

Page 1

1 IN RE: THE MISSION CONTINUES)
 2) CID No.
 3) 22-18
 4
 5 - - -
 6
 7 Deposition of DANIEL LAUB
 8 Washington, D.C.
 9
 10 Wednesday, April 18, 2018
 11
 12 9:13 a.m.
 13
 14 BEFORE:
 15 Gail L. Inghram Verbano:
 16 Registered Diplomat Reporter,
 17 Certified Realtime Reporter,
 18 Certified Shorthand Reporter-CA (No. 8635)
 19
 20
 21
 22
 23
 24
 25

Page 2

1 Deposition of DANIEL LAUB, held at the
 2 offices of CAPLIN & DRYSDALE, One Thomas
 3 Circle, NW, Suite 1100, Washington, D.C. 20005,
 4 on Wednesday, April 18, 2018, beginning at
 5 approximately 9:13 a.m., the proceedings being
 6 recorded stenographically by Gail Inghram
 7 Verbano, Registered Diplomat Reporter,
 8 Certified Realtime Reporter, Certified
 9 Shorthand Reporter-CA (No. 8635), and
 10 transcribed under her direction.
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

Page 3

1 A P P E A R A N C E S
 2
 3 On behalf of Missouri Attorney General:
 4 D. JOHN SAUER, ESQ.
 5 [REDACTED]
 6 JASON S. DUNKEL, ESQ.
 7 [REDACTED]
 8 Attorney Generals' Office of Missouri
 9 221 West High Street
 10 Jefferson City, Missouri 65102
 11 573.751.8145
 12
 13 On behalf of the Witness:
 14 SANFORD J. BOXERMAN, ESQ.
 15 [REDACTED]
 16 MICHELLE FEIT SCHWERIN, ESQ.
 17 [REDACTED]
 18 (via telephone)
 19 CAPES SOKOL
 20 Pierre Laclede Center
 21 7701 Forsyth Boulevard, 12th Floor
 22 St. Louis, Missouri 63105-1818
 23 314.505.5470
 24
 25

Page 4

1 C O N T E N T S
 2 EXAMINATION OF: PAGE
 3 DANIEL LAUB
 4 By Mr. Sauer 8
 5
 6 E X H I B I T S
 7 LAUB IDENTIFIED
 8 Exhibit 1 Email communication, 10-16-13 31
 9 Exhibit 2 Email communication, 2-17-14, with 35
 10 attachment
 11 Exhibit 3 Email communication, 3-19-14 43
 12 Exhibit 4 Email communication, 3-20-14 49
 13 Exhibit 5 Email communication, 3-20-14 55
 14 Exhibit 6 Email communication ending 3-26-14, 63
 15 Bates GG_Email0022027 to 028
 16 Exhibit 7 Email communication 4-1-14 68
 17 Exhibit 8 Email communication, 4-7-14 76
 18 Exhibit 9 Email communication, 5-15-14 79
 19 Exhibit 10 Email communication, 5-15-14 85
 20 Exhibit 11 Email communication ending 5-20-14, 89
 21 with attachment
 22 Exhibit 12 Email communication, 5-24-14, with 96
 23 attachment
 24
 25

DANIEL LAUB 4/18/2018

Page 5

1	LAUB IDENTIFIED	
2	Exhibit 13 Email communication ending 5-27-14, with attachment	103
3		
4	Exhibit 14 Email communication 5-28-14, with attachment	123
5		
6	Exhibit 15 Email communication, 5-30-14	131
7	Exhibit 16 Email communication, 6-30-14	133
8	Exhibit 17 Email communication, 6-30-14	138
9	Exhibit 18 Preliminary proposal, Strategic Plan and Scope of Work	142
10		
11	Exhibit 19 Eric Greitens' Plan/Focus Pre-Rollout Process	143
12		
13	Exhibit 20 Memo from D. Laub to E. Greitens, 7-28-14	144
14		
15	Exhibit 21 Email communication, 8-19-14	149
16	Exhibit 22 Email communication ending 10-7-14, with attachment	153
17		
18	Exhibit 23 Email communication 10-15-14	165
19	Exhibit 24 Calendar invite for 10-20-14 meeting	169
20	Exhibit 25 Email communication ending 10-27-14	178
21	Exhibit 26 Email communication, 12-1-14, with attachment	180
22		
23	Exhibit 27 Email communication, 12-2-14	186
24	Exhibit 28 Email communication, 12-19-14	192
25	Exhibit 29 Calendar invite for 1-7-15 meeting	194

Page 6

1	LAUB IDENTIFIED	
2	Exhibit 30 Email communication, 1-6-15, with attachments	198
3		
4	Exhibit 31 1-7-15 Meeting agenda	203
5	Exhibit 32 Email communication, 1-16-15, with attachment	206
6		
7	Exhibit 33 1-7-15 Meeting Agenda	209
8	Exhibit 34 1-8-15 Meeting notes	212
9	Exhibit 35 Calendar invite for 1-19-15 meeting	220
10	Exhibit 36 Email communication, 1-19-15	222
11	Exhibit 37 Greitens for Missouri Task List, 1-22-2015	226
12		
13	Exhibit 38 Email communication, 1-21-15, with attachments	229
14		
15	Exhibit 39 Email communication, 1-28-15, with attachment	234
16		
17	Exhibit 40 Email communication, 1-28-15, with attachment	235
18		
19	Exhibit 41 Email communication ending 2-1-15, with attachment	239
20		
21	Exhibit 42 Email communication, 2-2-15, with attachment	241
22		
23	Exhibit 43 Email communication ending 2-4-15	244
24	Exhibit 44 Email communication, 2-5-15, with attachment	249
25		

Page 7

1	LAUB IDENTIFIED	
2	Exhibit 45 Email communication, 2-5-15, with attachment	251
3		
4	Exhibit 46 Email communication, 2-5-15	256
5	Exhibit 47 Screenshot of 4-22-15 email	261
6	Exhibit 48 AT&T Wireless statement, 5-24-17	266
7	Exhibit 49 Missouri Ethics Commission Committee Disclosure Report	274
8		
9	Exhibit 50 Settlement Agreement between Missouri Ethics Commission and Greitens for Missouri	279
10		
11		
12	Exhibit 51 Email communication ending 11-11-14	284
13	Exhibit 52 2014 1099 of D. Laub	288
14	Exhibit 53 Email communication ending 1-26-15, with attachments	296
15		
16	Exhibit 54 Email communication ending 3-9-15	299
17	Exhibit 55 Email communication ending 3-11-15	305
18	Exhibit 56 Email communication ending 3-26-15, with attached Push Digital invoice	306
19		
20	Exhibit 57 Email communication ending 10-20-15	307
21		
22		
23		
24		
25		

Page 8

1 Washington, D.C.

2 Wednesday, April 18, 2018; 9:13 a.m.

3 - - -

4 DANIEL LAUB, having first been duly

5 sworn according to law, was examined and

6 testified as follows:

7 - - -

8 EXAMINATION

9 BY MR. SAUER:

10 **Q. All right. On the record.**

11 **Good morning, Mr. Laub. My name is**

12 **John Sauer, and I'm an attorney with the**

13 **Missouri Attorney General's Office. You**

14 **understand that; correct?**

15 A. I do.

16 **Q. And you understand that you're giving**

17 **a deposition today about -- relating to our**

18 **investigation of an entity known as The Mission**

19 **Continues and related matters; correct?**

20 A. I do.

21 **Q. And do you feel mentally alert today?**

22 A. Yes.

23 **Q. Do you feel like there's anything that**

24 **would stop you from giving clear, accurate and**

25 **truthful testimony today?**

2 (Pages 5 to 8)

Page 9

1 A. No.

2 **Q. As we discussed with the court**

3 **reporter, both of us have a tendency to talk**

4 **quickly, so let's both make an effort to talk**

5 **slowly during this deposition. Is that**

6 **all right?**

7 A. Terrific.

8 **Q. And let's be careful not to talk over**

9 **each other so that the record is clear.**

10 A. Okay.

11 **Q. And if I ask you a question and you**

12 **are unclear of what I mean or don't understand**

13 **any part of the question, will you tell me that**

14 **rather than guessing at what I'm asking?**

15 A. Yes.

16 **Q. Now, you -- as I understand it, you**

17 **were served with a civil investigative demand**

18 **in this matter; correct?**

19 A. That's true.

20 **Q. And that was served by our office on**

21 **you; correct?**

22 MR. BOXERMAN: Well, we accepted

23 service.

24 BY MR. SAUER:

25 **Q. So your attorney accepted service on**

Page 11

1 A. That's my understanding.

2 **Q. Other than that, have I or anyone else**

3 **at the Attorney General's Office offered you**

4 **any kind of benefit or inducement to get you to**

5 **testify today?**

6 A. No.

7 **Q. Has anyone in the Attorney General's**

8 **Office or related to the Attorney General's**

9 **Office made any attempt to influence the way**

10 **you're going to testify today?**

11 A. No.

12 **Q. Has anyone else outside the Attorney**

13 **General's office contacted you in any way to --**

14 **in attempt to influence the way you will**

15 **testify today?**

16 A. No.

17 **Q. You hesitated. Is there anything**

18 **about which you think might be near that answer**

19 **other than, of course, your own attorneys?**

20 A. No.

21 MR. BOXERMAN: I'm guessing,

22 because I don't know what was in Danny's head,

23 but we've received inquiries from

24 Representative Barnes about testifying in front

25 of his committee and I kind of sense that Danny

Page 10

1 **your behalf; correct?**

2 MR. BOXERMAN: Yes. It's

3 actually two CIDs. One was initially for

4 documents and a subsequent CID for this

5 proceeding today.

6 BY MR. SAUER:

7 **Q. And as to those two CIDs, I understand**

8 **that you responded by invoking your right**

9 **against self-incrimination; is that correct?**

10 A. Yes.

11 **Q. And then our office filed a petition**

12 **to enforce the CIDs under a provision of**

13 **Missouri law known as Section 407.045. Is that**

14 **your understanding?**

15 MR. BOXERMAN: He's looking at

16 me. The statute is right.

17 BY MR. SAUER:

18 **Q. Let me put it this way: Our office**

19 **filed an enforcement action to compel you to**

20 **testify. Is that your understanding?**

21 A. That's my understanding.

22 **Q. Is it your understanding that that**

23 **statute, if you're forced to testify over your**

24 **objection, grants you immunity for the matters**

25 **that we testify about today?**

Page 12

1 thought maybe that's where you were headed, but

2 no one has done anything to try to influence

3 what Danny testifies here to today.

4 THE WITNESS: Correct.

5 BY MR. SAUER:

6 **Q. Now, at some point you were affiliated**

7 **with the political campaign Greitens for**

8 **Missouri?**

9 A. Yes.

10 **Q. What role did you have in that**

11 **political campaign?**

12 A. Towards the beginning, it was

13 undefined. I became the campaign manager.

14 **Q. And how long were you affiliated with**

15 **that campaign?**

16 A. I was affiliated with the campaign

17 from its inception, which would have been

18 February of 2015, through when I resigned,

19 which would have been end of October 2015.

