

MICHAEL HAFNER 3/16/2018

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1 IN RE: THE MISSION CONTINUES)
) CID No.
) 22-18
 2
 3
 4 DEPOSITION OF MICHAEL HAFNER
 5
 6 March 16, 2018
 7 Sheryl A. Pautler, MO-CCR 871, IL-CSR 084-004585
 8 (The proceedings began at 9:30 a.m.)
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1 IN RE: THE MISSION CONTINUES)
) CID No.
) 22-18
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 3
 4 DEPOSITION OF WITNESS, MICHAEL HAFNER,
 5 produced, sworn, and examined on the 16th day of March,
 6 2018, between the hours of nine o'clock in the forenoon and
 7 four o'clock in the afternoon of that day, at Sowers Ernst,
 8 LLC, 13321 North Outer 40 Road, Chesterfield, Missouri,
 9 before SHERYL A. PAUTLER, a Certified Court Reporter within
 10 and for the State of Missouri, in a certain cause now
 11 pending IN RE: THE MISSION CONTINUES.
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1 APPEARANCES
 2 For the Missouri Attorney General:
 3 Mr. Michael Martinich-Sauter
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 7
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 12
 13 The Court Reporter:
 14 Ms. Sheryl Pautler
 Alaris Litigation
 15 711 North Eleventh Street
 St. Louis, Missouri 63101
 314-644-2191

1 else that would prevent you from answering accurately
 2 today?
 3 A. I am not.
 4 Q. If you don't understand any of my questions
 5 today, will you ask me for clarification before answering?
 6 A. I will.
 7 Q. And sometimes you may know the answer to the
 8 question before I get it out. And sometimes I may be
 9 overeager and want to ask you a second question before you
 10 finish. Can we agree not to talk over one another today?
 11 A. Yes.
 12 Q. And if you need a break, will you let me know?
 13 A. Yes.
 14 MR. ERNST: Do you mind if I, for the record,
 15 just state that this is Edwin C. Ernst, IV, of Sowers Ernst
 16 representing Mike Hafner.
 17 Q. (By Mr. Martinich-Sauter) Thank you.
 18 Mr. Hafner, where do you currently work?
 19 A. I am employed -- I'm self-employed. I have an
 20 LLC named Spartan Strategic, LLC. I have a number of
 21 political clients. I'm also a registered lobbyist for an
 22 organization called Missouri Century Foundation. I'm also
 23 co-owner of a restaurant in St. Louis.
 24 Q. Setting aside the lobbying work and the
 25 restaurant work, what sorts of work do you do for political

1 IT IS HEREBY STIPULATED AND AGREED, by and
 2 between counsel that the deposition of MICHAEL HAFNER may
 3 be taken in shorthand by Sheryl A. Pautler, shorthand
 4 reporter, and afterwards transcribed into typewriting; and
 5 the signature of the witness is expressly reserved.
 6 *****
 7 MICHAEL HAFNER,
 8 of lawful age, being produced, sworn and examined, deposes
 9 and says:
 10 [EXAMINATION]
 11 QUESTIONS BY MR. MARTINICH-SAUTER:
 12 Q. Good morning. Could you state your name for
 13 the record.
 14 A. Michael Hafner.
 15 Q. I'm Michael Martinich-Sauter. This is Jason
 16 Dunkel. We're here from the Attorney General's Office.
 17 And do you understand that you're here today pursuant to a
 18 civil investigative demand from the AG's office?
 19 A. I do.
 20 Q. Have you ever been deposed before?
 21 A. I have not.
 22 Q. Do you understand that you'll be under oath
 23 today?
 24 A. I do.
 25 Q. Are you taking any medications or anything

1 candidates and similar clients?
 2 A. Sure. Political campaign management and PR
 3 communications work predominantly. But overall, campaign
 4 activities. I've been in politics a long time and a lot of
 5 candidate -- provide advice and guidance to candidates in a
 6 number of areas.
 7 Q. And about how long have you been doing that
 8 work?
 9 A. Since 2004.
 10 Q. Since 2004. Approximately, if you can sort of
 11 guesstimate, how many campaigns have you worked on total?
 12 A. I would say directly, around ten. Indirectly,
 13 probably over 50. And that's because I, for a time, for a
 14 period of three or four years, I worked for a consulting
 15 firm that advised party committees. So by extension of
 16 that, it's -- it's certainly a lot of candidates that I've
 17 worked indirectly for, minor tasks here and there.
 18 Q. And of those, how many do you think were
 19 statewide campaigns?
 20 A. I'd have to think about it. But of the ones
 21 I've worked directly for, almost all of them. So the ten.
 22 Q. And were any of them, other than the ones
 23 involving Mr. Greitens, candidacy for governor?
 24 A. Can you repeat that question?
 25 Q. Yes. Other than the campaign work you did for

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1 **Mr. Greitens, were any of the those campaigns you worked on**
2 **for governor?**
3 A. Yes.
4 **Q. How did you first come to know of**
5 **Mr. Greitens?**
6 A. So in 2013, in the fall of 2013, we started
7 hearing some rumors -- "we" as in myself and a couple other
8 political consultants, Republican political campaign
9 consultants -- began hearing rumors that Mr. Greitens was
10 potentially looking at running for office in 2016. I had
11 had a mutual friend with Mr. Greitens, a gentleman by the
12 name of Tyler Holman, who had worked for Mr. Greitens at
13 The Mission Continues a number of years previous.
14 And -- and I don't recall the exact outreach,
15 whether it was me to Tyler or Tyler to me. But we began a
16 conversation and -- and I was connected with Mr. Greitens'
17 managing director of his private company The Greitens
18 Group, a gentleman by the name of Dave Whitman. I was
19 connected with Mr. Whitman. And we set a meeting in
20 December of 2013 to discuss a potential political campaign
21 by Mr. Greitens, a potential candidacy for office. And
22 that was the first introductory meeting. We met in
23 December of 2013 out of his office which was south of --
24 south of the stadium in -- south of Busch Stadium in
25 St. Louis.

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1 **Q. In those conversations you had with**
2 **Mr. Holman, did you have the sense that Mr. Holman had**
3 **spoken to Mr. Greitens about the possibility of**
4 **Mr. Greitens running for office?**
5 A. Yes.
6 **Q. And what did he say that led you to believe**
7 **that?**
8 A. I don't recall the exact conversations. But
9 Mr. Holman had been friends with Eric, Mr. Greitens, for a
10 long time and I think knew where -- where his ambition was
11 and that a campaign for political office of some sort was
12 in his future.
13 **Q. Did your conversations with Mr. Holman give**
14 **you the sense that Mr. Greitens had spoken with other**
15 **Mission Continues staffers about the possibility of running**
16 **for office?**
17 A. I don't recall those conversations.
18 **Q. Okay. Great. Do you recognize this document?**
19 A. Yes.
20 (Whereupon Exhibit 1 was marked for
21 identification.)
22 **Q. (By Mr. Martinich-Sauter) And what is it?**
23 MR. ERNST: Do you have copies for me?
24 MR. MARTINICH-SAUTER: Yes. I'm just slow.
25 A. This is a time line that I put together

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1 detailing the different meetings and time frames that I --
2 that I interacted with Mr. Greitens and his pending
3 campaign and staff of Mr. Greitens.
4 **Q. (By Mr. Martinich-Sauter) And does this time**
5 **line accurately reflect your recollection and understanding**
6 **of the facts?**
7 A. Yes.
8 **Q. Do you see where it says December 2013 towards**
9 **the top?**
10 A. I do.
11 **Q. And did you meet with Mr. Greitens in December**
12 **2013?**
13 A. I did.
14 **Q. And what did you discuss with him at that**
15 **meeting?**
16 A. It was more of an introductory meeting.
17 Again, it was the first time that I personally met
18 Mr. Greitens. The other people in the meeting were another
19 political consultant, myself, Mr. Whitman and Mr. Greitens.
20 It says first meeting at Mission Continues because his --
21 his company, The Greitens Group, was located at the same
22 offices as The Mission Continues were.
23 And again, it was more of a meeting that was
24 introductory in nature. As a first-time candidate, we go
25 through a process, meeting with candidates and go over the

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1 potential landscape and give an overall view of certain --
2 if we don't know the specific office that we know they're
3 going to run for, then we go through potential offices that
4 might be open and different opportunities to try to find an
5 office that may fit their skill set or fit -- fit their
6 ambition.
7 And it was -- it was really just an
8 introductory meeting to get to know each other and start
9 building a relationship.
10 **Q. And I apologize to break the flow here. But**
11 **just for the record, the document that we're looking at**
12 **here was marked Exhibit 1.**
13 **You mentioned there was another political**
14 **consultant in the meeting. Who was that individual?**
15 A. In the first meeting, it was a gentleman by
16 the name of David Barklage. I had worked with Mr. Barklage
17 at his consulting firm Barklage & Knodell. I don't know
18 the exact dates I started working. It was roughly 2011 to
19 late 2014, I was directly employed by that consultant firm.
20 **Q. Okay. And you mentioned that The Greitens**
21 **Group had office space in the same building as The Mission**
22 **Continues; is that accurate?**
23 A. It is.
24 **Q. And was The Greitens Group's office space in**
25 **the same space as The Mission Continues or was it another**

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1 **office in the same building or something else?**
 2 A. I do not know. I just know they were in the
 3 same building. We met in a conference room. I'm not sure
 4 who the conference room belonged to. I just know we --
 5 they were housed out of the same building. They had the
 6 same address. But I never set foot directly in The Mission
 7 Continues offices, at least to my knowledge. We came into
 8 the building. Mr. Whitman got us from downstairs and then
 9 took us into a conference room. I don't know who owned the
 10 conference room, though.

11 **Q. And what offices or potential offices did you**
 12 **discuss -- political offices did you discuss with**
 13 **Mr. Greitens during that December meeting?**
 14 A. I do not recall exactly. The December meeting
 15 was really just a -- just an introductory meeting. But
 16 for -- for me who is somebody who normally works on higher
 17 profile races in the state, I wouldn't meet with a
 18 candidate and certainly the other gentleman, David
 19 Barklage, wouldn't meet with a candidate without believing
 20 that it was for some high -- one of the highest offices in
 21 the state, meaning a statewide office.

22 I was led to believe it was governor just
 23 through the rumors that we had heard and, you know, some
 24 other discussions. And at that time, the primary field
 25 was -- was really not set at all. But I really didn't --

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1 didn't know if he had settled on a specific office or not.
 2 **Q. Did you during that meeting discuss with him**
 3 **running for governor specifically?**
 4 A. To the best of my recollection, it was a very
 5 minor topic of discussion. It came up. But I don't recall
 6 the exact conversation at that time that we had.

7 **Q. Did you discuss during that meeting with**
 8 **Mr. Greitens potential strengths and potential weaknesses**
 9 **of a statewide candidacy?**
 10 A. I know in -- I know in the first initial
 11 meetings that we had in the first few months, we did. I
 12 don't recall if it was that exact meeting or not.

13 **Q. Do you recall whether you discussed potential**
 14 **fundraising strategies at all during that meeting?**
 15 A. I do not recall. I do not believe we did
 16 during that meeting.

17 **Q. Do you recall approximately how long that**
 18 **meeting lasted approximately?**
 19 A. I believe it was at least an hour.

20 **Q. Do you recall discussing The Mission Continues**
 21 **during that meeting?**
 22 A. I don't recall exactly. To the best of my
 23 recollection, I believe it was discussed probably just in
 24 the context of what he had been doing during that time
 25 and -- and also I believe it was this meeting -- if not, it

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1 was one of the subsequent meetings -- but I believe it was
 2 indicated that he had planned on stepping down from The
 3 Mission Continues sometime in the following year. And
 4 again, I don't recall if it was exactly the December 2013
 5 meeting or -- or the January meeting.

6 But I do know it was indicated early on in our
 7 discussions that he had a potential time line of stepping
 8 down mid-year from The Mission Continues.

9 **Q. Did he tell you the reason why he was going to**
 10 **step down from The Mission Continues?**
 11 A. He didn't -- I don't recall him telling us the
 12 exact reason. I know that he had an upcoming book planned,
 13 a book launch planned, that he was going to release
 14 another -- another book in 2015. I know that was in some
 15 of the initial discussions just in terms of his time line.
 16 Because he didn't want to officially announce for office
 17 until after his book launch, which would have been in the
 18 spring of 2015. So I know that occurred in some of the
 19 initial -- initial meetings. But -- but I don't recall the
 20 exact conversations during that time.

21 **Q. Did he explain why he didn't want to announce**
 22 **for political office until after the book launch?**
 23 A. He explained it to the extent that -- that he
 24 wanted to focus on the book, on the launch of his book and
 25 focus on that. It was certainly indicated much later on,

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1 that the positive media and the exposure that he would get
 2 from that book launch would serve as kind of a launching
 3 pad to -- to rolling his -- to rolling right into a
 4 campaign for governor. And again, it was indicated that he
 5 would have a lot of positive media exposure that he could
 6 use for a launch of a campaign.

7 **Q. Do you remember anything else about what was**
 8 **discussed during that December 2013 meeting?**
 9 A. Not particularly. I just know that the first
 10 meeting was an introduction, served as an introductory
 11 meeting. It was the first time I had met Mr. Whitman as
 12 well personally. I had some communications, e-mails and
 13 maybe a phone call or two between Mr. Whitman and myself
 14 prior to this, I believe in November. But the first
 15 meeting really was just a getting-to-know-you session and
 16 introducing ourselves and touching on the Missouri
 17 political landscape and a potential campaign.

18 **Q. Who is, if you know, Mr. Whitman's employer at**
 19 **that time?**
 20 A. To the -- as I understand, it was The Greitens
 21 Group.

22 **Q. And do you have a sense of what The Greitens**
 23 **Group, what its line of business was, what it did?**
 24 A. Yes. In my discussions with Dave Whitman and
 25 understanding his role as managing director of The Greitens

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1 Group, I understood The Greitens Group to be a -- kind of a
 2 PR company. It helped sell Mr. Greitens' books, helped
 3 book speeches for Mr. Greitens. So I would probably
 4 describe it as a PR, maybe a personal marketing or
 5 promotional company for Mr. Greitens.

6 **Q. And to your knowledge in late 2013, were there**
 7 **any other employees of The Greitens Group?**

8 A. To my knowledge in 2013, the only employee
 9 that I had discussions with was Mr. Whitman. I -- I don't
 10 know at that time if I -- if I -- I don't believe I knew if
 11 there were any other employees at that time.

12 **Q. But you don't have any reason to believe that**
 13 **there weren't, you're just not aware of them?**

14 A. Correct.

15 **Q. Looking here at Exhibit 1 again, do you see**
 16 **where it says late 2014 towards the top? I'm sorry. Late**
 17 **January 2014.**

18 A. Yes.

19 **Q. Did you meet with Mr. Greitens in late 2014,**
 20 **late --**

21 A. Yes.

22 **Q. Do you remember what day that took place?**

23 A. I do not.

24 **Q. Do you remember where that meeting took place?**

25 A. It was in the conference room at -- at the

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1 consulting firm that I was employed at at the time,
 2 Barklage & Knodell. It's located on Clayton Road, 7925
 3 Clayton Road.

4 **Q. Did you have more than one meeting in**
 5 **January 2014 with Mr. Greitens?**

6 A. I -- I do not believe so.

7 **Q. In between the December 2013 meeting that we**
 8 **discussed and this January 2014 meeting, do you remember**
 9 **having any other meetings or conversations with**
 10 **Mr. Greitens or Mr. Whitman?**

11 A. I believe I probably had -- well, I don't
 12 recall exactly. I just -- I know that I was the -- was the
 13 coordinator of many of these meetings. And so just by the
 14 fact that we met in January of 2014, I would have had to
 15 have some conversations with Mr. Whitman. I don't know if
 16 those occurred over -- over phone or e-mail. I would
 17 assume e-mail, but I don't -- I don't know for sure.

18 **Q. And who attended the January 2014 meeting?**

19 A. It was myself, David Barklage, Mr. Whitman and
 20 Mr. Greitens. I do not recall anyone else there, but there
 21 could have been.

22 **Q. And what was discussed at that meeting?**

23 A. It was obviously a follow-up on our December
 24 meeting. Just to go more in depth about the political
 25 process and -- and early on, myself and Mr. Barklage and

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1 Mr. Knodell and a couple others that were very close in
 2 our -- in our inner orbit, we wanted to present a number of
 3 options to Mr. Greitens, potential offices that he could
 4 run for. And those -- those were all the way from
 5 statewide races, to I think even congressional or county
 6 wide races.

7 Through our discussions in 2014, it was -- it
 8 was obvious that Mr. Greitens wanted to seek one of the
 9 higher offices in the state. But again, the January 2014
 10 meeting was just a follow-up and more of an introductory
 11 meeting to the political process. And I would assume
 12 during that meeting, we discussed -- we started discussing
 13 some potential offices that may be a good fit for
 14 Mr. Greitens to run for.

15 **Q. Do you remember with specificity which offices**
 16 **you talked about?**

17 A. I -- I do not recall during that meeting, no.

18 MR. ERNST: We can go off the record for just
 19 a minute.

20 (Whereupon there was a short break.)
 21 (Whereupon Exhibit 2 was marked for
 22 identification.)

23 **Q. (By Mr. Martinich-Sauter) This is -- I**
 24 **numbered this Exhibit 2. Do you recognize this document?**

25 A. I do.

Page 20

1 **Q. What is this document?**

2 A. So this is a document that was created by
 3 Danny Laub. And the dates at the top, I believe, is wrong.
 4 It should say 2015. Because this was -- this was a
 5 document that Danny Laub created. That they had a -- they
 6 had a meeting with a bunch of political vendors, national
 7 and Missouri-based consultants, that I attended. And it
 8 was a whole strategy session based on his run for governor,
 9 Mr. Greitens' run for governor.

10 4500 West Pine was the address that
 11 Mr. Greitens moved The Greitens Group to. And that
 12 eventually served as one of his campaign office
 13 headquarters -- or did serve as his campaign office
 14 headquarters when he announced his run for office.

15 I remember these being created by Danny Laub
 16 because Mr. Greitens wanted -- he wanted to -- on each of
 17 these numbers, there's a success -- there's the success
 18 factor or description. Mr. Greitens wanted Mr. Laub to put
 19 all of these things in it. And it was kind of an odd thing
 20 to me for an agenda. But yes, this is a document from a
 21 strategy session that occurred at Mr. Greitens' West Pine
 22 office.

23 **Q. And that strategy session took place in 2015?**

24 A. Yes.

25 **Q. Okay.**

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1 A. I don't know why the mistake is at the top.
 2 But 4500 West Pine is where Mr. Greitens' office was
 3 located. So yeah, the date must be wrong on this at the
 4 top.
 5 MR. MARTINICH-SAUTER: Let's set that one
 6 aside for a moment.
 7 (Whereupon Exhibit 3 was marked for
 8 identification.)
 9 **Q. (By Mr. Martinich-Sauter) This document is**
 10 **numbered as Exhibit 3. Do you recognize this document?**
 11 A. I do.
 12 **Q. What is this document?**
 13 A. This is a document that -- that I created that
 14 included notes from our meeting with Mr. Greitens in
 15 January of 2014.
 16 **Q. So are these your notes from the late**
 17 **January 2014 meeting that's listed on the time line?**
 18 A. These are notes that I typed. Some of these
 19 notes were placed on a -- on a whiteboard in the conference
 20 room, which I -- for example, the Greitens strength as a
 21 candidate, that was something that we wrote out first, then
 22 I transcribed them, took them down and put them into a
 23 document that we could -- that we could use. But yes,
 24 these are notes that -- that I typed up from that meeting
 25 in January of 2014.

