiau,	Q.		
	, 5	I do.			
Q. You hesitate, but you described him in the memo as	1 4	graph.			
0.50	13	assembled. Do you see, that's the penultimate matter		13	
Q. And that source was a Russian?	12	decides to reveal the data he and his colleagues had		12	
A. That's right, yes.	11	page 4 of this {D/121/4}, it is in August 2016 that Max		11	
Q. So you chose a particular source on that occasion?	10	with a pseudonym, this time called Max. If we look at		10	20
sub-source and so on.	9	That's at (D/121/1). This is another computer scientist	Ö		
somebody is travelling, is able to meet a certain	ω	Yes.	A	00	
circumstances which are operational, for example, if	7	allegation, aren't you?		7	
A. No, usually several, depending on all sorts of	თ	article in the New Yorker about the history of this		o	
one person you go to?	UI	You see, you're also familiar with the subsequent long	O		
source 2, is this a job for source 3; or is there only	4	mentioned to me in late July.		4	
	ω	Therefore, it has to have been the case that it was		w	
	N	linked to the server issue.		N	
 A. I gave a briefing question to my source. 	Ы	instruction to produce 1112 was absolutely definitely		М	

definitely	۲	A	I gave a briefing question to my source.
*****	u N	Ó	Did you do you have a range of possible sources? Did
	4		source 2, is this a job for source 3; or is there only
equent long	UI		one person you go to?
of this	n	P	No, usually several, depending on all sorts of
	7		circumstances which are operational, for example, if
	00		somebody is travelling, is able to meet a certain
we look at	10	0	sub-source and so on. So vou chose a particular source on that occasion?
016 that Max	11	P 4	That's right, yes.
gues had	12	Ö	And that source was a Russian?
ate matter	13	A	Yes.
	14	O	You hesitate, but you described him in the memo as
	15		a trusted compatriot of a Russian Government official?
Lichtblau,	16	A	Correct, yes.
	17	0	Where was that source living at the time?
	18	P	I'd rather not answer that question, your Lordship,
the FBI in	19		because it is part of the issue of jigsaw
? If you go	20		identification .
N. Wal	2 2	Ö	Mr Steele, I know that you had a career in intelligence
	23		possibly identify someone by saying what country they
	24		are living in, can you?
16,	25	M	MR JUSTICE WARBY: You didn't actually ask what country.
			7
	ы		You said where.
	N		So we have established
ection,	ω	MR	MR TOMLINSON: I'm so sorry, your Lordship is absolutely
nformed	4		right.
	UI		What country were they living in, Mr Steele?
	თ		I wasn't asking for their address.
e, that the	7	P	Your Lordship, would you care to comment on that
nformed	ω		question in terms of this jigsaw
	9	M	MR JUSTICE WARBY: Well, it's not for me to comment. If you
rce that	10		want to say that giving the answer would risk
t seems there	3 F		identification of the source and that you object to
I III HOLSUIC	ט ני		was should say and then we'll get another question
Steele, with	14	-	Okay. Yes, I do object to that because of travel and
ere's not	15		
was aware of	16	M	MR TOMLINSON: So the FSB has a total rundown on everybody
y, is there?	17		who travels around Europe and can work out from that who
is that	18		your source might be?
	19	P	From passenger manifest, yes.
nust have been	20	Ö	Mr Steele, that's just not realistic, is it?
ome date before	21	P	It is realistic, I'm afraid.
	22	M	MR TOMLINSON: My Lord, that's a question I would ask
	23		your Lordship to direct the witness to answer.
instruction?	24	M	MR JUSTICE WARBY: Well, shall we round them up as a list
	25		and see later on?

tely	-	A	I gave a briefing question to my source.
	N	Ò	Did you do you have a range of possible sources? Did
it was	ω		you think: is this a job for source 1, is this a job for
	4		source 2, is this a job for source 3; or is there only
t long	υı		one person you go to?
is	თ	P	No, usually several, depending on all sorts of
	7		circumstances which are operational, for example, if
	œ		somebody is travelling, is able to meet a certain
cientist	9		sub-source and so on.
ok at	10	Ö	So you chose a particular source on that occasion?
at Max	11	A	That's right, yes.
had	12	Ö	And that source was a Russian?
atter	13	A	Yes.
	14	o	You hesitate, but you described him in the memo as
	15		a trusted compatriot of a Russian Government official?
lau,	16	A	Correct, yes.
	17	Ó	Where was that source living at the time?
	18	P	I'd rather not answer that question, your Lordship,
H 18	19		because it is part of the issue of Jigsaw
og no	20		Identification .
	21	Ö	Mr Steele, I know that you had a career in intelligence
York	22		and your instinct is to be secret, but you can't
	23		possibly identify someone by saying what country they

25

Q. So what did you do then, when you got that What was your next move?

> MR JUSTICE WARBY: Yes. MR TOMLINSON: I'll ask Ms Sjøvoll to keep a list

MR TOMLINSON: Was this person the source for any of the

other memoranda in the so-called dossier?

Q. How many of them? All of them?

Q. Most of them. How long had you had them on retainer? A. Most of them.

A. On retainer or on the payroll? It's a slightly different issue.

13 A. If you pay someone a retainer, you pay them a monthly

Q. Sorry, what's the distinction? I wasn't aware there was

16 Q. Right. amount of money regardless of their work.

 A. And if you pay them according to what they produce for a project or a particular report, it's a sort of

Q. In your witness statement you only refer to the first as one-off, or series of one-off payments.

A. Yes, at that time. people being paid a regular sum of \$3,000 to \$5,000.

At that time.

We're going back in history.

Q. I see. I see. So how long had they been either on the payroll or on retainer?

A. Yes, I would say about six years

Q. What kind of business or occupation did this source work in?

A. I would rather not answer that, my Lord. If we could

Q. You see, is this -- if this is a source who moves in

information they are going to provide to you, doesn't that obviously casts a substantial light on the sort of anti-Putin émigré circles, if I can put it that way,

A. It would if they did.

13 A. But our sources are not involved in anti-Putin émigré Q. And did they?

activity.

Q. Well, that wasn't my description, if they moved in anti-Putin émigré circles, it's a different point.

They don't do that either.

Q. You say in your third witness statement that you have concerns about their safety. Is this someone who has

been subject to any threats?

A. That's a difficult question, my Lord, to answer. I believe their family has been monitored.

Q. Their family has been monitored. This source is still alive, we're talking about a living person here;

10

 We are.
 Is this the source that the Inspector General's report designates as Person 1?

A. Person 1?

Q. Person 1, your primary sub-source. The terms are used in a confusing way --

Q. -- but I think by sub-source they mean source in your A. I'm sorry, I think -terms?

10 A. Yeah, I think there are two -- two separate people I think there's a Person I and a principal sub-source they're referring to here, if I might say, my Lord.

o There's a Person 1 and a primary sub-source?

14 A. Yes.

Q. Is this person Person 1? Is the source you're talking about here Person 1?

Ö Yes. No. Is there -- are they the primary sub-source?

17 18 19 20 21 22 O The Person 1 you described as a boaster and an egotist who engaged in embellishment; correct?

 A. I didn't make a categorical statement of that sort. I said he was somebody who possibly embellished.

24 25 Q. But you said he was a boaster and an egotist?

A. Yeah, that doesn't mean he's a bad source though.

Ö

Many sources have big egos, I'm afraid

Ö Was the primary sub-source that we're referring to here -- that's the source in this case --

Yes.

No. -- was that person a boaster and an egotist as well?

o So how did you communicate with this source, initially ? and Putin ". How do you communicate with the source? said, "I want you to look into the links between Alfa We're talking after Mr Simpson has called you up and

13 Q. So you actually have a meeting with them before they're Both by encrypted communications and in person.

15 16 17 Usually, yes. process; is that right?

14

commissioned, as it were, as part of the commissioning

Q. Not usually: in this case? Yes.

Q. Did you identify at that stage a suitable sub-source or

20 21 22 It's a slightly more complicated situation than that did you leave that to the source?

a particular issue. And so we obviously discuss and a number of potential sub-sources to report on because obviously the source has a number of sub-sources

sub-sources who might be able to comment on an issue and

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14	I can think of a couple but I would rather again,	they contributed to.	. Shall we go through them and identify which ones that	other report.	all of the reports. So they contributed parts of the	I would say parts of them, rather than all of them	Which ones?	Yes.	memoranda?	Was this person the sub-source for any other of the	At the peak of the vertical of power, yes.	Russian Government?	But you mean that they're at the centre of	Kremlin.	administration is not physically in the walls of the	Indeed, because I think even the presidential	of that building in Moscow?	don't mean that they're physically within the confines	I see. So "in the Kremlin" by "in the Kremlin" you	I don't I wouldn't use that term, no.	aren't they?	then they're obviously a top level government official,	If someone is in charge of the third city of Russia,	Yes.	top level of government?	13	Well, you said the term "the kremin" referred to the	NO, I don't tillik tiley would be.	mey were the	in he a tob texet Soveriment outrest	Well they would be a top level government official if	No that would be not the Kremlin.	Novosibirsk, you mean?	So this person might be the government minister in	that take part in the high organs of state.	the number of government ministries and other bodies	It is a reference to the leadership of the country and	who works physically within the walls of the Kremlin.		Ves Wy Lord may I make a comment about the term.	Who was in the Kremlin?	Yes	level Russian Government official?	But your source alighted on a sub-source who was a top	and potentially to this specific issue.	could have contributed to this, or did to the project.	Yes, there were a number of sub-sources who potentially	potential sub-sources; is that your evidence?	So, on this occasion, you discussed a number of		who is useful on a particular topic. To use their	it 's up to the source then to see who they can meet and
	25	24	23	22	21	20	19	18	17		15	14		12	11	10	9	ω	7					N	ы		22) t			2 1					17	16						10			7					N	Н
		A	Ö	A.	O	A		Ö		Ö		A.	ó	A	Ö	A	Ö		A			A		Ö					2						Ò				A			A			Ó			A		o.		
16	information.	Well, both from the source and from open source	On what basis? Where did your information come from?	Mm.	A lot?	A lot.	the Russian Government?	What did you know about that sub-source's connections in	Okay. So I would say three years.	No, of course, I'm talking about 2016.	from this	Well, it depends whether you are talking from 2016 or	Ten?	Three or four.	How many is that? Two?	Several years.	How long have you had dealings with them?	identification reasons.	Again, I'd rather not answer that, my Lord, for	The sub-source, is that someone you have ever met?	Well, I'll come back to that.	Yes.	Incorrect, Mr Steele?	Is that your evidence; that's the only thing that's	St Petersburg.	15	and the period when visuality ruth was peputy wayor or	and the second riber Westing Busin upon Departs Moreon of	100% correct is the timing of Governn's time with Alfa	The only thing in Memorandum 112 that appears not to be	von were maintaining that this one was 100% correct?	that no memorandum is ever 100% correct so I thought	So which bit of Memorandum 112 is not correct? You say	Well, that is my assessment when we've assessed things.	How do you know that?	report I've ever seen has been 100% correct.	of detail. If I might say, my Lord, no intelligence	general, sorry, at the time, so these are minor points	There was a Miami consular general Miami consul	consulate that was running cyber activities?	The Miami consulate, for example, the non-existent Miami	I wouldn't admit to that.	they were inaccurate?	were undoubtedly inaccurate; even on your assessment,	I mean, we know that certain things in your memoranda	several years.	_	It's part of that could be part of that process.	accurate information, doesn't it?	But it also helps us to assess whether they provided	pertains to jigsaw identification of the sub-source.	my Lord, I have a problem with that, because I think it

	UI	4	ω	2	Н	0	9	8	7	0	U	4	w	2	1	0	9	8	7	0	UI	4	w	2	1
			O	A	O	A.				Ö	A.		Ö	A	Ö	A.		Ö	A		Ö	A	0	A.	o.
17	specifically say to the contrary, steps that you took in	evidence that the steps you then outline are, unless you	I don't want to take a false point, Mr Steele. Is your	Yes.	Is that your evidence?	Yeah.	memoranda in the Dossier - including CR112."	far as possible the reliability of the content of the	"Instead, I took the following steps to ensure as	It says:	Yes.	subparagraph under paragraph 31.	It says there's a little free-floating	Yeah.	Paragraph 31.	Which number, sorry?	statement $(C/4/7)$. It will pop up in a moment.	If you look at page 31 of your first or your revised	Mm hmm.	to ensure the reliability of this memorandum.	I now want to ask you about the specific steps you took	I don't know.	Have they been subject to threats?	Indeed.	You say you're concerned about their safety?
	25	24	23	22	21	20	19	18	17	16	15	14	13	12	11	10	9	00	7	0	ហ	4	ω	N	Н
	A			Ö	P	Ö	A	o	P		O				A	Ö	P		o					P	Ö
19	Yeah.	made from a country outside the UK."	"Contact between the sub-source and the source w	The last sentence:	Yes.	If we go back to the previous page (C/4/6).	Right. I didn't see that.	Paragraph 30 of your witness statement.	Direct or indirect?	your	I'm talking about what you say at paragraph 30 of	initial contact, by other means?	meeting, or are you talking about their original	was made between them? Are you talking about them	Can you elaborate on what you mean by the contact tha	Which country was that, in the case of Memorandum	Yes.	made from a country outside the UK?	Was the contact between the sub-source and the source	source and events on the ground.	sources or had turned out to be the case from open	had reported on had either been corroborated by other	Orbis projects over the years and the things that the	What I mean is that they had contributed to a number	What do you mean by that?

13 Q. It says --

Q. So at paragraph 33 --A. Yes. relation to CR112?

source was

Q. -- you say: onto other destinations out of the country. On their "Normally, sources would transit through London and

4 A. Mm hmm.

face to brief them on the intelligence I was seeking." transit out of London, I would meet with them face to Did that happen in this case?

11 A. That is my evidence. So, yes --12 Q. It did happen in this case?

Q. -- that the contact between the source and the Q. You say at paragraph 34 --A. Mm hmm. sub-source was made from a country outside -- I'm sorry. Paragraph 34: the source reported back to you; you took

correct?

manuscript notes but did not keep them. Was that

21 A. I kept them for as long as it took to write the memo.
22 Q. You say, again, at paragraph 34:
23 "... the source and the sub-source had a very good
24 reporting record."
25 A. Correct.

18

ontact that out them orandum 112?

1 Q. Are you referring there to the initial contact, or the contact for the purposes of this memorandum?

Q. So which country was that? The memorandum.

Q. You then have a briefing with your source when the

8 A. Debriefing, I think, better term. Briefing before --9 Q. Debriefing. source has been in contact with the sub-source; correct?

debriefing after.

Q. Let me get the terminology right. Was that in London?

A. Yes.

Q. Was that in person or by telephone?

14 A. In person.

15 Q. What did the source tell you about the meeting -- about the dreumstances of their meeting with the sub-source. The about gifts and favours?

18 A. Nothing specific about gifts and favours, other than they had met directly.

20 Q. The reason I ask you is because that's what you describe as happening in paragraph 29 [C/4/6].

21 as happening in paragraph 29 [C/4/6].