20 **Q. And I take it this was the**

21 **gubernatorial campaign of Eric Greitens to**

22 **become governor of Missouri; correct?**

23 A. It became that.

24 **Q. You say it became that. At some point**

25 **was the campaign for some other office?**

Page 13

1 A. Originally, it was filed for statewide
 2 office and it became a gubernatorial campaign.
 3 **Q. How did you first meet Eric Greitens?**
 4 A. I met Eric -- I originally met him
 5 sometime when I was in college when he spoke --
 6 I met him in this context during 2014 -- early
 7 2014 when we came to have informal meetings
 8 with Mr. Greitens.
 9 **Q. You met him while you were still a**
 10 **college student?**
 11 A. Yes. He spoke once or twice when I
 12 was a college student, but I didn't have any
 13 substantive conversations until 2014.
 14 **Q. So the college student time frame,**
 15 **when was that content?**
 16 A. It would have been 2009 to 2010-ish.
 17 **Q. When were you in -- where were you in**
 18 **college?**
 19 A. St. Louis University.
 20 **Q. And then at some point several years**
 21 **later, you got in touch with him about working**
 22 **for him in a political connection; correct?**
 23 A. Working for him in a capacity that
 24 involved political and other things.
 25 **Q. What other things?**

Page 14

1 A. His book tour, his general missions of
 2 The Greitens Group, things like that.
 3 **Q. So at some point, you entered into a**
 4 **formal arrangement with The Greitens Group as a**
 5 **consultant?**
 6 A. Yes.
 7 **Q. When did you first sort of reinstate**
 8 **contact with him after college?**
 9 A. 2014, I started having informal
 10 meetings with Eric.
 11 **Q. What month of that year? Do you**
 12 **recall?**
 13 A. It would have been the first half of
 14 the year. I can't give you exactly -- I want
 15 to say around April.
 16 **Q. How was the initial contact or the**
 17 **initial meeting set up? Did you reach out to**
 18 **him or what happened?**
 19 A. A mutual acquaintance asked me if I
 20 would come meet with Eric to discuss Eric's
 21 desire for running for office eventually.
 22 **Q. Who was that acquaintance?**
 23 A. Tyler Holman.
 24 **Q. How did you know Tyler?**
 25 A. I've known Tyler since college when he

Page 15

1 was the college Republican chair of Webster
 2 University and I was the college Republican
 3 chair at St. Louis.
 4 **Q. What had you been doing professionally**
 5 **since you graduated from college? Were you**
 6 **working as a political consultant?**
 7 A. Yeah. Political consultant and
 8 operative since college, yes.
 9 **Q. Okay. Just generally describe for me**
 10 **what kind of matters you worked on and who your**
 11 **employer was.**
 12 A. Directly out of college, I worked for
 13 now Senator Blunt's first U.S. Senate campaign
 14 in St. Louis. Then I worked for Anne Wagner,
 15 Congresswoman Wagner's campaign. Then I went
 16 and worked for Governor Romney's presidential
 17 campaign. Do you want me to keep going?
 18 **Q. Please.**
 19 A. Then I managed the lieutenant
 20 governor's race in Virginia, and then I started
 21 working for a consulting shop in St. Joseph,
 22 Missouri.
 23 **Q. What was that shop?**
 24 A. It was called Sandlot Strategic.
 25 **Q. What -- who was the principal of that**

Page 16

1 **particular firm?**
 2 A. There was three of us. It was myself,
 3 Colin Hoffman and Patrick Graham.
 4 **Q. Did Colin Hoffman or Patrick Graham**
 5 **have any involvement in working with Eric**
 6 **Greitens?**
 7 A. No.
 8 **Q. So -- and were you working at Sandlot**
 9 **when Mr. Holman introduced you or brought you**
 10 **into a meeting with Mr. Greitens?**
 11 A. Yes.
 12 **Q. To the best of your recollection, what**
 13 **was discussed at that first meeting?**
 14 A. To the best of my recollection, it was
 15 very -- a tutorial on Missouri politics; the
 16 players, what running for office would look
 17 like at a very basic level.
 18 **Q. Who was at that meeting?**
 19 A. I can't remember exactly, but I
 20 believe it was Tyler Holman, myself, Dave
 21 Whitman and Eric.
 22 **Q. And who is Dave Whitman?**
 23 A. Dave Whitman was the managing director
 24 of The Greitens Group at the time.
 25 **Q. Let me ask you some questions about**

Page 17

1 **The Greitens Group.**
2 **At this time, was The Greitens Group**
3 **sharing office space with the charity known as**
4 **The Mission Continues?**
5 A. At what time?
6 **Q. At the time of this initial meeting**
7 **that you testified occurred in the first half**
8 **of 2014.**
9 A. I have no idea. We met at Eric's
10 house in the central west end.
11 **Q. Okay. And Dave Whitman was there.**
12 **What's your understanding of his role in The**
13 **Greitens Group?**
14 A. It was my understanding that he was
15 the managing director that managed and
16 directed.
17 **Q. And what did The Greitens Group do,**
18 **generally speaking?**
19 A. To the best of my recollection,
20 oversaw Eric's speaking -- speeches, book, book
21 tour, all functions of things that Eric did.
22 **Q. In this initial meeting, was there a**
23 **discussion of any particular office that Eric**
24 **was interested in running for?**
25 A. I don't recall specifically, but I

Page 19

1 **it, would have occurred after you initially**
2 **started discussions with him about his**
3 **political future; correct?**
4 A. I believe so.
5 **Q. But you don't know for sure?**
6 A. I don't know for sure.
7 **Q. Later on, did you ever go to the**
8 **office of The Greitens Group?**
9 A. Yes.
10 **Q. Where was that located in 2014?**
11 A. 4500 West Pine in the central west
12 end.
13 **Q. Was The Greitens Group sharing office**
14 **space with The Mission Continues at this time?**
15 A. Not then, no. At that point, it was
16 just The Greitens Group office.
17 **Q. Did you meet anyone -- in the course**
18 **of your time at the mission -- sorry -- at --**
19 **working with Eric, either through The Greitens**
20 **Group or through the political campaign, did**
21 **you meet individuals who were employed by or**
22 **affiliated with The Mission Continues?**
23 A. Yes.
24 **Q. Who were those individuals?**
25 A. I don't know specifically, but I do --

Page 18

1 will say that over these meetings, multiple
2 offices were discussed.
3 **Q. What offices were discussed?**
4 A. Governor and lieutenant governor,
5 specifically.
6 **Q. Was there any discussion of other**
7 **offices, to the best of your recollection, in**
8 **the first half of 2014?**
9 A. Just the two, best of my recollection.
10 **Q. Do you know if Dave Whitman had any**
11 **formal or informal role in The Mission**
12 **Continues?**
13 A. No idea.
14 **Q. Do you know if Eric Greitens at this**
15 **time had a formal role with The Mission**
16 **Continues?**
17 A. I have no idea.
18 **Q. So you don't know whether in the**
19 **latter -- or the former part of 2014, whether**
20 **Eric was serving as CEO of The Mission**
21 **Continues?**
22 A. I remember at some point that year he
23 stepped down as CEO but remained on the board,
24 but I don't know the timeline.
25 **Q. Would -- that stepping down, I take**

Page 20

1 there was a few times at social events that I
2 met folks involved with The Mission Continues.
3 **Q. Do you remember any specific**
4 **individual that you met who was affiliated with**
5 **The Mission Continues?**
6 A. The only one that comes to mind was
7 Greg Favor who used to be Eric's, I think,
8 chief of staff at The Mission Continues. I
9 don't know. That's the only name I can
10 remember.
11 **Q. And to the best of your recollection,**
12 **there were other people, but you just -- from**
13 **The Mission --**
14 A. It was entirely social, so I don't.
15 **Q. Did you ever have discussions about**
16 **Eric's political ambitions or political**
17 **campaign with people who were at The Mission**
18 **Continues?**
19 A. That were currently employed with The
20 Mission Continues?
21 **Q. Correct.**
22 A. Not to my knowledge.
23 **Q. And I take it you know Krystal Taylor;**
24 **correct?**
25 A. I do.

Page 21

1 **Q. During this time frame, did you have**
 2 **an understanding of what her role was at The**
 3 **Greitens Group?**
 4 A. The best of my understanding, I did.
 5 **Q. What was that?**
 6 A. To my understanding is, Krystal was
 7 the executive assistant at The Greitens Group
 8 to Eric.
 9 **Q. Do you know whether she had any role**
 10 **at The Mission Continues?**
 11 A. I know previously she did. At the
 12 current time, I -- I don't know.
 13 **Q. So tell me more -- what -- what was**
 14 **your understanding about her relationship to**
 15 **The Mission Continues?**
 16 A. It was my interpretation that she
 17 worked for The Mission Continues in a similar
 18 capacity that she did when she came to The
 19 Greitens Group, and that when Eric left The
 20 Mission Continues or transitioned, whatever,
 21 that she came with him.
 22 **Q. So it's your understanding that she**
 23 **was simultaneously employed by The Mission**
 24 **Continues and The Greitens Group up until the**
 25 **time when Eric stepped down as CEO?**

Page 22

1 A. No.
 2 **Q. What's your understanding?**
 3 A. My understanding, and I was not
 4 involved in this, was that she left The Mission
 5 Continues to work for The Greitens Group, that
 6 there wasn't an overlap, but I don't know.
 7 **Q. Do you know when that occurred?**
 8 A. I don't.
 9 **Q. Do you know if that had already**
 10 **occurred when you first made contact with Eric**
 11 **Greitens at this initial meeting at his house**
 12 **in 2014?**
 13 A. I don't.
 14 **Q. During the course of your time working**
 15 **with The Greitens Group and working with the**
 16 **campaign, did you receive emails from people**
 17 **with Mission Continues.org email addresses?**
 18 A. I remember once or twice, yes.
 19 **Q. Do you remember specifically who those**
 20 **emails came from?**
 21 A. Someone in the PR department.
 22 **Q. So Mission Continues had a PR**
 23 **department?**
 24 A. To the best of my knowledge.
 25 Communications PR.

Page 23

1 **Q. Do you know who those people were?**
 2 A. I don't. I no longer have access to
 3 those emails.
 4 **Q. Do you know generally, at least, what**
 5 **the nature of the communications in those**
 6 **emails was?**
 7 A. Yes. It was referred to me because
 8 they were getting questions at The Mission
 9 Continues about Eric running for office.
 10 **Q. Do you know what time frame this would**
 11 **be?**
 12 A. Sometime in 2015. I don't have an
 13 idea.
 14 **Q. You don't know specifically when those**
 15 **inquiries were made?**
 16 A. No, I would be speculating.
 17 **Q. Do you know how you responded to those**
 18 **inquiries?**
 19 A. I don't.
 20 **Q. Did you respond?**
 21 A. I don't remember. I don't have access
 22 to those emails.
 23 **Q. Can you -- I take it you had an**
 24 **initial meeting at some point in 2014 and, to**
 25 **the best of your recollection, around April at**

Page 24

1 **Eric's house to discuss his political future;**
 2 **correct?**
 3 A. Yes, sir.
 4 **Q. And to the best of your recollection,**
 5 **at that meeting the offices of governor and**
 6 **lieutenant governor were discussed; is that**
 7 **fair to say?**
 8 A. Yes, sir.
 9 **Q. Did you have a view -- and Eric**
 10 **attended that meeting?**
 11 A. Yes, sir.
 12 **Q. And did he talk to you directly about**
 13 **his political aspirations?**
 14 A. Yes, sir.
 15 **Q. Do you remember anything specific he**
 16 **said about those political aspirations at that**
 17 **time?**
 18 A. No.
 19 **Q. Do you remember him discussing in any**
 20 **way how those aspirations might relate to his**
 21 **role with The Mission Continues?**
 22 A. No.
 23 **Q. Were there follow-up meetings after**
 24 **that initial meeting?**
 25 A. Yes.