Page 22

1 **Q. Do you remember whether that meeting took**
 2 **place during the work week?**
 3 A. I do not recall. To the best of my
 4 recollection, it did. But I don't remember the exact day.
 5 **Q. Do you remember what time of day approximately**
 6 **that meeting took place?**
 7 A. I do not recall exactly, yeah. I'm sure it's
 8 still in my calendar that I could go back and look. But I
 9 don't recall exactly.
 10 **Q. And to the best of your recollection, do these**
 11 **notes accurately set forth what was discussed at that**
 12 **meeting?**
 13 A. Yes.
 14 **Q. And so the strengths as a candidate and**
 15 **weaknesses as a candidate section, were those items that**
 16 **were discussed during the meeting with Mr. Greitens?**
 17 A. Yes.
 18 **Q. Of those strengths and weaknesses, who was**
 19 **identifying those?**
 20 A. The attendees of the meeting. I don't recall
 21 the exact -- if there were other attendees. I do know
 22 myself, Mr. Barklage, Mr. Whitman and Mr. Greitens were
 23 there.
 24 **Q. Do you see the fourth item under strengths**
 25 **where it says strong financial network and personal**

Page 23

1 **contacts?**
 2 A. Yes.
 3 **Q. Is that something that you discussed at the**
 4 **meeting?**
 5 A. Yes.
 6 **Q. Do you remember anything about that**
 7 **discussion?**
 8 A. Not so much. It was more -- it was more just
 9 a -- people would throw out things that we perceived
 10 Mr. Greitens to have in terms of strengths as a potential
 11 candidate. Obviously, either he or Mr. Whitman would have
 12 had to say the Goldman Sachs thing, just because we would
 13 have had no idea if he had -- what his financial network or
 14 personal contacts were really like. But in terms of a
 15 specific discussion, I think all these were ones that we
 16 all contributed during an overall discussion on strengths,
 17 on his strengths or perceived strengths as a potential
 18 candidate.
 19 **Q. In the context of the financial network, do**
 20 **you remember whether there was any discussion of The**
 21 **Mission Continues and/or its donor network?**
 22 A. No, not a specific discussion. But it
 23 certainly was indicated in the very early months that he
 24 would rely on his network built over time as his -- as he
 25 was CEO of Mission Continues. That he would rely on that

Page 24

1 because it was a national organization that operated in
 2 many, many states around the country. It was -- so it
 3 certainly was indicated early on.
 4 But to my recollection, we don't -- I don't
 5 recall a specific -- a specific discussion based on The
 6 Mission Continues and -- other than in the overall
 7 discussion of just he was CEO and that was part of his
 8 experience and value as -- or a strength as a potential
 9 candidate.
 10 **Q. Do you see under strengths here on Exhibit 3**
 11 **where it says financial management, exemplary management?**
 12 A. Yes.
 13 **Q. What -- do you remember any discussion about**
 14 **that item?**
 15 A. I don't recall a specific discussion around
 16 that. I wouldn't have known that just meeting -- just
 17 having met with Mr. Greitens in December for the first
 18 time. I would assume that that specific strength came from
 19 either Mr. Greitens himself or Mr. Whitman, providing that
 20 to the -- to the -- to the overall discussion and to -- for
 21 the person taking notes to take down.
 22 **Q. In your professional experience, is that a**
 23 **relevant factor to a candidate being successful?**
 24 A. Yes. But it also depends on the office that
 25 they're seeking. Somebody in an executive role, I would --

Page 25

1 I would say that that's -- that has -- oversight over
 2 budget responsibilities, I would say that financial
 3 management would be a valued strength. I think it goes to
 4 the point that you're a CEO or that you're a leader.
 5 **Q. Do you see under the weaknesses section, No. 6**
 6 **where it says not well known in Missouri?**
 7 A. Uh-huh. Yes.
 8 **Q. Was that something that was discussed at this**
 9 **January meeting?**
 10 A. To my recollection, yes.
 11 **Q. What do you remember about the discussion of**
 12 **that item?**
 13 A. I think that's more to just say that that was
 14 a -- in political circles, he was virtually unknown,
 15 certainly in Republican political circles. That's from a
 16 grassroots prospective. That's from a donor prospective.
 17 And your other types of influencers, say political media
 18 or -- or other people, you know, former -- former
 19 Republican Party officials or elected officials, he was a
 20 virtual unknown. He had a military background, spent some
 21 time out of the state. And really -- really just new.
 22 And a lot of people in politics certainly
 23 didn't know what The Mission Continues did. There was some
 24 overlap in donors between the two, of course, between
 25 Republican campaigns and to The Mission Continues because

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1 of it's a pro-veteran's charity. But I think to that
 2 point, it's just not many people knew the guy.
 3 **Q. Do you see on the second page under additional**
 4 **ideas and questions to consider where it says how do you**
 5 **transition company organization to a campaign organization?**
 6 A. Yes.
 7 **Q. Was that an item that was discussed at the**
 8 **meeting?**
 9 A. I believe it was briefly. I think the second
 10 page is more on what the next steps were and things that
 11 you have to consider if you're going to consider running
 12 for office in a party, in a particular party. And it was
 13 indicated and Mr. Greitens had told us that his time line
 14 was completely stepping down from the organization sometime
 15 in the middle of the year.
 16 And so these additional ideas and below that,
 17 the action items were geared towards that end, to keep the
 18 process moving and the discussion moving forward on how do
 19 you transition, you know, your company and your role at the
 20 charity to the next phase.
 21 **Q. Was it your understanding during this meeting**
 22 **that Mr. Greitens had definitively decided to step down**
 23 **from The Mission Continues?**
 24 A. Yes.
 25 **Q. Was it your understanding that he had chosen a**

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1 **specific time frame in which he was going to do that?**
 2 A. Yes.
 3 **Q. During this meeting, did you have a sense of**
 4 **whether or not Mr. Greitens had definitively decided**
 5 **whether he was going to run for some office?**
 6 A. I would not say definitively decided, but yes.
 7 It was certainly indicated and we were led to believe that
 8 he would be running for an office in 2016.
 9 **Q. And was it your understanding that his desire**
 10 **to run for office was at least one of the causes for him**
 11 **stepping down from The Mission Continues?**
 12 A. Yes.
 13 **Q. Did he discuss other causes for stepping down**
 14 **other than running for office?**
 15 A. I believe he also discussed the fact that his
 16 next book would be coming out in -- in spring of 2015. And
 17 that was -- and that was a reason that he provided for
 18 stepping down. We didn't really believe that that was the
 19 sole reason just because he wrote his first book -- I'm not
 20 sure of the time frame, 2011 or 2012. It was called The
 21 Heart and the Fist. Certainly he wrote that during the
 22 time he was CEO of The Mission Continues.
 23 So we didn't believe that that was the main
 24 reason. But publicly, that was -- I believe that was
 25 another reason that he gave to people. Certainly he

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1 informed us that he'd be spending a lot of time finishing
 2 writing and all that. But we really didn't believe that
 3 that was the main driver of him stepping down, though.
 4 **Q. Can we turn back to this Exhibit 1, the time**
 5 **line. Do you see where it says February 2014, Mike MTG**
 6 **with Dave Whitman?**
 7 A. Yes.
 8 **Q. Did that meeting occur?**
 9 A. Yes.
 10 **Q. Do you remember approximately what date that**
 11 **was?**
 12 A. I do not.
 13 **Q. Where did that meeting take place?**
 14 A. I do not recall. I believe it was at a
 15 restaurant. I know it wasn't in his offices. It was
 16 either at a restaurant or at our offices at Barklage &
 17 Knodell.
 18 **Q. What did you discuss with Mr. Whitman at that**
 19 **meeting?**
 20 A. I do not recall exactly. I believe it was a
 21 meeting -- just more of a networking meeting, another
 22 relationship building meeting. Mr. Whitman and myself had
 23 been in discussions of course. And he was really the --
 24 the -- he was Mr. Greitens' right-hand guy for a number of
 25 years and was the gatekeeper, so to speak, for

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1 Mr. Greitens.
 2 And I think, to my recollection, the
 3 February 2014 meeting was just another relationship
 4 building meeting that I had personally with Mr. Whitman.
 5 **Q. Did you and Mr. Whitman discuss anything**
 6 **politically related during that meeting?**
 7 A. Yes.
 8 **Q. Do you have any recollection what those**
 9 **discussions were?**
 10 A. I do not. To the best -- I do not recall
 11 exactly. But to the best of my recollection, I believe it
 12 was regarding Mr. Greitens and potential plans and -- and
 13 potential offices for him to run for. Again, to the best
 14 of my recollection during that time period -- I don't know
 15 for sure what precipitated us meeting in February.
 16 But to the best of my recollection, Catherine
 17 Hanaway announced for office at some point during
 18 February 2014, I believe. I'm not sure if that's what
 19 precipitated this meeting or if that was the driver. But
 20 to my recollection, the meeting in February 2014 was just
 21 another relationship building meeting.
 22 **Q. Do you remember whether you discussed with**
 23 **Mr. Whitman the possibility of Mr. Greitens running for**
 24 **secretary of state?**
 25 A. I know that we certainly did discuss that

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1 option at some point or at numerous points in our
 2 conversations. But I don't -- I don't recall if that was
 3 the meeting or not. I think that was part of an overall --
 4 an ongoing discussion certainly in the early -- in the
 5 early -- in the early months of our relationship, we had
 6 hoped Mr. Greitens would settle on an office or would -- or
 7 would consider running for another office, rather than one
 8 of the top offices in the state, for a couple of reasons.
 9 One, because he was an unknown; and, two, no one had
 10 believed he was a Republican before. Rumors started that
 11 he was looking at running for office as a Republican.
 12 **Q. Do you recall when at least in your**
 13 **understanding Mr. Greitens definitively decided he was**
 14 **going to run for office in 2016?**
 15 A. I don't recall the exact date or -- or time
 16 frame. I think just from our standpoint and our view, we
 17 wouldn't have met with him in December if we didn't think
 18 that he was really serious. And we wouldn't have continued
 19 the discussion if we didn't believe that he was intent on
 20 running for office in 2016.
 21 **Q. Looking again at Exhibit 1, do you see where**
 22 **it says April 4, 2014?**
 23 A. I do.
 24 **Q. What is the Lewis & Clark PAC annual dinner?**
 25 **Or I guess what is the Lewis & Clark PAC?**

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1 A. That is a -- it's a politic action committee
 2 that is registered through the Missouri Ethics Commission
 3 continuing committee. It consists of a group of
 4 pro-business -- pro-business, pro-growth, generally pretty
 5 conservative donors that have often funded leadership races
 6 at the state level in terms of the -- of the party
 7 committees within the house and senate caucus, plus has
 8 funded pro-business, pro-growth-minded candidates. It's
 9 one of the top leadership funds, I would call it, in the
 10 State of Missouri.
 11 They held an annual dinner every year that
 12 usually occurred in the spring of -- of the year on the
 13 back half of the legislative session. And a lot of
 14 politicians, mostly Republicans, but there were a couple
 15 Democrats that would attend too, like Mayor Slay at the
 16 time. But it was -- it was always held at a very nice
 17 hotel. And it was a dinner and chance to -- to network
 18 socially and meet donors certainly and network socially
 19 among an upper political class of individuals. And this
 20 particular dinner was held at the Four Seasons in downtown
 21 St. Louis.
 22 **Q. Did you arrange for Mr. Greitens to speak at**
 23 **that dinner?**
 24 A. I did. And I coordinated his appearance with
 25 Mr. Whitman.

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1 **Q. And do you remember, at least from your**
 2 **perspective, the purpose of having Mr. Greitens speak at**
 3 **that dinner?**
 4 A. It was a couple. There was a couple different
 5 purposes. One -- one, we thought he would make a great
 6 keynote speaker because he had a background as a leadership
 7 and motivational speaker. He had -- part of his -- part of
 8 The Greitens Group, his personal company, was to book
 9 speeches. He had a -- he had a firm called Leadership
 10 Authorities that was his agent, so to speak.
 11 But I arranged this appearance directly
 12 through Mr. Whitman. And he was selected for a couple
 13 reasons. One, because of his ability as a leadership and
 14 motivational speaker. And, two, because most of these
 15 donors that were at the dinner and most of the elected
 16 officials, Republican elected officials that were there,
 17 didn't -- didn't know the guy.
 18 So it was a good intro to a lot of people that
 19 would be helpful in a campaign when he decided to
 20 officially announce for office.
 21 **Q. And did you discuss with Mr. Greitens the fact**
 22 **that attending this dinner and speaking at this dinner**
 23 **would be helpful from a campaign perspective?**
 24 A. Maybe not so much a specific campaign
 25 prospective, but certainly a -- but certainly a political

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1 prospective in getting to know a bunch of people who could
 2 be helpful to him.
 3 (Whereupon Exhibit 4 was marked for
 4 identification.)
 5 **Q. (By Mr. Martinich-Sauter) This is marked as**
 6 **Exhibit 4. Do you recognize this document?**
 7 A. I do.
 8 **Q. What is this document?**
 9 A. This is -- these are notes of mine that I
 10 compiled, very basic notes, and a list of very brief action
 11 items that I compiled following the meeting regarding
 12 Mr. Greitens.
 13 **Q. Who was that meeting with?**
 14 A. I do not recall exactly the individuals who
 15 were there. Based on this time line, which I compiled that
 16 time line based on e-mail records and everything else, but
 17 it would lead me to believe that this meeting was with
 18 Mr. Whitman and potentially Mr. Greitens as well, but.
 19 **Q. Do you see where it says here on Exhibit 4**
 20 **dinner with Koster set up?**
 21 A. I do.
 22 **Q. What does that refer to?**
 23 A. That was a suggestion made by David Barklage
 24 during the meeting. And now that these notes -- I know
 25 it's not in my time line. I would have to go back and look

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1 in my e-mail records and everything. But I do recall
 2 Mr. Barklage suggesting directly to Mr. Greitens that he
 3 should have a meeting or dinner with Chris Koster who was
 4 obviously the Attorney General at the time and running for
 5 governor on the Democrat side.
 6 That suggestion was made by Mr. Barklage. I
 7 don't want to speak for Mr. Barklage, but having worked
 8 with him, I think -- I think that suggestion was made to
 9 Mr. Greitens just -- just so both of them could meet each
 10 other and potentially build a relationship. And I would
 11 assume that Mr. Barklage thought that by Mr. Greitens
 12 meeting with somebody who was at that level, who had been
 13 in the political game for a long time, that Mr. Greitens
 14 would realize that he was at a big disadvantage approaching
 15 a potential race for governor against a candidate --
 16 against a candidate like Chris Koster.
 17 **Q. Do you know whether that meeting between**
 18 **Mr. Koster and Mr. Greitens ever occurred?**
 19 A. To the best of my recollection, it did not.
 20 And I know I never set up a meeting between -- or helped
 21 coordinate setting up a meeting between both Mr. Greitens
 22 and Mr. Koster.
 23 **Q. Did you at this time think that running for**
 24 **governor made sense for Mr. Greitens?**
 25 A. I never believed it made sense for

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1 Mr. Greitens to run for governor.
 2 **Q. And why not?**
 3 A. For a number of reasons. One, generally you
 4 want the people in your party, the candidates in your party
 5 who are running to be the de facto head of your state
 6 party, to have built relationships around the state with --
 7 with activists, with donors, with other influencers, such
 8 as former Republican Party officials and influencers within
 9 your community.
 10 And Mr. Greitens really had not done any of
 11 that. His skill set came from a completely different --
 12 different -- different background. He was the leader of a
 13 charity for six or so years. He was virtually unknown.
 14 And normally when you want people running for a high office
 15 like that, you want them to have helped build a party and
 16 of course prove your conservative credentials as well along
 17 the way.
 18 Again, Mr. Greitens had not done any of that.
 19 He told an activist, a very well-known activist in
 20 southwest Missouri, in a meeting that we set him up with,
 21 that he did -- he wasn't somebody that ever climbed
 22 ladders. Indicating that he didn't have to -- he didn't
 23 have to prove anything to anybody or give back to the party
 24 or felt like he owed the party as the -- the Republican
 25 Party anything.

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1 And that was certainly, just in my experience
 2 and the consultants that I was working with, that was a
 3 completely different approach than we ever experienced.
 4 And we didn't agree with that approach. And we had hoped
 5 to offer him other offices to potentially run for in 2016.
 6 **Q. Did either you or anyone else that you're**
 7 **aware of expressly tell Mr. Greitens or recommend to him**
 8 **that it would be better to run for an office other than**
 9 **governor?**
 10 A. Myself and a number of others had suggested
 11 him running for another office other than governor.
 12 **Q. And do you recall what his reaction to those**
 13 **conversations were?**
 14 A. On the surface, he was always very open to
 15 listening -- listening to us. It was never really
 16 indicated that he was really taking our advice. Later on
 17 in meetings that I had with him where we introduced him to
 18 other people, he -- he never indicated he was looking at
 19 any other office other than lieutenant -- other than
 20 governor or lieutenant governor.
 21 He would always -- in the early -- in 2014 or
 22 even in early 2015 in our meetings, he would always say
 23 governor or lieutenant governor. He would never say
 24 secretary of state or state treasurer or anything else.
 25 The way he would phrase it -- and I don't have his exact

1 words. But the way he would always phrase it was that he
2 was looking at an office where he could make a real impact.
3 And for him, that was always governor or lieutenant
4 governor he was looking at.

5 Now, there were other meetings we had with
6 other people that suggested that he look at secretary of
7 state or another office. But I never felt that he was
8 really heeding that advice. I felt he had a very, very
9 high level of ambition. And he wanted the top prize which
10 was -- which was governor.

11 **Q. Do you see on Exhibit 4 where it says for
12 office of SOS, confirm you don't have to live -- work/live
13 in Jeff City?**

14 A. Yes.

15 **Q. Is that an issue that you ever discussed with
16 either Mr. Whitman or Mr. Greitens?**

17 A. Yes.

18 **Q. What was the nature of those discussions?**

19 A. I think just -- just that if he had run for
20 another office, whether it was SOS or state treasurer or
21 lieutenant governor, he -- he or Mr. Whitman wanted to know
22 whether he had to work or live in Jeff City in terms of
23 being there permanently, whether he could focus on other
24 business issues or have a separate business.

25 **Q. So did Mr. Greitens or Mr. Whitman ever raise**

1 **for you the possibility that he might want to carry on some
2 sort of business while he was in office?**

3 A. I don't recall that being a specific issue of
4 theirs or a major topic of conversation between us. I know
5 that as our discussions went on in our work with -- you
6 know, in our political work -- in my political work with
7 the lieutenant governor at the time, Peter Kinder, we were
8 extremely close with the lieutenant governor. And we had
9 known in a very small circle that he did not intend to run
10 for reelection for lieutenant governor.

11 And so in our discussions with Mr. Greitens --
12 I don't know the exact time frame. But at some point in
13 2014, we had discussed with him the possibility of him
14 running for lieutenant governor. And it was an idea that
15 he appeared to be very open to. And he -- and in those
16 discussions and with us having a great -- a very good
17 understanding of the roles of lieutenant governor and the
18 duties of lieutenant governor, we knew that he could have a
19 business on the side, that he could continue to give
20 speeches and use the office for -- to have a platform to
21 speak on specific issues, especially those relating to
22 veterans, taking into account the lieutenant governor is
23 the veteran's advocate in the State of Missouri.

24 And so some of those discussions did -- we did
25 have. But I don't know if that was necessarily driven by

1 Mr. Greitens or Mr. Whitman. It was more in an overall
2 discussion of how that could be a great landing spot for
3 somebody with extraordinary ambition, plus it could give
4 you time to get acquainted to the political process, to the
5 governing process and be a great launching pad for another
6 higher office, whether that was U.S. Senate or governor or
7 something else.

8 **Q. And at that time, did you know that Mr. Kinder
9 intended to run for governor?**

10 A. No, we did not. We did not know that until
11 sometime in 2015. We had no idea he would ever run for
12 governor. We were involved in his very brief -- I wouldn't
13 say governor's campaign in 2011, even though that's what it
14 was. But Mr. Kinder had intended -- we had laid all the
15 groundwork for running for governor in 2011. And then the
16 campaign was derailed on a number of fronts.

17 And so we had never believed after -- after
18 that failed attempt, that Mr. Kinder should ever run for
19 governor again. Certainly at that time, we had no idea
20 that -- and he didn't indicate to us either -- Mr. Kinder
21 didn't indicate to us either that he would run for
22 governor. We just knew that he was not planning on running
23 for reelection. He had already been there for 11 years and
24 was bored with the office.

25 (Whereupon Exhibit 5 was marked for

1 identification.)

2 **Q. (By Mr. Martinich-Sauter) Do you recognize
3 this document which is marked as Exhibit 5?**

4 A. I do.

5 **Q. And what is this document?**

6 A. This was a memo that Mr. Barklage sent to
7 Mr. Greitens in the spring of 2014 following a couple of
8 discussions and a number of meetings -- a number of
9 meetings and discussions that we had with Mr. Greitens and
10 Mr. Whitman. I recognize this document because I wrote --
11 I wrote a lot of this. And Mr. Barklage had given -- had
12 given me kind of an overall framework on what he wanted to
13 communicate to Mr. Greitens. And I put it into words and
14 then gave it to Mr. Barklage for review. And then he sent
15 it on to Mr. Whitman and Mr. Greitens.

16 **Q. Do you know whether a prior version of this
17 document was provided to anyone else outside of your firm?**

18 A. I don't. I believe this document was just
19 created solely for -- solely for Mr. Barklage, Mr. Greitens
20 and Mr. Whitman.

21 **Q. Do you see on the first page under the first
22 bullet point where it says it will be very difficult to
23 raise in-state money in this type of scenario especially
24 from some of the establishment/old guard of the party?**

25 A. Yes.

1 **Q. Is that something that you discussed with**
 2 **Mr. Greitens?**
 3 A. Yes. I don't recall the exact -- the exact
 4 conversations that we had. But certainly it -- certainly
 5 it was discussed that he would have a tough time raising --
 6 raising money within that primary field.
 7 **Q. Do you remember what his response to that**
 8 **issue was?**
 9 A. I don't recall the exact words or the exact
 10 conversations. But that was never a sticking point for him
 11 or reason that he shouldn't be dissuaded. Mr. Greitens is
 12 not the kind of person -- he is not -- he is very
 13 ambitious. And when he has his mind set on doing
 14 something, there's not many people that are going to stop
 15 him in that endeavor -- in his endeavor.
 16 **Q. Did you have the sense that he believed he**
 17 **could raise sufficient money even without traditional**
 18 **donors?**
 19 A. At this time, I did not believe that he'd be
 20 able to convince a lot of national donors and his network
 21 to contribute to him in a contested primary of which he
 22 would be running in the Republican Party where he didn't
 23 have a background even as a Republican.
 24 **Q. Do you see at the end of that paragraph where**
 25 **it says you would have to out raise the others**

1 **substantially?**
 2 A. Yes.
 3 **Q. Is that something you discussed with**
 4 **Mr. Greitens?**
 5 A. Absolutely. It was -- again, I don't recall
 6 the specific conversations. But that was always a part of
 7 the discussion in why he should look at another office.
 8 And that was -- of course, that was just one of many points
 9 that we would make to him. And obviously at the time, we
 10 had no idea that his donor network would step up in the way
 11 that they did for him.
 12 **Q. During those conversations, did he raise the**
 13 **fact that he had this separate donor network that he might**
 14 **be able to tap?**
 15 A. I don't recall the -- the exact conversations.
 16 He had always indicated to us that there was a lot of
 17 people that were ready to contribute to him. And we were
 18 led to believe that whoever they were, that he did have
 19 this network that was ready to fund whatever -- whatever he
 20 decided to run for.
 21 **Q. Did he ever say anything that led you to**
 22 **believe that he had already discussed with those donors the**
 23 **possibility of running for office?**
 24 A. I don't recall anything specifically. But
 25 again, we were always led to believe that he had had people

1 that were ready to contribute to him. I can't speak to if
 2 there were -- if there were specific conversations that
 3 Mr. Greitens had with specific donors. I would not know
 4 that. But we were certainly always led to believe that
 5 there were donors ready to fund -- fund a campaign of his.
 6 And it wasn't until I actually worked in a
 7 paid capacity for him that there were discussions that he
 8 had already had conversations with donors about what his
 9 next move were -- next moves were.
 10 **Q. Let's see more about that.**
 11 MR. ERNST: I'm just going to object to the
 12 form.
 13 **Q. (By Mr. Martinich-Sauter) Can you tell me**
 14 **about the discussions you had with Mr. Greitens that led**
 15 **you to believe he had had those conversations with donors?**
 16 A. One of our first meetings at his office in
 17 January of 2015 after I was working in a paid capacity for
 18 him, we went through donor lists and selected prospects
 19 for -- from those donor lists. And he would provide notes
 20 to me on different donors. And I remember one donor, one
 21 very specific conversation because it just struck me as
 22 very odd that he would say such a thing. I don't remember
 23 the exact name. But he said so and so already wants me to
 24 run for president.
 25 And again, for a first-time candidate, it was

1 just a very odd thing for me to hear. And so from -- based
 2 on that specific statement by Mr. Greitens, I was led to
 3 believe that he had already had conversations with at
 4 least, at the very minimum, one donor prior to ever forming
 5 a candidate committee or anything else about running for
 6 office.
 7 **Q. Other than that specific comment during 2014,**
 8 **did Mr. Greitens make any other statements that led you to**
 9 **believe he had spoken to donors about the possibility of**
 10 **running for office?**
 11 A. I mean, well, certainly during 2014, we had --
 12 we had introduced him to a lot of different people, donors,
 13 certainly Republican Party activists and officials. So
 14 yes, I mean it was indicated that he was planning on
 15 running. And -- but in terms of specific conversations
 16 with specific donors, I can't really speak to that. And
 17 again, it was always indicated that he would have a network
 18 that was ready to fund him, which led us to believe of
 19 course he had to have had conversations with some of these
 20 individuals. But in terms of specific conversations and
 21 exact statements, I can't really -- I can't really speak to
 22 that.
 23 **Q. Turning back to Exhibit 1, the time line, do**
 24 **you see where it says February to May 2014?**
 25 A. Yes.