24 Q. It just says: 25 "During th a bottle of wine or something like that.

"During the course of my briefings with the sources

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 xes. The report the note becomes the report in some sense 	0 2	25 4	was tt? A. But "open source" is mentioned, and that's what I'm		25
i. Yes.	A	2.4	Was It?		
		,			20
	Q	2 23	constitute reasonable care, none of this was mentioned,		23
up the report?		22	Q. When your side was asked what steps were taken to		22
 Yes, probably a couple well, type up the note or type 	Α	21	 No. I didn't think it was necessary. 		21
You make a handwritten note and then you type it up?	Ó	20	steps, do you?		20
A. A couple of hours.	A	19	Q. But you don't say, "In this case, we did the following		19
2. Yes.	Õ	18	which is what we did.		18
	A	17	A. Well, there is a reference of looking at open source,		17
	Ö	16	statement, is there?		16
A. Sorry.	Þ.	15	Q. Mr Steele, there's no mention of that in your witness		15
2. The meeting	Ó	14	Union of Industrialists and Entrepreneurs		14
hours. Which sorry, which meeting? The meeting	_	13	also looked up meetings that took place of the Russian		13
 That meeting that meeting lasts probably a couple of 	A	12	A. I think we did. We looked up Govorun and I think we		12
). How long is that meeting?	Ó	11	source data. You didn't do that in this case, did you?		11
 A detailed note, yes. 	Þ	10	it? It's cross-referencing information against open		10
and this is what he's told me", and you make a note?	_	9	Q. Well, this isn't about talking to your colleagues, is		9
says, "I have had a bottle of wine with the sub-source		ω	of contact.		œ
evidence is this: the source comes back from Russia,	-	~1	a piece of work, it doesn't usually feature in this kind		7
minutes, Mr Steele, but I just want to so your	٠,	O	A. Well, when you talk to your colleagues and people around		a
	o.	(n	there was no mention of doing any of this, was there?		υı
on it, along the lines I've described.		4	the steps that constituted reasonable care to verify,		4
 But we did open source work, some open source research 	A	w	Q. And when you were asked, when Orbis was asked to set out	_	ω
research into Mr Govorun, for example, does it?		N	A. Not everything is in the witness statement.		2
You see, it doesn't say there that you did any specific	0	Д	statement specifically in relation to 112, is there?		ы
26			21		
	Α.	25		_	25
		24	A. I yes, I did.		24
		23	Did you do that in this case?		23
		22	source data where possible."		22
		21	I cross-referenced the information against open		21
	A	20	source or sub-source and their story, and		20
the Defendant using its knowledge and experience.		19	their roles I asked other about the individual		19
input of intelligence sources, the reliability of		18	regard to what I knew of the source and sub-sources and		18
considering public domain material (see above) and the		17	"I assessed the intelligence I received having		17
and status all steps reasonably required		16			16
which it was instructed to report [etc] the roles		15	Q. Now, in terms of your verificatory steps, at		15
" had regard to the nature of the allegations		14	A. I think they shared a bottle of wine.		14
taken to constitute reasonable care:		13			13
		12	A. I did, yes.		12
	0	11	Q. Did you ask that in this case?	_	11
. Sorry, you're on 21 now?	A	10	A. Yes.	_	10
Sorry, it's response 21 [A/12/12].		9	any favours in exchange for the intelligence."		9
[A/12/10].		ω	dinner [and whether they] had asked the source for		œ
something different. Give me a moment. Response 15		7	modest gifts had been given the value of the		7
response 8 in [A/12/1] no, sorry, response 8 is		O)	about the circumstances of the meetings whether any		a
of Orbis in the further information. I think it's		UI	following their meeting with a sub-source, I would ask		ហ
Let's have a look at the see what was said on behalf	0	4	"During the course of my briefings with the sources		4
. We're getting down into the weeds here.	A	ω	well, but never mind:		ω
). Well, let's have a look at it.	٥	N	I see you use the inaccurate term "briefings" as		2
describing.		ы	following their meeting with a sub-source"		ш