Page 25

1 **Q. What happened -- can you just**
 2 **generally describe how this relationship**
 3 **developed to the point where you would be**
 4 **working for him?**
 5 A. It's my understanding that Eric was
 6 reaching out to a variety of people -- me being
 7 one of them -- for informal advice. And after
 8 the initial meeting, apparently he must have
 9 liked what I had to say, kept inviting me back,
 10 and I probably had maybe a half dozen of these
 11 similar meetings at his house between then and
 12 when he asked me to come over full time.
 13 **Q. And when you say "come over full**
 14 **time," was that to be a full-time employee of**
 15 **the campaign or to have some role at The**
 16 **Greitens Group?**
 17 A. I originally became a contractor of
 18 The Greitens Group.
 19 **Q. That was your full-time job was to be**
 20 **an independent contractor of The Greitens**
 21 **Group?**
 22 A. Yes.
 23 **Q. Roughly when did that relationship**
 24 **begin?**
 25 A. The first month I was paid as an

Page 26

1 independent contractor was December of 2014.
 2 **Q. What sort of work did you do as a paid**
 3 **independent contractor of The Greitens Group?**
 4 A. We were getting ready for his book
 5 tour for his new book, "Resilience." I had a
 6 hand in speaking gigs and preparing and
 7 doing -- getting those ready and then I had a
 8 hand in political planning.
 9 **Q. When you say "political planning,"**
 10 **what do you mean by that?**
 11 A. Everything from -- from surveying the
 12 landscape, figuring out who Eric should meet
 13 with, figuring out how to achieve at this
 14 point -- at this point what became a future
 15 gubernatorial campaign, how to achieve success.
 16 **Q. So you say at this point there was --**
 17 **by this time frame, there was definitely a**
 18 **future gubernatorial campaign that was being**
 19 **prepared for?**
 20 A. To the best of my -- I mean, yes.
 21 **Q. And it was your understanding that**
 22 **there had been, by December of 2015, a firm**
 23 **decision by Mr. Greitens to run, specifically,**
 24 **for the office of governor of Missouri?**
 25 MR. BOXERMAN: You said 2015. Do

Page 27

1 you mean 2014?
 2 MR. SAUER: I apologize. Thank
 3 you.
 4 BY MR. SAUER:
 5 **Q. By this time, by December of 2014,**
 6 **there -- at least there had been a firm**
 7 **decision by Mr. Greitens to pursue the office**
 8 **of governor of Missouri; is that correct?**
 9 A. That was the primary objective. There
 10 was conversations in the early parts of 2015
 11 that discussed whether running for lieutenant
 12 governor was still an option, but yes, governor
 13 was the primary objective.
 14 **Q. And by this time, December of 2014,**
 15 **when you began working as a full-time**
 16 **contractor for The Greitens Group, there was a**
 17 **firm decision by Mr. Greitens to pursue**
 18 **political office; is that correct?**
 19 A. Yes. To either seriously explore or
 20 pursue political office, yes.
 21 **Q. Do you know whether it was -- do you**
 22 **have a view on whether it was one or the other**
 23 **of those two things you mentioned? In your**
 24 **view, at this time was it a serious exploration**
 25 **or was it a firm plan in his mind?**

Page 28

1 A. I don't know what was in his mind. I
 2 don't know when exactly the switch flipped.
 3 **Q. But at some point, you believe that**
 4 **decision was made?**
 5 A. Yes.
 6 **Q. Okay. And you believe that that**
 7 **happened by December of 2014?**
 8 A. Around there. I don't know when he
 9 made the decision in his mind.
 10 **Q. Let's go back to these -- you said**
 11 **half a dozen meetings that occurred --**
 12 A. Okay.
 13 **Q. -- between your initial meeting with**
 14 **him in the spring of 2014 --**
 15 A. Yes.
 16 **Q. -- and your full-time employment in**
 17 **December of 2014 as a contractor.**
 18 A. Okay.
 19 **Q. What -- what was discussed at this**
 20 **series of meetings?**
 21 A. It was an evolution of what was
 22 discussed at the first meeting. It was, Here
 23 is the landscape. I remember we went through a
 24 variety of TV ads that had been played in
 25 Missouri before. I remember we talked about

Page 29

1 ideology, where people sit on a spectrum versus
 2 the electorate. We talked about vendors,
 3 possible vendors. We talked about what a team
 4 would look like, both conceptually and in
 5 reality. We talked about what -- what a
 6 campaign looks like in terms of what do people
 7 physically do. It was a tutorial 101 of
 8 running for office.
 9 **Q. So the content of these meetings was**
 10 **all directed towards running for office;**
 11 **correct?**
 12 A. Yes.
 13 **Q. Was there any discussion of The**
 14 **Mission Continues and how The Mission Continues**
 15 **should operate at these meetings?**
 16 A. I don't think so.
 17 **Q. Was there any discussion of other work**
 18 **that The Greitens Group may have done that was**
 19 **not oriented towards running for political**
 20 **office?**
 21 A. I don't think so.
 22 **Q. And how many of these meetings were**
 23 **there? You estimated about half a dozen; is**
 24 **that right?**
 25 A. A minimum.

Page 30

1 **Q. Who attended these meetings?**
 2 A. Some combination of Dave Whitman,
 3 Tyler Holman, myself, Eric Greitens,
 4 occasionally Sheena Greitens. And at some
 5 point, Mark Bobak was brought in.
 6 **Q. Who is Mark Bobak?**
 7 A. To the best of my knowledge, Mark
 8 Bobak was Eric's personal attorney or attorney
 9 for The Greitens Group and kind of his legal
 10 advisor of all things Eric Greitens.
 11 **Q. Do you know which or -- of those**
 12 **meetings that Mr. Bobak attended?**
 13 A. Towards the latter part of the year,
 14 because we started -- we moved from his
 15 house -- we started having meetings in the
 16 office and Mark attended those.
 17 MR. BOXERMAN: Can I jump in?
 18 Was Krystal Taylor at any of those meetings?
 19 THE WITNESS: Krystal Taylor
 20 joined towards the end of the year. I don't
 21 know exactly when. She was never at the
 22 meetings at Eric's house.
 23 BY MR. SAUER:
 24 **Q. So at some point, there's -- meetings**
 25 **occur at The Greitens Group and more people**

Page 31

1 **attend them?**
 2 A. Yes.
 3 **Q. And The Greitens Group again has**
 4 **office space in the central west end at this**
 5 **time?**
 6 A. Yes, at 4500 West Pine.
 7 **Q. Do you know where The Mission**
 8 **Continues was -- had office space at this time?**
 9 A. I've been told it was at the Art Of
 10 Living building, but I couldn't tell you where
 11 that was.
 12 **Q. Let me give you a document -- let's**
 13 **call this Exhibit 1.**
 14 **(Exhibit 1 was marked for**
 15 **identification.)**
 16 BY MR. SAUER:
 17 **Q. Do you recognize this document?**
 18 A. No.
 19 **Q. And this is an email dated**
 20 **October 16th, 2013; correct?**
 21 A. Appears that way.
 22 **Q. And I take it this email would have**
 23 **occurred before you made that initial contact**
 24 **with Mr. Greitens to discuss his political**
 25 **future?**

Page 32

1 A. It appears that way.
 2 **Q. Do you know who Steve Michael is?**
 3 A. I do.
 4 **Q. Who is Steve Michael?**
 5 A. Steve Michael is a consultant for
 6 Victory Enterprises.
 7 **Q. Okay. What's Victory Enterprises?**
 8 A. They are a political consulting firm.
 9 **Q. And are they -- have you ever been**
 10 **affiliated with them?**
 11 A. They did some work for Eric's
 12 campaign, exploratory end campaign while I was
 13 there. Prior to that, no. I knew Steve
 14 Michael.
 15 **Q. So you -- you worked in parallel with**
 16 **them on Eric's campaign; is that fair to say?**
 17 A. We contracted them to do some work.
 18 **Q. So when you were campaign director,**
 19 **you hired them to do some work for campaign?**
 20 A. I inherited them. They were already
 21 around.
 22 **Q. Do you view yourself as a competitor**
 23 **to Victory Enterprises in some sense at this**
 24 **time frame?**
 25 A. No. I don't think Steve Michael's --

Page 33

1 I don't know.

2 **Q. Go ahead. You don't think Steve**

3 **Michael was what?**

4 A. I think we had different lanes.

5 **Q. So he was doing other work that was**

6 **not the work that you were doing?**

7 A. That was my interpretation.

8 **Q. What kind of work was he doing?**

9 A. He was focused on grassroots

10 legislative mobilization, that kind of work

11 when he worked for the campaign in 2015. I

12 don't know what this was about in 2013.

13 **Q. You say in this email -- it refers --**

14 **it says, "Attached is Schweich's donor list"**

15 **there in the first-to-second line of the email**

16 **at the top.**

17 A. It says that.

18 **Q. Yeah. Do you know what that's**

19 **referring to?**

20 A. I have never seen this email in my

21 life.

22 **Q. Well, were you aware at any time of**

23 **the Greitens' campaign having a Schweich donor**

24 **list?**

25 A. Not specifically.

Page 34

1 **Q. Do you recognize that file name to the**

2 **attachment, Schweich.xlsx?**

3 A. No.

4 **Q. Based on your experience as a**

5 **political consultant, would it be unusual for a**

6 **political consultant to give, for example, Tom**

7 **Schweich's donor list to someone who was**

8 **contemplating a run for the same office?**

9 A. No.

10 **Q. Why would that not be unusual?**

11 A. It's a fairly common -- fairly common

12 thing.

13 **Q. How does that happen?**

14 A. Well, I don't have this list in front

15 of me so I don't know whether this list is --

16 is Tom Schweich's list. I don't know whether

17 this is a list pulled off the MEC. I don't

18 know whether this is a list that, you know,

19 Steve Michael took from random public reports.

20 I don't know what the list is. So unless I see

21 the list, I can't speculate.

22 **Q. And as you sit there today, you don't**

23 **recall seeing a Schweich donor list from your**

24 **time with the Greitens campaign?**

25 A. I know that there was lists, plural.

Page 35

1 I wasn't intimately involved in everyday list

2 management. So I don't know. Once again, I

3 wasn't part of this email.

4 **Q. Are you aware of Steve Michael having**

5 **any affiliation with The Mission Continues or**

6 **doing any work for them?**

7 A. I'm not aware of it. I would suspect

8 not, but I'm not aware of it.

9 **Q. Why would you suspect not? Is it**

10 **because he's only a political consultant?**

11 A. It's because I've never known him to

12 be involved with The Mission Continues.

13 **Q. Let me give you this document,**

14 **Exhibit 2.**

15 **(Exhibit 2 was marked for**

16 **identification.)**

17 THE WITNESS: This is more

18 familiar since I sent this one.

19 BY MR. SAUER:

20 **Q. You recognize this document?**

21 A. I do.

22 **Q. And this is an email from you to Tyler**

23 **Holman; correct?**

24 A. Yep.

25 **Q. Correct?**

Page 36

1 A. Yes, sir.

2 **Q. Let's try not to talk over each other.**

3 **And this was sent on February 7th, 2014;**

4 **correct?**

5 A. Yes, sir.

6 **Q. Do you recall what occasioned the**

7 **sending of this particular email from you to**

8 **Mr. Holman?**

9 A. Can I read it first?

10 **Q. Yes.**

11 A. (Witness reviews document.) Yes, I do

12 remember this.

13 **Q. Why did you send this email?**

14 A. This was prior to our first meeting

15 with Eric. And Tyler reached out to me and had

16 political questions. This is me answering said

17 questions.

18 **Q. So is this -- Tyler wanted you to pull**

19 **together some information for your initial**

20 **meeting with Eric; is that fair to say?**

21 A. I don't know whether this was -- I

22 don't know whether this was for Tyler's prep or

23 for the first meeting, but I have no idea.

24 **Q. But in any event, this was -- I take**

25 **it in this email you're sort of providing**

Page 37

1 information to pitch to Eric that he would work
 2 with you on his political aspirations; is that
 3 fair to say?
 4 A. Well, this was an email from me to
 5 Tyler.
 6 **Q. Oh, did you anticipate that Tyler**
 7 **would forward this information on to Eric**
 8 **Greitens?**
 9 A. No. This was an internal -- at this
 10 time, Tyler and I were working together to
 11 prepare to talk to Eric at some point. This
 12 was -- I don't believe this information was
 13 ever given in this form to Eric. Obviously,
 14 some of it would have been.
 15 MR. BOXERMAN: Just so the record
 16 is clear, Exhibit 2 has five or six pages, and
 17 I don't know if you're looking at all the pages
 18 or if you're just looking at the email part.
 19 THE WITNESS: Okay. I got it.
 20 BY MR. SAUER:
 21 **Q. The third, fourth and fifth pages is a**
 22 **memo to Eric Greitens from Danny Laub; correct?**
 23 A. Yes.
 24 **Q. Dated February 5th, 2014; correct?**
 25 A. Appears to be.