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1 **Q. Did you in fact set up political meetings for**
 2 **Mr. Greitens during that time?**
 3 A. Yes.
 4 **Q. With whom did Mr. Greitens meet in those**
 5 **meetings?**
 6 A. So to my recollection, Mr. Greitens attended
 7 Lincoln Days, statewide Lincoln Days. I don't recall the
 8 exact time frame. Usually statewide Lincoln Days occurs in
 9 February or maybe early March, but usually late February.
 10 He attended statewide Lincoln Days that year which I
 11 believe was in Springfield. And he -- and we set up a
 12 series of meetings for him during that weekend or during
 13 that day that he was down there. Obviously they were
 14 political in nature. They were people that were in our
 15 network.
 16 And it was -- I believe I provided a list to
 17 either Mr. Whitman or Mr. Greitens. And then I directly
 18 set up a number of these meetings for them for Mr. Greitens
 19 to attend.
 20 So that was certainly one time period. And
 21 then we also -- we also coordinated his appearance at a
 22 couple other pro-business PACs that we advised. "We" as me
 23 and Mr. Barklage or that we did advise at the time. One of
 24 those groups being in Springfield, another one of those
 25 groups being in St. Louis and the third one being in

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1 northeast Missouri in Lincoln County, Troy, Missouri.
 2 And I don't know the exact dates of those
 3 meetings, but those were certainly meetings that -- with
 4 donors, elected officials, I think there was a congressman
 5 or two that we set up, plus people that could be helpful to
 6 him in a campaign for a statewide office.
 7 **Q. Did you --**
 8 A. I don't have the list of those exact meetings.
 9 But I know -- I know in that time frame, we certainly set
 10 up a bunch of meetings for him, introductory meetings.
 11 **Q. Did you participate in those meetings?**
 12 A. A number of them, yes.
 13 **Q. Did Mr. Whitman participate in those meetings?**
 14 A. A number of those meetings, yes, he did.
 15 **Q. Do you know whether anyone else from The**
 16 **Greitens Group or The Mission Continues participated in any**
 17 **of those meetings?**
 18 A. I don't know. The ones that I was at, it was
 19 just Mr. Whitman and Mr. Greitens. But some of the other
 20 ones, it's possible that there could have been another
 21 staffer there. The other -- if I recall correctly, we
 22 had -- we asked a gentleman by the name of [REDACTED] to
 23 help escort Mr. Greitens around at the meetings at
 24 statewide Lincoln Days in February of 2014 and just to get
 25 him from place to place.

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1 [REDACTED] was a gentleman from Springfield. [REDACTED]
 2 would eventually go work for The Greitens Group in spring
 3 of 2015. To the best of my recollection, we asked him to
 4 help just usher Mr. Greitens around during those February
 5 meetings in Springfield.
 6 MR. ERNST: When you get to a stopping point,
 7 maybe we could take a five-minute break.
 8 MR. MARTINICH-SAUTER: Sure. One more
 9 question.
 10 **Q. (By Mr. Martinich-Sauter) During those**
 11 **meetings, those political meetings that you attended, did**
 12 **Mr. Greitens address what office, if any, he was**
 13 **considering running for?**
 14 A. To the best of my recollection, he said
 15 governor or lieutenant governor. And some of the
 16 discussions were -- the discussions were introductory in
 17 nature. Most of the -- specifically the donor meetings
 18 that we set up, it was more to go through Mr. Greitens'
 19 resume and serve as an introductory meeting for both sides
 20 to get to know each other. But there were some policy
 21 questions in there as well.
 22 I remember a meeting in Springfield that we
 23 had with a group of donors in Springfield that
 24 [REDACTED] asked -- [REDACTED] he's from
 25 Branson -- asked Mr. Greitens what his views on education

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1 policy was. And Mr. Greitens of course went in and went
 2 and kind of gave a vague answer. But -- but certainly
 3 there were -- those policy questions were geared toward
 4 somebody who was looking at being an executive of the
 5 state.
 6 And so to the best of my recollection, it was
 7 indicated that he was looking at governor or lieutenant
 8 governor in -- in 2016.
 9 MR. MARTINICH-SAUTER: If it's okay with
 10 everyone, I would propose going off the record and take a
 11 break.
 12 MR. ERNST: Agree.
 13 (Whereupon there was a short break.)
 14 **Q. (By Mr. Martinich-Sauter) Mr. Hafner, can we**
 15 **circle back real quickly to the 2014 Lincoln Days?**
 16 A. Yes.
 17 **Q. I have just a couple quick questions about**
 18 **that. Did Mr. Greitens have a suite at Lincoln Days?**
 19 A. To my knowledge in February 2014 Lincoln Days,
 20 he did not.
 21 **Q. And did you say that Mr. [REDACTED] was attending**
 22 **the events with Mr. Greitens and driving him; is that**
 23 **correct?**
 24 A. To my recollection, Mr. [REDACTED] only introduced
 25 him around, took him around to a couple different meetings.

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1 Yeah. I don't believe he was driving him.
 2 **Q. Okay. Do you know whether Mr. [REDACTED] was paid**
 3 **for any of that work?**
 4 A. I don't know whether he was paid.
 5 **Q. During the time period listed on Exhibit 1 as**
 6 **February to May 2014, were either you or your firm being**
 7 **paid by Mr. Greitens or The Greitens Group or The Mission**
 8 **Continues?**
 9 A. We were not.
 10 **Q. And other than the specific meetings that**
 11 **we've talked about, what sorts of work were you or your**
 12 **firm doing for Mr. Greitens or The Greitens Group?**
 13 A. During that time, it was only helping him
 14 network around to Republican Party officials, influencers
 15 and activists.
 16 **Q. And during that time period, did you ever**
 17 **interact with in any way the staff of The Mission**
 18 **Continues?**
 19 A. No.
 20 (Whereupon Exhibit 6 was marked for
 21 identification.)
 22 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 23 **this document which is numbered as Exhibit 6?**
 24 A. I do.
 25 **Q. And what is this document?**

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1 A. This was an agenda that I created for a
 2 meeting on July 1, 2014. It was a follow-up meeting based
 3 on a meeting we had previously with a group of national and
 4 Missouri political consultants. And it was a meeting that
 5 we had at the offices of Barklage & Knodell.
 6 **Q. And that prior meeting, when did that occur?**
 7 A. It was sometime in the previous month.
 8 June 18, I believe it was.
 9 **Q. So was that meeting, the meeting listed on**
 10 **your time line for June 18?**
 11 A. Yes.
 12 **Q. Other than meetings and -- that we've already**
 13 **discussed, did you have any other in-person meetings before**
 14 **June 18 with Mr. Greitens?**
 15 A. I do not recall.
 16 **Q. Does the time line, Exhibit 1, accurately list**
 17 **the attendees for the June 18 meeting?**
 18 A. Yes.
 19 **Q. Who is Krystal Taylor?**
 20 A. Krystal Taylor was an employee of Mr. Greitens
 21 or it was indicated to us that she was an employee of
 22 Mr. Greitens -- an employee of Mr. Greitens at The Greitens
 23 Group. I was led to believe she was his personal
 24 assistant.
 25 **Q. So was it your understanding that she was an**

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1 **employee of The Greitens Group?**
 2 A. That was my understanding.
 3 **Q. Did you have any understanding that she was an**
 4 **employee of The Mission Continues?**
 5 A. No.
 6 **Q. What was your understanding of Ms. Taylor's**
 7 **job duties?**
 8 A. She appeared to be Mr. Greitens' scheduler.
 9 And I was led to believe that she would have some role in
 10 the campaign. I was led to believe she was his personal
 11 assistant. And along with Mr. Whitman, they would both
 12 have roles in -- in -- in Mr. Greitens' campaign for
 13 office.
 14 **Q. And what made you think that Ms. Taylor would**
 15 **participate in a campaign?**
 16 A. Mainly because there would be no other reason
 17 for her to attend this -- this vendor meeting on June 18 if
 18 she didn't. It was a very high-level meeting that we held
 19 that we had at a hotel. I believe it was the Drury
 20 Plaza Hotel in June of 20 -- on June 18 of 2014.
 21 And we had that meeting because we had these
 22 other vendors in for a bunch of other meetings with other
 23 candidates. And Mr. Greitens was only available on
 24 June 18. And that was the day before we had all these
 25 other meetings. He was going out of town. So we arranged

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1 everyone's schedule in order for Mr. Greitens -- to
 2 accommodate Mr. Greitens' schedule.
 3 **Q. And what was discussed at the June 18 meeting?**
 4 A. Everything from grassroots, to polling, to the
 5 state demographics, to general strategy, to media buying,
 6 opposition research. Kind of going through the whole --
 7 the whole process on what it takes to put together a major
 8 campaign.
 9 **Q. Was it your sense that one purpose of this**
 10 **meeting was for Mr. Greitens to meet with vendors who might**
 11 **end up being vendors for him on a campaign?**
 12 A. Yes.
 13 **Q. Was it your sense that Mr. Greitens had that**
 14 **impression, that that was a purpose of the meeting?**
 15 A. Yes.
 16 **Q. What led you to believe that Mr. Greitens had**
 17 **that understanding?**
 18 A. Well, everything that we did -- everything
 19 that I coordinated with Mr. Whitman, everything that I was
 20 led to believe was that Mr. Greitens has final say -- or
 21 had final say on anything political that he did. Obviously
 22 I communicated to Mr. Whitman the attendees who would be --
 23 who would be there, their goals. I believe -- I don't
 24 recall exactly. I believe I provided Mr. Whitman a bio of
 25 the different vendors that were in attendance at that

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1 meeting.

2 And everything I was led to believe was

3 approved by Mr. Greitens. So yes, I believe he had direct

4 knowledge that this -- that was what the meeting was about.

5 **Q. In advance of this June 18 meeting, did you**

6 **speak directly with Mr. Greitens about that meeting or its**

7 **agenda?**

8 A. I do not recall.

9 **Q. The vendors that participated in this meeting,**

10 **are they the sorts of vendors that a candidate for governor**

11 **might consider retaining?**

12 A. Yes.

13 **Q. Are they the sorts of vendors that a candidate**

14 **for lieutenant governor might consider retaining?**

15 A. Yes.

16 **Q. Are they the sorts of vendors that a secretary**

17 **of state might consider retaining?**

18 A. Yes.

19 **Q. Other than the individuals listed on the time**

20 **line that you produced for the June 18 meeting, do you**

21 **remember anyone else attending that meeting?**

22 A. I do not.

23 **Q. Do you recall any of the attendees taking**

24 **written or typed notes during that meeting?**

25 A. I do not recall specifically. But just in my

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1 knowledge on how these meetings -- how I set up these

2 meetings and how others -- how others associated with

3 meetings like this do, I would assume someone did take

4 notes and action items.

5 **Q. Was the June 18 meeting exclusively dedicated**

6 **to political and potential campaign topics?**

7 A. Yes.

8 **Q. Would there be any reason for someone to**

9 **participate in that meeting if they were not somehow**

10 **involved with political or campaign issues?**

11 A. No.

12 **Q. Do you recall Ms. Taylor speaking at that**

13 **meeting?**

14 A. I do, just very briefly. To my knowledge,

15 that was the first time I had met Ms. Taylor. I don't

16 recall exactly what she had said during it. But to the

17 best of my knowledge, the only people that really spoke

18 outside of -- you know, the individual people listed here,

19 were Mr. Greitens, maybe a couple words by Mrs. Greitens

20 and again maybe -- maybe just a couple words by Ms. Taylor

21 as well.

22 **Q. Do you recall what Mr. Greitens said at that**

23 **June 18 meeting?**

24 A. I don't recall exactly. I know that there was

25 a lot of -- a lot of responses and dialogue and questions

Page 55

1 that both he and Ms. Greitens had for the group and for

2 individuals that were presenting different topics.

3 **Q. Do you recall whether Mr. Greitens ever asked**

4 **any questions specific to candidacy for governor?**

5 A. I don't recall exactly. Yeah, I don't recall

6 exactly.

7 **Q. Before your July 1, 2014 meeting, did you have**

8 **any conversations with Mr. -- between your June 18 and**

9 **July 1 meetings, did you have any conversations with**

10 **Mr. Greitens or Mr. Whitman?**

11 A. I believe I had conversations with

12 Mr. Whitman.

13 **Q. And what did you discuss with him?**

14 A. To my recollection, it was -- it was just

15 follow-up from the vendor meeting and coordinating setting

16 up the next meeting.

17 **Q. And was the next meeting the July 1, 2014**

18 **meeting?**

19 A. Yes.

20 **Q. And is this Exhibit 6 the agenda for that**

21 **meeting?**

22 A. Yes.

23 **Q. What did you discuss during that meeting?**

24 A. It was more the finer points of running a

25 campaign. So the previous meeting on the 18th was more a

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1 40,000-foot overview going through voting -- voting

2 demographics, introduction to polling, introduction to

3 media buying, media markets, overall campaign strategy.

4 The July 1 meeting was more really getting down into

5 details what he needs to be doing right now in order to run

6 for a high-level office.

7 **Q. At the July 1 meeting, was there discussion of**

8 **Mr. Greitens running for governor?**

9 A. I don't recall a specific -- a specific

10 discussion regarding that. But certainly for a high-level

11 office.

12 **Q. During -- was there any discussion about the**

13 **June 18 vendor meeting?**

14 A. To my recollection, yes.

15 **Q. Do you remember what was discussed during that**

16 **portion?**

17 A. I do not recall.

18 **Q. Do you remember whether Mr. Whitman or**

19 **Mr. Greitens expressed any views on the vendors that had**

20 **been at the June 18 meeting?**

21 A. At some point, either Mr. Greitens or

22 Mr. Whitman -- I'm not sure when it occurred. But

23 Mr. Whitman did reach out to me at some point and ask me

24 for contact information. And I can't -- I don't recall if

25 it was for some specific vendors or not. But I do remember

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1 Mr. Greitens wanted to follow up with a couple specific
 2 vendors who were at that June 18 meeting. And I believe
 3 Robert Odell and John Morgan were two of them.
 4 **Q. And who is John Morgan?**
 5 A. He's a demographer that's -- that is based out
 6 of Virginia, I believe, and has done a lot of work in
 7 Missouri.
 8 **Q. During your July 1 meeting, do you remember**
 9 **discussing the possibility of a primary campaign at all?**
 10 A. Yes.
 11 **Q. Do you remember anything about that**
 12 **discussion?**
 13 A. At the time, it was still very early in terms
 14 of the cycle. 2014 elections were coming up. And so the
 15 primary field at that time was very fluid. And there was
 16 only one candidate in the race at that time. Tom Schweich
 17 would also be entering the race right after his November
 18 election. But just in terms of the primary field was very
 19 fluid and -- and it was at a time where the dynamics --
 20 there were -- the dynamics of the primary just were
 21 evolving. And so the discussion was focused on what --
 22 what a potential candidate would have to do or should be
 23 doing at that point in time.
 24 **Q. And was that discussion tied to a candidate**
 25 **for any particular office?**

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1 A. To my recollection, it was one of the
 2 high-level offices, either governor or lieutenant governor
 3 or another statewide office.
 4 **Q. During the July 1 meeting, was there**
 5 **discussion by name of Tom Schweich and/or Catherine**
 6 **Hanaway?**
 7 A. I believe so, yes.
 8 **Q. During the July 1 meeting, was there**
 9 **discussion by name of a potential primary candidate for the**
 10 **office of lieutenant governor and/or the office of**
 11 **secretary of state?**
 12 A. Other than Mr. Greitens being a potential
 13 candidate for those offices, no.
 14 **Q. Do you see on Exhibit 6 here under Roman**
 15 **numeral III, the bullet point that says in-state and**
 16 **national finance strategy and goals?**
 17 A. Yes.
 18 **Q. Was that something that was discussed at the**
 19 **July 1 meeting?**
 20 A. I believe so, but I don't recall the exact
 21 conversation.
 22 **Q. Do you remember anything about that**
 23 **discussion?**
 24 A. Not in particular.
 25 **Q. Do you remember whether The Mission Continues**

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1 **was ever discussed at the July 1 meeting?**
 2 A. To my recollection, no.
 3 **Q. Can we return to Exhibit 1, the time line. Do**
 4 **you see where it says July 1 -- I'm sorry -- where it says**
 5 **July 2014?**
 6 A. Yes.
 7 **Q. Before he stepped down as the CEO of The**
 8 **Mission Continues, was it your understanding that**
 9 **Mr. Greitens was working full time at The Mission**
 10 **Continues?**
 11 A. It was my understanding he had an active role
 12 at The Mission Continues. I don't -- I don't know what
 13 that entailed.
 14 **Q. Do you have any sense on what proportion of**
 15 **his time was dedicated to The Mission Continues?**
 16 A. I was led to believe that -- that it was in a
 17 transition phase. I don't -- I don't know the exact hours
 18 that he would be working for the charity.
 19 **Q. Was it your understanding that somebody else**
 20 **was transitioning into his role?**
 21 A. Yes.
 22 **Q. Who was that person, if you know?**
 23 A. The gentleman who is, I believe, the current
 24 president -- or the current CEO. I believe his name is
 25 Spencer Kympton or something along those lines. Somebody I

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1 never met.
 2 **Q. Do you see on the time line that it says**
 3 **Hafner asked by EG to help manage press coverage of the**
 4 **announcement?**
 5 A. I do.
 6 **Q. Can you -- did you in fact help manage press**
 7 **coverage of the announcement?**
 8 A. To the extent that I was a resource in
 9 crafting a statement that Mr. Greitens could give to people
 10 that asked about his political plans. And that was -- that
 11 was done through Mr. Whitman who was acting at the
 12 direction -- at the sole direction of Mr. Greitens.
 13 **Q. What led you to believe that Mr. Whitman was**
 14 **acting at the sole direction of Mr. Greitens?**
 15 A. Because there was a statement that we helped
 16 craft that -- that had gone through many revisions and
 17 included revisions made by Mr. Greitens.
 18 **Q. Were either you or your firm paid by anyone to**
 19 **do this press work?**
 20 A. We were not.
 21 **Q. To your knowledge when Mr. Greitens left The**
 22 **Mission Continues, did any other Mission Continues staff**
 23 **depart with him?**
 24 A. I would not know that. I do not know that.
 25 **Q. Before he departed The Mission Continues, did**

1 **you discuss with Mr. Greitens what he planned on doing**
 2 **after leaving The Mission Continues?**
 3 A. Not specifically. Just in our meetings, I was
 4 led to believe it was planning to run for office and
 5 launching his -- his book in the spring of 2015.
 6 **Q. At this time, did you have a sense that**
 7 **Mr. Greitens was still trying to decide which office to run**
 8 **for?**
 9 A. At this time, I was led to believe he -- he
 10 was keeping other options in terms of offices open,
 11 other -- other offices open.
 12 **Q. At this time, was it your sense that**
 13 **Mr. Greitens had decided he would in fact run for some**
 14 **office in 2016?**
 15 A. It was my sense that he -- he absolutely would
 16 be running for -- for an office in 2016.
 17 **Q. And what made you think that?**
 18 A. Just knowing my role and knowing my
 19 discussions with both Mr. Whitman and Mr. Greitens.
 20 Somebody doesn't meet with high-level political
 21 consultants. I was also aware of other people that
 22 Mr. Greitens was speaking with and -- and I certainly
 23 believed that he had made his mind up on running for an
 24 office in 2016.
 25 **Q. Did Mr. Greitens ever say anything to you that**

1 by either Mr. Whitman or Mr. Holman. And there was another
 2 consultant as well during this time period in 2014, a
 3 gentleman by the name of Dave Hageman and another gentleman
 4 who worked for Dave Hageman named Steve Michael.
 5 I don't know to the extent that -- of which --
 6 the conversations that were being had between Mr. Greitens
 7 and Mr. Whitman. But I do remember our vendor meeting on
 8 June 18, we had a discussion with Mr. Whitman to see
 9 whether they wanted us to invite Mr. Hageman to that
 10 meeting. And the answer was -- was no. They did not --
 11 they did not want -- or they didn't find it necessary for
 12 Mr. Hageman to attend that meeting.
 13 So there were discussions that they were
 14 having with others. Mr. Hageman sometime in 2014. I don't
 15 know how extensive those were. And then before that in
 16 2013, Mr. Martin.
 17 **Q. Do you know whether Mr. Hageman and/or**
 18 **Mr. Michael are affiliated with any firm?**
 19 A. Yes. A firm named the Victory Enterprises.
 20 **Q. Have you worked with Victory Enterprises at**
 21 **all?**
 22 A. I have worked with them to the extent we've
 23 both been independent contractors on campaigns -- or on
 24 campaigns together. And then I've worked with them to the
 25 extent we've been on opposing campaigns in primaries as

1 **gave you that impression?**
 2 A. To me directly, no. However, in meetings that
 3 I was in with others, including Mr. Whitman and the others
 4 that were present at our numerous other meetings,
 5 certainly -- certainly we were all led to believe that he
 6 was set on running for an unspecified office at the time.
 7 **Q. What other political consultants are you aware**
 8 **of Mr. Greitens having met with around this time?**
 9 A. There was a gentleman who was head of the
 10 state party in 2013. A gentleman by the name of Ed Martin.
 11 At the time, prior to us meeting with Greitens, we had been
 12 told either by Mr. Whitman or Mr. Holman that Mr. Greitens
 13 had been meeting or in conversations with Mr. -- with
 14 Mr. Martin.
 15 Ed was the head -- he was the chairman of the
 16 state Republican Party at that time. And again, I don't --
 17 I don't recall exactly who it was that told us this. I
 18 believe it was either Mr. Whitman or Mr. Holman who
 19 informed us that Ed was trying to arrange a deal with
 20 Mr. Greitens that Ed would run his campaign for governor in
 21 2016 in exchange for Ed providing a grassroots network and
 22 a political network for Eric's campaign.
 23 I can't speak to the times or the discussions
 24 that -- that Mr. Martin and Mr. Greitens had with each
 25 other. I just know that that information was given to us

1 well.
 2 **Q. To your knowledge, did Victory Enterprises end**
 3 **up working on Mr. Greitens' campaign committee?**
 4 A. Yes.
 5 **Q. What was, to your knowledge, Victory**
 6 **Enterprises' role in that campaign?**
 7 A. I think it was -- it was to help Mr. Greitens
 8 network among grassroots, grassroots activists. A lot
 9 of -- and doing some of the same things that I was helping
 10 them as well with, such as networking to different donors,
 11 influencers and things of that nature.
 12 (Whereupon Exhibit 7 was marked for
 13 identification.)
 14 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 15 **this document which is marked as Exhibit 7?**
 16 A. I do.
 17 **Q. What is this document?**
 18 A. This was a document that Victory
 19 Enterprises -- I was led to believe that was a proposal or
 20 part of a proposal that Victory Enterprises provided to
 21 Mr. Greitens at some point in early 2015. It was on my
 22 desk when I was working in a paid capacity with
 23 Mr. Greitens and his campaign manager Danny Laub. I don't
 24 know if this is the full document. I just know these were
 25 the two pages that I personally came in -- came in contact

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1 with.