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und the
of ...
rience."
                                                                      ions on
                                                                                         nave been
/13].
                                                               roles
                                                                                                of.
```

19 20 21 22

Q. -- the last paragraph: A. Mm hmm.

"The source and sub-source were established

fifth -hand, or whether I've just read it on the

A. Not by definition, no.

accurately, does it?

they know or they might not?

24

22

 I think they were the only two things we looked at. Q. So you then produce -- and in between the taking of the You say in paragraph 34 of your witness statement at I am. In this case -- but in this case I think I did open source search. Sometimes one of my colleagues does at meetings of the Russian Union of Industrialists . Is it, because they're far more able technologically than that you do an internet search on Mr Govorun, you look handwritten note and typing up the report, you now say If I might say, it's not always me that does the 13 14 15 16 17 17 18 19 20 21 12 Q. I mean, if I tell you something that happened in British Q. Well, you didn't know for uncertain either, did you, A. Not for certain, no. Q. So in relation to that allegation, that was something A. No. Q. It doesn't mean that they had either, does it? A. I don't think they were there in the 1990s, but that that was second-hand, third-hand, fourth-hand; you doesn't mean that they hadn't talked to people who were. of the organisation on one side or the other? reporting on what happened and you have personal there, or whether I have heard it from fourth-hand, there, or whether I've heard it from someone who was Mr Steele? didn't know? knowledge, you must in some sense have been there, part third-hand; in other words, they were there. If you're politics in the 1990s, you don't know whether I was

10 11 12

there anything else you do?

A. Me. Q. And who does that? A. It does, yes.

13

14 15 16 17

Ó

(C/4/7) --

A. That the sub-source, by definition of their job, would connections of mine; I trusted them and knew that they 24 25 23 Q. But you couldn't ask him because you're not in touch sub-source so you can't ask them? But I would ask you. with -- him or her; you're not in touch with your internet. You have no idea.

have known of the information --

were in a position to report to me accurately."

O

But that doesn't mean --

A. No, it's the job of the source do that.

Q. And did the source?

You would have expected them to have known the

Q. I mean, they might give you an accurate account of what That's absolutely true. I think that, however, when you But that doesn't mean that they're going to tell you it assess information, you assess whether you think that 4 Q. Did the -- so far as you are aware, did the sub-source Q. But did you know one way or the other whether they A. I would say possibly. A. On that specific point, no. actually did? meeting Mr Fridman directly? know enough about Mr Putin's diary to know when he was

information by definition of their job or relatives or 12 10 A. I would have expected that they could have known, given Q. Did you ask your source whether they'd asked the their position.

14 15 16 17 13 A. The source said that the sub-source was clear that that they had heard that from somewhere else? sub-source whether they knew that directly or whether

was the case.

12 14 15

So --

whatever.

Q. -- what you mean by "in a position to report accurately

is: potentially had access to the information on which

they were reporting. Is that the position?

It's one of the factors of assessment.

10 A

the person giving it to you has access to that

More than potentially, I think; you would expect them to 19 0 A. Yes. Clear that Mr Fridman had recently met Mr Putin directly?

know that?", did they?

Q. And the source then said to the sub-source, "How do you

 So did your sub-source have personal knowledge of the dealings between Mr Aven, Mr Fridman and Mr Putin in the 21 22 A. I imagine so, yes.

Q. Sorry, you imagine so?

Q. So you don't know one way or the other? Yes.

Q. Well, something that they didn't pick up second- or A. Could you define what "personal knowledge" means?

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Q. I mean, the sub-source might have said, "I met a man in

a bar who told me that he had a friend who knew someone

who said that Fridman had met Putin recently".

How do you know? You're not there.

Because that's not how this sub-source and source work

How do you I know? Well, that wasn't the case. I don't know one way or the other

March 18, 2020

Opus 2 International 16 17 18 19 20 21 12 13 14 15 16 17 17 18 19 20 23 25 23 15 13 I hesitate because I'm concerned about getting into O Q. You see, to know about significant favours and informal Q. Did the sub-source have any, so far as you are aware, I mean, I think the position from your previous answer Q. Did you ask them that? Q. So did you say to your source, "Well, that's very A. I would say yes. A. Mm hmm. I'm not sure a friend, but certainly you would have to Who I trust. Did you --That is what I'm told by the source No, no, that wasn't the question I asked you. The Yeah, they -- looking at the history of that source's be proximate to them. potential identification of the sub-source. any personal knowledge about significant favours being Mr Steele, I was very careful in not asking you about The problem here, your Lordship, is if I go into the in the past so that's fine? of one of the two people involved, mustn't you? not in the room, you must be a close friend of either -advice, you must have very direct knowledge. I mean, if done by President Putin for the claimants or Alfa? I was asking you about what you said to the source. the access of the sub-source. If you listen again, access of this sub-source, we get into potential between the President of Russia and leading Russian about what happened in private, informal meetings question I asked you was: did you say to your source, reporting track record and what they had reported on, it Did you ask the source? leading Russian businessmen. How do they know that?" on in informal meetings between President Putin and interesting. That's remarkable. They know what's going was you thought: well, oh, they have reported accurately businessmen. How do they know that?" "Well, that's remarkable. This person is telling you was clear to me that they had this sort of access. identification of the sub-source. 30 24 25 A. -- based on my knowledge of the source and the I mean, we have the latest version in the bundle. Look A. I'm not sure that they did say that. Your Lordship, the Q. Your primary sub-source, which is the person I think A. That's correct. Yes, you make a judgment, but you don't know whether A. I have page 187. Q. Do you have that? A. Yes. Is that right or ...? Yes, sorry, when I say 225, it is the electronic bundle Yes, yes, you make -sub-source. you? someone who was actually in the room when Mr Putin was number. Don't worry about the page numbers. They are he gave to them in January 2017. and completely changed the nature of the interview that terms of its interviewing of this primary sub-source, has already been revised by the Department of Justice in OIG report, which is what Mr Tomlinson is referring to, multiple sections of your reports, didn't they? you had misstated and exaggerated your statements in we're talking about now, as your source, told the FBI having his meetings with Mr Aven or someone else, do whether it is something -- you know, whether it is what you're being fed is hearsay, gossip and rumour, or 31 32 transcripts@opus2.com

Yes.	o	22
I am making a judgment	7	21
way or the other, do you?		20
Mr Steele, you say that, but you actually don't know one	Ö	19
operandi, it's not fourth- or fifth -hand.		18
Not in a particular instance, but as a matter of modus	P	17
you?		16
You don't know whether it is fourth- or fifth -hand, do	o	15
Not fourth- or fifth -hand.	P	14
done in a country which you don't have any access to.		13
least second-hand and probably fourth- or fifth -hand,		12
because what you're dealing with is things which are at		11
Well, you wouldn't have known, would you, Mr Steele,	Ö	10
from this sub-source before.		9
I had no, because I had never seen hearsay or gossip	P	ω
just hearsay and gossip?"		7
them about that? Did you check that actually this isn't		σ
And you then said to the source, "Well, did you quiz	Ó	UI
Yes.	A	4
And the source said, "Yes"?	O	ω
this information?".		N
Yes, I said, "Does this sub-source have direct access to	P	Н

Q. If you go to the next page I think maybe it's there. A. I think it's in the bundle --Q. Well, let's just go -- we'll go back to see them. We'll is it page -- it's not page 1. [D/131/1] go back to page -- let me get the page. I'm not sure -beginning of the report, and --

A. I think it's in the bundle -- this is it, yeah, this Q. That's not about page 187, is it? it. Point 3 or .3.

13 No, it's not. It's about Person 1, I think. It's about the interview with the primary sub-source that took place in January 2017.

14 Q. But it doesn't -- Mr Steele, it doesn't bite in any way from this case is telling you that -- is telling the Department of Justice that you have misstated and on what I'm quoting to you, which is that your source exaggerated their statements.

Q. But not in respect of this part. With respect, I think it does purport to it because it put in the OIG report to begin with is actually wrong is showing that the account of that interview that was

Well, certainly in respect of some very important parts.

Q. It is the revised version. It is the latest version A. Is that the revised version? obviously different Q. 226, please [D/131/226]: so probably in respect of this part "The primary Sub-source was questioned again by the

A. Sorry, the amended version? Yes, this is the -- we have put in the latest published version of this report:

Ö

Primary Sub-source felt that the tenor of Steele's that interview and others after it told the OIG that the "The Washington Field Office agent ... who conducted Mm hmm.

FBI beginning in March 2017 ... "

representatives of NSD were present, the Primary Agent 1, the Supervisory Intel Analyst, and Sub-source told the FBI that he/she had not seen "During the FBI's January Interview, at which Case

13 statements in multiple sections of the reporting." misstated or exaggerated the Primary Sub-source's Steele's reports until they became public that month and that he/she made statements indicating that Steele

10 11 12 13

statements in reports or present them as facts. expected Steele to put the Primary Sub-source's The Primary Sub-source also stated that he/she never reports was far more 'conclusive' than was justified

According to WFO Agent 1, the Primary Sub-source said

Do you see that?

15 16 17 A. I see it, yes. Q. So your primary sub-source is telling -- which we're That's what's reported there. have misstated or exaggerated what they told you? talking about the individual in this case -- that you

> 18 17 16 14

friends over beers' ..."

explained that his/her information came from word of that 'It was just talk' ... the Primary Sub-source to support the statements from his/her sub-sources and he/she made it clear to Steele that he/she had no proof

mouth and hearsay'; 'conversation that [he/she] had with

2 2 2 2 2 2 3 4 3 2 20 Q. Look at page --As I say, I have doubts about the detail of that revised once by the Department of Justice. I think the interview because it has already been amended and

amendments are in the bundle, the trial bundle, at the

25 23

As reported in this report.

35

US Government inquiry, isn't it?

Q. Well, this is what your source is telling an official

No, I don't accept that.

dealing with, Mr Steele, isn't it?

That's the kind of quality of information we're

o got it wrong and you are right; is that the position? So you think that the US Inspector General's office has

Well, we know they have, Mr Tomlinson, because they have already had to amend their account of that interview. Significantly, I would argue.

Not in this respect, Mr Steele.

Well, we'll see.

unredacted from the report at the last minute and we that point, although we had engaged with the Inspector General's team for six months, that was were not given the ability to answer it by the Can I add one other point, your Lordship, that on

15 16 17 If you go down to page 230, please [D/131/230].

That's 192. Ah, yeah. 192.

14

complained about in public afterwards.

Inspector General's team, which is something we

18

20 19 Q. So in the penultimate paragraph, the interview with: "Steele ... made statements that conflicted with

explanations from two of his sub-sources about their had been 'speaking for a while : The Primary Sub-source the Primary Sub-source had direct access to a particular access to Russian officials ... Steele explained that former senior Russian government official and that they

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40		38	
state sometimes as a fact, it is correct	0	A. Excuse me, not the Attorney General. Incluspector	0
investigations and so on, do you check that, before you	A C	Attorney General and said that you	4 6
Q. Well, in witness statements and statements to		Q. I mean, you put out a press release criticising the) L
		sources in different ways.	22
		A. I don't think I got it wrong. I think we described the	21
business in a formal setting, do you always check that	20	this one; is that your evidence?	20
MR TOMLINSON: When you make statements of fact about Orbis'		Q. So you got it wrong in the other memoranda but not in	
A. Yes.		memorandum, they did.	18
MR JUSTICE WARBY: Oh, I see.		relies on specifics. In the case of this particular	17
point 1. [D/133/1-2]	16	A. I think it depends which ones we're talking about. It	
release and over the page; the last two sentences of	15	they were reporting on."	15
MR TOMLINSON: It's the bottom of point 1 in this press	14	sub-source] did not have direct access to the persons	14
Mr Tomlinson, where was that from?	13	primary sub-sources, what we're calling here the	13
MR JUSTICE WARBY: Sorry, the bit that you were quoting		from the election reports, his/her sub-sources [that's	12
A. No, they don't. I don't think that's true.	11	WFO Agent 1 that, in contrast to the impression left	11
effectively says you got it all wrong	10		10
sure that's right. But the person you were talking to	9	. That's the second paragraph:	o
Q. Well, you believe them to be meticulous, Mr Steele.	ω	have, or the sub-source?	
my assertion under oath.	7	A. Sorry, the sub-source the source? The source didn't	
 They no longer exist, but that is my assertion, indeed, 		That's the second paragraph.	
exist.	ហ	the persons they were reporting on."	
a position to check that because the records don't	4	reports, [the] sub-sources did not have direct access to	
Q. But you say it was meticulous, but nobody is in		. " in contrast to the impression left from [your]	o
A. At the time, Mr Tomlinson, when we wrote the report.	N		A
destroyed.	Н	. Look at page 226, again, please (D/131/226).	o
39		37	
Q. But none of these documents exist, so they have all been	25	that they got some of it wrong.	
A. At the time.	24	I don't know what else they got wrong. All I know is	A
meticulously documented and recorded."	23	you disagree with they got wrong; is that your evidence?	
Q. "The 'Primary Sub-Source's' debriefings by Orbis were		So the bits you agree with they got right, and the bits	O
A. Yes.		in this report, I would argue.	
Sub-Source' would be put in a very different light ."	20	a professional; but they clearly got quite a lot wrong	
a private session, the statements by the 'Primary	19	able to draw their own conclusions about me as	
"Had Orbis been given the opportunity to respond in	18	voluntary interviews in London, from which they were	
to page 1 to get the complete sentence [D/133/1]:	17	over a period of six months, including two days of	
[D/133/2]. Yes, sorry, forgive me, we need to go back	16		A
Q. If we I think we need to go over the page to page 2	15	you were, didn't you?	
thereafter.	14	you in this report to indicate what a truthful person	
did significant work with them back in Washington	13	statement you relied on the nice things they said about	
interviews we had with the Inspector General's team and	12	I mean, in the original version of your witness	0
London. He flew over. So he was present throughout the	11	I don't accept that.	A
that firm had been involved in the interviews we had in	10	[D/131/226]	
A. Yes. Just to say, your Lordship, that Bob Weinberg from	9	have been multiple layers of hearsay upon hearsay."	
out on your behalf by a firm of lawyers in Washington.	α	the persons quoted in the reporting, and that it could	
Q. Let's look at that. That's at [D/133/1]. This was put	7	existed between the Primary Sub-source's sub-sources and	
A. Correct.	0	have good insight into how many degrees of separation	
respond.	UI	" the Primary Sub-source revealed that [you] did not	0
Q. And saying that you didn't have the opportunity to		Yes.	A
A. Yes, sorry.	w	Do you see that?	
Q. Inspector General.		spoken with the official ."	

Δ	0	And saving that you didn't have the opportunity to
UT I	1	respond
n		Course
c	P	COTTECT
7	o	Let's look at that. That's at (D/133/1). This was put
ω		out on your behalf by a firm of lawyers in Washington.
9	A	Yes. Just to say, your Lordship, that Bob Weinberg from
10		that firm had been involved in the interviews we had in
11		London. He flew over. So he was present throughout the
12		interviews we had with the Inspector General's team and
13		did significant work with them back in Washington
14		thereafter.
15	Ö	If we I think we need to go over the page to page 2
16		[D/133/2]. Yes, sorry, forgive me, we need to go back
17		to page 1 to get the complete sentence [D/133/1]:
18		"Had Orbis been given the opportunity to respond in
19		a private session, the statements by the 'Primary
20		Sub-Source' would be put in a very different light."
21	?	Yes.
22	Ō	"The 'Primary Sub-Source's' debriefings by Orbis were
23		meticulously documented and recorded."
24	A.	At the time.
ח)	The same of the sa

is not owned by Alfa Group at all.

A. But the point that was told me by the official was that

Q. No, but the point I'm making to you is you state as it was Alfa Group that were lobbying for this takeover.

Alfa Group ..." Which is wrong. It isn't a fact. It is false. "... Pamplona Capital Management, which was owned by

a fact:

11 12 13 13 14 14 15 16 16 17 17 18 19 20 20 21 Q. Let's take another example. Look at paragraph 111 of A. It is in that instance. struck out as irrelevant, legally irrelevant, but I want this statement (C/4/26). This is a paragraph which was

outside of these proceedings that they had no "While I am aware that the Claimants have complained

campaign and responsible for harvesting the personal which was engaged on behalf of President Trump's SCL Group, a subsidiary of which is Cambridge Analytica

the Information Commissioner's office notice finding Etc. etc. You then go to the trouble of exhibiting

To the best of our knowledge.

Q. I just want to look at some examples, please. Look at a point that was put in cross-examination by Mr Millar, paragraph 36 of your witness statement (C/4/8). This is