Page 38

1 **Q. And you prepared this memo to Eric**
 2 **Greitens?**
 3 A. Our firm did.
 4 **Q. And "our firm" is this Sandlot**
 5 **consulting firm?**
 6 A. Yes, DDS and Sandlot are the same
 7 entity.
 8 **Q. So DDS is just a d/b/a for it?**
 9 A. Sandlot is a d/b/a of DDS, but yes,
 10 you are correct.
 11 **Q. Okay. So I take it the idea of this**
 12 **memo was to make a pitch to Eric Greitens to**
 13 **serve him as a political consultant; correct?**
 14 A. To arm him with the information.
 15 **Q. That would help him pick a political**
 16 **consultant?**
 17 A. No. At this time, it was more about
 18 helping Eric figure out what he wanted to do.
 19 **Q. Okay. So do you see -- flip back to**
 20 **the first page in this document.**
 21 A. Uh-huh.
 22 **Q. On the email, halfway down, you stated**
 23 **"of note." Do you see that under 2012 Senate?**
 24 A. I do.
 25 **Q. And you said, "There were under**

Page 39

1 600,000 votes cast in the Missouri Senate
 2 primary, meaning in a CHTSJB?EG race it would
 3 only take between 175K to 250K votes to win."
 4 **Correct?**
 5 A. Yeah, and I think my prediction was
 6 pretty good.
 7 **Q. In other words, your prediction here**
 8 **relates to a future governor's race; correct?**
 9 A. It does.
 10 **Q. CH is Catherine Hanaway?**
 11 A. Yes.
 12 **Q. And TS was Tom Schweich?**
 13 A. Yes.
 14 **Q. JB question mark is John Brunner?**
 15 A. John Brunner question mark, yes.
 16 **Q. And I take it at this time no one knew**
 17 **whether John Brunner was going to run for**
 18 **governor; right?**
 19 A. Correct.
 20 **Q. But everyone anticipated that**
 21 **Catherine Hanaway and Tom Schweich would run;**
 22 **correct?**
 23 A. Yes, Catherine may have been in the
 24 race at the time. Yes.
 25 **Q. She declared very earlier; is that**

Page 40

1 fair to say?
 2 A. Yes.
 3 **Q. And EG stands for Eric Greitens;**
 4 **correct?**
 5 A. It does.
 6 **Q. So this was providing information**
 7 **about the prospect for entering the governor's**
 8 **race specifically; correct?**
 9 A. I don't know whether it was the
 10 governor's race specifically, but --
 11 **Q. When you referred to a CHTSJBEG race,**
 12 **you're referring to a governor's race; correct?**
 13 A. Yes.
 14 **Q. Flipping ahead to the third page of**
 15 **this document, the first page of the memo is,**
 16 **"Eric and his team contemplate the viability of**
 17 **potential Republican candidates for governor,**
 18 **quality polling data will help determine the**
 19 **potential paths forward." Correct?**
 20 A. Yes.
 21 **Q. So the focus of this memo has to do**
 22 **with a future race for governor; correct?**
 23 A. It appears so.
 24 **Q. It appears so or it is so?**

Page 41

1 A. Both.

2 **Q. In other words, you wrote this memo;**

3 **correct?**

4 A. Our firm did.

5 **Q. Were you involved in preparing it?**

6 A. Yes.

7 **Q. And is there anything in this memo**

8 **that discusses any other race besides the race**

9 **for governor?**

10 A. Potential paths forward, leaves it

11 ambiguous.

12 **Q. And the sentence immediately following**

13 **the phrase "potential paths forward" refers to**

14 **the standing of the Democratic candidate Chris**

15 **Koster; correct?**

16 A. Appears that way.

17 **Q. And at this time Chris Koster was the**

18 **Attorney General; correct?**

19 A. To the best of my knowledge.

20 **Q. And everybody anticipated that he**

21 **would be running for governor at this time;**

22 **correct?**

23 A. That's fair to say.

24 **Q. And it says, "Several potential**

25 **Republicans" -- immediately after that, the**

Page 42

1 **memo says, "Several potential Republican**

2 **challengers"; correct?**

3 A. Correct.

4 **Q. And those are challengers to Chris**

5 **Koster in the future governor's race; correct?**

6 A. Okay. Correct.

7 **Q. Later in the memo, flipping to the**

8 **last page of the document, there's a cost**

9 **estimate for a statewide poll relating to a**

10 **future run for governor; correct?**

11 A. Yes.

12 **Q. And this is a cost estimate provided**

13 **by your firm; is that fair to say?**

14 A. Yes.

15 **Q. Do you know whether any such poll was**

16 **actually conducted by Eric Greitens or anyone**

17 **affiliated with him?**

18 A. This poll was not conducted, and I

19 don't believe any poll was conducted in --

20 during this time period.

21 **Q. "This time period" being 2014?**

22 A. The first half of 2014.

23 **Q. So no one at The Greitens Group spent**

24 **money on polling at this time, to your**

25 **knowledge?**

Page 43

1 A. To my knowledge.

2 **Q. Do you have any reason to believe that**

3 **anyone at The Mission Continues contributed**

4 **money for polling at this time?**

5 A. No idea.

6 **Q. Did you ever -- are you aware that a**

7 **memo like this from you or anyone else was ever**

8 **submitted to anyone at The Mission Continues?**

9 A. I know I never submitted a memo to The

10 Mission Continues. I have no idea.

11 **Q. And you don't know whether this memo,**

12 **for example, might have been forwarded to The**

13 **Mission Continues? Or anyone there?**

14 A. I have no idea.

15 MR. SAUER: Exhibit 3.

16 (Exhibit 3 was marked for

17 identification.)

18 BY MR. SAUER:

19 **Q. Do you recognize this email?**

20 A. I sent it.

21 **Q. I take it that's a yes?**

22 A. That would be a yes.

23 **Q. And you sent this email to Tyler**

24 **Holman on March 19th of 2014; correct?**

25 A. My birthday, yes.

Page 44

1 **Q. Happy birthday.**

2 **By the time you sent this email, had**

3 **you already had the initial meeting with Tyler**

4 **and Dave and Eric at Eric's house?**

5 A. I do not believe so, but I'm not

6 certain.

7 **Q. So in the first line of the email you**

8 **say, "Very confidential, only for your eyes,**

9 **Eric's and Dave's. This is very important."**

10 **Correct?**

11 A. I do say that.

12 **Q. Do you know what you are talking about**

13 **there?**

14 A. Yeah. So these two attachments are

15 examples of research books that a firm did,

16 therefore, it's customary for those to have a

17 close hold.

18 **Q. When you say "research books," what is**

19 **the content of these research books?**

20 A. I don't have the books in front of me,

21 but in terms of research, you do political

22 research on yourself and on opponents.

23 **Q. So are these reports reports on**

24 **Eric Greitens, or were they samples reports**

25 **that had been done on somebody else?**

Page 45

1 A. These were sample reports that the
 2 vendor sent to us as almost pitch materials.
 3 Hoping they would get the work.
 4 **Q. Do you know how the vendor knew that**
 5 **Eric might be interested in having these kinds**
 6 **reports done?**
 7 A. Yeah, we reached out.
 8 **Q. So you -- "we" is who?**
 9 A. Me.
 10 **Q. You specifically?**
 11 A. Yes.
 12 **Q. Did you reach out to vendors before**
 13 **you met with Eric face-to-face for the first**
 14 **time?**
 15 A. I believe so. I believe Tyler asked
 16 me to look into polling and research.
 17 **Q. So you reached out to vendors as part**
 18 **of your preparation for this meeting?**
 19 A. Yes.
 20 **Q. And when you say "For your eyes" --**
 21 **"only for your eyes, Eric's and Dave's," who is**
 22 **Dave?**
 23 A. Dave Whitman.
 24 **Q. How did you know that Dave Whitman**
 25 **would be involved in this process if you hadn't**

Page 46

1 **met with Eric yet?**
 2 A. Through Tyler.
 3 **Q. And what did Tyler tell you about his**
 4 **involvement?**
 5 A. That Dave reached out to Tyler.
 6 **Q. Dave had reached out to Tyler**
 7 **initially to find political consultants to talk**
 8 **to Eric?**
 9 A. I don't know the nature of the
 10 conversation, but I know that either Eric asked
 11 Dave or Dave reached out to Tyler knowing that
 12 Tyler was involved in the political space.
 13 **Q. Later -- so -- and that is how you got**
 14 **looped in, because you knew Tyler?**
 15 A. Yes, sir.
 16 **Q. Other than these initial meetings in**
 17 **college, you hadn't had any contact with Eric**
 18 **Greitens or Dave Whitman in the intervening**
 19 **years; correct?**
 20 A. No. Not up to this point, no.
 21 **Q. So Tyler really is the guy who brought**
 22 **you -- introduced you to Eric Greitens?**
 23 A. Yes.
 24 **Q. And introduced to you Dave Whitman as**
 25 **well?**

Page 47

1 A. Yes.
 2 **Q. But you don't recall him introducing**
 3 **you to anyone else that had any affiliation**
 4 **with The Mission Continues?**
 5 A. No.
 6 **Q. Lower down in your email, the one that**
 7 **begins "very confidential."**
 8 A. Yeah.
 9 **Q. You say, "Looking at a cost of 25K**
 10 **plus or minus, but it's scalable down if**
 11 **needed"; correct?**
 12 A. That's what it says.
 13 **Q. So you -- and you wrote that; correct?**
 14 A. Yes.
 15 **Q. And I take it that this cost you're**
 16 **referring to would be an estimated cost for**
 17 **doing these kinds of research reports on Eric**
 18 **himself?**
 19 A. I believe we were discussing a
 20 self-book, yes.
 21 **Q. And a self-book is kind of like when**
 22 **you do opposition research on yourself to see**
 23 **what your potential vulnerabilities are?**
 24 A. We would call it a vulnerability
 25 study, yes, but you are correct.

Page 48

1 **Q. So there was discussion between you**
 2 **and Tyler about doing a vulnerability study at**
 3 **this stage?**
 4 A. Yes.
 5 **Q. And I take it, was this vulnerability**
 6 **study and the cost of it something that was**
 7 **discussed with Eric and Dave at the initial**
 8 **meeting, to your recollection?**
 9 A. I don't remember.
 10 **Q. Do you know whether such a**
 11 **vulnerability study was ever conducted?**
 12 A. I do.
 13 **Q. When was it done? You do know. Was**
 14 **it done?**
 15 A. Yes.
 16 **Q. When was it done?**
 17 A. But it was not this firm.
 18 **Q. Okay. When was it done?**
 19 A. It was done 2015. I believe it was
 20 done in the middle of 2015, but I'm not
 21 certain.
 22 **Q. Do you know whether the cost of it was**
 23 **comparable to this \$25,000 estimate that you**
 24 **put in this email in 2014?**
 25 A. It was close.