2 **Q. I think you said you were led to believe.**

3 **What led you to believe that?**

4 A. That -- can you -- can you let me know

5 exactly?

6 **Q. Sure. I think you said that you were led to**

7 **believe that this was a proposal from Victory Enterprises.**

8 **What led you to believe that?**

9 A. My conversations with Danny Laub in January

10 and February of that -- of that year 2015. It was -- he

11 indicated to me on numerous occasions that -- that Victory

12 Enterprises was becoming more aggressive in their outreach

13 to -- to get Eric to sign them as a consultant or as one of

14 the main consultants on his race for governor.

15 So it was in discussions that I had with

16 Mr. Laub essentially. And also Steve Michael who is listed

17 here, Steve Michael was also working out of that office not

18 an incredible amount, but he was in the office regularly on

19 a weekly basis and was in -- was in meetings with Mr. Laub

20 and myself. And it was my sense that Victory was -- was

21 aggressively trying to get them to -- trying to get both

22 Danny Laub and Mr. Greitens to officially sign -- enter

23 into some sort of contract or agreement with them.

24 **Q. And when you referred to the office, what**

25 **office were you referring to?**

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1 A. The office of The Greitens Group which ended

2 up becoming Greitens for Missouri as well. They were

3 housed out of the same location in the Central West End on

4 West Pine Boulevard.

5 **Q. Do you know approximately what time period**

6 **Mr. Michael was spending time in The Greitens Group office?**

7 A. It was certainly during the time that I was

8 spending a lot of time in The Greitens Group office, which

9 would have been January, February, March. I don't know

10 about before then.

11 **Q. So you're not aware whether Mr. Michael --**

12 **you're not aware of Mr. Michael's interaction with The**

13 **Greitens Group during 2014, other than what we've already**

14 **discussed?**

15 A. Correct. I just know that Mr. Hageman and

16 Mr. Michael were advising Mr. Greitens and Mr. Laub. I do

17 not know in what capacity.

18 **Q. During mid 2014, what is your understanding of**

19 **what The Greitens Group was doing in terms of its business**

20 **or other activities?**

21 A. In mid 2014, my understanding was that they

22 were still serving as Mr. Greitens' PR arm, helping him

23 book speeches and also plan on -- and also coordinate

24 political work. Mr. Whitman, that -- that would be

25 Mr. Whitman essentially. Mr. Whitman was coordinating

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1 political work for Mr. Greitens.

2 **Q. And when you say coordinating political work,**

3 **what does that entail?**

4 A. As Eric's -- Mr. Greitens' right-hand guy,

5 Mr. Whitman, his official title was managing director of

6 The Greitens Group. But my -- my access to Eric was always

7 through -- during this time period, was always through

8 Mr. Whitman. So when I say coordinating, I'm referring to

9 setting political meetings, setting meetings with

10 consultants, helping out with any press during this time

11 that was pertaining to Eric's -- to Mr. Greitens' political

12 career or pending political campaign.

13 So -- so mostly just in terms of coordinating

14 the networking meetings and any other things having to do

15 with a pending campaign.

16 **Q. Other than the December 2013 meeting that you**

17 **had at The Mission Continues, did you ever attend any other**

18 **meetings at The Mission Continues?**

19 A. I did not.

20 **Q. Are you aware of any other meetings that took**

21 **place at The Mission Continues that either involved**

22 **political consultants or otherwise had some sort of**

23 **political purpose?**

24 A. I am not directly aware.

25 **Q. Are you indirectly aware?**

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1 A. No, I'm not indirectly aware.

2 **Q. Do you have any reason to suspect that such**

3 **meetings might have occurred?**

4 A. Yes.

5 **Q. Why do you suspect that?**

6 A. Our first meeting -- my first meeting with

7 Mr. Greitens occurred at the offices of The Greitens Group

8 and Mission Continues. I know he was in discussions with

9 other consultants. And it would not surprise me if he had

10 other meetings to discuss a potential run out of that same

11 office prior to -- prior to our meeting in December of

12 2013.

13 **Q. Were you or your firm ever compensated by**

14 **Mr. Greitens, The Greitens Group or The Mission Continues**

15 **for your work involving Mr. Greitens?**

16 A. The only compensation I received was in 2015.

17 Prior to that, the only thing you could consider

18 compensation or a gift, both David Barklage and myself

19 received three -- three or four -- I believe it was only

20 three of Mr. Greitens' signed books. They were sent to us

21 as a gift at some point in 2014.

22 **Q. So were you ever paid by The Greitens Group?**

23 A. Yes. To my recollection, I was paid in

24 January of 2015. To my recollection, the check came from

25 either The Greitens Group or from Eric Greitens personally.

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1 I do not recall the exact -- the exact name on the check.
 2 But I do recall when and where Mr. Greitens provided me
 3 with that check.
 4 **Q. What was that check compensation for?**
 5 A. \$4,000.
 6 **Q. And what work were you being paid for?**
 7 A. That was political work being conducted for
 8 Mr. Greitens in the month of January 2015.
 9 **Q. Was that work for the purpose of getting**
 10 **Mr. Greitens elected to office?**
 11 A. That work was for the purpose of establishing
 12 a campaign, a working campaign and a campaign that would --
 13 that would end up being his campaign for governor.
 14 **Q. When -- would you consider the work that you**
 15 **did at that time necessary for Mr. Greitens to get elected**
 16 **governor?**
 17 A. Yes.
 18 **Q. At the time you performed that work, were you**
 19 **aware of whether Mr. Greitens had decided to run for**
 20 **governor?**
 21 A. I was -- I was aware. I was certainly aware
 22 that he had decided to run for an office. Mr. Greitens led
 23 me personally to believe that either governor or lieutenant
 24 governor were the two offices that he had settled on.
 25 **Q. What did he say to lead you to believe that?**

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1 A. I don't recall the exact words or
 2 conversations. But every meeting that we had together with
 3 other -- with other people, he always said he wanted to run
 4 for an office that he would have an impact in. And those
 5 two offices were for him either governor or lieutenant
 6 governor. But that he would never run against Peter Kinder
 7 in a primary.
 8 **Q. Do you have any impression of why Mr. Greitens**
 9 **did not want to run against Mr. Kinder?**
 10 A. I -- I believe he was saying that because he
 11 wanted -- I believe he was saying that for a couple
 12 reasons. One, because we had informed Mr. Greitens that
 13 Mr. Kinder wasn't going to run for reelection. And two, I
 14 believe he said that to -- to endear himself with certain
 15 Republican donors, activists and other elected officials as
 16 a sign of respect to Mr. Kinder who was -- who was quite
 17 popular among -- as a sitting lieutenant and who was quite
 18 popular among a lot of people in different groups in
 19 Missouri.
 20 **Q. In your experience in past campaigns, is it a**
 21 **major development in the campaign when the candidate or**
 22 **potential candidate finally decides to run for office?**
 23 A. Can you state that question again just so I
 24 understand it?
 25 **Q. Sure. In your experience working on other**

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1 **campaigns, is it your experience that once the candidate**
 2 **decides, truly decides to run for office, that that's a**
 3 **noteworthy moment in the life cycle of a campaign?**
 4 A. Absolutely.
 5 **Q. Do you recall when that moment was in**
 6 **Mr. Greitens' candidacy?**
 7 A. I think my answer on that would depend on --
 8 on whether you're asking if I -- if I believed from our
 9 first meeting that he was going to run for office. And on
 10 the surface, Mr. Greitens wanted us to believe that he had
 11 not made his mind up yet. But for us, reading between the
 12 lines for us, we believed his mind had already been made up
 13 at our first meeting essentially. There wouldn't have been
 14 a reason for us to even meet with him if we didn't think he
 15 was very serious about running for an office.
 16 **Q. And why did you believe at that time he was**
 17 **already serious about running for office?**
 18 A. Just because of the fact he had already had
 19 discussions with a few others. And for myself, who is
 20 somebody that has worked on high-level campaigns in the
 21 state for my entire career, there was no reason for us to
 22 even meet with him initially if we didn't think that he was
 23 somewhat serious.
 24 **Q. So other than the December 2013 meeting, was**
 25 **there any other moment in your interactions with**

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1 **Mr. Greitens where you felt like he had progressed to the**
 2 **point of having actually decided to run for office?**
 3 A. I think it was early -- early 2014 that there
 4 was no turning back for him. He had discussed a time line
 5 with us that -- that we advised him that it would be
 6 difficult -- it would be a difficult time line to achieve.
 7 But he had indicated to us -- I don't know the exact
 8 moment, but it was in our first meetings -- that he wanted
 9 to officially launch a campaign after his next book launch
 10 which -- which was going to -- which was scheduled to
 11 happen in spring of 2015. And I don't -- I don't know the
 12 exact time frame. I know it was extremely early on in our
 13 discussions.
 14 **Q. Did he describe that time line to you sometime**
 15 **in 2014?**
 16 A. Yes.
 17 **Q. Did those discussions or other discussions you**
 18 **had with Mr. Greitens during 2014 lead you to believe he**
 19 **had decided he was going to run for office?**
 20 A. Yes.
 21 **Q. Did those discussions lead you to believe that**
 22 **he had already decided that he was going to run for**
 23 **governor?**
 24 A. Not a hundred percent. I was led to believe
 25 that he was very interested in running for lieutenant

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1 governor as well.

2 **Q. When did it become clear to you that**

3 **Mr. Greitens intended to run for governor and not for some**

4 **other office?**

5 A. In 20-20 hindsight, it was -- it was evident

6 early on. The first time that I -- that I truly knew a

7 hundred percent -- with a hundred percent certainty that --

8 that he was going to run for governor and there was nothing

9 else, was in a conversation that I had with him the day

10 that we parted ways in March of 2015.

11 And in that conversation, Mr. Greitens

12 informed me that I would be a great employee in the

13 governor's office some day, that -- that in a couple

14 months, depending on whether the dynamics of the primary

15 changed, that he would love to bring me back on the

16 campaign. And also in a conversation that I had that same

17 morning with his campaign manager, Danny Laub, I asked him

18 directly if lieutenant governor was completely off the

19 table. And Danny said yes.

20 So a hundred percent, that's the exact moment

21 that I knew that he had ruled out any other office. Again,

22 for me to read between the lines, I -- I should have picked

23 up on it a lot sooner. But I'd say the first time that I

24 truly understood that -- that there was -- there was no

25 other option for any other office was in March of 2015.

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1 **Q. Why do you say that you should have picked up**

2 **on it sooner?**

3 A. The way that we parted ways, I felt was very

4 unprofessional. I did not hear it from Mr. Greitens first

5 after putting in well over a year's worth of work for him.

6 And a lot of people that we introduced him to as really

7 professional courtesy throughout 2014, many of which ended

8 up becoming some of his inner circle for both his campaign

9 and governor's office, I believed at the time of our

10 separation, it kind of dawned on me that our relationship

11 all through 2014 and up until we parted ways was just

12 purely transactional.

13 I told Mr. Greitens that when I spoke to him

14 later that night, that he -- I deserved to hear it from him

15 first, not his campaign manager that we were -- that our

16 working relationship was ended. I think just personally,

17 I -- I've never been in that situation before. And I think

18 that it called for a little bit more of a professional

19 level of respect. And it wasn't provided. And it is what

20 it is.

21 But I kind of knew then that our relationship

22 was purely transactional. And in that mind frame, every --

23 all the work that I had put in for Mr. Greitens prior to

24 that was for -- for him was a means to an end for him. And

25 that was -- that was going through a political process

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1 and -- and a candidate process that -- I'm not sure how to

2 specifically answer this.

3 I think really it was just a whole exercise

4 that I should have -- I really should have realized what

5 he -- what he was planning on from the very beginning in

6 terms of running for the highest office in the state.

7 **Q. Did you ever speak with Mr. Barklage about --**

8 **either as these events were unfolding or later on, about**

9 **when Mr. Greitens, you know, decided he wanted to run for**

10 **governor or speak about your parting of ways?**

11 A. Can you say that question again?

12 **Q. Sure. That was a long, rambling question. It**

13 **was really two. So let me ask you them separately.**

14 **Did you ever speak with Mr. Barklage about**

15 **your parting ways with Mr. Greitens?**

16 A. Yes.

17 **Q. What did you guys discuss about that?**

18 A. Just about how it occurred. And how -- how

19 Mr. Laub was the first one to tell me why they were

20 separating -- or why they were separating their

21 relationship with me. It -- obviously, I was told it had

22 nothing to do with me. It was more because of the

23 consultants that I had relationships with, Mr. Barklage

24 included.

25 A couple days prior to this, Mr. Barklage

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1 informed Mr. Greitens, Mr. Bobak and Danny Laub that if he

2 were to run for governor, that -- that Mr. Barklage would

3 not work for him because he didn't feel that he should be

4 running for governor. And a couple days later is when -- I

5 believe that conversation between them happened on a

6 Friday. And on Monday when I came into the office, I met

7 with Danny Laub, and Danny had informed me that they

8 were -- that they were severing all ties with Mr. Barklage

9 because he was likely to work for John Brunner in the event

10 that John ran for governor.

11 **Q. Who is Mr. Bobak?**

12 A. Mark Bobak was a gentleman -- I don't know if

13 he acted as Eric's personal attorney or a personal adviser.

14 I don't really know what his exact role was.

15 MR. ERNST: Before you continue, I'm going to

16 caution here we're taking the position although it's not a

17 position to Mr. Hafner, that out of abundance of caution,

18 he's not going to give any testimony that would require him

19 to elicit any privileged communications involving

20 Mr. Bobak. My understanding is there's a process that's

21 underway to resolve that issue. If and when that process

22 is resolved and Mr. Hafner is asked to provide testimony,

23 he will be prepared to provide it at that time.

24 MR. MARTINICH-SAUTER: Can we go off the

25 record real quick?

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1 (Whereupon there was an off-the-record
 2 discussion.)
 3 **Q. (By Mr. Martinich-Sauter) Mr. Hafner, did you**
 4 **ever communicate directly with Mr. Bobak?**
 5 A. Yes. Almost certainly regularly, almost on a
 6 daily basis when I was in the office.
 7 **Q. Did you communicate with Mr. Bobak in writing?**
 8 A. Yes.
 9 **Q. You described Mr. Laub as campaign manager; is**
 10 **that correct?**
 11 A. Yes.
 12 **Q. Was that his title?**
 13 A. I don't believe it was an official title. He
 14 certainly conducted himself and his work for Mr. Greitens
 15 as a campaign manager would. And going along with that, I
 16 don't think I even really had an official title. It was he
 17 and I had specific roles in the campaign. And Mr. Laub's
 18 were much more general. And he had a -- he had the roles
 19 and duties of a campaign manager, that a campaign manager
 20 would.
 21 **Q. Do you know, did anyone refer to Mr. Laub as**
 22 **campaign manager in either 2014 or January 2015?**
 23 A. I don't recall.
 24 **Q. Did you know Mr. Laub before he started to**
 25 **work for Mr. Greitens?**

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1 A. I did.
 2 **Q. How long had you known Mr. Laub?**
 3 A. I'm not sure of the exact year. But we both
 4 attended the same college. And I remember meeting Mr. Laub
 5 either -- either in my final year as -- as a student or in
 6 a year or two right after -- right after college. So that
 7 would have put the time frame probably somewhere around
 8 2009, 2010 when I first met him.
 9 **Q. Had you worked professionally with him before?**
 10 A. Not until this point. Not until this point I
 11 didn't.
 12 **Q. Do you know anything about Mr. Laub's**
 13 **professional background or experience?**
 14 A. I knew that he worked for a Congresswoman Ann
 15 Wagner in her campaign. I also knew some of his background
 16 from 2012, he worked, I believe, for Mitt Romney's campaign
 17 in some capacity, maybe in Virginia, I believe it was. And
 18 then I also believe that he worked for a lieutenant
 19 governor candidate out there named Pete Snyder. I'm not
 20 sure when that -- when that time frame was.
 21 And then I was aware he had worked for a small
 22 consulting firm based out of St. Joseph, Missouri. I don't
 23 remember the name of that firm, but he did work with some
 24 people over there quite regularly I think in the months or
 25 maybe in the year leading up to his relationship with

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1 Mr. Greitens.
 2 **Q. Do you know an individual named Thalia**
 3 **Seligson?**
 4 A. I do not. I only recall that name because the
 5 Missouri Ethics Commission, I believe that was the name
 6 they asked me about in November of 2016. No, I've never
 7 met her. But obviously it's a unique name so I recall just
 8 the name.
 9 **Q. Do you recall hearing that name any time**
 10 **before your MEC meeting?**
 11 A. I do not.
 12 **Q. Do you know an individual named Jennae**
 13 **Neustadt?**
 14 A. I do.
 15 **Q. How long have you known Ms. Neustadt?**
 16 A. Quite a while. She worked for the same
 17 consulting firm before I did in pretty much the same role I
 18 had while at the consulting firm. So I've known her since
 19 2011 for sure, probably 2010.
 20 **Q. Did you ever interact in any way with**
 21 **Ms. Neustadt with regards to Mr. Greitens? Did you ever**
 22 **discuss Mr. Greitens with her?**
 23 A. Very early on, we had had a number of
 24 conversations, Jennae and I did. If I recall correctly,
 25 the first time that she met Mr. Greitens was out of the

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1 Barklage office. She was working in the front of the
 2 office, and Mr. Greitens had come in for a meeting. I
 3 don't know which -- which meeting it was. I don't really
 4 recall. I think it was in the summer of 2014. And I
 5 believe -- to my recollection -- to the best of my
 6 recollection, that was the first time Mr. Greitens met
 7 Ms. Neustadt.
 8 **Q. Are you aware of whether she did any political**
 9 **work for Mr. Greitens?**
 10 A. She did. She did, I believe, quite a bit of
 11 political work. She, along with her former boss, John
 12 Lamping, he was a former state senator from the 24th Senate
 13 District here in St. Louis. They had a series of meetings
 14 with Eric. I was not in those meetings. But they had a
 15 series of meetings to introduce Eric to policy matters,
 16 policy issues. And they had a series of briefings with
 17 Eric and really served as policy advisers to Eric through
 18 2014. But I don't recall -- I was not in those meetings
 19 and I don't know the dates of those meetings.
 20 **Q. Based on your knowledge, was Ms. Neustadt a**
 21 **political consultant at that time?**
 22 A. I believe she was a -- she was still an
 23 employee of the state. I wouldn't necessarily consider her
 24 a political consultant. I believe she was an employee of
 25 the state through 2014. She did some work on campaigns.