I think, yesterday, concerning a company called Pamplona Capital Management and its permission to take a stake in

the insurer Chaucer.

Q. Here, in paragraph 36, you say, stating apparently as a fact, that:

12 14 of the FSA in order to attempt to incite the FSA to Capital Management, which was owned by Alfa Group..." reverse their decision to refuse to grant Pamplona "... the Russian ambassador ... attended the offices

16 A. That's what I was told by the FSA official.
17 Q. Well, you state it as a fact, Mr-- you sta
18 Pamplona investment Capital Management w Q. Well, you state it as a fact, Mr -- you state as a fact Do you see that?

Pamplona Investment Capital Management was owned by Alfa Group, don't you?

20 A. Yes.

21 Q. A two-minute search on the Companies House website would reveal to you that Pamplona Capital Management is in fact owned by an individual called Alexander Knaster and

A. Yes.

8 Q. It's careless at the very least, Mr Steele, isn't it? A. Okay.

to ask you some questions about it because this is

statement, signed by a statement of truth: something you were prepared to put in a witness

US Presidential election, Alfa Group in fact owns involvement in efforts to influence the 2016

data of Facebook users ..."

42

Alfa Group -- finding a breach:

of President Trump, that taint seems to me to arise between their businesses and influence on the election "If the Claimants suffer from a taint of association

Do you see that?

regardless of CR112."

Yes.

10 A. No, it links them to -- what was it -- SL -- SL Group, Q. This is an attempt to smear the claimants, by linking them to Cambridge Analytica, isn't it, Mr Steele?

whatever.

11 12 Q. 13 You see, Alfa Group has nothing whatever to do with SCL Mr Steele. no -- there's absolutely no truth in that whatever, That is simply an internet conspiracy theory that's been put about by wild disinformation individuals. There's

18 Q. None at all? 16 17 A. That there's no link between Alfa and SCI?

A. If you say so.

19 20 21 22 Q. Well -- but you were prepared to go into a witness the -- basically on the basis of a piece of false online statement, attacking the claimants on that basis, on disinformation. That's not responsible conduct, is it,

24 Mr Steele? 25 A. If it's wrong, I would apologise for it.

Q. Why did you put it in your witness statement at all?

Because I understood it to be true.

Q. But you didn't say, "I understand this to be true"; you state it as a fact, don't you?

MR JUSTICE WARBY: I'm not sure how I'm supposed to

of all this. determine, on the basis of those questions, what to make

MR TOMLINSON: Well, Mr Steele has --

MR JUSTICE WARBY: You have put it to him. There's no evidence before me yet -- or I haven't been shown it --

that what's stated here is derived from a bit of

MR TOMLINSON: My Lord, there isn't, but Mr Steele has internet conspiracy theory.

16 accuracy. this is -- this is -- he has no knowledge of its accepting on the basis of the question I put to him that

accepted he has no personal knowledge of this and he's

But, Mr Tomlinson, I haven't seen any evidence, as you

Q. Well, have you seen any evidence that --

say, of that. That's your contention.

A. That's your contention.

Q. -- to support -- you're the one who makes the statement in a witness statement with a statement of truth. Have

you seen any evidence to support this allegation?

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10 11 12 13 14 15 16 23 20 21 22 18 19 20 21 22 23 23 25 110 112 113 114 115 116 Ó A. I don't -- no, I don't accept there's no truth in it. Q. You accept that there's absolutely no truth in that Q. So when they record it as a statement of fact, they have A. I told them that it was the reporting that we had from Let me take another example. Do you remember you met Q. I see. A. -- contains some fairly odd things, like, for example Look at [D/71/1], please. This is the Where? I have read about it This -- again, this note by, I think, Kathleen Kavalec I believe, Mr Simpson at the time. if I'm not mistaken -a hidden server managed by Alfa Bank (see separate paper Footnote 259: I've worked with him for many years. How do you know it was in good faith? I accept it's what was reported to me in good faith by got it wrong as well, have they? was the position; correct? on this channel)." messages are encrypted via Tor software and run between secret communications between the Kremlin and Manafort reported as telling them: State Department officials on 11 October 2016? had told Ohr that the Alfa Bank server was a link to the of their, as it were, internal memorandal, that Steele Still does, and features heavily in this report. worked for the Department of Justice? with a meeting that you had with Bruce Ohr, who I think Inspector General's report at (D/131/155). This deals statement at all? that, but, again, there are problems with this write-up I didn't say that. I remember that Mr Simpson told me which seems bizarre in the extreme. So I'm not saying implying that Vladislav Surkov is one of my sources, your investigations. At the bottom of the page, you're about the things that were going on, you told them about State Department's note. This is what you told them Let's look at another example, the You told the State Department as a fact that that "Peter Aven of Alfa Bank has been the conduit for "... according to an FBI FD-302 [I think that's one 45 12 13 15 16 17 18 19 20 21 22 23 10 11 12 13 13 14 15 15 17 10 9 00 ωхр 9 00 4 N 0 A A. I think Bruce Ohr has misreported it, which is not the Q. Yes. Bruce -- counsel at the Department of Justice has Q. I see. So you think that the FBI have misrecorded that; A. I remember the two breakfast meetings quite distinctly A Q. You know nothing about this allegation, is that the --Q. I mean, it is an extraordinary allegation, whoever has A. In fact, I'm pretty sure I didn't, because I was careful Q. Very well. I think so. That's my understanding of this Well, I don't recall -- I'm under oath here -- that I don't think I did. I mean, I had two breakfast is that the position? No, I don't think that's true. I think Person 1 is Well --Fi go Very well. One of Mr Simpson's sources? No, not one of my sources, Mr Tomlinson. I think one of No, I believe it is Mr Simpson. Mr Simpson had not to discuss the details of memoranda with him. But, you see, Person 1 is your source It's not a slapdash document; it's a fair reflection of Mr Simpson's. server? someone that their organisation has used the Alfa Bank Well, it appears that one of your sources has told As I have said, it's not my information. that issue with Bruce Ohr. given inaccurate information to the FBI? same thing. Or misremembered it. believe it's my information. possibly Paul Manafort, but I'm not sure because I don't all. and they did not get into the details of the project at Glenn Simpson that told him that, not me. meetings with Bruce Ohr. I suspect that it was slapdash document; that's right, isn't it? I suggest to you, Mr Steele, this is a hastily prepared like, the technical aspects of this issue. never produced any intelligence on the actual -- if you or November 2016. This is not emanated from us. We a meeting with Bruce Ohr, I believe in December source's Russian-American organisation has used the made it, whether it is you or Mr Simpson, that the either that was my information or that I ever discussed Let's now look at Memorandum 112, please (A/1/1).

ump campaign and that Person 1's Russia/American	
ganisation in the US had used the Alfa Bank server two	
eeks prior."	
Did you tell him that?	

unless you disagree -- you say that in relation to the "I have seen nothing to suggest it was factually A. I don't think it shows large parts are incorrect; I think it shows there is a problem of chronology in

16 17 18

Ó

transcribed as PH.

Mr Govorun is mentioned on two occasions. He features

translated as PH. The letter F in Russian is usually English, your Lordship, many times you will find it is translation of the word "Alfa" from Russian into

quite heavily in this memorandum, doesn't he?

18 17

case

MR TOMLINSON: Yes.

in the memoranda

Ö

He certainly features.

Firstly, in the second bullet point of the summary.

Yes.

25 4

A. Yes, yes.

paragraph 2; yes?

Q. Then in paragraph -- effectively the whole of

Q. In your witness statement -- I don't want to turn it up.

24 25 23 20 21 22

incorrect

A. Mm hmm.

Q. Which showed that large parts of this are obviously Q. You see, Mr Govorun's employment record was disclosed. I'm not sure I had read everything.

MR TOMLINSON: Had you not read the disclosure in the case? A. I had seen an assertion by your side that that was the

49

14 10 11 12 13

A. It's regrettable, but, as I say, if you look at the

writing about correctly?

o

It's not a good start on it being a careful document, is

I, that you can't spell the name of the company you are

10

 I had read my own memorandum. I think there are Q. You hadn't read your own memorandum?

documents in the bundle that relate to Mr Govorun's

A. No, I had read the witness statement. Q. You hadn't read what, the witness statement? A. I hadn't read it. Q. That's not true, is it?

13

MR JUSTICE WARBY: I think what counsel is putting to you is

employment with Alfa.

that when you signed that statement in your witness

statement you had seen things that contradicted what was

A. That's a Russianist issue, where the letter, circle with

of. You misspell it throughout.

a line through it, is usually -- can be transcribed as

PH or as F, your Lordship, and has been, I think, in

Q. Because you can't even spell the name correctly of an

what my experienced source reported to me

Q. When you signed the witness statement --

Q. -- that's what you said?

organisation that you claim to have extensive knowledge

of St Petersburg. terms of Mr Govorun's employment with Alfa in the 1990s and the time when President Putin was the Deputy Mayor

A Ö Mm. Well, I'll go through it, Mr Steele, and give you the opportunity.

At that time, yes.

Is that still your evidence?

incorrect."

statements about Mr Govorun:

The time that you produced your witness statements, in

Q. The first -- second bullet point: a Presidential Administration department ..." identified as Oleg Govorun, currently Head of "Key intermediary in Putin-Alpha relationship

Ö That statement is incorrect. He's not head of --

17 15 He was responsible for relations with CIS countries. in 2016 he was not the head of a presidential head of a presidential administration department. administration department, indeed he has never been the

16 17

statement you say:

factually incorrect."

"I have seen nothing to suggest that this

o

No, no, I'm not asking you that. In your own witness

but I was certainly not aware of it at the time. in the bundle about this, so that's probably relevant, documentation, there is -- I think there's documentation opportunity for you now to correct your mistakes.

13 12

A

No, I am saying what my position is, that the

Q. Are you sure about that, Mr Steele? I'm giving you the

A. Yeah, I think that's right, yes.

other words, two weeks ago?

19 about here? depends how you -- which word in Russian are we talking which I think was a department. I mean, again, it

23 22 Ö delivered illicit cash directly to Putin." "... throughout the 1990s, the Alpha executive who

Q. No, no, no. This is your witness statement --

That's not true, is it, Mr Steele?

No, I hadn't seen, at that time.

Are we talking about now or when I signed the witness

statement or what?

50

isn't it? So that means from 1991 to 1999. That's untrue.

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Opus 2 International Official Court Reporters 12 13 14 15 15 17 16 17 18 19 20 21 19 20 21 22 11 15 14 13 10 10 0 o o Q. Look at (D/148/1), please. This Mr Govorun's biography Q. You accept that Mr Govorun was first employed by A. I do, yes. Q. You accept that Mr Putin stopped being Deputy Mayor of You told his Lordship earlier that you had done some I don't think that follows, but it may be an inference. So it follows that he can't have been delivering illicit It -- he wasn't working as deputy head of Alfa's I say that he was deputy head, rather than head. So you say that that's accurate, do you, Mr Steele? He was deputy head in the 1990s though. He wasn't head of government -- he was never head of I think he was deputy head. So, yes, he wasn't head. Mm hmm. Right. Let's go down to paragraph 2. The last two I've not seen anything to suggest that's untrue. The statement that he was delivering illicit cash on I have -- which statements, sorry, to be precise? This -- the statement about Mr Govorun. Which was factually incorrect? Mr Steele, I am not asking you about what the source I'm reporting what the source said to us. St Petersburg in June 1996? of St Petersburg, doesn't it? government relations department at the same time, it searches on the internet about Mr Govorun. cash on behalf of Alfa when Putin was the Deputy Mayor of St Petersburg." He subsequently became the deputy head. Government Relations at Alpha Group ..." behalf of Mr Aven and Mr Fridman. communications on 3 March 1997? seems, that Putin was Mayor of St Petersburg. cash to the Russian president, at that time deputy Mayor he was a manager in the government relations department government relations at Alfa Group and during the 1990s lines of paragraph 2: said to you. I'm asking you about your assertion, in page, produced from the Kremlin --Alfa Bank as a manager in the department of Fridman and Aven to deliver large amounts of illicit "I have seen nothing to suggest it was factually That's untrue, isn't it? in reality, the 'driver' and 'bag carrier' used by ... during the 1990s Govorun had been Head of 14 15 16 17 18 19 20 21 22 23 23 18 19 20 21 17 10 11 12 13 14 15 10 11 12 13 23 чичи чи 9 8 o o 0 Ö A. Not just when he was Deputy Mayor of St Petersburg. A. I was looking at his current job, his current role Q. You see, going back to (A/1/1) --No, I --Yes. Yes? Yes. We see from 1993 to 1995 he worked in various companies -- on the Kremlin website, which responds to a search on Mm hmm he was Deputy Mayor of St Petersburg --I think it's during the 1990s. And the source has said, "Christopher, I have wouldn't you? GR department, vice-president of Alfa Bank manager, then specialist in Rosprom. 1997 to 2000, in Moscow. 1995, he was a manager's assistant, project source has told, you have you? St Petersburg". has told you -checking our open source. deputy head -- manager, deputy head of the Vladimir Putin when he was Deputy Mayor of transcripts@opus2.com +44 (0)20 3008 5900

A. Well, we did do an internet search. We were looking at, Q. If you had done an internet search, you would have So you checked that he had gone to Karimov's funeral, I remember -- I do remember specifically that he had immediately realised that your statement was wrong, time that he was supposed to be handing over illicit but you didn't check that he was in St Petersburg at the Uzbekistan in his government capacity at that time. That was the one thing that I remember checking and accompanied Putin to the funeral of Karimov of

A. All I remember is what came up in the open source check

The state -- if -- assuming in your favour, Mr Steele

that you have faithfully transcribed what your source

over illicit cash on behalf of Aven and Fridman to you, "I have discovered that in the -- my sub-source discovered -- " or Mr Steele, Sir, however he addresses tells me that in the 1990s Oleg Govorun used to hand Is that -- he said to you something like that?

Q. Oh, I see. So go to the second page of this memorandum (A/1/2). So you have inaccurately recorded what your

Q. You're now saying it was during the 1990s, not just when

March 18, 2020 Petr Aven, Mikhail Fridman and [...] Business Intelligence Limited

Day 3

2 A. I think it says, if you go back to the summary [A/1/1],

4 Q. I think, Mr Steele, the summary is supposed to be

summarising what it says in the memorandum, not

A. It is what I was told by the source.

10 11 12 13 14 15 this?", and he says, "Trust me, he is a high-ranking

get things wrong.

my source has got it wrong"?

20 22 22 23 23 24 25

directs, a witness statement is available for inspection

The rule is that, unless the court otherwise

court otherwise directs. So unless anyone asks for

inspection during the course of the trial, unless the during the course of the trial, unless -- is open to

57

Because you didn't do the searches you claim to have

 A. No, I did certain searches and I said what we had the fact that he had gone with Putin to Karimov's searched on. We had searched on his current role and

Q. Isn't it an absolutely elementary thing to do, Mr Steele: someone tells you something which includes funeral in Uzbekistan.

are telling you might be true or not? checkable historical facts. You can check those historical facts to see whether the other things they

Q. And you didn't do it? A. It's a reasonable assertion, yes.

A. No, we did an open source search. We just didn't come across the document that you referred --

16 17 Q. What I don't understand, Mr Steele, is how in this court you can assert, "I have seen nothing to suggest that

that are given to you by your source are obviously this was factually inaccurate", when the actual facts

A. I don't agree that the facts given to me by the source are false. I agree that one of the points made is

Q. No, the point you have recorded, assuming you were

accurately recording it, is that your source told you

58

I think it refers to the 1990s, doesn't it?

Mell, it says throughout the 1990s so it would include

the time when he was Deputy Mayor of St Petersburg.

St Petersburg; correct?

this happened when Putin was Deputy Mayor of

MR JUSTICE WARBY: Good. Right. We'll take a ten-minute MR TOMLINSON: I was - my Lord, I had my eye on the time MR JUSTICE WARBY: Is that a convenient moment?

and I'll stop.

break.

Q. So your source says this to you, "Mr Steele, Mr Putin about -- what does your own sub-source know about you say to him, "Well, what does your source know 1990s when he was Deputy Mayor of St Petersburg"; and was getting illicit cash from Aven and Fridman in the

A. Sure, but that doesn't rule out that people occasionally official, he knows all these things ". A conversation something like that took place?

> 13 12

> > case, even if you were tempted.

As I said before, don't talk to anyone about the

MR JUSTICE WARBY: Before you continue, Mr Tomlinson, can

(Short Break)

I just mention something which I think you're both aware

of, that there's been a request by a journalist for

a convenient moment just to deal with that. access to Mr Steele's witness statement. It may be (11.57 am) (11.46 am) A. Yes.

A. Sources get things wrong.

Q. Yes, indeed. Then you do a check and you discover that So a rational person, Mr Steele, then thinks, "Perhaps Mr Govorun, actually, there is no cross-over in time.

I never saw the cross-over problem at the time.

to inspection, then it is. The mechanism for that is a direction that the witness statement is not to be open another matter. I think this case is on the CE-File

system, is it not? It would be before all cases automatically went on, but I think they have all been

Perhaps I can just say that my understanding is that