Page 49

1 **Q. Do you know who paid for that study?**
 2 A. Greitens for Missouri.
 3 **Q. Are you aware of any money from The**
 4 **Mission Continues to be contributed to that**
 5 **study?**
 6 A. Can you rephrase the question?
 7 **Q. Are you aware of any other sources of**
 8 **funding that may have gone to pay for that**
 9 **research study?**
 10 A. No. It was my recollection that it
 11 was another expense of the campaign paid with
 12 campaign donations.
 13 MR. SAUER: Exhibit 4.
 14 (Exhibit 4 was marked for
 15 identification.)
 16 THE WITNESS: Looks familiar.
 17 BY MR. SAUER:
 18 **Q. I take it by your comment that you**
 19 **recognize this document?**
 20 A. I believe I sent it.
 21 **Q. And you sent this email to Tyler**
 22 **during this same time frame?**
 23 A. I did.
 24 **Q. And this email is dated March 20th,**
 25 **2014. So it's a day after the email exchange**

Page 50

1 **in Exhibit 3; correct?**
 2 A. Yes.
 3 **Q. To the best of your recollection, had**
 4 **you met with Eric and Dave face-to-face for the**
 5 **first time when you sent this email?**
 6 A. Can I read it real quick?
 7 **Q. Please do. I wonder if it jogs your**
 8 **memory.**
 9 A. I honestly don't remember the timing
 10 great. I don't believe we've met at this time,
 11 but I don't know for sure.
 12 **Q. In your initial email at the top, you**
 13 **talked to Tyler about how Eric would be running**
 14 **a different kind of campaign, but that**
 15 **grassroot support alone can't deliver a**
 16 **victory; correct?**
 17 A. Yes.
 18 **Q. Okay. And then Tyler responds and he**
 19 **says, to paraphrase, and he kind of gives your**
 20 **thoughts back to you phrased differently; is**
 21 **that fair to say?**
 22 A. Yes, he's much better at that than I
 23 am.
 24 **Q. In the middle of his email -- I have**
 25 **no view on that. In the middle of his email,**

Page 51

1 **he says, "If Eric is going to win, he has to**
 2 **have the financial resources to compete on paid**
 3 **media and couple of it with nontraditional**
 4 **strategies"; correct?**
 5 A. He does say that.
 6 **Q. Do you recall discussing Eric's need**
 7 **for financial resources with Tyler at this**
 8 **time?**
 9 A. Absolutely.
 10 **Q. Okay. What were the nature of those**
 11 **discussions?**
 12 A. He's going to have at least
 13 \$10 million to win the primary.
 14 **Q. So that is something that you and**
 15 **Tyler estimated or agreed on?**
 16 A. Something we talked about.
 17 **Q. When you had your initial meeting with**
 18 **Eric, either before or after you sent this**
 19 **email, is that a number that was communicated**
 20 **to him?**
 21 A. I'm sure it was.
 22 **Q. So you believe in your very first**
 23 **meeting with Mr. Greitens you told him he would**
 24 **need to raise \$10 million to win the primary?**
 25 A. I'm sure I did.

Page 52

1 **Q. Did you talk about methods of**
 2 **fundraising with Tyler during this time frame?**
 3 A. No, but I wouldn't have.
 4 **Q. And why would you not have?**
 5 A. That's not Tyler and I's method of
 6 expertise.
 7 **Q. So that's not -- in other words, you**
 8 **don't have expertise in fundraising; is that**
 9 **fair to say?**
 10 A. Correct.
 11 **Q. And so when you were campaign manager,**
 12 **did you hire other people to do the**
 13 **fundraising?**
 14 A. Every time.
 15 **Q. When you had the initial meeting with**
 16 **Eric, was there any discussion of his strengths**
 17 **and weaknesses as a possible fundraiser?**
 18 A. Yes.
 19 **Q. What was the nature of those**
 20 **discussions?**
 21 A. He was very bullish about his
 22 prospects of raising significant amounts of
 23 money, far exceeding the 10 million that I
 24 speculated that he needed to win.
 25 **Q. What did he say about that in this**

Page 53

1 **initial meeting?**
 2 A. I think I can raise 50 million.
 3 **Q. Why did he say that? Did he tell you**
 4 **why he thought he could raise that much?**
 5 A. I don't remember exactly. Just was a
 6 big number and I remember it.
 7 **Q. Do you remember him, in that meeting**
 8 **or in the subsequent five or six meetings that**
 9 **happened after that, him discussing his**
 10 **experience as a fundraiser for The Mission**
 11 **Continues?**
 12 A. Yeah, I'm sure it came up in
 13 conversation. I don't remember specifically.
 14 **Q. Do you remember it being mentioned in**
 15 **a specific connection to the optimism that he**
 16 **had about being able to raise a lot of money**
 17 **for the campaign?**
 18 A. Yes, that he's raised significant
 19 amounts of large-dollar donations before.
 20 **Q. So he said to you and Tyler, in the**
 21 **course of these meetings, that he has raised a**
 22 **very large amount of money for The Mission**
 23 **Continues and that gives him optimism that he'd**
 24 **be able to raise a lot of money for a political**
 25 **campaign?**

Page 54

1 A. Yes.
 2 **Q. Is that something he said repeatedly?**
 3 A. More than once.
 4 **Q. Did he ever say anything in these six**
 5 **meetings that you had leading up to December of**
 6 **2014 --**
 7 A. Roughly six.
 8 **Q. Roughly six.**
 9 A. I don't know that it was exactly six.
 10 It was roughly six. Thank you.
 11 **Q. In the series of meetings that you had**
 12 **leading up to 2014, did he ever say anything**
 13 **about using personnel from The Mission**
 14 **Continues to assist in his fundraising efforts**
 15 **for political office?**
 16 A. No.
 17 **Q. Did he ever say anything about using**
 18 **any other resources from The Mission Continues**
 19 **relating to raising money for a future**
 20 **political campaign?**
 21 A. Not to my knowledge.
 22 **Q. Was there ever any mention or contact**
 23 **with anyone else from The Mission Continues**
 24 **about supporting or being involved in any way**
 25 **in political fundraising during this time**

Page 55

1 **frame?**
 2 A. Not to my knowledge.
 3 MR. SAUER: Exhibit 5.
 4 (Exhibit 5 was marked for
 5 identification.)
 6 THE WITNESS: Thank you.
 7 BY MR. SAUER:
 8 **Q. Do you recognize this email?**
 9 A. Yes. I sent it.
 10 **Q. And this email was sent on the same**
 11 **day as Exhibit 4; correct?**
 12 A. I clearly did not have a very good
 13 birthday, yes.
 14 **Q. This is the day after your birthday?**
 15 A. I know. Clearly I was doing all this
 16 and not having a good birthday.
 17 **Q. Again, to the best of your**
 18 **recollection, was this email exchange between**
 19 **you and Tyler occurring before or after the**
 20 **initial face-to-face meeting with Eric Greitens**
 21 **and Dave Whitman?**
 22 A. I believe it was before but same
 23 caveat as the email from the same day: I don't
 24 know exactly. I didn't keep a Day Planner at
 25 the time.

Page 56

1 **Q. Understood.**
 2 **Just -- and here these are emails**
 3 **you're firing back and forth to each other on a**
 4 **minute-by-minute basis that evening; correct?**
 5 A. Yes.
 6 **Q. So you and Danny are kind of --**
 7 A. I am Danny.
 8 **Q. I'm sorry. You and Tyler are still, I**
 9 **guess, brainstorming or sharing ideas about**
 10 **stuff you can say to Eric Greitens when you**
 11 **meet with him; is that fair to say?**
 12 A. Yes. We're clearly preparing for
 13 something.
 14 **Q. Okay. And you initially say that**
 15 **here's a bunch of grassroots supporters,**
 16 **volunteers and coordinators that you can,**
 17 **quote, "obtain easily"; correct?**
 18 A. That's what it says.
 19 **Q. And you said that; right?**
 20 A. That's what it says.
 21 **Q. Did you mean it?**
 22 A. Yes.
 23 **Q. Okay. And these all would be persons**
 24 **who would support a future political campaign;**
 25 **correct?**

Page 57

1 A. They were a list of people actively
 2 involved in politics.
 3 **Q. And the reason you're listing them in
 4 an email to Tyler is because they would be
 5 resources that you would be able to offer to
 6 Eric Greitens for a future political campaign;
 7 correct?**
 8 A. Yes.
 9 **Q. And you don't mention volunteers from
 10 The Mission Continues in that list, do you?**
 11 A. Why would I?
 12 **Q. That's my question: Was there any
 13 discussion between you and Danny --**
 14 A. I'm Danny.
 15 **Q. I'm sorry, Tyler -- you and Tyler
 16 during this time frame about using volunteers
 17 from The Mission Continues as resources for a
 18 future political campaign?**
 19 A. Not to my recollection.
 20 **Q. Was there any discussion of that with
 21 Dave Whitman or Eric Greitens during this
 22 entire 2014 time frame where you had the series
 23 of meetings?**
 24 A. I don't remember that.
 25 **Q. Do you remember anyone -- discussing**

Page 58

1 **that with anyone using The Mission Continues
 2 volunteers to support a future political
 3 campaign?**
 4 A. I don't remember that ever happening.
 5 **Q. Halfway down this email you, Danny,
 6 sent an email to Tyler saying "I also have
 7 Cantor's national list but don't tell anyone,"
 8 winky face; correct?**
 9 A. Yes. I did say that.
 10 **Q. Who is Cantor? Is that Eric Cantor,
 11 the --**
 12 A. Congressman from Virginia.
 13 **Q. Okay. And is this national list --
 14 does this refer to a national list of donors?**
 15 A. I think it's supporters, but I don't
 16 have the list here.
 17 **Q. What is the -- supporters include both
 18 donors and volunteers? What is a list of
 19 supporters?**
 20 A. I believe that's supporters and
 21 emails, but I'm not sure. I don't have the
 22 list attached here.
 23 **Q. So its -- "supporters" include donors?**
 24 A. I guess.
 25 **Q. When you say "don't tell anyone," is**

Page 59

1 **there any reason you said "don't tell anyone"?**
 2 A. Yes, because when I was given the
 3 list, I was told to keep a close hold on it.
 4 **Q. You were given the list by someone
 5 with the Cantor organization?**
 6 A. Yes.
 7 **Q. And that person -- was that person
 8 authorized to give you that list?**
 9 A. I believe so. It was to be helpful in
 10 a race.
 11 **Q. A different race than Cantor's race?**
 12 A. Yes. Yes.
 13 **Q. But it was your understanding that
 14 they were giving it to you with the
 15 authorization, but they didn't want you to
 16 disclose it further?**
 17 A. Yes.
 18 **Q. And that race that you referred to is
 19 some other race, not --**
 20 A. In Missouri.
 21 **Q. Oh, what race --**
 22 A. Not in Missouri.
 23 **Q. Not in Missouri?**
 24 A. Correct.
 25 **Q. What race was that?**

Page 60

1 A. It was a lieutenant governor's race in
 2 Virginia in 2013.
 3 **Q. Did you ever mention to Eric Greitens
 4 or Dave Whitman that you had this Cantor list?**
 5 A. No.
 6 **Q. So this never came up again, to your
 7 recollection, in connection with Eric Greitens'
 8 campaign?**
 9 A. Correct.
 10 **Q. Do you know if Tyler ever mentioned it
 11 to them?**
 12 A. I have no idea.
 13 **Q. Okay.**
 14 A. But I will say Tyler and I sat in most
 15 of the meetings together, and I don't recall
 16 anything else being said.
 17 **Q. And you don't recall them ever
 18 expressing interest in getting access to data
 19 in this national list?**
 20 A. I don't believe so.
 21 **Q. And Cantor, I take it, had no
 22 connection to The Mission Continues, that
 23 you're aware of, or does he?**
 24 A. No, not that I'm aware of.
 25 **Q. Okay. Tyler responds, "Word. That's**

Page 61

1 good stuff. Martin got his list from Barklage
 2 who got his list from Schweich, who got his
 3 list from Talent." Correct?
 4 A. Okay.
 5 Q. Is that -- who is Martin? Is that Ed
 6 Martin, the former AG candidate?
 7 A. I believe so, based on this email.
 8 Q. The prior email?
 9 How about there at the bottom, the
 10 very last of your next email? It says, "With
 11 Ed you get one wing of the party, and it's
 12 toxic to the rest."
 13 A. Must be.
 14 Q. Correct?
 15 A. Yes, I would say that.
 16 Q. Does that indicate that this "Martin"
 17 in Tyler's email is Ed Martin?
 18 A. I believe so.
 19 Q. Who is Barklage? Is that David
 20 Barklage, the political consultant?
 21 A. Yes.
 22 Q. Okay. And "Schweich" is Tom Schweich;
 23 correct?
 24 A. Yes.
 25 Q. And "Talent" is Jim Talent, the --

Page 62

1 A. The former senator.
 2 Q. Yes. Correct?
 3 A. Yes.
 4 Q. These lists that are referred to here,
 5 do you know if they are donor lists or
 6 supporter lists or what? The ones referred to
 7 in Tyler's email.
 8 A. I have no idea, and I don't think I've
 9 ever seen them.
 10 Q. So you don't know if those lists ever
 11 came into possession of the Greitens campaign?
 12 A. I don't know.
 13 Q. Do you know whether Tyler gave lists
 14 of any kind to Eric Greitens or Dave Whitman or
 15 anyone associated with Greitens' political
 16 efforts?
 17 A. I do not know.
 18 Q. Did you ever supply lists -- I take it
 19 you testified you never gave the Cantor list to
 20 the Greitens or anyone affiliated with the
 21 Greitens' political efforts.
 22 Were there any other lists that you
 23 personally supplied to Greitens or his campaign
 24 or anyone affiliated with his political
 25 efforts?