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1 Certainly she had worked -- done some work for State
 2 Representative Rick Stream. He was running for St. Louis
 3 County Executive. She and I worked together on that race.
 4 I don't know if she was ever compensated for it. I think
 5 it was more as a volunteer adviser. But to answer your
 6 question, I wouldn't consider her a consultant, but more of
 7 a campaign staffer.
 8 MR. MARTINICH-SAUTER: I've got a couple of
 9 questions and then maybe we can break for lunch.
 10 MR. ERNST: Okay.
 11 **Q. (By Mr. Martinich-Sauter) When, if ever -- did**
 12 **you ever enter into a written contract with Mr. Greitens or**
 13 **The Greitens Group?**
 14 A. I don't recall ever entering into a written
 15 contract with either of them.
 16 MR. ERNST: If I may, just so there's no
 17 ambiguity here. There's potential for a consulting
 18 agreement, but you also may have in mind a certain
 19 non-disclosure agreement. So I don't know if your question
 20 was intended to encompass any and all contracts or if you
 21 have something else in mind. So you may want to clarify
 22 that with the witness.
 23 MR. MARTINICH-SAUTER: Yeah. And I will ask a
 24 follow-up question.
 25 **Q. (By Mr. Martinich-Sauter) Did you ever enter**

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1 **into a non-disclosure agreement with either Mr. Greitens or**
 2 **The Greitens Group?**
 3 A. I did.
 4 **Q. Do you recall when you entered into that**
 5 **contract?**
 6 A. It was early January of 2015.
 7 **Q. Do you recall any conversations you had with**
 8 **Mr. Greitens or anyone else leading up to that?**
 9 A. Regarding that agreement?
 10 **Q. Correct.**
 11 A. There would have been one discussion I had
 12 just, I think, when it was provided to me. His adviser
 13 supplied me it. And I believe I took a -- took one day
 14 just to review it. And I may have had my brother-in-law,
 15 who's an attorney, review it. And then I signed it the
 16 next day. So other than I think maybe an initial
 17 discussion just with Eric's adviser, just that I wanted to
 18 have some time to review it, but that was it.
 19 **Q. Who's the adviser you're referring to?**
 20 A. Mark Bobak.
 21 **Q. Did anyone other than Mr. Bobak give you any**
 22 **explanation for why you were being asked to sign this or**
 23 **why you were being asked to sign this now, rather than at**
 24 **another time?**
 25 A. No. There was -- there was -- there really

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1 wasn't an explanation given. It was -- for them, it just
 2 came across as standard operating procedure. And before I
 3 officially was included in the inner circle, I had to sign
 4 one.
 5 **Q. In your experience working on other campaigns,**
 6 **is executing a non-disclosure agreement ordinary practice?**
 7 A. For me, it was not ordinary. At the time --
 8 at the time, I was, I think, 27 years old. And the other
 9 campaigns I had been on, even though I had been on them at
 10 a higher level, I had never had to sign an NDA before,
 11 before that. So for me, it was -- it was different.
 12 Now, at a higher level, say for somebody
 13 that's acting as a general consultant, which I don't
 14 consider myself a general consultant, who manages a bunch
 15 of campaigns at one time even and directs general strategy
 16 on other things, I don't think it's out of the realm of --
 17 of what's ordinary. I think that's a general thing that
 18 people at a higher level than I was at the time would be
 19 asked to sign one. I don't think that's out of the
 20 question. But for me, it was unique.
 21 MR. MARTINICH-SAUTER: All right. With that,
 22 I would propose going off the record and taking a break.
 23 MR. ERNST: Okay.
 24 (Whereupon there was a lunch break.)
 25 (Whereupon Exhibit 8 was marked for

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1 identification.)
 2 **Q. (By Mr. Martinich-Sauter) Mr. Hafner, do you**
 3 **recognize this document that is labeled as Exhibit 8?**
 4 A. I do.
 5 **Q. What is this document?**
 6 A. This was an e-mail sent by Krystal Taylor to
 7 myself and Danny Laub one of the first -- in one of the
 8 first days that I was employed by Mr. Greitens.
 9 **Q. When did you start being employed by**
 10 **Mr. Greitens?**
 11 A. I don't know the exact day. I know it was
 12 early January. I know that this was sent to me in one of
 13 the first days that I was employed. I would like to say it
 14 was Monday, January 5, was my first day in the office.
 15 **Q. Were you employed by Mr. Greitens individually**
 16 **or some entity?**
 17 A. I was led to believe that I would be employed
 18 by him or The Greitens Group, at least at the beginning of
 19 our arrangement.
 20 **Q. You said at the beginning of your arrangement.**
 21 **Was it your understanding that that would change at some**
 22 **point?**
 23 A. Yes. At the point when he established a -- a
 24 campaign finance committee, it was my understanding that I
 25 would be paid through that entity. But I believe when I

1 started in January, to my recollection -- I don't recall
2 when I started, who was going to pay me. I just know that
3 our arrangement was for \$4,000 a month. But to my
4 recollection, I don't -- I don't recall in the beginning
5 knowing for sure where that money was going to come from.

6 **Q. Did Mr. Greitens ever say anything to you to
7 lead you to believe that at some point you would be
8 employed by a campaign committee?**

9 A. Yes.

10 **Q. What did he tell you?**

11 A. I don't recall an exact conversation. But
12 when we finalized our compensation agreement in -- in
13 December of 2014, it was -- it was just -- it was -- the
14 only thing we really agreed on for sure was that the
15 compensation was 4,000. And I don't recall the exact --
16 exact conversation on what entity would pay me. But I knew
17 that the campaign was moving forward. And that I would be
18 paid for my work -- for my work for Mr. Greitens, my
19 political fork for Mr. Greitens.

20 **Q. What was the nature of the work that you
21 expected to do for Mr. Greitens?**

22 A. So I think from the beginning, I had known
23 that Mr. Greitens was also working with Steve Michael and
24 David Hageman, and there were a couple of others. People
25 like Jim Lempke who was a former state senator who was also

1 was certainly indicated that that was going to be my role.
2 And I say that because Danny Laub had -- he had been
3 focused on, let's just say, some higher level political
4 stuff, setting up meetings with national vendors and kind
5 of coordinating an overall campaign. And it was kind of
6 defined that my role was going to be along the lines of
7 fundraising and helping Mr. Greitens network, network into
8 different influencers, donors, people that can be helpful
9 to him.

10 **Q. Now, did you say that Krystal Taylor sent this
11 e-mail to you at the direction of Mr. Greitens?**

12 A. I believe it was at the direction of
13 Mr. Greitens. Obviously I had no idea that any of these
14 lists existed. And as I recall, Mr. Greitens informed --
15 instructed Krystal Taylor to provide these lists, these
16 lists to me. And she sent them to both Danny and myself.

17 **Q. What makes you think that Mr. Greitens gave
18 that instruction to Ms. Taylor?**

19 A. Danny, if he had these filings, he would have
20 provided them to me. He would have provided them to me
21 himself. It's just he would have. He provided me other
22 files and a lot of other things political campaign related
23 and things that they had been working on.

24 **Q. Did --**

25 A. As I recall --

1 working with Victory Enterprises.

2 I had known that they were helping him on the
3 grassroots side. And so it was -- it was indicated to me
4 that I would be helping with kind of general political
5 matters, but then really coordinate fundraising activities
6 for the campaign.

7 **Q. Did you ever discuss with anyone a time line
8 for when Mr. Greitens might start fundraising?**

9 A. I don't recall a specific time line. But I do
10 know that this was something they wanted me to work on
11 immediately beginning on one of the first days that I
12 started.

13 **Q. So it was your understanding that Mr. Greitens
14 wanted you to start working on fundraising as early as
15 January 6?**

16 A. Yes.

17 **Q. And what was your understanding based on?**

18 A. Because Krystal Taylor sent me these lists at
19 the direction of Mr. Greitens. And from these -- from
20 these files, I was to set meetings with Mr. Greitens and
21 discuss establishing a fundraising plan and a finance plan
22 to be utilized by the campaign.

23 **Q. Did Mr. Greitens tell you that that was what
24 was expected of you?**

25 A. I don't recall a specific directive. But it

1 **Q. I'm sorry. Go ahead.**

2 A. As I recall, Danny had asked Krystal to send
3 him the files at the same time. And so my first -- my
4 first day -- and we had set a finance meeting to discuss
5 these files I think on -- sometime that week. We had set a
6 finance meeting to discuss these files. If Danny had them
7 himself, he could have provided them to me without
8 Krystal's involvement.

9 **Q. Did Krystal ever tell you directly that
10 Mr. Greitens had instructed her to send these to you?**

11 A. No.

12 **Q. Before you received this e-mail, were you
13 familiar with any of the attachments to this e-mail?**

14 A. I was not.

15 **Q. Do you think you would recognize the
16 attachments of this e-mail if you saw them today?**

17 A. I would. And to clarify my earlier response
18 and -- sorry. To clarify my earlier response, I was
19 familiar with one of the lists here. I was familiar with
20 some of the information, I'll say, on one of the lists.
21 Because it included a bunch of information from meetings
22 that I had helped set up for Eric. So to that extent, I
23 was familiar with one of these. But other than that, no, I
24 didn't know any of these existed.

25 **Q. Which of the lists were you familiar with some**

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1 of the information?

2 A. The fundraising tracker list.

3 **Q. And what was your understanding of the nature**

4 **of that list?**

5 A. To my recollection, it was people that Eric

6 had come across or had been referred to him that he'd reach

7 out to. And there were a number of names on that list that

8 I provided him the information with in 2014. And it

9 included some of the donors that I introduced him to.

10 **Q. Do you know who was compiling or updating that**

11 **list?**

12 A. I do not.

13 **Q. So you don't know whether Krystal Taylor was**

14 **working on that project?**

15 A. I do not know.

16 **Q. Before this e-mail, had you actually seen that**

17 **list before?**

18 A. No.

19 (Whereupon Exhibit 9 was marked for

20 identification.)

21 **Q. (By Mr. Martinich-Sauter) Do you recognize**

22 **this document which is labeled as Exhibit 9?**

23 A. I do.

24 **Q. And what is that document?**

25 A. This is a donor list that was provided to me

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1 that was described by Krystal Taylor in the initial e-mail

2 with this list as The Mission Continues list.

3 **Q. Before this e-mail, had you ever heard anyone**

4 **use the phrase "The Mission Continues list"?**

5 A. No.

6 **Q. When you received this e-mail, what did you**

7 **think about the use of the phrase "The Mission Continues**

8 **list"?**

9 A. I don't recall. I -- all these lists, I had

10 no idea how they were acquired or -- or in the way they

11 were acquired. So I think with all the lists -- the

12 Schweich list I was pretty taken aback by. It was -- it

13 appeared to be an internal fundraising list that Tom

14 Schweich utilized.

15 The Mission Continues list, while it's

16 described that in the e-mail, I didn't know how it was

17 created or how it was acquired or that the charity didn't

18 provide it directly to Eric.

19 So at the time, I -- I didn't -- I might have

20 suspected something -- or maybe I shouldn't say that. I

21 might have had a little hesitancy utilizing a list like The

22 Mission Continues list and the Schweich list. But at the

23 time, I don't recall specifically how I reacted or anything

24 else.

25 **Q. Why would you have had some hesitancy using**

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1 **The Mission Continues list?**

2 A. Well, in the event that it was the charity's

3 donor list directly, just in my experience with campaigns

4 and building fundraising plans and tracking lists and

5 everything else, I've never used the donors of a

6 non-profit, of a C3 before. And so to that extent, I

7 would -- in the back of my mind, if it -- if it had been a

8 list from a charity, it's just something that makes me a

9 little uneasy.

10 But again, at the time, I had no idea how or

11 when it was compiled or that Eric didn't compile it himself

12 from his personal contacts or personal notes.

13 **Q. After this e-mail, did you ever learn where**

14 **that list came from?**

15 A. No.

16 **Q. Did you ever ask anybody where that list came**

17 **from?**

18 A. I did not.

19 **Q. Did you ever express to anybody your**

20 **discomfort with using that list?**

21 A. The only time I would have expressed

22 discomfort would be when David Lieb from the Associated

23 Press, he contacted me in October of 2016 and he had had a

24 copy of this list. And whatever background research he did

25 or analysis -- I think at that time, he had looked in the

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1 metadata of the document and found out that it had been a

2 Mission Continues employee.

3 That was the first instance that I -- that I

4 knew or that I suspected that it did originate from the

5 charity. So at that point, yes, I was -- yeah, experienced

6 some discomfort with that fact. But at the time, no.

7 **Q. Did Mr. Lieb tell you how he obtained that**

8 **document?**

9 A. He did not.

10 MR. MARTINICH-SAUTER: Keep that handy, but

11 we'll move on.

12 (Whereupon Exhibit 10 was marked for

13 identification.)

14 A. There was one other aspect. You might ask me

15 about it later. But the action items from one of the first

16 meetings that I had with Mr. Greitens, he wanted me to go

17 meet with somebody who had direct knowledge of Mission

18 Continues' donors. And I never reached out to that person.

19 I don't know if she was a -- a direct employee or still

20 employed at Mission Continues. But I knew that she had

21 helped fundraise for Mr. Greitens or that's how he

22 communicated to me, that she -- she would know a lot of

23 these donors. And I took notes on that meeting and but I

24 never followed up with her because that was something that

25 I was uncomfortable with.

1 **Q. (By Mr. Martinich-Sauter) Do you know what her**
2 **name was?**

3 A. It was somebody by the name of Lindsay Hodges.

4 **Q. Did you express your discomfort to anybody?**

5 A. I did not tell anybody about it. I -- I had
6 that as action items at the following one of our meetings.
7 But internally, I -- yeah. Internally, I was uncomfortable
8 with that aspect of it.

9 **Q. I'll circle back to that. But for the moment,**
10 **do you recognize this document that's labeled as**
11 **Exhibit 10?**

12 A. I do.

13 **Q. What is this document?**

14 A. This is the document that -- let me just make
15 sure it is the one I'm thinking of. Yes. This is the
16 document that was presented to me as a -- as a list of
17 potential donors to Mr. Greitens' campaign. And to my
18 knowledge, it was communicated in the e-mail that this was
19 Mason Fink's list.

20 Mason Fink is a national fundraiser. He did
21 come in for a strategy meeting in Eric's office in January.
22 But this was communicated that this was his list. Mason
23 had a lot of experience raising money for Mitt Romney. And
24 this was kind of -- this was a bunch of donors that -- that
25 could be potentially useful to Mr. Greitens' campaign.

1 created it. But my understanding is that this -- these
2 were people that -- that Mr. Greitens had identified or had
3 met with recently who would be useful to his campaign.

4 **Q. Do you see in the title of the attachment, it**
5 **says Oct 10, 2014?**

6 A. Yes.

7 **Q. Does the date October 10, 2014 have any**
8 **significance to you that you know of?**

9 A. No.

10 (Whereupon Exhibit 12 was marked for
11 identification.)

12 **Q. (By Mr. Martinich-Sauter) Do you recognize**
13 **this document that's labeled as Exhibit 12?**

14 A. Just by the size of the document and the
15 columns, yeah. This is the Schweich fundraising list.

16 **Q. So is this document a true and accurate copy**
17 **to the best of your recollection of the Schweich list that**
18 **was attached to the January 6, 2015 e-mail?**

19 A. Yes.

20 **Q. Did anyone ever tell you any information about**
21 **where this list came from?**

22 A. Not directly. But on the e-mail, it was
23 communicated that another consultant, Steve Michael, had
24 acquired and provided this list to Mr. Greitens at some
25 point.

1 **Q. Just to circle back to make sure I use the**
2 **proper language here. Can you look at Exhibit 9 again?**

3 A. Yes.

4 **Q. Is that a true and accurate copy of a list**
5 **that you received as an attachment to the January 6, 2015**
6 **e-mail from Krystal Taylor to the best of your**
7 **recollection?**

8 A. Yes. Yeah. I was confirming that there were
9 three tabs on it. One was a foundation tab which is right
10 after the individual donor section. Then there was a
11 company tab too. Which I -- which is the last -- the last
12 one in here.

13 (Whereupon Exhibit 11 was marked for
14 identification.)

15 **Q. (By Mr. Martinich-Sauter) Do you recognize**
16 **this document that is labeled as Exhibit 11?**

17 A. Yes. This is the other -- this is the other
18 list on here, the fundraising tracker list.

19 **Q. And so is this a true and accurate copy of the**
20 **document attached to that e-mail, the January 6 e-mail**
21 **titled fundraising tracker?**

22 A. Yes.

23 **Q. And remind me what your understanding was of**
24 **the origin of that document.**

25 A. The origin of this document, I do not know who

1 **Q. To your knowledge, did Mr. Michael or his firm**
2 **ever do work for Tom Schweich?**

3 A. To my knowledge, no.

4 **Q. Is it correct that earlier today, you**
5 **commented that it was your impression that this list might**
6 **be an internal Schweich campaign list?**

7 A. Yes.

8 **Q. What led you to believe that?**

9 A. I remembered some of the notes that were on
10 the list and also how extended -- how extensive it was.
11 Just knowing the fundraising vendors in our state and
12 having worked with a couple of them directly, I know that
13 this was a professionally created list that had donor
14 history. And I remember that donor history from a bunch of
15 other candidates. And so -- so I -- I inferred that --
16 that it was created by somebody who had Mr. Schweich as a
17 client. Yeah.

18 **Q. What was your reaction to the fact that you**
19 **were receiving what you thought was a donor list for**
20 **another candidate?**

21 A. That's -- that was something that made me very
22 uncomfortable. And I -- I don't recall ever using this
23 list in the fundraising plans. Certainly fundraisers and
24 myself, I've used lists from previous campaigns or used
25 lists as a template to build a fundraising -- fundraising

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1 plans for other candidates. But taking something that was
 2 developed by another candidate, especially another who
 3 would be a primary candidate, that is something that I've
 4 never done before and I didn't in this case. That's
 5 something that would make me very uncomfortable.

6 **Q. And at the time you received this e-mail, did**
 7 **you perceive Mr. Schweich as a potential primary opponent**
 8 **of Mr. Greitens?**

9 A. Yes.

10 **Q. To your knowledge, did Mr. Greitens perceive**
 11 **Mr. Schweich as a potential primary candidate?**

12 A. Yes.

13 **Q. Did you ever discuss with Mr. Greitens that**
 14 **Mr. Schweich might be a potential primary candidate --**
 15 **opponent?**

16 A. I don't recall any exact specific
 17 conversations. I do remember -- I do remember there was
 18 one time where Mr. Greitens had -- had gone to an event.
 19 And I can't remember when the event was. But it was a
 20 fundraising event at, I believe, [REDACTED] house. And
 21 Mr. Schweich was there. And Mr. Schweich, the way it was
 22 communicated to me from Mr. Greitens, was very paranoid
 23 that Mr. Greitens was at the same fundraiser and meeting
 24 people.

25 And Mr. Greitens had told us this kind of in

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1 passing. And I don't remember when it was, but -- but to
 2 that extent, Mr. Greitens did expect Mr. Schweich to be a
 3 candidate for -- for governor.

4 **Q. Do you recall when that event at Mr. [REDACTED]**
 5 **house took place?**

6 A. I do not recall.

7 **Q. Do you recall whether it was in 2014?**

8 A. To my knowledge, it was in late 2014.

9 **Q. In January 2015, had anyone been retained as a**
 10 **professional fundraiser to work on the Greitens' campaign**
 11 **or potential campaign?**

12 A. No.

13 **Q. In your experience, how do political campaigns**
 14 **identify potential donors?**

15 A. I'd say it's a multilayer process for --
 16 first, you kind of look at the candidate's personal friends
 17 and family network. That's usually considered low-hanging
 18 fruit, people that have known you for a long time that want
 19 to contribute to your campaign. More often than not,
 20 it's -- you know, friends and family aren't providing huge
 21 contributions to you. But it gives you a base to -- to
 22 raise other money and go -- and spread out beyond that
 23 initial circle.

24 The second layer is you look at donor history
 25 and donors who have contributed to other campaigns in the

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1 past. People contribute for -- for a million different
 2 reasons. But -- but obviously if there's a previous donor
 3 history, that's somebody that you'd approach -- that you'd
 4 approach next. And from there, you know, you can cast kind
 5 of a larger net and network into people that you get into
 6 to introduce you to -- to other donors that might be
 7 interested in your candidacy or the cause, depending on
 8 what you're fundraising for. And you build a fundraising
 9 network.

10 So you identify those donors through --
 11 through lists, through other people and some other ways,
 12 whether it's e-mail or -- or other things. But that's
 13 essentially how -- how something like this -- a fundraising
 14 plan is built, selected from a prospect list and then you
 15 work with the candidate through the process to reach out to
 16 donors and donor prospects.

17 **Q. After you received that January 6, 2015 e-mail**
 18 **from Krystal Taylor, did you discuss that e-mail or the**
 19 **list attached to it with either Krystal Taylor or Danny**
 20 **Laub?**

21 A. I don't recall.

22 **Q. Do you recall having any other communications**
 23 **with Danny Laub that same day, January 6, 2015?**

24 A. I know that there were, but I don't recall
 25 those specific conversations.

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1 **Q. To the best of your recollection, were you**
 2 **guys both working in the same office that day?**

3 A. Yes.

4 **Q. So it would have been possible for you to**
 5 **communicate orally in person?**

6 A. Yes. We were out of the same room.
 7 (Whereupon Exhibit 13 was marked for
 8 identification.)

9 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 10 **this document that is labeled as Exhibit 13?**

11 A. I recognize the e-mail.

12 **Q. Did you have any conversations with Danny Laub**
 13 **leading up to that e-mail about this e-mail or the list**
 14 **that was attached to it?**

15 A. Leading up to, I don't recall.

16 **Q. Did you have any communications with Mr. Laub**
 17 **after receiving this e-mail about this e-mail or the list**
 18 **attached to it?**

19 A. I don't believe so. I remember this
 20 attachment was -- it wasn't really professionally put
 21 together and had just a bunch of notes on it. It included
 22 some activists and other things. I don't recall having a
 23 direct conversation with Danny or a detailed conversation
 24 with Danny about it.
 25 (Whereupon Exhibit 14 was marked for

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1 identification.)

2 **Q. (By Mr. Martinich-Sauter) Do you recognize**

3 **this document that is labeled as Exhibit 13?**

4 **MR. ERNST: 14.**

5 **Q. (By Mr. Martinich-Sauter) 14. It's labeled as**

6 **Exhibit 14.**

7 A. I do.

8 **Q. What is this document?**

9 A. This was an e-mail that was sent to myself

10 from Krystal Taylor suggesting that a specific donor to The

11 Mission Continues should be on Mr. Greitens' prospect list.

12 **Q. Do you see where the e-mail says is John Hauck**

13 **on the donor list?**

14 A. I do.

15 **Q. When Krystal Taylor used the phrase "the donor**

16 **list," what did you take her to be referring to?**

17 A. A -- I took her to be referring to a -- at the

18 time, just an unspecified list that we were going to create

19 or in the process of creating, a prospect list for Eric to

20 reach out to for his political campaign.

21 I don't believe -- at the time, I didn't take

22 that to mean a specific donor list, but it could have meant

23 one of the donor lists that were supplied to me. I just

24 took that to mean that when I started working there, I was

25 in track of -- I was in charge of tracking donors and John

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1 Hauck should be on that -- on that list that we were in the

2 process of establishing.

3 **Q. And when you use the word "donor," are you**

4 **referring to individuals who might contribute to a campaign**

5 **committee for Mr. Greitens?**

6 A. Yes.

7 **Q. And was that one purpose for which you were**

8 **hired?**

9 A. Yes.

10 **Q. Do you see the sentence where it says Eric**

11 **still needs to call re The Mission Continues?**

12 A. Yes.

13 **Q. Did you ever discuss with anybody whether**

14 **Mr. Greitens was going to or had spoken with Mr. Hauck?**

15 A. I don't recall.

16 (Whereupon Exhibit 15 was marked for

17 identification.)