in the usual way to obtain a copy. should apply to Queen's Bench listing or go on CE-File a right of inspection of that witness statement and under the Civil Procedure Rules, anyone who wishes has

12 MR TOMLINSON: My Lord, I am sure that that's entirely right. I have to say that I have always taken the

18 in the old days you would hear -- someone in court would a short way of dealing with it. hear it all, and so having a witness statement is just stands as the witness's evidence in-chief, so it is -view -- two things: first of all, a witness statement

more convenient for a journalist just to be given Court Service of a small fee, in general it is probably Secondly, although perhaps it deprives Her Majesty's

a paper copy in court if one is available.

MR JUSTICE WARBY: Yes. I am not concerned with being the disclose it, but I don't think the rule requires a party overseer of collection of fees if a party is willing to

to oponious a copy it intry don't want to. Latergin: is 2 to obtain impectation think from the court resords, to 3 that's the point that I was seeding to make. Sometimes 4 parties prefer not to vedimes documents or will the 5 are semilable for inspection, but that's a matter for 6 Mc Steels and Orbits. Mc Statistical Mc Steels and Orbits. Mc Note of Statistical Mc Mc Steels and Orbits. Mc Note of Statistical Mc Mc Steels and Orbits. Mc Note of Statistical Mc Mc Steels and Orbits. Mc Note of Statistical Mc Mc Steels and Orbits. Mc Note of Statistical Mc Mc Steels and Orbits. Mc Note of Statistical Mc Mc Steels and Orbits. Mc Note of Statistical Mc Mc Steels and Orbits. Mc Note of Statistical Mc Mc Steels and Orbits. Mc Note of Statistical Mc And Mc Steels and Orbits. Mc Note of Statistical Mc And Mc Steels. Mc Note of Statistical Mc And Mc And Mc Steels. Mc Note of Statistical Mc And Mc Steels. Mc	64		3	
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to provide a copy if they don't want to. Intergal: that's the point that I was seeking to make. Sometimes parties prefer not to voluntered documents, even if they are available for inspection, but that's a matter for MR TOMINSON: You see, Mr Stee parties prefer not to voluntered documents, even if they are available for inspection, but that's a matter for MR TOMINSON: As Steele, I now want to ask you just very briefly about the use of the word' illicit.' in paragraph 2 of the memorandum. [A/1/1] is that a word that was used is that your word or is that the word that was used is that your word or is that the word that was used is that your word or is that the word that was used- is that your eddence that, really, by "illicit." in paragraph 2 of the memorandum. [A/1/1] is that a word that context, you simply men patronage payments of an informal nature as opposed to mything illigal? A Yes well, it's not clear. It's the word illicit. It assess through formal accounting procedure. Q. I think it is suggested on behalf it has been suggested on behalf of Orbis that really I put it in summary, but its is representing in the 1990-strings were Q. I was the wast didn't constitute any kind of illegal and went on wow was working were Q. I think it is a suggested on behalf of Orbis that really I put it in summary, but in this is legally relevant is a matter for that wast didn't constitute any kind of illegal A. The conversation is legally relevant is a matter for bit Lordship in due course, but that you're suggesting to you is the pool A. I may glow yes. A. I was quoting what directly what the source. Q. Well, a moment ago you were imagining that that was the position. Are you now styring that that was the position. Are you now styring that that was the position. Are you now styring that that was the position. Are you now styring that that was the position. Are you now styring that that was the position and that he imaginal that that was the position. A woun mant	Is that still your evidence, Mr Steele? I'll give	24	MR JUSTICE WARBY: With your source?	24
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to provide a copy it they don't wind to. Incregit is to obtain inspection I think from the court records, so that's the point that I was seeking to make. Sometimes parties prefer not to volunteer documents, even if they are available for inspection, but that's a matter for MR TOMLINSON: You see, Mr Stee parties prefer not to volunteer documents, even if they are available for inspection, but that's a matter for MR TOMLINSON: Well for the above I think is correct. MR MILLAR: All of the above I think is correct. MR TOMLINSON: Well for the seem of the word' illicit in MR MILLAR: All of the above I think is correct. MR TOMLINSON: Well for the seem of the word illicit in paragraph 2 of the memorandum. [A/1/1] is that a word that was used—is that your word or is that the word of your source? A limagine it's the word of the source, to the best of my I don't know that. A limagine it's not convex; to the, you simply mean patronage payments of an informal nature as opposed to anything illegal? A lies—well, it's not clear. It's the word illicit. It means it's not money, think, your Lordship, which has passed through formal accounting procedure. O lithink it is suggested on behalf—it has been suggested on behalf of correct are year. A lies and went on to work you repole. Suggested on behalf or constitute any kind of illegal O lithink it is suggested on behalf—it has been suggested on behalf or constitute any kind of illegal O lithink it is providing background to conduct. Is that your—is it your evidence in this court that that's what was meant by the use—what you whether this is legally relevant is a matter for that that's what you meant by the use—what you was working the word "Illicit" A lit's providing background to have a don't was a meant by the use—what you was worked as a matter for the that's what you meant by the use—what you was worked background to have the plaintiffs. O well, the only evidence you lite to you see the point I'm a was that that's what you meant by the use—what you was worked bac	"driver" and "bag carrier"	19	Sorry.	19
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	assessment"	23
to be a fair, accurate and well-founded	to be a fair, accur	22
	of St Petersburg:	21
cash to President Putin when he was Deputy Mayor	illicit cash to President Pu	20
a "driver" and "bag carrier" to deliver large amounts of	a "driver" and "bag carrier"	19
ence to do with using Mr Govorun as	Which is the sentence to	18
1,	sentence 4"	17
	signed:	16
So that's the present tense when the statement was	So that's the present ter	15
idered (and consider)"	"I therefore considered (and consider)	14
paragraph 96, I think it is, of your statement (C/4/24):	paragraph 96, I think it is,	13
So do you still abide by your evidence this is at	Q. So do you still abide by you	12
	Mr Putin.	11
was: what links were there between the Alfa Group and	was: what links were there b	10
The question we were asked by Mr Simpson and his client	 A. The question we were asked b 	9
hip?	evidence to his Lordship?	ω
he relationship? Is that your	background showing the relationship?	7
, it is simply a matter of	Q. Is that your evidence, it is simply a matter of	0
ntiffs .	Mr Putin and the plaintiffs .	σı
providing background to a relationship between	A. It's providing background to	4
regard it as a serious one?	allegation shows you regard it as a serious one?	ω
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Probably along with many tens or hundreds of	O. Correct. Probably along with	21
or Mr Putin.		20
orking for Alfa in the late 1990s	A. No, Mr Govorun was working for Alfa in the late	19
	SOUTCE.	1 1
the is the incorrect statements made to you by your		17
Well, the only evidence you have to the contrary is what		16
	A No I don't know that	л I
That's nirely made in Mr Steele as you know.	That's mirely made in Mr Stoole as you know	14
invaluitat him.		1 L
But not involving Mr Governn I think.		12 1
more internet searches, you would have found that out.	more internet searches. Voll V	1 C
everyouty knew that there was a link	C. But mere was everybody k	2 4
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your memorandum? Why is it of any significance at all?		1 σ
hy does it feature so heavily in	for Russia in 1990, why does it feature so heavily	, 0
is really rainy run-of-the-mil and standard ochaviour	is really rainy run-or-me-i	1 4
Mr Steele, the position is, if this	MR TOMLINSON: You see, Mr Steele, the position is,	ا د
	AP TOM INSON: Von see Mr Stee	ه د
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me rat; you wrote it for your chem.	the FRI: von wrote it for vonr client	So the intended audience was you didn't write it for	No, to the FBI and to the client of Fusion.	all those other people later on?	didn't intend to disclose it to Mr Strobe Taibott and	No, no. You didn't Intend when you produced it, you	The people I disclosed it to.	Who do you mean by the intended audience?	Yes.	allegation of criminality?	intended audience would interpret the sentence as an	CR112 would interpret the you don't believe the	the previous page $[C/4/23]$. The intended audience for	You say that the intended audience paragraph 89, so	Yes.	of in withdrawing this allegation, is it, Mr Steele?	And that's as far as you're prepared to go in support	Alfa.	did not overlap with Mr Govorun's formal tenure within	wrong, which is that Mr Putin's tenure in St Petersburg	reflected, but I concede that one aspect of this is	reporting this to me, and obviously how it was	wrong. It is the source and the sub-source who were	I got one aspect of it we got well, not I got it	wrong.
6	2	24	23	22	21	20	19	18	17	16	15	14	13	12	11	10	9	ω	7	თ	υı	4	ω	Ν	ь
			Ó		>			Ö	A			o	A	Ö			P				Ó	A			o
mat me position:	that the position?	paying your bills, is not your intended audience; is	So when you produced the memoranda, your client, who is	Perkins Coie client and the FBI.	I disagree with that. The intended audience was the	client?	person who was paying your bills, namely the ultimate	And I'm saying to you that the intended audience was the	Yes.	audience would interpret this memorandum.	would not you're talking about how the intended	You say that the intended audience would interpret	What was your question?	That wasn't my question, Mr Steele.	evidence that they passed this on to anyone beyond that	that, the clients would have known that. I have no	I believe that the Perkins Coie lawyers would have known	St Petersburg in the 1990s? Is that your evidence?	understand the nuances of patronage payments in	a Democratic Party institution, whoever it was, would	So are you saying is it your evidence that	I knew yes.	Party institution; correct?	institution it was. You knew it was some Democratic	Let's not argue about which particular Democratic Party

13 14

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Q. Well, it wasn't coming out of Perkins Coie's own pocket, Q. But the intended -- you were being paid to produce this Q. Well, I'll come on to that, but the intended audience America campaign, as you knew. The money was coming 20 13 Q. We'll come back to that. 10 Q. But they could and indeed did hand this out to all kinds Q. Is your evidence -- and you said -- I think you said A. Not -- not to my understanding at the time, no. A. Sorry, just to put on that point, if I may, Mm hmm. Can we go back to the memorandum at [A/1/1] -of people, as we know? Union of Industrialists and Entrepreneurs? the 1990s. So they're one of the filters that this to a meeting of the Congress of Russian -- the Russian directly in Russia that six months earlier he had been that you meant by saying he had recently met Putin of Russian Union Industrialists . Is it your evidence discovered that he had been at a meeting of the Congress earlier to his Lordship that you did a Google search and directly with Putin in Russia. stuff went back to the Perkins Coie ultimate client sophisticated understanding of this issue in Russia in your Lordship, Fusion would have had very much the their client was Perkins Coie, not the DNC or Hillary You also say that Mr Fridman had recently met

17

A. Perkins Coie.

document by the ultimate client of --

A. Okay.

Q. No. No, no. You were being paid by the Hillary for

A. I believe we now know that in fact the DNC was the

ultimate client for this, not Hillary Clinton. I think

there's a difference, I think.

A. No, that's not my evidence. My evidence is that what

A. I -- I'm not sure that that's true.

from them; they were the ultimate client.

10

A. No, and the FBI.

was Fusion and Fusion's ultimate client, wasn't it?

A. Yes, sure. But that was the instruction. Q. You know what I'll say about that in due course. Q. Well, I'll come on to that, Mr Steele.

reporting to the FBI.

A. Yeah.

A. No, but we had had an instruction in August,

A. No, the client is -- the client actually was Fusion but

late August 2016, your Lordship, to provide all our

Q. Well, put the FBI to one side. Let's agree to differ

about the FBI for the moment.

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72			70		
It was just pointing out that Mr Benczkowski had	A	25	Turn over the page. And so on.		25
move on.		24	national security"		24
whatever to do with the case? If you do, then we can		23	are] required for the purposes of safeguarding the		23
E		22	which it is alleged that the [memorandum disclosures		22
And if we go over the page (A/12/5). Do you accept		21	nature of the Defendant's case, the factual basis on		21
Mr Brian Benczkowski, to investigate the allegations"		20	"State, so that the Claimants may understand the		20
"Alfa Bank instructed an individual,		19). And the request is, at 8:	0	19
The next ones:	O	18	L. Yes.	A	18
Which ones, sir?	A	17	That's the statement that Orbis makes.		17
I'll give you the opportunity to just read them.		16	the purpose of safeguarding the national security"		16
three four sentences have any relevance to this case?		15			15
So far, so good. Do you still maintain that the next	o	14). So if we look at the bottom, "Under paragraph 2":	0	14
Yes.	A	13		A	13
a computer server linked to the Trump Organisation."		12		0	12
interest, Alfa Bank, had been communicating with		11	. I have, yes.	A	11
server of an entity in which the Claimants have an		10). You have seen this document before?	0	10
"Internet traffic data suggested that a computer		9	. Right.	A	9
And then it suggests it says that:	Ö	œ	behalf on behalf of Orbis by your solicitor .		œ
Yes.	P	7	it begins at [A/12/1]. That's signed as true on your		7
outlined above; yes?		o	(A/12/3). Sorry, that's the bit I want to look at, but		O
Russian President were material to the allegations		vı	legal further information of 1 August 2018. That's		vi
to explain why links between the claimants and the		4	 I have already referred you to your company's formal 	0	4
subparagraphs aren't numbered, but the next answer seeks		w	. Mm hmm.	A	W
Then you the next answer unfortunately the	ó	2	national security purposes.		N
to me, that is "link".		ч	that the disclosure of this memorandum was required for		\vdash
71			69		
how you would describe "concerned", your Lordship, but		25	. I want to now ask you about some of the your claim	0	25
It was a background context to such links. I don't know	P	24	faithfully and truthfully .		24
It was not, was it?		23	to report the situation as they understood it to me,		23
"Memorandum 112 was concerned with such links."		22	I had faith, your Lordship, in my source and sub-source	A	22
is a matter of ordinary English:		21	sub-source to what they say; is that what you're saying?		21
Mr Steele, let me just ask you the question again.	o	20	you prefer the multiple hearsay evidence from your		20
from the Trump Tower-Alfa server issue.		19	. So, despite the evidence of the claimants in this court,	0	19
It is, because it arose out of the tasking that came	A	18		A	18
That's not true, is it?	Ó	17	a number of serious inaccuracies, doesn't it, Mr Steele?		17
Yes.	1	16			16
with the Trump campaign and Russian operatives?		15		0	15
That is to say links between individuals associated		14			14
"Memorandum 112 was concerned with such links."	4	13		A 4	13 1
You then say your company says:		12		0	3 1
Yes.		11		>	11
Yes?		10			10
Yes.	A	9	"Re	0	9
the US, and so on?		ω	And you used the word "recent"?		ω .
a serious threat to democracy and national security in		7			7
Any such interference would be likely to constitute	o	σ		A	0
Mm hmm.	A	UI	met Putin directly: is that what you're saying?		UI
operatives with links to the Kremlin.		4		12	4
individuals associated with the Trump campaign, Russian		ω		0	ω
Russian interference, including links between		N	credible, given that open source record.		N

Q. Can you look at [D/131/154], please. Look at the second A. No, I didn't. They sought a meeting with me. paragraph.

A. Mm hmm.

Q. "We asked Kavalec [that's the person who produced the

Nuland did not ask to meet Steele and that Nuland note] about the meeting with Steele. She stated that

requested she attend the meeting because Nuland did not

want to devote time to it. It was Kavalec's

Q. Yes, but this was six months later.

look at this. It has nothing whatever to do with your which was a firm of lawyers which had been instructed to

No, it hasn't, no.

Then it says:

Yes.

Ö A. Yes. Just tell me, who are the Individuals who requested it

A. The FBI, who requested all our memorandum -- or from you? Requested this memorandum from you?

memoranda --

A. And the senior British national security official who we You approached him? dealt with.

A. Yes, but he -- I approached him. We had a conversation and he then requested that I provided him with all our memoranda.

Q. So you tout you memoranda to one of your former from you. colleagues. That's not him requesting the memoranda

No. He specifically requested all our memoranda in hard copy.

After you had gone to him and said --

Sure.

Q. -- excuse me --

Q. -- whoever it is, Sir Humphrey: "Excuse me, A. There's an issue -- I'd like to --

Sir Humphrey, I have these memoranda which show extraordinary things about President Trump and Russia",

and he says, "Give me a copy"?

A. Yes. He says, "Can you --"

Q. So that's at your instigation, not his?

A. No, it's at his request.

23 Q. You sought a meeting with the State Department as part of a wider effort to disseminate these memoranda to

people in Washington, didn't you?

investigated this at the same time that he was involved

in the Trump transition. That's all.

Q. Mr Benczkowski was a partner in Kirkland and Ellis,

preparation of the memorandum, has it?

Q. No. Thank you.

from the Defendant by individuals with official responsibilities ..." "Memoranda including Memorandum 112 were requested

13

as part of a wider effort to disseminate his election

understanding that Steele sought the meeting with Nuland

Etc, for the safeguarding.

o Is that true, Mr Steele?

Q. Yes, well, I'll come on to the FBI.

Sure, yeah,

Q. Just put them to one side.

24 23 20 19 17 18

Q. As a result of your contact with the State Department

had heard about your memoranda and he wanted to show it then Strobe Talbott got in touch with you and said he Secretary of State Nuland.

A. No, at his request -- his suggestion. He invited us in

to meet, as I understood it, at her request, Assistant

Q. At your request?

called John Weiner.

The meeting was set up by a State Department official

the FBI he found a lack of interest ."