Page 63

1 A. I do not believe I gave any list,
 2 including these lists, to the campaign.
 3 Q. So you don't believe you ever supplied
 4 any list of any kind to the campaign?
 5 A. To the best of my knowledge, I never
 6 supplied any lists to the campaign.
 7 Q. And same question as to anyone -- Eric
 8 or anyone affiliated with him for the purposes
 9 of the campaign?
 10 A. To the best of my knowledge, I did
 11 not.
 12 MR. SAUER: Exhibit 6.
 13 (Exhibit 6 was marked for
 14 identification.)
 15 THE WITNESS: Thank you.
 16 BY MR. SAUER:
 17 Q. Do you recognize this email?
 18 A. Nope.
 19 Q. And I take it you're not copied on
 20 this email; correct?
 21 A. No, I was not.
 22 Q. And why were you laughing about it?
 23 A. You're asking me if I remember an
 24 email I've never seen before.
 25 Q. Okay. But there's nothing in the

Page 64

1 content of the email that you thought was
 2 significant when you chuckled just now?
 3 A. No. I just think it's funny that you
 4 asked me about emails that I've never seen.
 5 Q. You never know. Sometimes you see
 6 things that you're not copied on. I want to
 7 make sure the record is clear.
 8 A. The record is clear. I've never seen
 9 this email before until now.
 10 Q. And, in particular, this is an email
 11 dated March 26th, 2014; correct?
 12 A. Seven days after my birthday.
 13 Q. And six days after the last two emails
 14 we just talked about; right?
 15 A. Yes, sir.
 16 Q. And, again, do you know whether or not
 17 you'd had your first meeting with Dave Whitman
 18 and Eric Greitens by the time this email was
 19 sent?
 20 A. Same caveat as before. I do not
 21 believe so. I believe those other emails were
 22 in preparation of said meeting, but I don't
 23 know for sure.
 24 Q. Do you see in the subject line of this
 25 email it refers to "Salesforce"?

Page 65

1 A. Yes.

2 **Q. Do you know what Salesforce is?**

3 A. Yeah, it's a CRM.

4 **Q. What's CRM?**

5 A. A database.

6 **Q. What does "CRM" stand for?**

7 A. I don't know. Making me look stupid.

8 I don't know. It's a database of some kind.

9 **Q. Okay. And what sort of data is in**

10 **such a database? Could be anything?**

11 A. Contacts, people, customers. I don't

12 know.

13 **Q. Do you know whether The Greitens Group**

14 **used a database called Salesforce to track that**

15 **kind of information of – contact information**

16 **of people?**

17 A. I know The Greitens Group used

18 Salesforce.

19 **Q. Do you know --**

20 A. I'm not entirely sure what they used

21 it for.

22 **Q. Did you ever access the Salesforce**

23 **database of The Greitens Group?**

24 A. I don't believe I ever logged into it,

25 but I was around it.

Page 66

1 **Q. What do you mean by you "were around**

2 **it"?**

3 A. Like, I knew it was being used.

4 **Q. Do you know what was in it?**

5 A. Yeah. It was contact information of

6 people that -- The Greitens Group had

7 possession of.

8 **Q. Do you know whether The Mission**

9 **Continues had a Salesforce database?**

10 A. I have no idea.

11 **Q. So this reference to Salesforce**

12 **tags – do you know what tags are in**

13 **Salesforce?**

14 A. I suspect -- no, I don't.

15 **Q. Okay. What do you suspect?**

16 A. That it's how you categorize people,

17 but I don't know.

18 **Q. Do you see where it indicates about**

19 **tagging donors with subcategories in the top**

20 **paragraph of this – top paragraph of this**

21 **email? Did you ever have -- I take it you knew**

22 **Krystal Taylor; right?**

23 A. Not at this time.

24 **Q. Okay. Later on you got to know her?**

25 A. Yes.

Page 67

1 **Q. Did you ever have discussions with**

2 **Krystal Taylor about identifying potential**

3 **donors in The Greitens Group's database?**

4 A. Can you rephrase the question?

5 **Q. Did you ever have any conversation**

6 **with Krystal Taylor about her identifying**

7 **potential donors in a Salesforce database of**

8 **The Greitens Group?**

9 A. I don't remember, but possibly.

10 **Q. Same question as to The Mission**

11 **Continues: Did Krystal Taylor ever tell you**

12 **that she was accessing any Mission Continues**

13 **database to identify or tag potential donors?**

14 A. No.

15 **Q. Are you aware of – I take it you**

16 **don't know a lot of human beings at The Mission**

17 **Continues; correct?**

18 A. I know there are human beings over

19 there, but I don't know who they are.

20 **Q. Okay. So are you aware of anyone at**

21 **The Mission Continues, other than Krystal**

22 **Taylor, engaging in that kind of activity,**

23 **identifying potential donors for a future**

24 **political campaign?**

25 A. No idea.

Page 68

1 MR. SAUER: Exhibit 7.

2 (Exhibit 7 was marked for

3 identification.)

4 THE WITNESS: Familiar.

5 BY MR. SAUER:

6 **Q. You say "familiar."**

7 **This means you recognize this email;**

8 **correct?**

9 A. I sent it.

10 **Q. And EG4G – what does that stand for?**

11 A. Eric Greitens for Governor.

12 **Q. So fair to say that at this time your**

13 **discussion with Tyler was focusing on a future**

14 **run for governor by Mr. Greitens?**

15 A. That's fair to say.

16 **Q. This is April 1st, 2014?**

17 A. April Fools' Day.

18 **Q. Your birthday. April Fools' Day. The**

19 **next email I guarantee will be dated**

20 **December 25th. That's a joke.**

21 MR. SAUER: Off the record.

22 (Discussion off the record.)

23 BY MR. SAUER:

24 **Q. Okay. So at this time, do you know**

25 **whether the meeting has happened, the first**

Page 69

1 **face-to-face meeting between you and Tyler and**
 2 **Dave and Eric?**
 3 A. I don't think it had, but I'm not
 4 positive.
 5 **Q. Okay.**
 6 A. Because, once again, these are things
 7 preparing for that first piece.
 8 **Q. There's a lot of back and forth**
 9 **between you and Tyler to prepare -- to the best**
 10 **of your recollection, to prepare for that first**
 11 **meeting.**
 12 **Do you know if Tyler was getting some**
 13 **kind of input or feedback from Eric or Dave**
 14 **about what kind of information they would like**
 15 **to have at this first meeting?**
 16 A. I suspect he was.
 17 **Q. Okay. Did he ever say that to you, to**
 18 **your recollection?**
 19 A. Don't remember.
 20 **Q. Well, let's -- at some point,**
 21 **obviously, you put "EG4G" in the subject line**
 22 **of this email; correct?**
 23 A. Yes.
 24 **Q. So at some point someone told you that**
 25 **it would be of interest to Mr. Greitens to talk**

Page 70

1 **about a future governor's campaign at your**
 2 **initial meeting. Fair to say?**
 3 A. That was the pretext of the meeting.
 4 **Q. Okay. So how did you get that**
 5 **understanding? Did Tyler tell you that?**
 6 A. I wanted -- he said we're going to
 7 meet with Eric to discuss future political
 8 options, and he's particularly interested in
 9 the governor's race.
 10 **Q. Do you know what his basis for**
 11 **believing he was particularly interested in the**
 12 **governor's race was?**
 13 A. I don't know why he thought that. I'm
 14 assuming someone told him, but I don't know.
 15 **Q. Do you know whether he was already**
 16 **communicating with Dave Whitman and Eric**
 17 **Greitens at this time frame?**
 18 A. I believe so.
 19 **Q. Do you know whether he was**
 20 **communicating with anyone affiliated with The**
 21 **Mission Continues at this time frame?**
 22 A. No idea.
 23 **Q. Other than Eric Greitens, obviously?**
 24 A. No idea.
 25 **Q. Do you know -- I don't know if I asked**

Page 71

1 **you this.**
 2 **Do you know if Dave Whitman ever had**
 3 **any role in The Mission Continues?**
 4 A. You have asked that, and I don't
 5 believe he did, but I don't know for certain.
 6 **Q. And then you put together in this**
 7 **email basically the potential structure for a**
 8 **governor's campaign specifically; correct?**
 9 A. Yes.
 10 **Q. And you put in costs that that**
 11 **campaign would have in terms of salary costs;**
 12 **right?**
 13 A. Looks like that.
 14 **Q. And estimated salary -- I assume these**
 15 **are monthly numbers?**
 16 A. Yes.
 17 **Q. So \$10,000 a month for a campaign**
 18 **manager, \$6,500 a month for a director of**
 19 **operations and so forth; is that fair to say?**
 20 A. Yes.
 21 **Q. Was the amount of the monthly cost of**
 22 **running a statewide gubernatorial campaign**
 23 **actually discussed in your initial meeting with**
 24 **Eric Greitens and Dave Whitman?**
 25 A. I believe so.

Page 72

1 **Q. So would you have -- do you recall**
 2 **giving him these specific estimates?**
 3 A. I don't know if I gave it in a paper
 4 copy, but I'm sure we talked about. I don't
 5 know that we got into the details of the whole
 6 staff burn versus a specific line by line. I
 7 doubt we went line by line.
 8 **Q. But, in other words, you would have at**
 9 **least communicated to him in that initial**
 10 **meeting --**
 11 A. That you will have staff and they will
 12 cost money.
 13 **Q. And did you tell him roughly how much**
 14 **money they would cost?**
 15 A. I don't remember.
 16 **Q. Was there any discussion at that time**
 17 **of his ability to cover those costs through**
 18 **fundraising efforts?**
 19 A. The conversation was he was going to
 20 cover the costs through the \$10 million budget
 21 that we allocated. It would be a line item of
 22 the budget.
 23 **Q. So the \$10 million budget was this**
 24 **\$10 million figure that you discussed as what**
 25 **it would take to win a primary; correct?**

Page 73

1 A. Was the working assumption, yes.

2 **Q. And he indicated that he thought he**

3 **could far exceed that number through his**

4 **fundraising efforts?**

5 A. Yes.

6 **Q. And I think he quoted the number of**

7 **50 million, believing he could raise**

8 **\$50 million for the political campaign?**

9 A. Yes.

10 **Q. Do you remember him making any**

11 **reference at all to The Mission Continues or**

12 **its donors in that connection?**

13 A. I don't believe so.

14 **Q. Looking at these various positions**

15 **you've listed in this email -- campaign**

16 **manager, director of operations, personal aid,**

17 **driver, and so forth -- did you, in any of**

18 **those five or six meetings that you had in the**

19 **course of 2014, discuss how these positions**

20 **would be filled?**

21 A. Yes.

22 **Q. What were the nature of those**

23 **discussions?**

24 A. We talked about more so the type of

25 people we'd want to fill these roles and some

Page 74

1 possibilities, both in Missouri and out of

2 Missouri, to fill these positions on a possible

3 campaign.