18 **Q. (By Mr. Martinich-Sauter) Do you recognize**

19 **this document that is labeled as Exhibit 15?**

20 A. I do.

21 **Q. What is this document?**

22 A. This was a calendar invite sent to me to place

23 on the calendar a time where I could discuss with

24 Mr. Greitens fundraising for the campaign and -- and to

25 discuss the donor list.

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1 **Q. Did you -- what was -- what made you think**

2 **that that was what the agenda for the meeting would be?**

3 A. When I began working there, they didn't --

4 they didn't want to waste any time. There hadn't been

5 really any work done in terms of a fundraising apparatus or

6 putting together a -- a finance plan for the campaign. And

7 from the first day I was working there, I was led to

8 believe that fundraising would be my -- one of my main

9 roles there.

10 And so the first meeting -- the first meeting

11 that we had, it was -- I was led to believe that it would

12 be focused on putting together those plans.

13 **Q. When you say you were led to believe, was that**

14 **based on things that Mr. Greitens told you?**

15 A. I don't recall.

16 **Q. Did anyone else tell you things that would**

17 **lead you to believe that?**

18 A. There was one time when I -- when I started --

19 when we finalized our arrangement in December of 2014, I --

20 I thought that I was going to be joining the campaign kind

21 of maybe more so in a campaign manager or deputy campaign

22 manager role where I'd be involved in a lot of other areas.

23 When I started, it was indicated that I -- that I would

24 have a role in coming up with a finance plan and

25 fundraising plan for the campaign.

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1 I didn't realize that was -- that they had

2 that -- had in mind that that would be my only role until

3 probably until the strategy meeting that they had in late

4 January with -- with national and some state political

5 consultants where fundraising came up in that -- in that

6 meeting. And Eric told the group that this was something

7 that Mike could do for the campaign.

8 So probably during that meeting was the first

9 time that -- that I heard directly from Eric that he wanted

10 me to essentially be focused on raising money.

11 **Q. Did the meeting reflected in this calendar**

12 **entry occur -- did it occur at all?**

13 A. Yes.

14 **Q. Did it occur at the date, time and location**

15 **reflected in this calendar entry?**

16 A. To my knowledge, yes.

17 **Q. Who attended that meeting?**

18 A. Myself, Mr. Greitens and to my -- to my

19 recollection, Danny Laub as well.

20 **Q. Now, looking at this calendar entry, do you**

21 **see where it says the e-mail address**

22 **EGreitens@MissionContinues.org?**

23 A. I do.

24 **Q. At the time you received this calendar entry,**

25 **had you ever received any e-mails or calendar entries**

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1 **previously from that e-mail address?**
 2 A. To my knowledge, no.
 3 **Q. Did you -- did it strike you as unusual for**
 4 **any reason to receive an e-mail of this nature from that**
 5 **e-mail address?**
 6 A. Yes.
 7 **Q. And why did it strike you as unusual?**
 8 A. Well, certainly because it's -- it would lead
 9 me to believe that it was property of the charity. I was
 10 led to believe that Mr. Greitens had severed all ties from
 11 the charity in the middle of 2014. So I had no idea that
 12 he still had access to any property of the charity.
 13 **Q. What did you discuss during the meeting that's**
 14 **reflected by this calendar entry?**
 15 A. To my knowledge, we -- we went through some of
 16 the donor lists and prospect lists that Krystal Taylor
 17 supplied to me on January 6. Of the ones that -- that she
 18 supplied to me, the all donors 1K total and up and the
 19 fundraising tracker list were the two lists that we -- that
 20 we went through. "We" being myself and Mr. Greitens. And
 21 he gave me notes on specific donors in both of those lists.
 22 **Q. When you say you went through those lists with**
 23 **him, what did that entail?**
 24 A. Literally going line by line through donors
 25 and -- and me taking down notes from Mr. Greitens on

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1 specific donors.
 2 **Q. What sorts of things, if you recall, did he**
 3 **say about donors?**
 4 A. There was a lot. I know I took notes on what
 5 he provided me. But there were a lot of notes on, you
 6 know, who we need to specifically network with in order to
 7 reach a certain person or -- or specific action items
 8 that -- that -- that Mr. Greitens needed to do or things
 9 literally across -- across the board. Some background
 10 information on how he knew specific donors or certain
 11 prospects.
 12 And those were notes that I took down that I
 13 know I typed out. I believe I wrote them down first and
 14 then I typed them out.
 15 **Q. When you went through the all donors 1K total**
 16 **and up list with Mr. Greitens, how did you describe that**
 17 **list to him?**
 18 A. I don't recall. But I -- it was understood
 19 that it was a list of donors to The Mission Continues.
 20 **Q. What did Mr. Greitens say or do to make you**
 21 **think that he understood that that was the nature of the**
 22 **list?**
 23 A. There were a lot of donors that he knew on the
 24 list. And there were a lot of donors that he didn't
 25 remember. And there were specific donors that he knew that

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1 he had a good relationship with. And those were the ones
 2 that he gave me -- gave me notes on.
 3 And I remember the donors that he didn't have
 4 a good recollection of at one point during the meeting, he
 5 told me that I needed to reach out to a former employee of
 6 his to get extra notes on some of the people.
 7 **Q. And who is that former employee that he**
 8 **mentioned?**
 9 A. Someone by the name of Lindsay Hodges.
 10 **Q. So did Mr. Greitens indicate to you that he**
 11 **had some intention of trying to fundraise with the**
 12 **individuals on that list whom he did not recall before**
 13 **having seen the list?**
 14 A. Yes.
 15 (Whereupon Exhibit 16 was marked for
 16 identification.)
 17 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 18 **this document which is labeled as Exhibit 16?**
 19 A. I do.
 20 **Q. What is this document?**
 21 A. These are notes that were provided to me by --
 22 by Mr. Greitens.
 23 **Q. So was this document provided to you by**
 24 **Mr. Greitens?**
 25 A. No. This was something that I created. But

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1 some of the information on here was certainly supplied by
 2 Mr. Greitens.
 3 **Q. If the information on here was not supplied by**
 4 **Mr. Greitens, what was the source of that information or**
 5 **sources?**
 6 A. It was either supplied by Mr. Greitens or it
 7 was on the donor list that I was provided.
 8 **Q. Do you see at the top where it says January 8,**
 9 **2015 MTG notes?**
 10 A. I do.
 11 **Q. If you recall, what does that refer to?**
 12 A. They were notes from the finance meeting where
 13 Mr. Greitens and I were present.
 14 **Q. To the best of your recollection, did that**
 15 **meeting occur on January 8?**
 16 A. Yes.
 17 **Q. Do you recall who, if anyone else, was at that**
 18 **meeting?**
 19 A. I don't recall. I know Mr. Greitens and
 20 myself were there. It's possible that Danny Laub and Mark
 21 Bobak were there too. But to my recollection, just myself
 22 and Eric.
 23 **Q. Do you -- what did you discuss during that**
 24 **meeting?**
 25 A. It was predominantly fundraising and people

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1 that Mr. Greitens -- donor prospects who could contribute
 2 to Mr. Greitens -- Mr. Greitens' campaign. And there are a
 3 couple of different phases that we were planning -- or that
 4 he was planning on doing. One for an initial phase and
 5 then -- then a second round where he'd have to -- where he
 6 needed to cultivate donors a little bit more.

7 The first phase was -- were people that it was
 8 kind of described that they were low-hanging fruit that
 9 would contribute immediately if Mr. Greitens just called
 10 and asked.

11 **Q. At this time, had you discussed with**
 12 **Mr. Greitens or with anyone else a time frame for when**
 13 **those phases might occur?**

14 A. Mr. Greitens, yes. I don't remember the
 15 particular phases -- the particular phases, though.

16 **Q. Do you recall which entries on this document**
 17 **reflect Mr. Greitens' input versus some other source?**

18 A. No. This all would have been directly from
 19 Mr. Greitens.

20 **Q. So all of the information on this document is**
 21 **from Mr. Greitens?**

22 A. Yes.

23 **Q. Do you see, for example, next to Tim Noonan**
 24 **where it says call, ask for, and then a specific dollar**
 25 **amount?**

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1 A. Uh-huh.

2 **Q. What was your understanding of what that**
 3 **phrase meant?**

4 A. The dollar amount of \$5,020.16 was because
 5 Mr. Greitens wanted to have a show of force in his
 6 fundraising capability. So when you raise over \$5,000, you
 7 have to immediately report those contributions to the
 8 Missouri Ethics Commission. You have to report them within
 9 48 hours. And it's a good indicator if you're -- if a
 10 candidate is getting a lot of those contributions, that --
 11 that they are -- that they are a serious candidate that
 12 can -- that can raise money from high dollar donors.

13 And the number \$5,020.16 was, I think -- I
 14 don't know whose idea it was. But I think that was a
 15 creative way to indicate to people that Mr. Greitens was
 16 extremely serious, could raise money and he was focused on
 17 2016.

18 **Q. Was it your understanding at the time of this**
 19 **January 8 meeting that Mr. Greitens decided to ask specific**
 20 **individuals for specific amounts of money for the purpose**
 21 **of running a campaign in 2016?**

22 A. Yes.

23 **Q. During that January 8 meeting, did you discuss**
 24 **any of the specific lists that Krystal Taylor had sent you**
 25 **on January 6?**

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1 A. Yes.

2 **Q. What were the nature of those discussions?**

3 A. The -- we -- we went through the list and
 4 identified hundreds of prospects for Mr. Greitens to reach
 5 out to. So it was certainly fundraising in nature.

6 **Q. So would you say that the content of your**
 7 **discussions in the January 7 meeting and content of your**
 8 **discussions in the January 8 meeting were substantially**
 9 **similar?**

10 MR. ERNST: I'll object to the form.

11 A. Yes, they were.
 12 (Whereupon Exhibit 17 was marked for
 13 identification.)

14 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 15 **this document that's labeled as Exhibit 17?**

16 A. Yes.

17 **Q. What is that document?**

18 A. This was an agenda. This was an agenda that
 19 I -- to the best of my recollection, that I created to go
 20 over -- to go over fundraising and fundraising practices
 21 with Mr. Greitens.

22 **Q. Does this agenda relate to the January 7**
 23 **meeting at which you discussed the four fundraising lists**
 24 **with Mr. Greitens?**

25 A. I remember having multiple fundraising

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1 meetings in January to go over the finance plan and
 2 identify donor prospects. I don't recall the specific
 3 times in which -- in which we went through those lists.
 4 But I do recall that we spent a substantial time on those
 5 lists and reviewing those lists.

6 **Q. Looking at this agenda, do you recall**
 7 **discussing the matters on that agenda with Mr. Greitens?**

8 A. Yes.

9 **Q. Do you recall having those discussions on or**
 10 **about January 7, 2015?**

11 A. Yes.

12 **Q. Do you see under Roman numeral IV one of the**
 13 **bullet points that says merging Mission Continues database**
 14 **with new database?**

15 A. Yes.

16 **Q. Let me take a step back. Do you know whether**
 17 **this agenda was ever shared with Mr. Greitens?**

18 A. Yes.

19 **Q. Did you --**

20 A. To my recollection.

21 **Q. Did you share it with him directly?**

22 A. Yes.

23 **Q. Did you discuss with Mr. Greitens this bullet**
 24 **point, merging Mission Continues database with new**
 25 **database?**

1 A. I don't recall.

2 **Q. Do you recall during this meeting having any**

3 **discussion about The Mission Continues?**

4 A. I don't recall specifically.

5 **Q. Do you see under Roman numeral IV on this**

6 **agenda, the bullet point identifying and engaging**

7 **traditional and non-traditional donors?**

8 A. Yes.

9 **Q. Did you discuss that topic with Mr. Greitens**

10 **at this meeting?**

11 A. Yes.

12 **Q. What did you and he discuss on that topic?**

13 A. To my recollection, it was going through the

14 prospect -- process of the fact that in most political

15 campaigns in terms of fundraising, you're going to have

16 to -- candidates rely on traditional party donors. And in

17 Mr. Greitens' case, he was going to be relying on a much

18 different network for his race. People that -- a lot of

19 people that who generally -- that some were completely

20 unknown in Republican circles.

21 For example, people like [REDACTED] I never

22 knew who [REDACTED] was before -- before I started working

23 for Eric. That's an example of someone who I would

24 consider a non-traditional donor. And certainly

25 Mr. Greitens and I had discussed -- discussed that fact,

1 bunch of people that were willing to give him money. So to

2 that end, yes, there was a lot of discussions that occurred

3 just that he was going to be able to raise out-of-state

4 money.

5 **Q. Did he tell you anything that made you think**

6 **that he had talked with potential donors about contributing**

7 **to him politically?**

8 A. Yes. And the reason is because when we were

9 going through the donor lists, particularly The Mission

10 Continues donors list, as well as the other fundraising

11 tracker lists, it really seemed like he had had initial

12 discussions with people well in advance of me going through

13 those lists with him, that he had had discussions with

14 people about his next move, whether that was to run for

15 governor or something else.

16 And like I said before, the particular

17 conversation, we got to a specific donor and he said, yeah,

18 they -- they're already ready for me to run for president.

19 It was just kind of a shocking statement to hear.

20 **Q. Why was it shocking?**

21 A. Because of the level of ambition of somebody.

22 You're already -- he was already running for the highest

23 office in the state. But his -- his mind was already

24 moving past that, which is a -- which was a unique thing to

25 hear from a candidate, from a first-time candidate.

1 that he was approaching this from a different angle and

2 background than most other candidates would be in his

3 position.

4 **Q. Did Mr. Greitens ever say or do anything that**

5 **led you to believe that he viewed non-traditional donors as**

6 **an important part of his campaign?**

7 A. Yes.

8 **Q. What did he say or do that gave you that**

9 **impression?**

10 A. There were a number of conversations -- well,

11 I'll probably rephrase that. In my discussions with him, I

12 never -- I always had the impression that -- that Eric felt

13 he would always be able to raise this money from -- from

14 people that he -- from donors that weren't necessarily

15 Missouri political donors.

16 And there were a number of conversations in

17 that regard. Even going back to 2014 in conversations

18 where we introduced Eric to donor groups, Mr. Greitens had

19 stated he was planning on raising \$25 million for -- for

20 his campaign. And there's just not that kind of money in

21 Missouri for a campaign, even when you're high -- one of

22 your marquee races in the state.

23 So I always knew from our discussions, that

24 Mr. Greitens was going to be able to tap a national

25 network. He always made us believe that -- that he had a

1 **Q. Would you say that you had the sense that he**

2 **was impatient or eager to be able to run for an office like**

3 **president?**

4 A. Yes. I would say eager.

5 **Q. Based on your understanding of his ambition to**

6 **run for president, did you feel -- or do you feel like an**

7 **office such as lieutenant governor or secretary of state**

8 **would have fit in with that plan?**

9 A. Yes, I do. Because that could be an office

10 where -- he was a young guy. He was 40 years old. You

11 could -- you could spend time in a lower level office and

12 still have time to run for governor or U.S. Senate and then

13 president, not go one step to governor and then the next

14 step to president, like I believe that he was thinking

15 about.

16 MR. ERNST: When we get to a stopping point,

17 can we take five minutes?

18 MR. MARTINICH-SAUTER: Sure.

19 MR. ERNST: If you're at one, we can stop now

20 or if you want to go just a few more minutes.

21 MR. MARTINICH-SAUTER: Can we go just a couple

22 more minutes?

23 MR. ERNST: Sure.

24 (Whereupon Exhibit 18 was marked for

25 identification.)

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1 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 2 **this document that's labeled as Exhibit 18?**
 3 A. Yes.
 4 **Q. What is this document?**
 5 A. These were my outline notes that I presented
 6 during the previous exhibit's meeting. It's just a more
 7 extensive outline.
 8 **Q. Does this document reflect what was discussed**
 9 **at that January 7 meeting?**
 10 A. Yes.
 11 **Q. Do you see under Roman numeral I on the first**
 12 **page where it lists the fundraising information about**
 13 **Catherine Hanaway, Tom Schweich and John Brunner's**
 14 **campaign?**
 15 A. Yes.
 16 **Q. Is that something that you discussed at the**
 17 **meeting?**
 18 A. Yes.
 19 **Q. What did you discuss about that topic?**
 20 A. I think just the current state of fundraising
 21 in the race so he'd have an idea of, one, that he was
 22 starting from a -- at a disadvantage. And, two, the kind
 23 of money that he'd have to raise. This was still early in
 24 the -- somewhat early in the cycle. But the kind of money
 25 that he'd have to raise in order to be competitive.

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1 And Brunner was a factor at this time. He
 2 wasn't in the race, but I had Brunner on there because
 3 Brunner had a self-funding capability, and that was an
 4 unknown aspect at the time. If Brunner had even gotten in,
 5 he could immediately make up any sort of difference.
 6 **Q. Did you discuss at this meeting the state of**
 7 **the race for any other race, such as lieutenant governor or**
 8 **secretary of state?**
 9 A. Certainly not secretary of state. I don't
 10 recall whether lieutenant governor was -- was -- was a --
 11 was a topic of discussion.
 12 **Q. Do you remember Mr. Greitens expressing that**
 13 **he felt any pressure to fundraise quickly based on the cash**
 14 **on hand that his potential opponents had?**
 15 A. Can you say that question again?
 16 **Q. Sure. Do you recall Mr. Greitens expressing**
 17 **any feeling that there was pressure to fundraise quickly?**
 18 A. I don't recall.
 19 **Q. Did you feel pressure for the campaign to**
 20 **fundraise quickly?**
 21 A. Yes and no. Yes, because if he was going for
 22 governor, then I would have certainly advised that he
 23 needed to open a committee and start fundraising. No,
 24 because at this time, I knew the primary -- the dynamics of
 25 the primary. There were some unknowns. Brunner we had no

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1 idea if he was going to run or not.
 2 And I had known some consultants that were
 3 talking with Brunner. And I still had felt Mr. Greitens at
 4 the time would have a much better shot at lieutenant
 5 governor and thought it was a better fit. And so I say no
 6 to that just because I think I was trying to slow play this
 7 a little bit and slow the train down. And by -- by that,
 8 hopefully encourage Mr. Greitens to consider other offices.
 9 But -- and there were some minor things here
 10 and there that led me to believe Eric wanted -- would still
 11 consider other offices. One time he told me, you know,
 12 look, if Rex Sinquefield decides to give Hanaway
 13 \$5 million, then, you know, I might not go forward with
 14 this whole thing. There were some very, very minor
 15 comments like that throughout this that made me think
 16 Mr. Greitens was still -- still kept the option open of
 17 running for another office.
 18 **Q. Did the Greitens campaign committee exist at**
 19 **this time?**
 20 A. No.
 21 **Q. Was there any discussion in January 2015 about**
 22 **creating the campaign committee?**
 23 A. Yes, there was. I don't know -- I don't know
 24 at what point or when those discussions took place. But I
 25 do remember discussing opening a committee. And -- and it

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1 really was a moving -- a moving target even up until the
 2 time they filed it. It was still -- it was still, you
 3 know, a moving target on when to do it.
 4 **Q. Other than communications or discussions where**
 5 **a lawyer was a part, are you aware of any conversations**
 6 **about what might trigger the need to start a committee?**
 7 A. Yeah. There was -- the dynamics of the
 8 primary I think were rapidly evolving. Mr. Schweich had
 9 been raising decent money. And Mr. Brunner had made some
 10 more -- how should I say it -- had made some more movement
 11 towards, you know, running for -- running for governor, had
 12 some more conversations about running for governor.
 13 And that, I think, made Mr. Greitens' time
 14 line move up quite a bit. Because he didn't want to get
 15 too far behind and he wanted to plant a flag. And so --
 16 so, yeah. Certainly there was some discussions during that
 17 time and there were some things that happened outside of
 18 Mr. Greitens that I think made his time line move up.
 19 MR. MARTINICH-SAUTER: Do you want to take a
 20 break?
 21 MR. ERNST: Yeah.
 22 MR. MARTINICH-SAUTER: Go off the record.
 23 (Whereupon there was a short break.)
 24 **Q. (By Mr. Martinich-Sauter) Mr. Hafner, did you**
 25 **want to clarify anything that you said from earlier today?**

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1 A. Yes. At the top of one of the documents, I've
 2 listed January 8, 2015 meeting notes. It's possible that I
 3 met with Mr. Greitens on January 8 as well, in addition to
 4 January 7. I just -- I don't know. I know I had these
 5 discussions and I know these notes are from Mr. Greitens
 6 and I know that we went through those donor lists. But in
 7 terms of whether it occurred on January 7 or January 8, I
 8 know it occurred on one of those dates. And it's possible
 9 this could just be a typo too at the top of my -- of my one
 10 notes document.

11 **Q. So it's possible that Exhibit 16 could be**
 12 **notes from a meeting that occurred on January 7, rather**
 13 **than January 8?**

14 A. It's possible. And it's possible that I met
 15 with Eric also on January 8 as a follow-up meeting from the
 16 7th. I know the meetings that we had in January, we went
 17 through the donor lists and I took these notes from Eric.
 18 I just -- I don't know -- I don't recall at which specific
 19 time those occurred in January.

20 **Q. Regardless of whether the meeting occurred on**
 21 **January 7 or January 8, Exhibit 16 reflects notes that you**
 22 **took from things that Mr. Greitens told you during a**
 23 **meeting on one of those dates?**

24 A. Yes.

25 **Q. Thank you. Looking real quickly at Exhibit 18**

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1 **which was the last document we looked at before the break,**
 2 **do you see on the bottom of Page 3 Roman numeral V, where**
 3 **it says MEC reporting and compliance overview?**

4 A. Yes.

5 **Q. What was discussed during the meeting**
 6 **regarding MEC reporting and compliance?**

7 A. It was really just an intro to complying with
 8 MEC campaign finance regulations in Missouri. Just working
 9 with a first-time candidate and just giving him a very
 10 broad overview of compliance procedures.

11 **Q. Did you discuss the question of when**
 12 **Mr. Greitens would have to create a campaign committee?**

13 A. At this time, no, we did not. We had advised
 14 Eric in 2014 that -- that he should establish at the
 15 minimum a continuing committee that he could raise money
 16 and use for -- use for purposes of just going out and
 17 speaking of veterans or other things, to introduce himself
 18 to broad groups of Republicans. But at this time -- I'm
 19 sorry. Can you remind me of your question again?