and explained that when he first offered information to stated that during the meeting Steele expressed report findings to persons in Washington, DC. She

frustration that the FBI had not acted on his reporting

to other people?

A. I think Strobe Talbott had got in touch with us much relevance to the US election. him, your Lordship, earlier in the summer, in which he cryptic terms, but he was aware that we had material of said that he was aware that I had -- he spoke in fairly earlier than that. I remember taking a phone call from

on that. A little bit of background if I may, your Lordship

both of them had briefed him on the work we had been Susan Rice, and Assistant Secretary of State, although he didn't state it explicitly, one or either or Russia, had been colleagues of Mr Talbott, and I had --Victoria Nuland, who were the key policymakers on Both National Security Advisor at the time,

19 A. He was a Russian expert. He was consulted, I believe. Q. He had been out of government for 15 years. Mr Talbott had been the Deputy Secretary of State in 2001.

by both National Security Advisor Rice and Assistant the Brookings Institution, your Lordship, before they entered government under President Obama. Secretary Nuland, both of whom had worked with him in

Look at paragraph 53 of your witness statement at (C/4/12), please. I mean, what you say there is:

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Voc	>	л			כ
Fusion (and its client, if appropriate)"		24	issue"; it was you saying,		24
" intended for a very limited audience, namely	4	2 1			2 1
Well, look at paragraph 57, please (C/4/13):	0	2 1	e position		22 1
I think if appropriate and if they asked us permission.	P	21	purposes of national security were, in effect.	,	21
to its client if appropriate; correct?	4	20	You see, all these all these disclosures for the	0	20
	0	19			1 9
Fusion and therefore it would apply to in this case.		18	iny years, and he was effectively		18
Mr Simpson is the majority owner and the director of	P	17	expert on Russia. He was somebody who Sir Andrew had		17
Mr Simpson. Nothing to do with Fusion.		16	He was a former Assistant Secretary of State. He was an	A	16
That was a personal agreement between Orbis and	ò	15			15
extant at still is extant.		14	Mr Kramer actually was a private citizen who worked for	0	14
with Mr Simpson that was signed in 2020 and was still		13	Senator John McCain.		13
It was a term of my our confidentiality agreement	A	12	advisor and would have been at the conference with		12
That wasn't a term of your contract with them, was it?	Ò	11	Mr Kramer about this issue, because Mr Kramer was an		11
Yes.	A	10			10
anyone else without our consent."		9	weeks later and he said that he was going to this		9
received from us, whether hard or digital copies, to		ω	is the answer. Sir Andrew came back to me about three		α
give copies of the pre-election reports that they		7	 That was sometime afterwards actually, yes. But "yes" 	A	7
"Fusion understood that they were not permitted to		O	a conference in Nova Scotia?		0
paragraph 40 at the bottom:		UI	And Andrew Wood then spoke to Mr David Kramer at	o	υı
I mean, look at [C/4/8], please. You say, in	ò	4	L Yes.	A	4
I was at one of the briefings where that happened.		W	Sir Andrew Wood; is that correct?		ω
They just briefed them on them orally. And in fact		N). And in November 2016 you discussed this with your friend	0	2
didn't actually give the memoranda to Perkins Coie.		Н	that we should stay in touch.		щ
79			77		
what I was told by Fusion, your Lordship, was that they		25	election and we had interesting information on it and		25
that's the case, not least because, in my understanding		24	e		24
privilege agreement was with Eusion, but I would doubt		2			23
I don't know what the terms of their confidentiality and	P	2 2 2			22
they wanted, couldn't they?)	What do we say here Yes. He approached me. So	>	27
ultimate client, could disclose the memoranda to whoever		, 0	paragraph, Mr Steele.		20
I mean, rusion come disclose, or rusion s cheme,	Ċ	2 6	sorry, where does it say that: sorry, show me that	Ć.) L
You like.		0 0	earner in the summer. I contacted nim. he tien)	. μ ο α
was like		0	oo, what we it saying is that he contacted in the Shaming	P	2 F
circulating at all amongst outside of government if		17	So what we're saving is that he contacted me originally	Þ .	170
My understanding was that the memoranda were not	-	16	Where does that annear in your witness statement?	0	16
circulated, did vou?		5			1 7
idea how widely these memoranda were going to be		14	Wood -		14
I mean, the position, Mr Steele, you had absolutely no	Ö	13	I think it was August and then I contacted him in		13
conference and, hopefully, Senator McCain.		12	No, he well, he no, he approached me originally in	A	12
proposal was that he would speak to Mr Kramer at the		11	approached you in November?		11
there, along with Mr Kramer, your Lordship, and his		10	So, on the face of it, it looks like you are saying he	o	10
Nova Scotia. Senator McCain he knew was going to be		9	. Yeah.	A	9
fact that he was going to this conference in		œ	Victoria Nuland"		œ
summer. But it was his proposal. He brought to me the		7	been speaking with John Kerry and		7
Well, I had confided in Sir Andrew earlier in the	A	O	. "Mr Talbott approached me and I understood that he had	O	σı
You having approached Sir Andrew?	Ö	UI		A	UΊ
idea to approach Mr Kramer.		4	. You then talk about his history and so on.	ō.	4
requested by these people. In fact, it was Sir Andrew's		W	. Yes.	A	ω
No, I disagree with that. I think they were all	A	2	early November 2016."		2
"Well, okay, give me a copy"?		Н	"I provided a copy to Strobe Talbott in		Ь

on U	P 0	You having approached Sir Andrew? Well. I had confided in Sir Andrew earlier in the
7		summer. But it was his proposal. He brought to me the
ω		fact that he was going to this conference in
9		Nova Scotia. Senator McCain he knew was going to be
10		there, along with Mr Kramer, your Lordship, and his
11		proposal was that he would speak to Mr Kramer at the
12		conference and, hopefully, Senator McCain.
13	O	I mean, the position, Mr Steele, you had absolutely no
14		idea how widely these memoranda were going to be
15		circulated, did you?
16	A	My understanding was that the memoranda were not
17		circulating at all amongst outside of government, if
18		you like.
19	Ö	I mean, Fusion could disclose, or Fusion's client,
20		ultimate client, could disclose the memoranda to whoever
21		they wanted, couldn't they?
22	A	I don't know what the terms of their confidentiality and
23		privilege agreement was with Fusion, but I would doubt
24		that's the case, not least because, in my understanding,
25		what I was told by Fusion, your Lordship, was that they
		79
Н		didn't actually give the memoranda to Perkins Coie.
2		They just briefed them on them orally. And in fact
ω		I was at one of the briefings where that happened.
4	ò	I mean, look at [C/4/8], please. You say, in
UI		paragraph 40 at the bottom:
0		110
· ~1		give copies of the pre-election reports that they
00		received from us, whether hard or digital copies, to
9		anyone else without our consent."
10) P	Yes.
) F	÷	Inat wash t a term of your contract with mem, was it:
12	A	It was a term of my our confidentiality agreement
14		with Mr Simpson that was signed in 2020 and was still extant
15	0	
16		Mr Simpson. Nothing to do with Fusion.
17	P	Mr Simpson is the majority owner and the director of
18		Fusion and therefore it would apply to in this case.
19	o	
20		to its client if appropriate; correct?
21	P	I think if appropriate and if they asked us permission.
22	o.	Well, look at paragraph 57, please (C/4/13):
23		intended for a very limited audience, namely
A C	>	rusion (and its client, if appropriate)
N	P	Yes.

U	Ó	You having approached Sir Andrew?
O	A	A. Well, I had confided in Sir Andrew earlier in the
7		summer. But it was his proposal. He brought to me the
œ		fact that he was going to this conference in
9		Nova Scotia. Senator McCain he knew was going to be
0		there, along with Mr Kramer, your Lordship, and his
11		proposal was that he would speak to Mr Kramer at the
12		conference and, hopefully, Senator McCain.
L	Ö	I mean, the position, Mr Steele, you had absolutely no
14		idea how widely these memoranda were going to be
5		circulated, did you?
16	A	My understanding was that the memoranda were not
17		circulating at all amongst outside of government, if
18		you like.
19	Ö	I mean, Fusion could disclose, or Fusion's client,
20		ultimate client, could disclose the memoranda to whoever
21		they wanted, couldn't they?
22	A	I don't know what the terms of their confidentiality and
23		privilege agreement was with Fusion, but I would doubt
24		that's the case, not least because, in my understanding,
25		what I was told by Fusion, your Lordship, was that they
		79
\vdash		didn't actually give the memoranda to Perkins Coie.

17

A. Yeah.

Q. I think it's over the page (D/133/2). Point 2:

property, and controlled what was done with the

15 16 17 18 19 20 21 22 23 23

about Mr Manafort -- do not seem to have arrived at FBI President Putin and ex-president Yanukovych of Ukraine investigation -- it's not as if they're marginal me, because it's not just this report, but three others, memorandum was sent to our contact. It's a mystery to

headquarters.

reports: one of them concerns meeting between my Lord, all of which are important to the

"Fusion paid for the work, owned the intellectual

information in the reports."

Q. -- I say that because that's your own statement to the

14 13

> A. No, likely within a few days. We don't have, because Q. So when you say "likely ", that means you don't remember?

our records were wiped, conclusive proof that that

A. Mm hmm.

shared with Fusion ..."

public in your press release. If you look at (D/133/1).

 A. How they deployed them. Q. You see, Mr Steele -- 9 A. I'm not sure what the legal status of that is, but the

every time that they deployed these things. understanding was that they had to consult with us on Q. The fact is that Fusion controlled what was done with

confidentiality agreement we had signed with Mr Simpson

the information in these reports; isn't that right?

A. That's taken -- sorry, Mr Tomlinson. That's taken as

4 Q. And you agreed to provide:

FBI in July.

halfway down that paragraph, you say you met with the

continued to pass on these reports to the FBI through to

"... all the information gathered to that date and

October 2016. This included CR112, which was likely

disclosed to the FBI within a few days of it being

read under the terms of engagement and the

Q. I mean, the fact that --

 No, only if they consulted us beforehand. Q. So they could disclose it to their client

25 P Yes

80

25

"Look, this is very interesting", and them saying,

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> covered by the -- this confidentiality agreement that we brief from it to their client, but they were still Q. That's because he had doubts about your credibility , A. No, I don't believe that's true. I mean --Mr Steele?

Q. It's clear from the Horowitz report --

A. No --

Q. Well, let's just look at that, please. It's at

had signed with them in 2010.

A. Mm hmm.

[D/32/1].

A. They owned the intellectual property, they were able to

what was done with the information.

Q. They didn't require your consent. On your own public

statements they controlled the intellectual property and

even the report that I gave to my FBI contact in early

In fact, as background to this, your Lordship, also

investigation team until at least 19 September. July 2016 does not seem to have reached the headquarters

83

A. Mm hmm.

Q. It's a formal undertaking from Glenn Simpson personally A. That doesn't imply that he had doubts about my Q. -- that the reason he was taking, as we lawyers say, instructions to find out what to do with this material?

11 10 o Look at (D/131/139), please. So I'm sure you're had been working with him for three years. reliability. I would argue the opposite, given that we

familiar with this. Footnote 231:

13 that Steele did not furnish to the FBI ..." "The following are reports with select highlights

15

13 11

Q. And it refers to confidential reports and research taken A. And an obligation of confidence to any third party

during or after my engagement. is about disclosing trade secrets.

Business Intelligence and associated companies, and it relating to the termination of his work with Orbis

16 17 Q. Then if we go over the page to [D/131/140], in that footnote one of them is Report 112?

Q. It has no -- on the face of it, no bearing at all on

research taken by or on behalf of Perkins Coie or the

A. Mm hmm.

by or on behalf of either.

19 20 21 22 23 Q. Then if we look at 155 (D/131/155). Footnote 259 deals with Report 112, and it says:

or about November 6, 2016, from a Mother Jones journalist through then FBI General Counsel "The Crossfire Hurricane team received Report 112 on

Q. You have said repeatedly that this memorandum was

disclosed to the FBI.

Q. Oh, you're a subcontractor? A. Our client was Fusion.

Democratic National Committee.

No, our client was Fusion.

Q. Can you look at [C/4/9], please. Paragraph 43, about

James Baker." Do you see that?

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Opus 2 International Official Court Reporters 19 20 21 22 23 23 25 17 12 14 15 16 10 20 21 22 23 19 15 14 10 o 0 Q. You read to them from your reports? Q. You spoke to Mother Jones? A. According to this, yes, but not us, and I had no Q. Someone must have done, mustn't they? Q. Well, if you remember, the meeting you had with the FB A. It's like a mystery to me because that's more reports Q. Look at page 213, please [D/131/213]. Footnote 319: And I never read my report to them and I certainly A. No, I didn't read to them from my reports. Q. Did you give that memorandum to Mother Jones? A. So it's slightly confusing. Q. They appear to quote your reports? That is true, yes. Well, doubtless these were the ones they got within the -- records you as giving them a report which doesn't "FBI records show that the FBI had not previously But that's --They appear to, yes. knowledge of that at the time. They have records. You don't. the previous three years we had supplied dozens of Several, but, I mean, that was constant traffic so over form part of the dossier? in Rome -from Steele ." Yes, correct, but I still find it mysterious because on different issues, your Lordship. reports to the FBI, with company numbers on like this referred to there. than were in the dossier. I think there's 20 reports received [and it lists various reports, including 112] The only contact I had was one Skype call on, I think didn't give my reports, your Lordship, to Mother Jones which were pretty seriously at the heart of this received 112 from you? this, Mr Steele: FBI records show that they hadn't material, period. But the point I'm making to you is supplied, after I had agreed to do so, four reports do not see, your Lordship, why I would not have And then it lists the report -- the numbers of your "These were the Steele Reports ..." 85 86 19 20 21 22 23 24 25 10 11 12 13 14 15 15 Q. Which isn't mentioned in the report? o A. I don't know whether the note does, but what I'm saying Q. Which part of this note supports that statement, A. I don't accept that, as I have said, your Lordship A. No, but my understanding is that the FBI and the Q. In your witness statement you say -- look at (C/4/9) A. No, but it's relevant -- this is relevant to that. A. Yeah, I would agree -- I would argue it was. A. I don't think it is false. A. Mm hmm. Q. And we have looked at this paragraph before Well, one thing we can agree on, Mr Steele, I think, is That document doesn't provide evidence, but at the Well, you, in your witness statement, refer to this It's false. This document does not evidence it, does document as evidence that the FBI considered this is it was clear to me at the time that the considered CR112 relevant to their work; correct? that this note provides no support whatever for the of State, before he did that. that up. That's not a meeting with the FBI at all. investigatory work." "likely disclosed": requesting them to provide the reports please, paragraph 43. You're talking about the FBI they were investigating. Yes. But not this one? consulting each other and discussing the whole issue of That's false? Memorandum 112 relevant to their investigatory work State Department and FBI were co-ordinating and statement in your witness statement that the FBI engagement with us and our investigation. very clear that FBI and State Department were both meeting I had with Kathy Kavalee, your Lordship, it was discussing the dossler and its implications transcripts@opus2.com

Q. The content included likely -- I took you to the words Mell, the Alfa -- Trump Tower-Alfa Bank server story, Q. You say that this was at the heart of the investigation? FBI officer came to London to meet me, he had cleared that even for the July meeting, your Lordship, when the State Department were discussing this information, this with the FBI, and they considered it relevant to their dossier from the get-go and that my understanding was The reference there is to [D/71/7], if we can turn "The content of CR112 was subsequently discussed

his lines with Victoria Nuland, the Assistant Secretary

24

Sure.

understand?

19 20 21 22

Mm hmm.

candidate Trump and Russia.

18 17

MR JUSTICE WARBY: -- it was clear to you that the FBI and MR TOMLINSON: Mr Steele, you're confusing two entirely MR JUSTICE WARBY: So your evidence is that you accept that And before actually. As I said, your Lordship, even the State Department had been discussing Memorandum 112 and State Department to come to London and engage. maintain that, as a result of a meeting you had with this document doesn't support this view, but you supposed revelations about the connections between State Department and the FBI were interested in your seek permission from Victoria Nuland at the came into London on July 5, I think it was, had had to first meeting I had with my contact -- our contact that First of all, there's the question of whether the 19 18 16 17 13 A. It may not be, but that was my understanding at the time Q. You understand that that's not what is said in the Q. Well, it does, but misidentified as a meeting with the A. Not from the writer, but there was also the discussions And nor does the meeting with Kathy Kavalec, I don't Something else that does not appear in your witness John Weiner was at the meeting with Kathy Kavalec. It was Kathy Kavalec, acting on FBI instructions. statement; correct, Mr Steele? witness statement? That's something else that doesn't appear in your Inspector General's report about it? meeting, in which these things were definitely I had with John Weiner, who was involved in this either the FBI or Kathy Kavalec, is there?

its implications?

Q. The second thing is: were they interested Q. I am not disputing that they were so interested. Do you memorandum -- which is a completely different thing, Ħ. , did 24 20 21 22 23 A. In what regard? nature of your instruction. If you look at the You appear to have misled the State Department about the paragraph (D/71/1). (Pause) issues. was that there was close co-ordination between Victoria Nuland and Kathy Kavalec and the FBI on these

first

 My understanding was that Kathy Kavalec, who raised What isn't accurate? Well, that's not accurate, is it? "... undertook the investigation ... at the behest of an