4 **Q. At any time was there a discussion of**

5 **using people that Eric knew through The Mission**

6 **Continues to fill some of these roles?**

7 A. Not to my knowledge.

8 **Q. Was there ever a discussion of having**

9 **people who were employed by The Mission**

10 **Continues also work for the campaign while they**

11 **were paid by The Mission Continues?**

12 A. Not to my knowledge.

13 **Q. What did you mean when you said this**

14 **is a list of folks that Eric would need to**

15 **create a viable, sophisticated, yet not**

16 **ridiculous, campaign?**

17 A. This came after a conversation I had

18 with Tyler that discussed how most campaigns

19 that are unsuccessful are unsuccessful at the

20 staff level because they suffer from one of two

21 errors. They either are way too big and have

22 too many people that don't know what they're

23 doing and bloated and paid too much, or they're

24 too small and they're ineffective. So this

25 was, you know, the porridge, just right in the

Page 75

1 middle.

2 **Q. And when you refer to finance director**

3 **for the campaign, was that a fundraising**

4 **position?**

5 A. Yes. That would be the entirety of

6 the position.

7 **Q. So that person and deputy finance**

8 **director would have the same responsibility?**

9 A. Entirety of fundraising.

10 **Q. So those people -- you had supposed**

11 **that there would be two people, full-time**

12 **campaign staffers, dedicated to fundraising?**

13 A. Minimum.

14 **Q. Was there discussion in these first**

15 **five or six months of how those positions might**

16 **be filled?**

17 A. Not that I remember at this time.

18 **Q. When do you remember that being**

19 **discussed?**

20 A. Towards the end of the year.

21 **Q. When you say this, towards the end of**

22 **2014?**

23 A. Yes, sir.

24 **Q. What human beings were discussed as**

25 **possibly filling those positions?**

Page 76

1 A. At that time we didn't have human

2 beings. We were looking at bringing people in

3 nationally to fill those positions. We were

4 looking at --

5 **Q. Go ahead.**

6 A. -- a finance director on another race,

7 another state to bring in to run the operation.

8 **Q. Okay. Were there names used in that**

9 **connection?**

10 A. If there was, I don't remember them.

11 MR. SAUER: Exhibit 8.

12 (Exhibit 8 was marked for

13 identification.)

14 BY MR. SAUER:

15 **Q. Exhibit 8.**

16 A. Here we are. I do recognize this

17 email. It looks like I sent it. No, it looks

18 like it got sent to me -- sorry -- to be clear.

19 **Q. Who is D. Miller?**

20 A. He is the research connecting -- he is

21 a research vendor that we do not go with who

22 was referenced in an earlier email you gave me.

23 **Q. Okay. Is he associated with this**

24 **McLaughlin & Associates?**

25 A. I don't believe so. I believe that

Page 77

1 it's a reference he's giving.
 2 **Q. So he's associated with this**
 3 **Gallagher --**
 4 A. That's his company.
 5 **Q. Wait until I finish talking, please --**
 6 **Gallagher Hollenbach; is that fair to say?**
 7 A. That's his company.
 8 **Q. Okay. And what occasioned sending**
 9 **this email?**
 10 A. Restate the question, please.
 11 **Q. What occasioned Mr. Miller sending**
 12 **this email to you?**
 13 A. I assume as an FYI about his
 14 conversation with Dave Whitman.
 15 **Q. So as you understand it, this**
 16 **Mr. Miller had had a conversation with Whitman**
 17 **about doing the sort of research that you had**
 18 **alluded to in, I think, your prior emails that**
 19 **we've talked about?**
 20 A. Looks that way.
 21 **Q. So you believe this refers to possibly**
 22 **doing a vulnerability study; correct?**
 23 A. Yes, sir.
 24 **Q. Does that refresh your memory as to**
 25 **whether or not you and Tyler had the initial**

Page 78

1 **meeting with Mr. Greitens and Mr. Whitman by**
 2 **this time?**
 3 A. Around this time. I can't give you a
 4 specific date.
 5 **Q. But you believe around early**
 6 **April 2014 is when you first met face to face?**
 7 A. I don't know that. I believe -- I
 8 believe it to be around -- I don't know whether
 9 it was the first week of April. Be around that
 10 time, but I couldn't tell you. I don't have a
 11 date.
 12 **Q. And I asked you earlier, I believe --**
 13 **is it your testimony that you do not believe**
 14 **this vulnerability study was actually conducted**
 15 **in this time frame?**
 16 A. I don't believe this vulnerability
 17 study listed here was ever conducted, to the
 18 best of my knowledge.
 19 **Q. Did the campaign end up doing any**
 20 **business with Gallagher Hollenbach?**
 21 A. Not while I was involved.
 22 **Q. How about John McLaughlin of**
 23 **McLaughlin & Associates?**
 24 A. Not to my knowledge.
 25 MR. SAUER: Exhibit 9.

Page 79

1 (Exhibit 9 was marked for
 2 identification.)
 3 THE WITNESS: Thank you.
 4 BY MR. SAUER:
 5 **Q. Do you recognize this email?**
 6 A. Can I read it one second?
 7 **Q. Sure.**
 8 A. (Witness reviews document.)
 9 Yes, I do.
 10 **Q. Okay. Did you send this email?**
 11 A. It looks like Tyler forwarded me an
 12 email that I responded to.
 13 **Q. So Tyler forwarded you an email from**
 14 **Dave Whitman; correct?**
 15 A. That's what it looks like.
 16 **Q. And this is all happening on**
 17 **May 15th, 2014; correct?**
 18 A. Looks like it.
 19 **Q. Now, by this time you had certainly**
 20 **had your first initial meeting with Eric and**
 21 **Dave Whitman; correct?**
 22 A. I believe so.
 23 **Q. But do you know whether you had more**
 24 **than one meeting by this time?**
 25 A. I do not.

Page 80

1 **Q. Were there any notes or agendas for**
 2 **your first meeting with him?**
 3 A. I don't believe so. I know there was
 4 agendas in later meetings, but I don't believe
 5 at the beginning. It was way more informal
 6 than that.
 7 **Q. Did you send them like any kind of**
 8 **pitch email or any written document to either**
 9 **Dave or Eric or, really, anyone else in**
 10 **connection with the initial meeting?**
 11 A. I don't believe so.
 12 **Q. You see halfway down this email --**
 13 **halfway down the document, it bears the**
 14 **forwarded message from Dave Whitman that Tyler**
 15 **forwarded to you that refers to Bill Wykpisz**
 16 **for inoculation research; correct?**
 17 A. Yes.
 18 **Q. Who is Bill Wykpisz? W-y-k-p-i-s-z.**
 19 A. He's another national researcher.
 20 **Q. Inoculation research -- is that the**
 21 **same as a vulnerability study?**
 22 A. Yes.
 23 **Q. It says he was recommended by Hafner;**
 24 **correct?**
 25 A. Yes.

Page 81

1 **Q. Who is Hafner?**
 2 A. Mike Hafner works for David -- at that
 3 point worked for David Barklage, the
 4 consultant, who was also having conversations
 5 with Eric at the time.
 6 **Q. Did you know Michael Hafner at that**
 7 **time?**
 8 A. I've known Michael Hafner for a long
 9 time.
 10 **Q. You knew him before there was any**
 11 **involvement or connection with Greitens?**
 12 A. I met him in college.
 13 **Q. So he's a SLU grad?**
 14 A. He's a couple years older than me, but
 15 he was involved in similar things.
 16 **Q. And are you all friendly?**
 17 A. At the time I would have described us
 18 as friendly.
 19 **Q. Are you no longer friendly?**
 20 A. We're not unfriendly. We haven't
 21 spoken in a significant amount of time.
 22 **Q. Did he end up working on the campaign?**
 23 A. He ended up being a consultant early
 24 on.
 25 **Q. But was he ever employed by the**

Page 83

1 that Steve Michael and his shop were speaking
 2 with Eric and Dave.
 3 **Q. But you were not at the same meetings**
 4 **that they were at?**
 5 A. Correct. It was siloed off.
 6 **Q. Okay. During 2014, you were aware**
 7 **that Eric was meeting with people from**
 8 **Barklage's group?**
 9 A. I was aware of that.
 10 **Q. But you were not -- didn't attend any**
 11 **of those meetings?**
 12 A. No.
 13 **Q. Okay. There were also meetings with**
 14 **people at Victory Enterprises?**
 15 A. Yes.
 16 **Q. And were you at any of those meetings?**
 17 A. Not at the time.
 18 **Q. So as I -- your understanding was**
 19 **that, essentially, he's meeting with at least**
 20 **three different groups of political**
 21 **consultants, all separately?**
 22 A. Possibly more, yes.
 23 **Q. Do you know -- is that unusual --**
 24 A. No.
 25 **Q. -- for someone who is considering or**

Page 82

1 **campaign?**
 2 A. I believe he was a consultant for the
 3 campaign. Paid as a 1099, I believe, not an
 4 employee, if I remember correctly.
 5 **Q. What sort of work did he do for the**
 6 **campaign?**
 7 A. Fundraising.
 8 **Q. Was it exclusively fundraising?**
 9 A. Yes.
 10 **Q. Okay. And this "Barklage" is David**
 11 **Barklage?**
 12 A. Yes.
 13 **Q. And that's the same person who is**
 14 **referred to in the prior email providing the**
 15 **Schweich list Ed Martin --**
 16 A. The partner at Barklage and Knodell,
 17 yes.
 18 **Q. So in this time frame, May of 2014,**
 19 **were you aware that there were conversations of**
 20 **some kind between Hafner and David Whitman?**
 21 A. Yes.
 22 **Q. Did Hafner -- what did you know about**
 23 **that?**
 24 A. I knew that Hafner and Barklage were
 25 speaking with Eric and Dave in the same way

Page 84

1 **planning to run for political office?**
 2 A. Very normal.
 3 **Q. Okay. Did you view Hafner as a**
 4 **competitor at this time frame?**
 5 A. No. I mean, maybe. They were
 6 pitching similar services. So, yes, I guess
 7 he's a competitor.
 8 **Q. In your email back to Tyler, you say**
 9 **"Research, any word on it? Has E.G. given the**
 10 **sign-off? Do we need to get more bids?"**
 11 **Correct?**
 12 A. Yeah.
 13 **Q. And that is a reference to this**
 14 **inoculation research or vulnerability study;**
 15 **correct?**
 16 A. Yes.
 17 **Q. So by this time -- is it fair to say,**
 18 **when you wrote this email, your expectation was**
 19 **that Eric was going to do a vulnerability study**
 20 **in the first half of 2014?**
 21 A. I certainly was of the belief that he
 22 should do one sooner than later.
 23 **Q. Is that something that you had**
 24 **communicated to him in your meeting or**
 25 **meetings?**

Page 85

1 A. I'm sure I did.
 2 **Q. Do you remember whether he said he**
 3 **would?**
 4 A. I believe so.
 5 **Q. What did he say about that?**
 6 A. I believe he said, "I understand that
 7 it's important."
 8 I don't think we discussed timing, but
 9 I think he saw the urgency in it as well.
 10 **Q. Did he discuss how you would pay for**
 11 **it?**
 12 A. I don't believe so.
 13 **Q. Did he discuss at any time using any**
 14 **sort of resources of The Mission Continues to**
 15 **pay for that kind of effort --**
 16 A. No.
 17 **Q. -- to your recollection?**
 18 A. Sorry. No.
 19 MR. SAUER: Exhibit 10.
 20 (Exhibit 10 was marked for
 21 identification.)
 22 THE WITNESS: Thank you.
 23 BY MR. SAUER:
 24 **Q. Do you recognize this email chain?**
 25 A. I do.