20 **Q. Sure. The question which I -- the question**
 21 **was, did you discuss -- what did you discuss in terms of**
 22 **MEC compliance and reporting?**

23 A. Gotcha. Again, it was just the basics of
 24 opening, filing the committee, the purpose of having a
 25 committee established with the Missouri Ethics Commission.

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1 **Q. And did you advise at some point in 2014,**
 2 **advise Mr. Greitens to open up some sort of committee?**

3 A. Yes.

4 **Q. What did he say about that topic?**

5 A. I don't recall his response. I do -- I do
 6 remember on more than one occasion, that he preferred not
 7 to open a committee until after his book launch. Which his
 8 book launch was in March of 2015. So his idea was that he
 9 would establish and launch his campaign officially in April
 10 or May of 2015.

11 **Q. Did he ever say why he preferred to wait to**
 12 **create his committee?**

13 A. Not directly. But it was inferred that he
 14 would use his book launch -- his book launch and the
 15 publicity and media exposure as a launching pad for his
 16 campaign and use all that positive publicity and outreach
 17 to people that were potential donors, immediately tap into
 18 that network.

19 **Q. Did Mr. Greitens indicate to you that the**
 20 **relative timing of the book launch and creating the**
 21 **committee, that timing was done for political purposes to**
 22 **benefit the campaign?**

23 A. He did not say that directly, but it was
 24 inferred that that was the reasoning behind it.

25 **Q. And did you infer that from things that he**

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1 **told you?**

2 A. Yes.

3 **Q. Do you recall what those things were that he**
 4 **told you?**

5 A. No, I do not.

6 **Q. Do you recall anything about those**
 7 **conversations?**

8 A. I think in the -- more so just in the general
 9 sense that he had had his time line which originally was
 10 using the book launch to roll right over into the campaign.
 11 But he didn't want to lose any sort of ground to any
 12 potential opponents prior to that. And it was our
 13 advice -- it was my advice during 2014 that -- that if you
 14 were going to run a campaign of the caliber of a
 15 statewide -- at the level of a statewide race and coming
 16 from a virtual unknown, that you need to get moving on --
 17 on a number of different fronts for it.

18 **Q. Do you know when Mr. Greitens actually created**
 19 **his campaign committee?**

20 A. It was in late February of 2015. And I was
 21 directly involved in filing the papers. I don't remember
 22 the exact date. It happened around statewide Lincoln Days,
 23 I think around the 24th or 25th of February.
 24 (Whereupon Exhibit 19 was marked for
 25 identification.)

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1 **Q. (By Mr. Martinich-Sauter) Do you recognize**
2 **this document which is labeled as Exhibit 19?**
3 A. I do.
4 **Q. What is this document?**
5 A. This was an invitation for another meeting,
6 another finance meeting for Mr. Greitens and myself.
7 **Q. Did a meeting -- did this meeting actually**
8 **occur?**
9 A. To the best of my knowledge, yes.
10 **Q. Did it, to the best of your recollection,**
11 **occur on the date that it states here, January 19?**
12 A. Yes.
13 **Q. What did you discuss during that meeting?**
14 A. I don't recall exactly. I believe it was --
15 it was certainly a follow-up from our previous meeting. I
16 don't know if during this meeting we had -- we discussed
17 the donor lists anymore or donor prospects. We certainly
18 could have. It could have been about building the
19 fundraising plan overall and -- so I don't know off the top
20 of my head, I don't know the exact topics that we
21 discussed.
22 **Q. In your --**
23 A. I don't recall.
24 **Q. I'm sorry. In your experience working on**
25 **other campaigns, would it be unusual to be having the sorts**

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1 **of conversations that you were having with Mr. Greitens**
2 **unless somebody was certain they were going to run for**
3 **office?**
4 A. Yes. It would -- yes.
5 (Whereupon Exhibit 20 was marked for
6 identification.)
7 **Q. (By Mr. Martinich-Sauter) Do you recognize**
8 **this document that's labeled as Exhibit 20?**
9 A. Yes.
10 **Q. And what is that document?**
11 A. So these are -- these were action items that I
12 took on January 19 and e-mailed them to myself. It's just
13 how I organize notes and follow-ups. They're organized in
14 my in-box. And this was -- yeah, these were action items
15 that I compiled with Eric regarding that meeting and moving
16 forward in building a true fundraising plan.
17 **Q. Do you see where this document, Exhibit 20,**
18 **says meeting with Lindsay Hodges and Krystal Taylor**
19 **regarding TMC contribution list?**
20 A. Yes.
21 **Q. Is that something you discussed during your**
22 **January 19 meeting with Mr. Greitens?**
23 A. To the best of my recollection, yes.
24 **Q. Do you recall whether Mr. Greitens instructed**
25 **you to meet with Lindsay Hodges?**

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1 A. Yes, he did.
2 **Q. And do you recall whether he instructed you to**
3 **meet with Ms. Hodges regarding the TMC contribution list?**
4 A. Yes.
5 **Q. What do you recall about that conversation**
6 **with Mr. Greitens?**
7 A. I recall him saying to reach out to her and
8 meet with her regarding to get notes or other things
9 regarding donors to The Mission Continues.
10 **Q. Did Mr. Greitens expressly ask you to speak**
11 **with Ms. Hodges about Mission Continues donors?**
12 A. He did not expressly ask, but he certainly
13 directed me to meet with her to reach out to her for a
14 meeting. And it would have only been in the context of The
15 Mission Continues donors.
16 **Q. At this time, who did you believe was**
17 **Ms. Hodges employer?**
18 A. At the time, I was not -- I don't believe I
19 was aware whether she was an employee of Mission Continues
20 or a former employee of Mission Continues. I was not -- I
21 wasn't sure about her current employment status.
22 **Q. But did you believe that at least at some**
23 **point, she had been an employee of The Mission Continues?**
24 A. Yes. I believe she worked closely with Eric
25 on fundraising at The Mission Continues. But I -- I did

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1 not know in what capacity.
2 **Q. Did you ever communicate with Ms. Hodges?**
3 A. To my recollection, I never reached out to
4 her. There was one person in the office once. I don't
5 know if it was her or not. But I remember meeting this
6 person. But to the best of my recollection, I never
7 e-mailed her or reached out to her via phone call or
8 anything else.
9 **Q. Why didn't you meet with Ms. Hodges?**
10 A. I don't know the reason, the exact reason why
11 the meeting never happened. You know, I believe -- you
12 know, I was a little hesitant, I guess, to meet with
13 anybody further about -- about coordinating donors that
14 were also donors to a charity and using them for a
15 political campaign.
16 So I don't know the exact reason, to answer.
17 But -- but it was something that I didn't follow up on.
18 And if she was -- if she was an employee of the charity, I
19 think it would have been inappropriate for me to meet with
20 her to begin with.
21 **Q. Did anyone ever follow up with you to inquire**
22 **whether or not you had spoken with Ms. Hodges?**
23 A. To my recollection, no.
24 **Q. To your knowledge, did Ms. Taylor ever speak**
25 **with Ms. Hodges about TMC donors or any other fundraising**

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1 **issues?**
 2 A. I don't know.
 3 (Whereupon Exhibit 21 was marked for
 4 identification.)
 5 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 6 **this document that's labeled as Exhibit 21?**
 7 A. I recognize this document as notes. But I
 8 don't recognize what some of these notes would be for. And
 9 this is kind of a style that maybe -- that I would use. I
 10 know I created this document, but I don't know what all the
 11 action items mean.
 12 **Q. But you -- did you create this document?**
 13 A. Yes.
 14 **Q. Do you see at the top -- do you recall when**
 15 **you created this document?**
 16 A. Not specifically. But this -- just knowing
 17 that sometimes I used to create just punch lists and it
 18 could have been a continuous document that I would add
 19 things to. So, no. To answer your question, I don't know
 20 when I created the document initially.
 21 **Q. When you save files for work purposes or**
 22 **otherwise, do you ever use a date naming convention in the**
 23 **file name to record when you created the document?**
 24 A. Yes. Many times I do.
 25 **Q. What is that date naming convention that you**

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1 **use?**
 2 A. Usually I'll put the type of meeting it is or
 3 a term to describe it. Then I'll do -- if it's January 22,
 4 '15, I'll usually put like 01222015.
 5 **Q. Do you see at the top of this document where**
 6 **it says Greitens for Missouri?**
 7 A. Uh-huh.
 8 **Q. Is Greitens for Missouri a phrase that you or**
 9 **Mr. Greitens or Mr. Laub or Ms. Taylor or Mr. Bobak were**
 10 **using in January 2015?**
 11 A. Yeah, it was. Both in documents and -- I
 12 don't remember how -- how we established to use that term
 13 for the campaign. But yeah, it was -- it was a pretty
 14 widely used term for the campaign at that point.
 15 **Q. So the phrase "Greitens for Missouri" referred**
 16 **to Mr. Greitens' political campaign?**
 17 A. Correct.
 18 **Q. Did the campaign committee Greitens for**
 19 **Missouri exist in January 2015?**
 20 A. It did not.
 21 **Q. Do you see on this document where it says**
 22 **finance call list?**
 23 A. I do.
 24 **Q. Do you know what that refers to?**
 25 A. Yes. That was in reference to a call list, a

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1 donor call list that I had been tasked with compiling for
 2 Mr. Greitens.
 3 **Q. Do you recall when you were tasked with**
 4 **compiling that list?**
 5 A. I do not recall the exact date. But it was
 6 certainly after I received notes from Eric based on
 7 specific donors and donor prospects. And I was -- I was to
 8 create a fundraising plan and a system, establish a system
 9 for providing daily call lists to Mr. Greitens.
 10 **Q. Do you -- to the best of your recollection,**
 11 **were you tasked with compiling that list sometime in**
 12 **January 2015?**
 13 A. Yes.
 14 **Q. Do you see on this document where it says**
 15 **meeting W/Lindsay Hodges and KT regarding TMC contribution**
 16 **list?**
 17 A. Yes.
 18 **Q. Do you know what that entry refers to?**
 19 A. Yes. It was -- it was an action item from --
 20 from Mr. Greitens to meet with Lindsay Hodges and Krystal
 21 Taylor. Krystal Taylor still had a friendship, I believe,
 22 with Lindsay Hodges. So I don't remember if Krystal was
 23 supposed to sit in on the meeting or what. But that's what
 24 that line is in reference to.
 25 **Q. And does this action item here flow from the**

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1 **same conversation you had with Mr. Greitens as the action**
 2 **item that we saw on a prior document?**
 3 A. Yes.
 4 **Q. Do you see on this document where it says set**
 5 **up Greitens for Missouri e-mail?**
 6 A. Yes.
 7 **Q. What does that refer to?**
 8 A. That refers to the e-mail address that would
 9 have been something that was coordinated with Danny Laub.
 10 But we had e-mail addresses that were Greitens for
 11 Missouri. I don't know when we started using them. But
 12 yeah, that was a directive from either Danny or
 13 Mr. Greitens to set up Mike@GreitensForMissouri.com.
 14 **Q. Is something like that, a**
 15 **GreitensForMissouri.com, something that would have to be**
 16 **paid for, a domain like that?**
 17 A. Yes.
 18 **Q. Are you aware of whether or not that domain**
 19 **was paid for by anyone?**
 20 A. That specific domain, I don't -- I don't know.
 21 Yeah, I don't recall who owned it at the time or who it was
 22 paid for.
 23 **Q. Do you see towards the bottom of this document**
 24 **where it says office space upstairs, February 1 or**
 25 **February 15?**

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1 A. Yes.

2 **Q. Do you know what that refers to?**

3 A. That refers to the second level of that

4 office -- of their office space. It was a converted home

5 in the Central West End on West Pine. And the second and

6 third levels for whatever reason, the tenants had moved

7 out. And Mr. Greitens was -- I don't -- I'm not sure if

8 they already had access to that office space at that time.

9 But they were planning on getting it.

10 And so it was the plan to use the office space

11 for the official campaign. And that particular note must

12 be just the dates on when we could move the campaign

13 upstairs.

14 **Q. Do you recall when that office space referred**

15 **to here was acquired or leased?**

16 A. I do not recall. It was sometime in February

17 to the best of my recollection.

18 (Whereupon Exhibit 22 was marked for

19 identification.)

20 **Q. (By Mr. Martinich-Sauter) Do you recognize**

21 **this document which is labeled as Exhibit 22?**

22 A. I do.

23 **Q. What is this document?**

24 A. This was an e-mail that I sent to Krystal

25 Taylor and Danny Laub. And it was a list of names that --

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1 that I had identified as donor prospects that I still

2 needed contact information for. And they were identified

3 as donor prospects because of the notes Mr. Greitens

4 provided me. And in order to build a call list for

5 Mr. Greitens, I needed some additional information like how

6 to contact them. And Sales Force was the contact

7 management database that Mr. Greitens used.

8 (Whereupon Exhibit 23 was marked for

9 identification.)

10 **Q. (By Mr. Martinich-Sauter) Do you recognize**

11 **this document that's labeled as Exhibit 23?**

12 A. I do. I believe this was the list that I

13 compiled. And these were names that Mr. Greitens provided

14 information and notes on.

15 **Q. Is Exhibit 23 a true and accurate copy of the**

16 **attachment to your January 28 e-mail?**

17 A. Yes.

18 **Q. Did you use The Mission Continues list to**

19 **compile the list that is Exhibit 23?**

20 A. Not solely. But it certainly was utilized on

21 some of these donors.

22 **Q. Had you ever used Sales Force before?**

23 A. I had not.

24 **Q. Were you familiar with Sales Force before**

25 **January?**

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1 A. No.

2 **Q. Do you know what The Greitens Group used Sales**

3 **Force for?**

4 A. I had -- I had assumed that they used it

5 for -- for Eric's personal contacts, to use as a database

6 management tool for him, to track follow-ups on specific

7 people in Mr. Greitens' network or, you know, perhaps

8 donors or people that he had come across. But in my

9 experience, at some point, I did have access to it. And I

10 do remember using it. And I remember the records

11 weren't -- weren't very well maintained within their

12 accounts for Sales Force.

13 **Q. Are you aware of whether The Mission Continues**

14 **uses Sales Force?**

15 A. I am not aware.

16 **Q. When you used Sales Force, did you ever use**

17 **Sales Force -- did you ever extract data from Sales Force**

18 **in the form of an Excel spreadsheet or any other kind of**

19 **spreadsheet?**

20 A. I don't believe I did. I'm almost certain I

21 never extracted any information in a spreadsheet form. But

22 certainly there might have been information that I

23 retrieved from it, contact information that I retrieved

24 from it.

25 (Whereupon Exhibit 24 was marked for

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1 identification.)

2 **Q. (By Mr. Martinich-Sauter) Do you recognize**

3 **this document which is labeled as Exhibit 24?**

4 A. I do.

5 **Q. And what is that document?**

6 A. This is an e-mail that was sent to me from

7 Krystal Taylor regarding my request to get some contact

8 information on specific donor prospects.

9 **Q. Do you see where the e-mail says some of these**

10 **will not be in Sales Force?**

11 A. I do.

12 **Q. What did you understand to be the relevance of**

13 **someone not being in Sales Force?**

14 A. That those specific names weren't in Eric's

15 personal contacts. And therefore, I would have to secure

16 those -- that contact information using other means.

17 **Q. Do you recall whether any of the names on The**

18 **Mission Continues list were not in Sales Force?**

19 A. I don't know which names specifically were

20 not. But to my recollection, there were numerous people

21 that weren't in Sales Force that I was trying to secure

22 contact information for.

23 **Q. And were some of those individuals you were**

24 **trying to secure contact information for individuals who**

25 **were listed on the Mission Continues list?**

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1 A. Yes.

2 **Q. Do you see where Exhibit 24 says if not, I**

3 **would suggest checking The Mission Continues list?**

4 A. I do.

5 **Q. What was your understanding of why Krystal**

6 **Taylor said that?**

7 A. My understanding is that The Mission Continues

8 list would have -- or the donor list that is identified as

9 The Mission Continues list would have that information for

10 some of the contacts on it.

11 **Q. So it was your understanding that The Mission**

12 **Continues list might have information that was not in Sales**

13 **Force?**

14 A. Correct.

15 **Q. Do you know whether The Greitens Group entered**

16 **into Sales Force all of the contact information they**

17 **gathered?**

18 A. I can't speculate on how much information they

19 gathered and ended up in Sales Force. I would expect that

20 a large portion of it would end up in Sales Force. People

21 that Mr. Greitens encountered, business cards that he

22 collected, I would imagine a lot of that would have ended

23 up in Sales Force.

24 (Whereupon Exhibit 25 was marked for

25 identification.)

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1 **Q. (By Mr. Martinich-Sauter) Do you recognize**

2 **this document which is labeled Exhibit 25?**

3 A. I recognize the e-mail. I don't -- I'm not

4 sure about the attachment. I'd have to see the attachment

5 to -- but I do recognize the e-mail as coming from myself.

6 And I believe this was -- I believe this was a list that I

7 provided to Eric when I drove him to Jefferson City in late

8 January. But I don't know without seeing the list

9 attached.

10 (Whereupon Exhibit 26 was marked for

11 identification.)

12 **Q. (By Mr. Martinich-Sauter) Do you recognize**

13 **this document that is labeled as Exhibit 26?**

14 A. I believe this was a donor prospect list that

15 I created that -- that I created based on the notes Eric

16 provided me on specific donors.

17 **Q. Do you know whether Exhibit 26 is the**

18 **attachment to the February 2 e-mail that you sent?**

19 A. I don't recall. To my recollection, this list

20 in particular, I had a specific name for it. Like a master

21 prospect list or something along those lines. If I saw

22 more, it might jog my memory on it. Normally I wouldn't

23 name an attachment Draft 1. But other documents might jog

24 my memory on this.

25 **Q. Do you remember providing a copy of Exhibit**

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1 **26, that list, to Mr. Greitens?**

2 A. I do not recall. I know that there were call

3 lists with some of this information that I most certainly

4 provided to Mr. Greitens. I don't know if this exact list

5 I provided him. I don't recall.

6 **Q. Do you see on Exhibit 26 where it says in the**

7 **note section for certain donors, TMC, and then a dollar**

8 **amount?**

9 A. Yes.

10 **Q. Did Mr. Greitens ask you to include**

11 **information about someone's TMC donor status in the**

12 **spreadsheets?**

13 A. He did not ask me directly. But certainly

14 many donors were identified based on -- based on the fact

15 that they were donors to The Mission Continues. So for me

16 as a campaign staffer, campaign consultant that has done

17 fundraising, specific donor notes like that are important

18 information for somebody to have and for a candidate to

19 have to be able to reference on a specific donor when

20 they're talking to them.

21 **Q. Do you see on your February 2 e-mail which is**

22 **Exhibit 25, where it says to my knowledge, he did not make**

23 **any calls from this list?**

24 A. Uh-huh. Yes.

25 **Q. Do you recall what that statement was based**

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1 **on?**

2 A. It's my recollection I provided Mr. Greitens a

3 list. And it was when we were going to Jeff City to have a

4 bunch of meetings in January. And I don't believe he made

5 any calls from the list that I gave him, that I provided to

6 him.

7 **Q. Had you or anybody else asked Mr. Greitens to**

8 **make fundraising calls at this time?**

9 A. I did not ask him to. With Mr. Greitens,

10 he -- from his time at Mission Continues, he essentially

11 was a professional fundraiser. He was the face and the

12 main guy for The Mission Continues to cultivate donors over

13 time and ask them for money and ask them for major

14 commitments. So he was unique as a candidate for me to

15 work with because he wasn't somebody that you needed to

16 encourage to go out and make fundraising calls. It was

17 something that he communicated to us in 2014 in at least

18 one meeting, that he loved making fundraising calls.

19 So I wasn't somebody to begin with when I was

20 employed by him, that needed to ask -- or that needed to

21 ask him to make calls. It was something that he just would

22 have done on his own.

23 **Q. Do you know when he first made fundraising**

24 **calls for his campaign?**

25 A. The first time directly that I know that he

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1 did was on our drive to Jefferson City for some meetings.
 2 And he made -- he made a couple calls at that time to
 3 solicit funds. There was one gentleman by the name of
 4 ██████ that he -- that he called on this trip. And he
 5 originally had asked ██████ for \$10,000. And ██████ had
 6 committed to 2,500. And Eric was sitting next to me in the
 7 car. I was driving. And we gave like a high five or
 8 something after he -- after he -- after he got the
 9 confirmation that ██████ was going to do 2,500.
 10 And I think there was another -- there was
 11 another thing that ██████ had promised to do, maybe have a
 12 small event or something at his home. And so that was --
 13 that was one fundraising call. And I knew there were
 14 numerous others that he did during this time frame. And I
 15 just know that because of the follow-up e-mails that
 16 Mr. Greitens provided to myself, Danny Laub and Mark Bobak.
 17 But I did not personally firsthand witness most of those
 18 other calls to my recollection.
 19 **Q. Were you physically present when Mr. Greitens**
 20 **called Mr. ██████**
 21 A. Yes.
 22 **Q. Do you remember what Mr. Greitens said to**
 23 **Mr. ██████ during that conversation?**
 24 A. It was a call that -- it was a catching up
 25 first. And then Mr. Greitens let him know kind of his

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1 plans moving forward and asked him for \$10,000, to
 2 contribute \$10,000.
 3 **Q. Did Mr. Greitens say what that \$10,000 would**
 4 **be for?**
 5 A. No. But it was certainly inferred that that
 6 money would be -- the first money for his campaign. Some
 7 of the -- in the first round of considerations for his
 8 campaign.
 9 **Q. Did Mr. Greitens expressly tell Mr. ██████ he**
 10 **was running for office?**
 11 A. To the best of my recollection, yes.
 12 **Q. Did Mr. Greitens mention the office of**
 13 **governor in his conversation with ██████?**
 14 A. To the best of my recollection, yes.
 15 **Q. Did Mr. Greitens mention any office other than**
 16 **governor in his conversation with Mr. ██████?**
 17 A. No.
 18 **Q. Did Mr. Greitens mention The Mission Continues**
 19 **in his conversation with Mr. ██████?**
 20 A. I do not recall.
 21 (Whereupon Exhibit 27 was marked for
 22 identification.)
 23 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 24 **this document which is labeled Exhibit 27?**
 25 A. Yes.