in October, had been closely co-ordinating with the FBI and the FBI knew that we were having the meeting and so hacked." institution he declined to identify that had been That's not true?

I think the Alfa issue with us in this meeting

investigatory work? Do you understand me? they consider Memorandum 112 relevant to their

9 Q. So is the answer to my question that the FBI did not on and so forth and that they were jointly working on A. Well, Perkins Coie's client was the DNC. You didn't know that?

consider 112 relevant to their investigatory work? I had assumed it was the Democratic Party and the campaign. In fact, John Podesta's emails had been hacked as well.

11 A. I don't agree with that.

Q. Because we know that the FBI, putting it neutrally, had

no record whatever of having received

this memorandum

from you; correct?

12 Q. "The Institution approached them based on the recommendation of Glenn Simpson and Peter Fritsch ..." That's not true?

A. Well, there's no reference to the memorandum, but the Q. There's no mention of the memorandum in this note with 15 A. That seems very muddled to me. And then there's this, you see. Mr Steele, this really gives the game away as to the purpose of all this:

prior to November 8." "... is keen to see this information come to light

Precisely. You told the State Department that your There's the US election. client was keen to see this information come to light What was happening on 8 November?

A. I'm not sure

92

before the election; correct?

There's no evidence that that issue was discussed with

90

Q. -- and President Putin.

Q. No, no. The issue in the memorandum is the issue of the

issue was discussed with them. the State Department; correct?

supposed close connections between the claimants --

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Do you think the State Department has made it up? I think there are errors in this account, as I have said before, from Kathy Kavalee and I don't have a lot of confidence in some of the detail in her account. You see, that's the truth, isn't it? Your client your ultimate client as you have said, it's the Democratic Party institution and you assumed it might be the Democratic National Committee was keen to have this information come to light prior to the date of the 9		10	US presidential election, but perfectly understandably?		10	
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Do you think the State Department has made it up? I think there are errors in this account, as I have said before, from Kathy Kavalec and I don't have a lot of confidence in some of the detail in her account. You see, that's the truth, isn't it? Your client your ultimate client as you have said, it's the 6	A		Democratic Party institution and you assumed it might be		7	
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Do you think the State Department has made it up? I think there are errors in this account, as I have said before, from Kathy Kavalec and I don't have a lot of 3 Q.		4	confidence in some of the detail in her account.		4	
Do you think the State Department has made it up? I think there are errors in this account, as I have said 2	Ö	ω	before, from Kathy Kavalec and I don't have a lot of		ω	
Do you think the State Department has made it up?		N)	I think there are errors in this account, as I have said	A	2	
		L	Do you think the State Department has made it up?	o	ц	
			22222222222222222222222222222222222222	nk there are errors in this account, as I have said are, from Kathy Kavalec and I don't have a lot of dence in some of the detail in her account. see, that's the truth, isn't it? Your client uithmate client as you have said, it's the occratic Parry Institution and you assumed it might be bemccratic National Committee was keen to have information come to light prior to the date of the residential election, but perfectly understandably? why would I be taking it to the State Department if that were the case? 12 use you were hoping that the State Department if that were the partment might take some public in which would bring this information into the field demain. 13 type You say no one was listening to me. The had sent four agents to a European capital to meet to ask you whether you could actually provide some er evidence, which you were unable to do? 14 to ask you whether you could actually provide some er evidence, which you were unable to do? 15 ti was far more than that, involving things like ing to pay for the resettlement of our sub-sources sy 3 16 it was far more than that, involving things like ing to pay for the resettlement of our sub-sources you assist and they and to them, 'Oh, well, perhaps you'd me to arrange for you to meet with the hotel ager so he can tell you about the prostitutes 'y wasn't frivolous. The hotel manager was outside of a by that time and that was a serious proposal. 17 Fill were asking you to provide some evidence to back hat you were saying, weren't they? 18 Use of the resettlement of our sub-sources of the sources to produce more matton and even to go sa far as offering to the resettlement of produce more unation and even to go sa far as offering to the control of the resettlement of produce more unatton and even to go sa far as offering to the control of the resettlement of produce more unation and even to go sa far as offering to the control of the resettlement of the resettlement of the resettlement of the resettlement of the produce more unation an	A. I think there are errors in this account, as I have said before, from Kathy Kavalee and I don't have a lot of confidence in some of the detail in her account. Q. You see, that's the truth, isn't it? Your clientyour ultimate client as you have said, it's the Democratic Party institution and you assumed it might be the Democratic Party institution and you assumed it might be the Democratic Party institution and you assumed it might be this information come to light prior to the date of the US presidential election, but perfectly understandably? A. But why would be taking it to the State Department then, if that were the case? Q. Because you were thoping that the State Department in the public domain. A. I don't agree. You say no one was listening to meet me in October and to fully debrief me on things that we had been 12 Q. Yes, to ask you whether you could actually provide some proper evidence, which you were unable to do? A. No, it was far more than that, involving things like offering to pay for the resettlement of our sub-sources 12 Q. Yes. The FBI were asking at one point I think you sarrastically said to them, 'Oh, well, perhaps you'd like me to arrange for you to meet with the hotel manager so he can tell you about the proposal. Q. Yes. The FBI were asking you to provide some evidence to back up what you were saying, weren't they? A. That wasn't frivolous. The hotel manager was outside of Russia by that time and that was a serious proposal. Q. The FBI were actually trying to get us to pump and pressure our network of sources to produce more information and even to go as far as offering to 12 12 13 14 15 16 17 18 19 19 19 19 10 10 11 11 12 12 13 14 15 16 17 18 18 19 19 19 10 10 10 11 11 11 12 12 13 14 15 16 17 18 18 19 19 19 10 10 11 11 11 12 12 13 14 15 16 17 18 18 19 19 19 10 10 11 11 11 12 12 13 14 15 16 17 18 18 19 19 19 10 10 11 11 11 12 13 14 15 16 17 18 18 19 19 19 10 10 11 11	Q. Do you think the State Department has made it up? A. I think there are errors in this account, as I have said before, from Kathy Kavalee and I don't have a lot of confidence in some of the detail in her account. Q. You see, that's the truth, isn't it? Your client your ultimate client as you have said, it's the Democratic Parry Institution and you assumed it night be the Democratic Parry Institution and you assumed it night be the Democratic National Committee was keen to have this information come to light prior to the date of the US presidential election, but perfectly understandably? A. But why would be taking it to the State Department then, if that were the case? Q. Because you were hoping that the State Department in then, if that were the population of the public domain. A. I don't agree. You say no one was listening to me. The FBI had sent four agents to a European capital to meet me in October and to fully debrief me on things that we had been Q. Yes, to ask you whether you could actually provide some proper evidence, which you were unable to do? A. No, it was far more than that, involving things like offering to pay for the resettlement of our sub-sources offering to pay for them, on, which you was assastially said to them, "Oh, well, perhaps you'd like me to arrange for you to meet with the hote! managers ohe can tell you about the proposal. Q. Yes. The FBI were asking you to provide some evidence to back up what you were saying, weren't they? A. That wasn't frivolous. The hotel manager was outside of Russia by that time and that was a serious proposal. Q. The FBI were actually trying to get us to pump and pressure our network of sources to produce more information and even to go as far as offering to

the memoranda and the information, your Lordship, into the public domain. Q. Well, Mr Steele I'm sorry, Mr Steele, the position is that you and Mr Simpson, on the instructions of the client, conducted a number of media briefings, trying to get this material into the public domain? A. No, we were briefing them on the general outlines of the material for further investigation. We were not saying, "Here's a memo. Can you please put it in the public domain." O. That wasn't my question. A. We were published in Yahoo News and Mother Jones? A. I didn't know it was going to be published because they were published in Yahoo News, you must have realised the next time you gave a briefing it was likely to come out? A. If was certainly well, it was possible, but it was supposed to be off the record. Q. Duce it had been in Yahoo News arriche relied upon a source within the Department of Justice. A. If was certainly of the Yahoo News arriche relied upon a source within the Department of Justice. MR JUSTICE WARBY: I am just trying to understand what you're doing talking to journalists when you don't intend publication of the memos and raising issues that came from the memos with journalists off the record. There was never any intention for any of the memos to be either handed to a journalist; shown to a journalist or published by a journalist, shown to a journalist or published by a journalist, shown to a journalist or published by a journalist, shown to a journalist or published by a journalist, shown to a journalist or published by a journalist, shown to a journalist or published by a journalist, shown to a journalist or published by a journalist, shown to a journalist or published by a journalist, shown to a journalist or published by a journalist, shown to a journalist or published by a journalist of the record. A. Yesh. O. Once it had been the FBI in Rome that we were talking about a little earlier. A. Yesh. O. Altho

. Had you worked with Mr Bensinger on the FIFA	o	25	providing a [copy] of The Memo to The Washington Post?		25	
. Mm hmm.	A.	24	"And did Mr Steele know that you were going to be		24	
And he couldn't talk to him in London.		23	page 55, line 20:		23	
professional"		22	He's given evidence there under oath. If you look at	o	22	
investigation was very trustworthy and		21	Yes, in Florida.	A	21	
had worked with him and BuzzFeed in the FIFA		20	use the name correctly, Mr Gubarev v BuzzFeed.		20	
with him he vouched for Mr Bensinger saying that he		19	referring to. It's his deposition in a case I can now		19	
		18	Look at (D/110/15), please. This is what you're	Ö	18	
8		17		P	17	
"Question: Was this in a telephone conversation?"		16	And he told you he had done it?	Ò	16	
holiday.		15	Florida BuzzFeed case, yes.		15	
Christmas Day or right around there, right around that		14	So it would appear from his witness statement in the	P	14	
"Answer: It was either Christmas Day excuse me,		13	He provided a copy to the Washington Post, didn't he?	Ó	13	
"When did Mr Steele make this suggestion to you?		12	Nova Scotia.		12	
line 10:		11	explicitly said to Sir Andrew Wood in Halifax,		11	
. If you look on the next page, page 60 sorry, page 59,	O	10	your Lordship, as the emissary of Senator McCain, as		10	
. Yeah.	A	9	We possibly should have done, but he was coming,	P	9	
"Answer: I did."		8	uses he could put them to, did you?		œ	
"Question: And did you meet with Mr Bensinger?		7	and you didn't place him under any constraint as to the		7	
"Answer: Ken Bensinger.		0	But he was a private individual. He had the memoranda	O	9	
"Question: And who was that individual?		υı	request.		UI	
"Answer: He did.		4	That's right. At his request, and at Senator McCain's	P	4	
"Question: Did he specify an individual at BuzzFeed?		ω	give copies to him?		ω	
"Answer: That is correct.		2	memoranda to Mr Kramer, but you arranged for Fusion to		N	
at BuzzFeed; is that correct?		1	You ensured I don't think you actually gave the	Ö	ь	
99			97			
. IOU SAID THAT ME STEELE ASK THAT YOU THEEL WITH SOMEONE	ç	20	purpose.		24	
	0 :	o t	possenty, Jess our or me purposes, not me only) t	
Right	-	2 4	nossibly use One of the numbers not the only	2	3 6	
		23	I think the general outlines and the lead information.	>	2	
	0	22	with that?		22	
he might know and report back to me.		21	was that it might be useful to the press. Do you agree		21	
find out what he was where he was coming from, what		20	one of the purposes of the gathering of the information		20	
I simply suggested that he should meet Mr Bensinger,		19	to go through it, but Mr Simpson, himself, accepted that		19	
him and was demanding to see him and meet him. And		18	Senate Judiciary Committee. It's probably not necessary		18	
	A.	17	Well, Mr Simpson gave evidence about all this to the	Ó	17	
you pronounce his name, at BuzzFeed, didn't you?		16	NBC, no, not NBC and not	P	16	
		15	I think NBC, CNN?	Ö	15	
. I think he says around Christmas. You specifically	o	14	Sorry, can you specify?	A	14	
afraid.		13	attended meetings with news networks as well.		13	
. I think, again, another mistake in his deposition, I'm	A	12	with we discussed it yesterday. Also I think you		12	
doesn't matter.		11	that you attended meetings with journalists and then		11	
	Ö	10	You attended I think we have already discussed		10	
. Christmas Eve, I think.	A.	9	Yes, thank you.	o	9	
Christmas Day		œ	was seeking to win an election.		ω	
. Then you telephoned him around Christmas, on	Ö	7	By definition, an opposing candidate in their campaign	A	7	
your Lordship, would not have agreed to that.		o	Donald Trump from becoming president?		σ	
provide copies of the memos to the Washington Post and,		ப	That was the purpose of your work, to prevent	Ó	И	
		4	Yeah.		4	
Yes.	A.	ω	Yes?		ω	
Do you see that?		N	Mm hmm.	P	N	
"Answer: Yes."		ы	Donald Trump becoming president') sufficed."		Н	

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Opus 2 International Official Court Reporters

A. He was writing a book, your Lordship, on FIFA and had

A. It was a clear understanding, when Mr Kramer took the

the next phase

to self-isolate.

Now, my Lord, as far as I understand it, the

someone but you're showing no symptoms, you don't have guidance and the guidance said that if you're exposed to

memoranda to anybody, other than Senator McCain and his memoranda off Mr Simpson, that he was not to divulge the

aid, and then other people if Senator McCain requested

as part of his research and I had agreed to help him approached me the previous summer, 2016, and then had

travelled through London, I think, the previous summe

March 18, 2020

Opus 2 International 10 11 12 13 13 14 15 15 16 17 17 17 18 19 20 21 15 16 17 18 19 20 21 23 14 13 Ö A. I simply expected him to find out what Mr Bensinger. A. I don't know how he knew about it though in the first Q. Why were you suddenly so coy about it? You had been Q. Why not? A. I wasn't expecting him to be discussing the Q. And it's obvious, Mr Steele, isn't it, that if you are A. I said, "I think you need to see what he's -- where he's Q. And you told him it was a good idea? A. He brought it to my attention that Mr Bensinger was Q. So you were -- is it your evidence that Mr Kramer asked Q. That you told him that Mr Bensinger had -- you had o A. We had briefed a small number of journalists off the Q. Well, as a proper journalist that is exactly what you A. Because I suspect -- I feared that Mr Bensinger knew So Mr Kramer has that right? Well, what right, sorry? But everybody knew about them because you had been you to meet Mr Bensinger, rather than the other way worked with Mr Bensinger in relation to FIFA? with his research on FIFA. You didn't say to Mr Kramer, "Well, don't show him the about the memoranda and the dossier and so on and was coy about Mr Bensinger briefing Mr Kramer? you, "Do you have any documents to back this up"? them very serious allegations, they are going to say to meeting with a serious journalist and you are telling coming from, what he knows, what he's doing". pestering him and demanding a meeting. would expect him to do, isn't it? briefing journalists for months. Why are you suddenly might know something about the investigation. your Lordship, afterwards, because I was worried that he knew, what he wanted to know and to report back, where he was coming from, what he was doing, what he investigation or the memos with Mr Bensinger. memoranda. Don't give him copies", did you? record about the general themes, your Lordship, in the end, hadn't you, Mr Steele? any journalist who would listen to you for months on briefing about -- you and Mr Simpson had been briefing trying to find out more about them. 101 102 18 20 21 22 23 25 9 110 111 12 13 13 14 15 15 4 A. That's not true. That was never the case and we never 5 did it. 6 Q. You never -- you knew full well that when Mr Kramer was Q. What do you mean by "clear understanding"? A. I had told him that he would need to seek permission to A. Absolutely not. In fact, when I asked Mr Bensinger, A. -- such as the hacking, such as the contacts between Q. Well --Q. You see, the true position is this, Mr Steele, isn't it, MR TOMLINSON: I think there are four, I'm told. MR JUSTICE WARBY: We have possibly two outstanding MR TOMLINSON: My Lord, I have no further questions. You were keen for all this to come out and the way for I wanted the US Government to investigate it properly MR JUSTICE WARBY: The list has grown. We had probably I would say this is superbly timed but -- ah ... (Pause) them? consequent risk that they were going to publish members of the campaign and Russian officials and so on the main leads that came out of the investigation -and thoroughly and I wanted the US media to investigate president -- by this time President Trump, didn't you? the US because of the influence of Russia over he -- Mr Kramer contacted me before doing so to ask my Senator McCain apparently asked him to go and see to me, your Lordship, when he was proposing -questions that you wanted. his witness statement here. He said he hadn't them the memoranda, he lied to me and he admits that in had shown Mr Bensinger any of the memoranda or given after the leak, your Lordship, to BuzzFeed, whether he something -- either the memoranda or something based on likely to be showing them the memoranda with the meeting with BuzzFeed that he was going to -- he was it to come out is for these memoranda to be shown to because you thought that this was a serious threat to that you were very keen for this information to come out permission as to whether he could do that. Victoria Nuland, I believe, in the State Department, and Celeste Wallander in the White House and discuss it with other people and he did that. He came better deal with that at 2 o'clock. basically, even though he had. journalists, isn't it? It's obvious, Mr Steele. Is there going to be any re-examination, subject to 103 104 transcripts@opus2.com

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MR MILLAR: No. He's been advised by the co	25	
advised; is that right?	24	
advised about this? Not legally advise	23	
MR JUSTICE WARBY: Right. And Mr Steele hir	22	
she remains in isolation.	21	
tested for Covid-19. There is no test	20	
I understand it from my client, in Isola	19	
Hospital with breathing difficulties . S	18	
MR MILLAR: She was taken in an ambulance t	17	
MR CHRISTOPHER STEELE: I can't hear this.	16	Ħ
in an ambulance to Frimley Park Hospital	15	
hospital after he left her this morning	14	
MR MILLAR: It's not that clear-cut. She w	13	
that his wife is unwell with Covid-19.	12	Q.
Since we parted, I learn, Mr Steele	11	
now.	10	
are things that we all know that probab	9	
MR JUSTICE WARBY: Yes, well, for the record	8	
Procedural discussion	7	
(2.00 pm)	Q	
(The luncheon adjournment	и	
(1.00 pm)	4	
MR JUSTICE WARBY: We'll deal with that 2 o'	ω	0,
MR MILLAR: Five questions.	۵	

	25	24	23	22	21	20	19	18	17	16	15	14	13	12	11	10	9	8	7	6	_U	4	ω
105	MR MILLAR: No. He's been advised by the court that the	advised; is that right?	advised about this? Not legally advised but medically	MR JUSTICE WARBY: Right. And Mr Steele himself has been	she remains in isolation.	tested for Covid-19. There is no test result yet, but	I understand it from my client, in isolation, has been	Hospital with breathing difficulties . She is, as	MR MILLAR: She was taken in an ambulance to Frimley Park	MR CHRISTOPHER STEELE: I can't hear this.	in an ambulance to Frimley Park Hospital.	hospital after he left her this morning. She was taken	MR MILLAR: It's not that clear-cut. She was taken to	that his wife is unwell with Covid-19.	Since we parted, I learn, Mr Steele has been told	now.	are things that we all know that probably should be said	MR JUSTICE WARBY: Yes, well, for the record, I think there	Procedural discussion	(2.00 pm)	(The luncheon adjournment)	(1.00 pm)	MR JUSTICE WARBY: We'll deal with that 2 o'clock.

16

MR TOMLINSON: When I - I don't have it here, but we --

were in their company.

you were exposed themselves had symptoms at the time you had exposure, in other words whether the person to whom

government's -- I think Mr Millar made the point to guidance produced by the government. The on Monday, we actually -- I think I do have it here, the because of this issue arising -- I may have it here --

your Lordship on Monday morning that the guidance says

13 12 10

MR JUSTICE WARBY: Well, that wasn't my understanding.

I thought that the point was about the time at which you

isolation steps to be taken.

moment, as he has no symptoms, there's no need for any symptoms, and then (b) his wife showing symptoms, at the being exposed to his business partner, who is showing Mr Steele has had the unfortunate experience of (a) guidance hasn't changed. So although Mr -- poor

appropriate procedure the RCJ procedure	105	MR MILLAR: No. He's been advised by the court that the	advised; is that right?
		2	7

showing symptoms

guidance was you only had to self-isolate if you were

whether it has changed, but certainly as of Monday the

Ah, well, it may have -- we're just checking now

have a conference room or something that he could sit	there was then supposed to be an arrangement which would	the judge if he is going to leave the building, and	giving evidence, technically he has to be discharged by	MR MILLAR: So we said that Mr Steele is in the middle of	MR CHRISTOPHER STEELE: I can't hear this feed, I'm afraid.	basis that is said, so we said	MR MILLAR: Step 1 in the protocol. I don't know on what	MR JUSTICE WARBY: Right.	court.	junior was advised that he was supposed to leave the	MR MILLAR: He was initially advised we were advised, my	MR JUSTICE WARBY: Ah.	
14	13	12	11	10	9	œ	7	σ	ທ	4	ω	2	
the diagnosis.	his wife may have symptoms of Covid-19. We don't have	at home, on the grounds that at the moment it seems that	separating himself from the general public and staying	it, self-isolation or whatever, Mr Steele should be	basis of that guidance, then whatever label one calls	MR JUSTICE WARBY: Yes, That's what I thought. So, on the	household has symptoms.	should stay at home for 14 days if someone in your	Yes, my Lord. So the new guidance says that you	MR TOMLINSON: Ah, there's new guldance. (Pause)	this.	MR CHRISTOPHER STEELE: I'm still having difficulty hearing	

-	15	MR TOMLINSON: Yes.
	16	MR JUSTICE WARBY: Now, you have four questions that you
٠,	17	provisionally wanted answered that hadn't been answered
	18	yet,
	19	MR TOMLINSON: Yes.
	20	MR JUSTICE WARBY: And Mr Millar said he had five questions

20 19

MR JUSTICE WARBY: Right.

MR CHRISTOPHER STEELE: I can't hear you, I'm sorry. MR JUSTICE WARBY: At the moment he is in court 75, which is

right next door. Can you hear me now, Mr Steele?

MR TOMLINSON: My Lord, there seems to be some confusion

21

in re-examination

because your Lordship will remember on the first day

business partner, who had shown symptoms and was Mr Steele had had some close exposure, namely to his

self-isolating. I think both sides looked into the

11 12 13 14 15

in, but that never materialised, so your Lordship kindly

offered --

have a conference room or something that he could sit

10

25	24	23	22
MR TOMLINSON: My Lord, I think in the light of the current	the light of the current situation? Press on?	MR JUSTICE WARBY: What, Mr Tomlinson, do you want to do in	MR TOMLINSON: Yes.

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112		110	
say as he did what country his source was located	25	spent training, how you say it should be approached,	25
going to say: and, in particular, the fact he refused to	24	that part of Mr Steele's career which you suggested was	24
account, but that's as far as I'm going to go. I'm not	23	to what I think is the first one, which is details of	23
their sources is a factor the court can take into	22	questions are that you would have asked and, in relation	22
give details that would back that up about the nature of	21	what I'd like to hear from you are what the four	21
have taken reasonable care, the fact that they don't	20	Now, Mr Tomlinson, I know the clerk is not back,	20
entitled to say if someone is trying to show that they	19	(Pause)	19
the familiar position in relation to journalists. I am	18	having made sure that that's happened.	18
somewhat different from the position that we find in	17	MR JUSTICE WARBY: Let's just wait until the clerk returns,	17
absence of an established privilege, the position is	16	want to go and deal with as soon as he possible can.	16
submissions yesterday. Your Lordship said in the	15	MR TOMLINSON: No, it is obviously something that he will	15
for misrepresenting the way that Mr Millar put it in	14	version of whathis wife's current position is.	14
a point your Lordship made yesterday, and I apologise	13	MR JUSTICE WARBY: at learning this somewhat incomplete	13
I will say generally that bearing in mind and this is	12	MR TOMLINSON: My Lord, absolutely so.	12
those four questions that he refused to answer, but	11	feeling	11
to his sources, I will say, generally, not in respect of	10	obvious and natural distress that Mr Steele must be	10
explanation as to his Civil Service career. In relation	9	to slightly prompt you to not press on further is the	9
his, I would say, unjustified refusal to give a proper	ω	MR JUSTICE WARBY: Yes. One of the factors that has led me	ω
going to ask you to draw any adverse inferences from	7	MR TOMLINSON: Yes, we all are.	7
MR TOMLINSON: My Lord, in relation to that, his I am not	o	MR MILLAR: He obviously is very concerned.	σ
but if I took another view, you might	ហ	Thank you, your Lordship.	и
any adverse inferences from his refusal to answer it,	4	MR CHRISTOPHER STEELE: Okay. Thank you.	4
it would involve, then you couldn't invite me to draw	ω	go formally in one minute's time.	ω
case to justify the intrusion into confidentiality that	N	to be released and the court clerk will come and let you	N
sufficiently important to the pursuit of justice in the	ъ	So, Mr Steele, the court clerk will you are going	р
;			
111		109	
or determined later, that the question was not	25	MR TOMLINSON: Yes.	25
If I rule now, or having heard any further argument,	24	because he can go.	24
the way in which I should approach the evidence.	23	questions, but I think we can deal with that separately	23
refusal to answer the question had some implications for	22	what I provisionally would have said on the four	22
case it was going to be suggested later on that the	21	I will give a short ruling on what I would have said,	21
reasoning process out of the way; and the other is in	20	He won't have long to wait. I will release him and	20
One is it is fresh in my mind and it gets part of the	19	you in a moment	19
reasons really why I had it in mind to rule on it now.	18	MR JUSTICE WARBY: Well, I'll get the court clerk to tell	18
MR JUSTICE WARBY: Well, the only reason I was well, two	17	MR CHRISTOPHER STEELE: Yes, I can't.	17
your Lordship to make any ruling about any of them.	16	your Lordship was saying.	16
questions to the witness now, I am not asking	15	concerned that Mr Steele couldn't hear what	15
sources. But, my Lord, as I'm not going to put the	14		14
department. And there were some questions about his	13	I was saying. That's reassuring.	13
information about Civil Service careers in whatever	12	MR JUSTICE WARBY: It wasn't out of disagreement with what	12
information about national security matters, not	11	MS SJØVOLL: Oh, sorry, I was saying	11
Secrets Act, is that that covers only the disclosure of	10	you, Mr Tomlinson.	10
The position, as I understand it, under the Official	9	application I am seeing a shaking head from behind	ω.
case-changing.	œ		ω .
re-examination. I don't think any of it is	7	MR HISTICE WARRY: Yes Well what I think I'll do is	7
now because, as Mr Millar said in relation to his	თ		on I
I'm not sure that it is necessary to pursue any of this	υı	to ask in re-examination are central to the case. So	υı
	4	MR MILLAR: I wouldn't say any of the questions I was going	4
information. If there are any other questions?	w	MR JUSTICE WARBY: Mr Millar?	ω
lawful basis on which he could withhold that	N	any more time in relation to that.	N
because you made the point to him that there was no	Ы	situation. It is probably sensible for me to not take up	ы

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e 1 Siling 3 MR: any 4 MR: any 5 MR: inly 6 MR 6 MR 7 MR 9 9 11 MR 11 MR 11 MR 12 MR hem 13 MR 14 MR 15 MR 16 MR 17 MR 18 MR	reply.	4	MR TOMLINSON: Ah.
e 1 xising 3 MR xising 3 MR xising 4 MR xisy 6 MR xisy 7 MR xisy 7 MR xisy 11 MR xisy 11 MR xisy 11 MR xisy 12 MR xisy 12 MR xisy 12 MR xisy 13 MR xisy 12 MR xisy 13 MR xisy 14 MR xisy 15 MR xisy 12 MR xisy 12 MR xisy 12 MR xisy 12 MR xisy 13 MR xisy 14 MR xisy 15 MR xisy 16 MR xisy 17 MR xisy 17 MR xisy 17 MR xisy 18 MR xisy 19 MR xisy 21 MR xisy 22 MR xisy 23 MR xisy 25 MR	MR TISTICE WARRY. Two hours each and half an half	n v	MK JUSTICE WARDI: 185. My CIETA INDICATED HIST I HEED TO
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e 1 xising 3 MR: any 4 MR 5 MR inly 6 MR 6 MR 7 MR 10 MR 11 MR 11 MR 11 MR 11 MR 12 MR heme 11 MR heme 11 MR heme 12 MR heme 17 MR alue 18 MR 20 MR 21 MR 22 MR at 23 MR 24 MR	in total.	ь	week.
e 2 MR. sinky 4 MR. 5 MR. 6 MR. 6 MR. 7 MR. 10 MR. 11 MR. 11 MR. 11 MR. 12 MR. 13 MR. 14 MR. 15 MR. 16 MR. 17 MR. 18 MR. 19 MR. 19 MR. 19 MR. 10 MR. 11 MR. 12 MR. 13 MR. 14 MR. 15 MR. 16 MR. 17 MR. 18 MR. 18 MR. 19 MR. 19 MR. 10 MR. 11 MR. 12 MR. 12 MR. 13 MR. 14 MR. 15 MR. 16 MR. 17 MR. 18 MR. 18 MR. 19 MR. 19 MR. 19 MR. 20 MR. 21 MR. 22 MR. 23 MR.	115		113
e 2 MR. ysing 3 MR. AMR. MAR. MA	of that? Let's say that gives us four and a half hours	25	MR MILLAR: I think it was an indication from the court last
e 2 MR. ysing 3 MR. any 4 MR. 5 MR. 6 MR. 6 MR. 7 MR. 10 MR. 11 MR. 11 MR. 11 MR. 11 MR. 12 MR. 13 MR. 14 MR. 15 MR. 16 MR. 17 MR. 20 MR. 21 MR. 23 MR. 23 MR.	the usual way, doesn't it, with some breaks to take out	24	MR TOMLINSON: My Lord, I'm not sure it was agreed.
e 2 MR. ssing 3 MR: any 4 MR 5 MR 6 MR 6 MR 7 MR 11 MR 12 MR 14 MR 15 MR 16 MR 17 MR 18 MR 19 MR 19 MR 19 MR 19 MR 19 MR 19 MR 11 MR 12 MR	MR JUSTICE WARBY: Yes. Well, that gives us five hours in	23	10 o'clock tomorrow. Is that agreed?
e 2 MR: ssing 3 MR: any 4 MR 5 MR 6 MR 6 MR 7 MR 10 MR 11 MR 11 MR 11 MR 11 MR 12 MR 13 MR 14 MR 15 MR 16 MR 17 MR 18 MR 19 MR	MR TOMLINSON: Then we need a timetable for that.	22	for the next stage, which at the moment is we start at
e 2 MR. ysing 3 MR. any 4 MR. 5 MR. 6 MR. 7 MR. 10 MR. 11 MR. 12 MR. 13 MR. 14 MR. 15 MR. 16 MR. 17 MR. 18 MR. 19 MR. 19 MR. 10 MR. 11 MR. 11 MR. 12 MR. 13 MR. 14 MR. 15 MR. 16 MR. 17 MR. 18 MR. 19 MR. 19 MR.	MR MILLAR: Yes.	21	What remains is just to agree the case management
e 2 MR: sing 3 MR: any 4 MR: 5 MR inly 6 MR 6 MR 7 MR 10 MR 11 MR	MR TOMLINSON: Yes.	20	Housekeeping
e 2 MR; ssing 3 MR; any 4 MR; 5 MR inhy 6 MR 6 MR 7 MR 10 MR 11 MR 11 MR 11 MR 11 MR 11 MR 13 MR 11 MR 13 MR 14 MR 15 MR	first, please, and then you have a right of reply.	19	anything about it now.
e 2 MR; ssing 3 MR; any 4 MR; 5 MR; inly 6 MR; 0 8 9 9 11 11 MR 11 12 MR hem 11 MR 11 MR heme 11 MR	MR JUSTICE WARBY: I think I would like Mr Tomlinson to go	18	MR JUSTICE WARBY: Right. Well, then, I don't need to say
e 2 MR. ssing 3 MR. any 4 MR. for MR 6 MR for MR 7 MR for MR 110 MR for MR 111 MR for MR 113 MR for MR 115 MR for MR 115 MR	MR MILLAR: Yes.	17	of things.
e 1 xising 3 MR xising 3 MR xising 4 MR 5 MR 6 MR 6 MR 7 MR 10 MR 11 MR 11 MR hem 13 11 MR halue 15 MR	your Lordship would find most helpful.	16	that argument and that comment has in the greater scheme
e 1 2 MR 3 MR 4 MR 5 MR 6 MR 6 MR 7 MR 10 MR 11 MR 11 MR 11 MR	MR TOMLINSON: I'm happy to do it either way, but whatever	15	role then will be, as it always is, to decide what value
e 1 Sising 3 MR Sising 4 MR	I'm happy to go first.	14	on the record. He can comment on that. The judicial
e 1 ssing 3 MR ssing 3 MR any 4 MR 5 MR 6 MR 0 8 10 MR 11 MR	issue around and asking what people's positions are.	13	the question each question and answer. We have them
e 1 ssing 3 MR: any 4 MR for M	MR MILLAR: I am happy to go first, if we are knocking the	12	say, by way of comment, whatever he wants to say about
e 1 2 MR 2 ssing 3 MR 4 MR 5 MR 6 MR 6 MR 7 MR 9 10 MR	back to	11	MR MILLAR: No, I think my learned friend is entitled to
e 1 2 MR ssing 3 MR any 4 MR any 5 MR 6 MR 0 7 MR	MR TOMLINSON: Yes, that's the rule from jury trials going	10	given what has been said?
1 2 MR 2 MR 5 MR 6 MR 7 MR 8	word. That's the	9	MR JUSTICE WARBY: Mr Millar, do you disagree with that,
400400	the defendant calls evidence, the claimant gets the last	8	rule on any of those issues.
2 W 4 W 0	MR JUSTICE WARBY: Usually, I mean, the old version is if	7	from my point of view, necessary for your Lordship to
take 1 2 oposing 3 ver any 4 5	MR TOMLINSON: Exactly, so have I.	o	your Lordship says, I don't think it would be, certainly
μ 4 α ω 4	MR MILLAR: I have had both.	υı	of those specific questions. Subject to anything
dditional factor that the court should take 1	MR JUSTICE WARBY: Yes, but I don't really mind.	4	to put any forensic weight on the failure to answer any
dditional factor that the court should take 1	MR MILLAR: You are accustomed to the old version?	ω	So, my Lord, in relation to those, I'm not proposing
Ь	MR JUSTICE WARBY: I am accustomed to the old version.	2	into asked.
	I am	1	in is an additional factor that the court should take

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it in the usual way.

So what's your proposal?

MR JUSTICE WARBY: In fact, there's every reason to stick to

MR TOMLINSON: No.

MR TOMLINSON: Sorry, there's another question that arises

20 21 22 23

MR JUSTICE WARBY: Yes.

19 18 17 16

exhausted.

MR MILLAR: I can work within a little less than two hours,

to the old version, if I can put it that way, claimant as to -- in terms of order of closing, whether we stick

which is claimant goes first and has a right of reply? goes last, or whether we stick to the modern version,

a balance to be struck between speed and quality,

me the sooner I'll read them, but there's always going to impose a timetable. The sooner you get them to

As far as written closings are concerned, I'm not

13

MR MILLAR: And the third question is whether we cap the

13 14 12

> MR JUSTICE WARBY: I was not allowing for the breaks. MR TOMLINSON: I was going to say, yes, if we -- if we --

an hour, starting at 3.30 for you, Mr Tomlinson. make an allowance for the ten or 15 minutes of break in

the morning, or thereabouts, and we'll finish with half before and an hour after lunch or -- then we'll have to will come down at midday and Mr Millar will have an hour

MR JUSTICE WARBY: Yes, we'll look for a convenient moment MR TOMLINSON: Yes. So, in other words, finish at 12.30, if

the breaks are 15 minutes each or ten.

to ensure that the shorthand writers don't get

time for those oral submissions.

MR JUSTICE WARBY: Right. So what --

argument about those written closing submissions. lodged and then the second is when we commence oral

10 11

first is when written closing submissions should be

My Lord, obviously there are two questions. The

MR TOMLINSON: I had -- that had passed me by or popped out

MR JUSTICE WARBY: So we'll start at 10.00. The guillotine

MR MILLAR: Yes, that's fine.

of my mind.

MR JUSTICE WARBY: Therefore --

MR JUSTICE WARBY: Yes. We have a four-day time estimate.

I don't see any reason not to stick to that.

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14 15 15 16 16 17 17 18 19 20 20 21 21 22 23 24 13 12 MR MILLAR: We can exchange between 8.00 and 9.00 and get MR JUSTICE WARBY: I know. MR TOMLINSON: I did say the ideal world tomorrow morning MR JUSTICE WARBY: I thought it might be. MR TOMLINSON: I think tonight is probably --MR JUSTICE WARBY: Well, we're not in an ideal world so MR TOMLINSON: Not necessarily impose a timetable, but, in (2.20 pm) MR JUSTICE WARBY: Thank you very much. Right. 10 o'clock MR TOMLINSON: Thank you. MR TOMLINSON: Yes, before 9.00 is what we'll aim for. MR CHRISTOPHER STEELE (continued) MR JUSTICE WARBY: Before 9.00, yes. Housekeeping Procedural discussion to me then, or tonight. 8 o'clock in the morning, if you really want to get them I won't answer that question. I can start reading at them to you as soon as possible. reading them tomorrow morning? an ideal world, when would your Lordship like to start impose a timetable for exchange. sides, and I will leave it to you, unless you want me to although I expect the qualify to be excellent on both Cross-examination by MR TOMLINSON (continued)1 (The court adjourned until 10.00 am on Thursday, 19 March 2020) 117 INDEX ...113 ...105 119

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Day 3

March 18, 2020

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