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1 **Q. What is this document?**
 2 A. This was a document that Mr. Greitens sent to
 3 Mr. ██████ copied me on. And it highlights the -- one of
 4 the calls that Mr. Greitens made to Mr. ██████ As I
 5 remember though, Mr. ██████ only committed to 2,500 at that
 6 particular time. I don't know what he ended up
 7 contributing. But -- but Mr. Greitens here says Mr. ██████
 8 essentially committed to 10,000. But yes, I do -- I
 9 recognize this e-mail.
 10 **Q. The conversation that you were present for**
 11 **when Mr. Greitens spoke by phone to Mr. ██████ do you**
 12 **remember when that occurred date wise?**
 13 A. I don't recall. There were some meetings that
 14 we had in Jefferson City. And I remember on our drive to
 15 Jefferson City is when he made that phone call, to the best
 16 of my recollection. And I believe that was in late
 17 January.
 18 **Q. So it's your understanding that this e-mail,**
 19 **Exhibit 27, was sent and received by you after the phone**
 20 **call between Mr. Greitens and Mr. ██████**
 21 A. Yes.
 22 **Q. Do you see where Exhibit 27 says thank you**
 23 **again for investing in me in this cause?**
 24 A. Yes.
 25 **Q. What was your understanding of that sentence?**

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1 A. That -- that Mr. Greitens simply was
 2 confirming that Mr. ██████ had committed to raising -- or
 3 committed to contributing to Mr. Greitens' campaign. And
 4 that was an affirmation of that commitment from Mr. ██████
 5 **Q. Do you know -- do you see on the CC line where**
 6 **it lists the e-mail address Mike@GreitensForMissouri.com?**
 7 A. Yes.
 8 **Q. Do you know why Mr. Greitens sent that e-mail**
 9 **to your Greitens for Missouri e-mail address?**
 10 A. I do not.
 11 **Q. Did Mr. Greitens e-mail you at other e-mail**
 12 **addresses around the same time?**
 13 A. I believe he would have also e-mailed me at my
 14 regular e-mail address which is ██████
 15 **Q. Do you recall Mr. Greitens ever e-mailing you**
 16 **at your GreitensForMissouri.com e-mail address other than**
 17 **in follow-up to potential donors?**
 18 A. I don't recall.
 19 (Whereupon Exhibit 28 was marked for
 20 identification.)
 21 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 22 **this document which is labeled as Exhibit 28?**
 23 A. I do.
 24 (Whereupon Exhibit 29 was marked for
 25 identification.)

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1 **Q. (By Mr. Martinich-Sauter) Would you recognize**
 2 **the attachment to that e-mail if you saw it?**
 3 A. I would.
 4 **Q. Do you recognize this document that is labeled**
 5 **as Exhibit 29?**
 6 A. I do.
 7 **Q. Is Exhibit 29 a true and accurate copy of the**
 8 **attachment to Exhibit 28?**
 9 A. I believe it is.
 10 **Q. Do you see on Exhibit 28, the e-mail, where it**
 11 **says this is a list built from roughly five lists (TMC**
 12 **donor list, the one random list, the Mason Fink list, top**
 13 **200 traditional R donor and top 15 R super donor list)?**
 14 A. Yes.
 15 **Q. Did you use those five lists to compile**
 16 **Exhibit 29?**
 17 A. I don't recall using the Mason Fink list, but
 18 it's possible that I did. The other lists, yes, I
 19 recognize -- it seems though that this -- the list that I
 20 have stops at H. It seems like there -- it seems like the
 21 list that I had should have been a little more extensive,
 22 that I created, should have included donors that went all
 23 the way to -- that went all the way to Z. But maybe it was
 24 a corrupt file or something. I don't know.
 25 **Q. Sure. In your e-mail when you use the phrase**

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1 **"TMC donor list," what did that refer to?**
 2 A. The Mission Continues list that Krystal Taylor
 3 provided me.
 4 **Q. So was that the list, The Mission Continues**
 5 **donor list, that she had sent you on January 6?**
 6 A. Yes.
 7 **Q. And did you in fact use that list to compile**
 8 **what -- compile the attachment to this e-mail?**
 9 A. I did. I used it as a -- certainly as a
 10 reference and certainly for the notes that Mr. Greitens
 11 provided me on specific donors I utilized.
 12 **Q. Do you recall what proportion of the**
 13 **attachment was in some way derived from the TMC donor list?**
 14 A. I do not know what portion. Yeah, I don't --
 15 I don't recall how much of it was used. It was certainly
 16 used as a reference.
 17 **Q. When you use the phrase "one random list,"**
 18 **what were you referring to?**
 19 A. I believe that was one of the lists that they
 20 provided. I'd have to look at the -- the correct -- or the
 21 file name or what they described it as. But I think it
 22 was -- I'm pretty sure it was one of the tracking lists
 23 that they provided in that initial document -- in that
 24 initial e-mail from Krystal Taylor.
 25 (Whereupon Exhibit 30 was marked for

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1 identification.)
 2 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 3 **this document that's labeled Exhibit 30?**
 4 A. Yes.
 5 **Q. Do you see in the subject of the e-mail where**
 6 **it says GFM?**
 7 A. I do.
 8 **Q. What does GFM stand for?**
 9 A. Greitens for Missouri.
 10 (Whereupon Exhibit 31 was marked for
 11 identification.)
 12 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 13 **this document that is labeled Exhibit 31?**
 14 A. I do.
 15 **Q. What is that document?**
 16 A. This was the first call list that I developed
 17 for Mr. Greitens to call to solicit contributions for his
 18 campaign.
 19 **Q. Do you recall how you compiled individuals to**
 20 **include on this list?**
 21 A. They were mostly from notes that Mr. Greitens
 22 gave me on specific donors.
 23 **Q. Do you recall whether you used The Mission**
 24 **Continues list to compile this list in any way?**
 25 A. Yes.

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1 **Q. Do you recall what criteria you used to**
 2 **include some people on this list and exclude other**
 3 **potential donors?**
 4 A. Mainly for two reasons. One, either
 5 Mr. Greitens had provided me with specific notes indicating
 6 specific donors were a priority or their ability to give
 7 based on their donor history to The Mission Continues or
 8 donor history to other political candidates, which you'll
 9 find in the top donor section, one of the following
 10 sections after the first one on here.
 11 **Q. So in compiling this list, did you consider it**
 12 **important that someone had made a large contribution to The**
 13 **Mission Continues?**
 14 A. Yes.
 15 **Q. Did you discuss that fact with Mr. Greitens in**
 16 **regards to this list?**
 17 A. I did not. To my recollection, I did not
 18 discuss with him -- I did not discuss that with him.
 19 However, certainly during our meetings when we discussed
 20 The Mission Continues' list, he had selected specific
 21 prospects that could be of value to his campaign from that
 22 list.
 23 **Q. Do you see on Exhibit 30, which is your**
 24 **February 5 e-mail, in the last paragraph, you use the**
 25 **phrase "ask amount"?**

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1 A. Uh-huh.

2 **Q. What does that refer to?**

3 A. I believe that refers to -- to the amount

4 of -- the level of contribution that Mr. Greitens would --

5 would request from a specific donor. Initially, the plan

6 was to ask a number of donors in kind of a first phase to

7 contribute \$5,020.16. At some point in here, there was a

8 strategic decision that was made that -- that those amounts

9 were -- would just be kind of thrown out the window and he

10 would ask for a different amount.

11 So, yeah. I believe -- I believe that phrase

12 is just something having to do with how the timetable was

13 evolving and the different phases were evolving in the

14 early stages of the campaign.

15 (Whereupon Exhibit 32 was marked for

16 identification.)

17 **Q. (By Mr. Martinich-Sauter) Do you recognize**

18 **this document that's labeled as Exhibit 32?**

19 A. Yes.

20 **Q. What is that document?**

21 A. This was a revision of a call list that I

22 provided to Mr. Greitens. And I believe it's a revision to

23 that first call list with some changes to the format of it.

24 (Whereupon Exhibit 33 was marked for

25 identification.)

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1 **Q. (By Mr. Martinich-Sauter) Do you recognize**

2 **this document that's labeled as Exhibit 33?**

3 A. Yes.

4 **Q. Is Exhibit 33 a true and accurate copy of the**

5 **attachment to the e-mail that is Exhibit 32?**

6 A. Yes.

7 **Q. What were the nature of the revisions that you**

8 **made to a prior list that resulted in Exhibit 33?**

9 A. I think there were some other -- let me just

10 take a minute to page through it. I believe the revisions

11 that were made to this, there were additional names and

12 notes either from Eric or just that I had. And -- and I

13 was able to build them a little bit bigger of a list for

14 Mr. Greitens.

15 **Q. Were any of those revisions based on feedback**

16 **that Mr. Greitens gave you?**

17 A. To my recollection, yes.

18 **Q. Do you recall the nature of the feedback he**

19 **gave you?**

20 A. No, I do not.

21 (Whereupon Exhibit 34 was marked for

22 identification.)

23 **Q. (By Mr. Martinich-Sauter) Do you recognize**

24 **this document that is labeled as Exhibit 34?**

25 A. I recognize this e-mail, yes.

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1 **Q. Do you see in the first line of the e-mail**

2 **where it refers to the EG tracking document?**

3 A. Yes.

4 **Q. What is the EG tracking document?**

5 A. This was some sort of Google doc that Danny

6 Laub created in order to track meetings with different

7 Republicans, activists, elected officials, influencers,

8 people who could be of value to Mr. Greitens' campaign.

9 And there was already a list of people that he had met with

10 of course. I think this Google list -- Google doc was just

11 a more extensive tracking document to keep track of people

12 that Mr. Greitens still needed to follow up with or meet

13 or, you know, or reach out to generally.

14 **Q. Do you know who had access to that document?**

15 A. To my recollection, I did. I'm not sure who

16 else did. And Mr. Laub did as well.

17 **Q. Do you see in the to line of the e-mail, it**

18 **says Steve Michael?**

19 A. Yes.

20 **Q. Do you know whether Mr. Michael had been**

21 **retained to work with the campaign at that point?**

22 A. I do not know. I know that he was helping the

23 campaign and was in the office quite regularly. I know

24 that he had been in discussions with Mr. Greitens and

25 Mr. Laub in 2014. But I do not know if they had a formal

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1 agreement.

2 **Q. Do you know the nature of the work that**

3 **Mr. Michael was performing for the campaign?**

4 A. Some of the same work that I was doing,

5 especially in terms of networking Mr. Greitens around to

6 different activists and influencers and elected officials.

7 **Q. Do you see approximately two-thirds of the way**

8 **down the page where in all caps it says potential**

9 **volunteers?**

10 A. Yes.

11 **Q. Did you ever discuss with anyone on the**

12 **campaign strategies for identifying volunteers?**

13 A. To my recollection, yes.

14 **Q. What was the nature of those discussions?**

15 A. As I recall, I had numerous conversations with

16 both Danny Laub and Steve Michael about -- about reaching

17 out to activists and others and putting together a

18 framework for including those individuals in -- in the

19 campaign or in the pending campaign.

20 **Q. Did you ever discuss The Mission Continues as**

21 **a source of potential volunteers?**

22 A. I do not recall.

23 **Q. Do you recall anyone ever discussing e-mail**

24 **lists or volunteer lists from The Mission Continues?**

25 A. I recall -- I recall Mr. Laub working with an

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1 e-mail vendor on -- that was, I guess, contracted by the
 2 Greitens campaign. I recall some discussion that they had
 3 had a set of e-mails that they were trying to upload into a
 4 database of some sort. And I believe that conversation was
 5 between Danny and the digital vendor that they had -- that
 6 they had been working with. But I do not know the nature
 7 of the e-mail list or -- or the database that they were
 8 discussing.

9 **Q. Do you know anything about that database and
 10 what the source of it might be?**

11 A. I do not.

12 **Q. Do you know who that digital vendor was?**

13 A. I believe they were called -- the name of the
 14 company was called Push Digital.

15 **Q. Had you ever worked with Push Digital before?**

16 A. No.

17 **Q. Do you know whether they're a Missouri based
 18 firm?**

19 A. I believe that they are a firm based in
 20 Georgia or at least had done some work in Georgia. And I
 21 say that because I -- I was familiar with -- I believe he's
 22 the CEO. And I'm drawing a blank on his name. But they
 23 had participated in a race that I was a little familiar
 24 with in Georgia. It was a Georgia U.S. Senate primary.
 25 And so that led me to believe that they have a base in

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1 Georgia. Or it might be South Carolina.

2 **Q. Do you know someone named Austin Chambers?**

3 A. I do.

4 **Q. How long have you known Austin Chambers?**

5 A. My first encounter with Austin Chambers was, I
 6 believe, in late 2015 or early 2016. And to this day, I've
 7 never had a conversation with him. But I have seen him and
 8 been around him at many political events and I know some of
 9 his background.

10 **Q. To your knowledge, was Mr. Chambers or his
 11 firm involved with Mr. Greitens at the same time that you
 12 were working for the Greitens project?**

13 A. To my recollection -- my recollection, no.
 14 They were not involved at the time I was.

15 **Q. Are you aware of any conversations between
 16 Mr. Chambers or anyone at his firm and Mr. Greitens during
 17 2014 or early 2015?**

18 A. No, I am not aware.

19 **Q. And are you aware of whether Push Digital had
 20 any affiliation or relationship with Mr. Chambers or
 21 Mr. Chambers' firm?**

22 A. I was not aware.

23 MR. MARTINICH-SAUTER: Mercifully I think
 24 we're on the last document.
 25 (Whereupon Exhibit 35 was marked for

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1 identification.)

2 **Q. (By Mr. Martinich-Sauter) Do you recognize
 3 this document that's labeled as Exhibit 35?**

4 A. I do.

5 **Q. What is this document?**

6 A. This was an e-mail that I found very odd to
 7 have received well after I parted ways with the campaign.
 8 And I received it because my Greitens for Missouri e-mail
 9 address was forwarded to my personal e-mail address. I did
 10 not have access to the Greitens for Missouri account. I
 11 believe that they changed the password perhaps even the day
 12 that we parted ways. But for whatever reason, the way
 13 e-mail forwarding works I guess in gmail, that I continued
 14 to receive e-mails that were sent to that e-mail address
 15 because they were automatically forwarded.

16 So even though I didn't have access to it,
 17 there was only a small handful of e-mails. And this one
 18 struck me as particularly odd that I received an e-mail
 19 from someone at The Mission Continues regarding the
 20 campaign.

21 **Q. Do you know who [REDACTED] is?**

22 A. I do not.

23 **Q. Other than this e-mail, have you ever had any
 24 communications with Mr. [REDACTED] ?**

25 A. No.

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1 **Q. Other than this e-mail, have you ever had --
 2 or did you while you were working for Mr. Greitens have any
 3 communications with anyone at The Mission Continues?**

4 A. I do not recall.

5 **Q. Are you aware of anyone else who was working
 6 for Mr. Greitens who had any communications with any
 7 employees of The Mission Continues?**

8 A. I am not aware.

9 **Q. When you were working for Mr. Greitens, do you
 10 recall any conversations about whether or not The Mission
 11 Continues donor list or any other donor list needed to be
 12 reported as an in-kind contribution?**

13 A. I am not aware of any conversations. At the
 14 time, the way I understood and the way I received those
 15 lists, I was not aware that it was property to be reported.
 16 I did not know how the list was created or acquired.

17 **Q. Do you know someone named Jeff Stuerman?**

18 A. I do.

19 **Q. Who is Mr. Stuerman?**

20 A. Mr. Stuerman is a former executive of Edward
 21 Jones Trust who Mr. Greitens brought into the campaign in,
 22 I believe, February of 2015. Mr. Stuerman had an office
 23 out of the campaign -- out of the campaign office on the
 24 second floor of the west -- of the building on West Pine.
 25 I developed a really solid working

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1 relationship with Mr. Stuerman. He did the compliance work
 2 for the campaign. He -- I remember he established a set of
 3 compliance procedures, reporting and compliance procedures
 4 and record retention procedures for the campaign and was
 5 a -- was one of the key advisers and -- and also had a
 6 network of his own that Mr. Greitens utilized.
 7 I saw Mr. Stuerman a couple more times after
 8 we parted ways just at campaign events, and it was always
 9 very cordial. But during -- we were working together
 10 almost on a daily basis in February and in March of 2015.

Q. Who is Chris Bobak?

11
 12 A. Chris Bobak was an employee of Mr. Greitens at
 13 The Greitens Group. I'm not sure what his specific role
 14 was. I -- I recall him doing a bunch of work for -- in
 15 advance of the book launch. He worked out of The Greitens
 16 Group office at the same time I was working out of there.
 17 And obviously he was the son of Eric's, you know, personal
 18 attorney Mark Bobak.

**Q. Do you remember Chris Bobak ever working on
 any politically oriented work?**

19
 20
 21 A. At that time, I do not recall him working
 22 directly on anything. He would get lunch and run errands
 23 for the campaign and, you know, for Danny Laub and myself.
 24 I don't believe he was present in any meetings that we had
 25 or any strategy sessions. But to the extent that he would

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1 MR. ERNST: Sure.
 2 MR. MARTINICH-SAUTER: Off the record.
 3 (Whereupon there was a short break.)
 4 MR. ERNST: I understand that counsel have
 5 completed their questions for today. I just wanted to
 6 reiterate again, Mr. Hafner was here pursuant to subpoena
 7 from the Attorney General of the State of Missouri and
 8 otherwise would not have given his testimony today except
 9 for that subpoena. That's all. I wanted to make it clear
 10 on the record.
 11 MR. MARTINICH-SAUTER: Just one last question.
 12 Mr. Hafner, do you understand that you have a right to read
 13 and sign the deposition?
 14 THE WITNESS: Yes.
 15 MR. MARTINICH-SAUTER: And do you want to
 16 exercise that right?
 17 THE WITNESS: Yes.
 18 (Whereupon signature was reserved.)
 19 (Off the record at 3:32 p.m.)
 20
 21
 22
 23
 24
 25

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1 do things around the office or -- or, you know, help out
 2 with office supplies or things like that for Mr. Laub and
 3 myself, I remember him doing so.
 4 And then later on, I do remember well after I
 5 departed the campaign, I remember Chris -- Chris being at
 6 some campaign events for Eric and seeing him at a couple
 7 campaign events.

**Q. Is there anyone from your time working with
 the Greitens campaign that you continue to stay in touch
 with?**

8
 9
 10
 11 A. There's a couple people that during my time
 12 when I was working with Mr. Greitens, there's a gentleman
 13 Tyler Holman is how we first met. Tyler was not employed
 14 at the same time I was. But Tyler did go and start work on
 15 the campaign sometime in the summer of 2015, I believe.
 16 Tyler's still a friend of mine and I still talk to him.
 17 Other than that, there was some -- there was a
 18 couple other individuals who worked for the campaign later
 19 on who parted ways who I still talk to. But they didn't
 20 work out of the St. Louis office. But other than that, not
 21 regularly. There's some other people. We mentioned Jennae
 22 Neustadt earlier. Jennae and I are still friends, still
 23 communicate with her, but not regularly.

24 MR. MARTINICH-SAUTER: Can we take just a one-
 25 or two-minute break?

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1 CERTIFICATE OF REPORTER
 2 I, Sheryl A. Pautler, Certified Court Reporter
 3 (MO), Certified Shorthand Reporter (IL), do hereby certify
 4 that the witness whose testimony appears in the foregoing
 5 deposition was duly sworn by me; the testimony of said
 6 witness was taken by me to the best of my ability and
 7 thereafter reduced to typewriting under my direction; that
 8 I am neither counsel for, related to, nor employed by any
 9 of the parties to the action in which this deposition was
 10 taken, and further that I am not a relative or employee of
 11 any attorney or counsel employed by the parties thereto,
 12 nor financially or otherwise interested in the outcome of
 13 the action.
 14
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 17 _____
 18 Certified Court Reporter (MO)
 19 Certified Shorthand Reporter (IL)
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1 ALARIS LITIGATION SERVICES
 2 March 21, 2018
 3 MICHAEL HAFNER
 4 [REDACTED]
 5 IN RE: IN RE: THE MISSION CONTINUES
 6 Dear Michael Hafner
 7 Please find enclosed a complimentary copy of your
 8 deposition taken on March 16, 2018 in the
 9 above-referenced case. Also enclosed is the original
 10 signature page and errata sheets.
 11 Please read your copy of the transcript, indicate any
 12 changes and/or corrections desired on the errata
 13 sheets, and sign the signature page before a notary
 14 public.
 15 Please return the errata sheets and notarized
 16 signature page to our office at 711 N 11th Street, St.
 17 Louis, MO 63101 for filing prior to trial date.
 18 Sincerely,
 19
 20 Sheryl Pautler
 21
 22 46387
 23
 24
 25

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1 STATE OF _____)
 2
 3 COUNTY OF _____)
 4
 5 I, MICHAEL HAFNER, do hereby certify:
 6 That I have read the foregoing deposition;
 7 That I have made such changes in form
 8 and/or substance to the within deposition as might
 9 be necessary to render the same true and correct;
 10 That having made such changes thereon, I
 11 hereby subscribe my name to the deposition.
 12 I declare under penalty of perjury that the
 13 foregoing is true and correct.
 14 Executed this ____ day of _____,
 15 20____, at _____.
 16
 17
 18
 19 _____
 20 MICHAEL HAFNER
 21
 22 _____
 23 NOTARY PUBLIC
 24 My Commission Expires:
 25

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1 ERRATA SHEET
 2 Witness Name: MICHAEL HAFNER
 3 Case Name: IN RE: THE MISSION CONTINUES
 4 Date Taken: MARCH 16, 2018
 5
 6 Page # _____ Line # _____
 7 Should read: _____
 8 Reason for change: _____
 9
 10 Page # _____ Line # _____
 11 Should read: _____
 12 Reason for change: _____
 13
 14 Page # _____ Line # _____
 15 Should read: _____
 16 Reason for change: _____
 17
 18 Page # _____ Line # _____
 19 Should read: _____
 20 Reason for change: _____
 21
 22 Page # _____ Line # _____
 23 Should read: _____
 24 Reason for change: _____
 25
 26 Witness Signature: _____

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