Page 86

1 **Q. And this email chain is dated the same**
 2 **day as Exhibit 9, the one we just talked about;**
 3 **right?**
 4 A. It looks that way.
 5 **Q. Do you remember getting this email**
 6 **from Dave Whitman?**
 7 A. I do now.
 8 **Q. And I take it that Dave Whitman**
 9 **emailed you and Tyler to ask for**
 10 **recommendations on firms that do campaign legal**
 11 **work; correct?**
 12 A. Yes.
 13 **Q. And he says, "Eric wants to start**
 14 **putting a list together"; correct?**
 15 A. Yes.
 16 **Q. Was this something that was discussed**
 17 **in your initial meeting with Dave and Eric?**
 18 A. Not that I remember.
 19 **Q. Do you believe that this is a**
 20 **follow-up email from your initial meeting or**
 21 **meetings from Dave then?**
 22 A. I suspect so. This would be a logical
 23 next step.
 24 **Q. And you responded, about 36 minutes**
 25 **later, with a list of law firms that do**

Page 87

1 **campaign legal work; correct?**
 2 A. Yes.
 3 **Q. And just listed some potential options**
 4 **there; correct?**
 5 A. Yes.
 6 **Q. And you talk about, at least in one of**
 7 **them as to this Gober Hilgers, how much you**
 8 **paid for them; right?**
 9 A. Yes.
 10 **Q. Was the cost of legal representation**
 11 **for a campaign already discussed between you,**
 12 **Eric and Dave at this time?**
 13 A. Don't remember.
 14 **Q. Dave, on the second page of this**
 15 **document, responds to you and says, "Very**
 16 **helpful. I'll circle back with you both before**
 17 **any discussions are commenced"; correct?**
 18 A. Yep.
 19 **Q. Do you know whether either Eric or**
 20 **Dave or anyone at The Greitens Group in this**
 21 **time frame reached out to or tried to recruit**
 22 **lawyers for a future campaign?**
 23 A. At this time or ever?
 24 **Q. At this time.**
 25 A. At this time, no.

Page 88

1 **Q. On your understanding, when did that**
 2 **happen?**
 3 A. Closer to the end of the year.
 4 **Q. So that would have been in late 2014?**
 5 A. I believe so.
 6 **Q. What was done in late 2014 with**
 7 **respect to getting legal representation for a**
 8 **future campaign?**
 9 A. Mark Bobak, referenced earlier,
 10 became -- was -- became -- he's a lawyer,
 11 became the intermediary, and engaged a firm out
 12 of D.C. that's not listed here.
 13 **Q. To the extent it's a public record, do**
 14 **you know what firm that is?**
 15 A. Wiley Rein, R-E-I-N.
 16 **Q. Without getting to any -- any**
 17 **discussions -- communications between Wiley and**
 18 **Mark Bobak and the campaign, do you know**
 19 **whether Wiley Rein was paid in late 2014?**
 20 A. I don't know when they were paid.
 21 **Q. Do you know if they were formally**
 22 **engaged in 2014?**
 23 A. I don't know when the engagement
 24 started. It was somewhere around the end of
 25 the year. I don't know when that first bill

Page 89

1 was paid.

2 **Q. Were you involved in the payment**

3 **process? Would you have approved payment on**

4 **the bill?**

5 A. I didn't approve it, but I saw it.

6 **Q. Do you know which entity actually paid**

7 **their bill?**

8 A. I don't remember that. I don't

9 believe it was Greitens for Missouri, but I

10 don't remember.

11 **Q. Do you remember ever having The**

12 **Mission Continues come up in connection with**

13 **having -- paying legal expenses --**

14 A. Never of.

15 **Q. -- Wiley Rein or anyone like that?**

16 A. No.

17 MR. SAUER: Exhibit 11.

18 (Exhibit 11 was marked for

19 identification.)

20 BY MR. SAUER:

21 **Q. Do you recognize this email chain?**

22 A. Could I read it?

23 **Q. Please.**

24 A. (Witness reviews document.)

25 Yes.

Page 91

1 A. Yes.

2 **Q. And we're in 2014 still; right?**

3 A. Yes.

4 **Q. So at this time frame, this would have**

5 **been a second or successive face-to-face**

6 **meeting with you and Tyler and Dave and Eric;**

7 **correct?**

8 A. I believe that to be true. It runs

9 together. There's a chance that this was the

10 first meeting, but I think it was the second.

11 **Q. So, to the best of your recollection,**

12 **there was an initial meeting that had no**

13 **agenda; correct?**

14 A. That was more informal, and this was

15 more of a formal.

16 **Q. But this meeting still would be**

17 **occurring at Eric Greitens' house?**

18 A. Yes, sir.

19 **Q. And suffice to say, this email -- or**

20 **this meeting did not occur at The Mission**

21 **Continues office space or anything like that?**

22 A. Correct.

23 **Q. Okay. Did you prepare the agenda**

24 **that's attached to this email?**

25 A. Tyler and I did it together.

Page 90

1 **Q. What is a kazoo?**

2 A. The little noisemaking machine.

3 **Q. Is that what it is, it's a little,**

4 **kind of musical instrument?**

5 A. Are you asking in regard to Eric's

6 email?

7 **Q. Yes. I honestly don't know what --**

8 **you know, what is a kazoo?**

9 **Why is there discussion of a kazoo in**

10 **this email, to your recollection?**

11 A. This is how Eric thinks. He is --

12 what I am interpreting he is saying is he is

13 trying to reframe our agenda in a way that he

14 wants us to think about this process, and he's

15 using a kazoo as an example, the little,

16 musical, doot-doot-doot instrument.

17 **Q. I'm not sure how that noise you just**

18 **made will be transcribed.**

19 MR. BOXERMAN: I could only hope.

20 (Discussion off the record with

21 the court reporter.)

22 BY MR. SAUER:

23 **Q. And here, in this email chain, there**

24 **is discussion of an agenda for a May 24th**

25 **meeting that is attached; correct?**

Page 92

1 **Q. And you submitted it to Eric and -- or**

2 **Tyler submitted it to Eric and Dave, copying**

3 **you; correct?**

4 A. That's what it looks like.

5 **Q. And then the next day, he emailed you**

6 **back, using the kazoo metaphor, to encourage**

7 **you to reframe your thinking; right?**

8 A. Yes, sir.

9 **Q. And you responded to that, agreeing to**

10 **reframe -- or Tyler responded to that, agreeing**

11 **to reframe it, but kind of advising him that**

12 **there's no silver-bullet path or strategy that**

13 **guarantees victory; right?**

14 A. Yes.

15 **Q. And it copies -- or it refers to**

16 **examples where campaigns were insufficiently**

17 **flexible and, therefore, were not successful;**

18 **right?**

19 A. Yes.

20 **Q. Was that -- were those thoughts**

21 **communicated to Dave and Eric, do you know?**

22 A. I don't.

23 **Q. Can you turn to the last two pages of**

24 **this document.**

25 **This is the actual agenda for the May**

Page 93

1 **24th meeting that you and Tyler prepared;**
 2 **correct?**
 3 A. Yes, sir.
 4 **Q. Correct?**
 5 A. Yes, sir.
 6 **Q. And so halfway down in the first page**
 7 **of this – this agenda, you referred to the**
 8 **candidates for Missouri governor in 2016;**
 9 **right?**
 10 A. Yes, sir.
 11 **Q. And you referred to Catherine Hanaway;**
 12 **correct?**
 13 A. It looks that way.
 14 **Q. Tom Schweich; correct?**
 15 A. Yes.
 16 **Q. John Brunner; correct?**
 17 A. Yes.
 18 **Q. Chris Koster; correct?**
 19 A. Yes, sir.
 20 **Q. And Eric Greitens; correct?**
 21 A. Yes, sir.
 22 **Q. And then switching to the next page,**
 23 **you talk about scenarios where Schweich doesn't**
 24 **enter the governor's race, Hanaway moves out of**
 25 **the governor's race to the lieutenant**

Page 95

1 time, but it all is really fuzzy. This could
 2 be the first meeting.
 3 **Q. Do you know why you and Tyler prepared**
 4 **an agenda that focused exclusively on a future**
 5 **race for governor?**
 6 A. Yes, because that was the purpose of
 7 the meeting.
 8 **Q. And the purpose of the meeting was to**
 9 **talk about the race for governor specifically,**
 10 **not political offices generally?**
 11 A. The thinking was always, if you
 12 prepared for governor, it becomes easy to drop
 13 down to LG.
 14 **Q. So the idea was, you would be – you**
 15 **were focusing your discussion on governor?**
 16 A. The hardest.
 17 **Q. When you actually had this meeting,**
 18 **did you talk about running for governor with**
 19 **Eric and Dave and Tyler?**
 20 A. Yes.
 21 **Q. Did you have any understanding of what**
 22 **Eric's intentions were at that time?**
 23 A. He was seriously considering running
 24 for governor.
 25 **Q. Was there any discussion at this**

Page 94

1 **governor's race, John Brunner decides to run;**
 2 **correct?**
 3 A. Yes, sir.
 4 **Q. And those are all game theory**
 5 **exercises that relate to the governor's race;**
 6 **correct?**
 7 A. Yes, sir.
 8 **Q. Lower down in that page, you say,**
 9 **"Share our working hypothesis of what it will**
 10 **take to win the 2016 Missouri governor primary**
 11 **and general election"; correct?**
 12 A. Yes.
 13 **Q. And a little further down, you discuss**
 14 **the pros and cons of a draft Eric for Governor**
 15 **campaign; right?**
 16 A. Yes.
 17 **Q. And none of this agenda refers to**
 18 **gaming out a run for lieutenant governor or any**
 19 **other office, does it?**
 20 A. No.
 21 **Q. So when you – at this time, to the**
 22 **best of your recollection, there's already been**
 23 **an initial meeting with Eric; right?**
 24 A. I believe so, or this could be it. I
 25 believe there was an informal meeting ahead of

Page 96

1 **May 24th meeting of The Mission Continues or**
 2 **any role that The Mission Continues might play**
 3 **in that run for governor?**
 4 A. I don't remember.
 5 Can we take a break?
 6 MR. SAUER: Absolutely, yes.
 7 THE WITNESS: Thank you.
 8 MR. SAUER: If you need a break
 9 at any time, just let us know.
 10 (Recess.)
 11 MR. SAUER: Exhibit 12.
 12 (Exhibit 12 was marked for
 13 identification.)
 14 BY MR. SAUER:
 15 **Q. Do you recognize this email?**
 16 A. I do not.
 17 **Q. So this is an email from Tyler to --**
 18 **to you; correct?**
 19 A. That's what it looks like.
 20 **Q. And it says, "To print for ERG";**
 21 **right?**
 22 A. Yes, sir.
 23 **Q. And ERG is the initials of Eric**
 24 **R. Greitens; correct?**
 25 A. Yes.

Page 97

1 **Q. And the attachment is called "2014**
 2 **Proposal ERG.doc"; correct?**
 3 A. Yes.
 4 **Q. It's dated May 24th, 2014; right?**
 5 A. Yes.
 6 **Q. Flipping back to Exhibit 11, the last**
 7 **email we looked at, that refers to a May 24th**
 8 **meeting that occurred with you and Eric and**
 9 **Dave Whitman and Tyler; right?**
 10 A. Yes.
 11 **Q. Do you remember whether this proposal,**
 12 **as attached to this email, was delivered or**
 13 **used at that Saturday, May 24th meeting?**
 14 A. I do not remember.
 15 **Q. Okay. So you don't know -- flipping**
 16 **to the attachment, you don't know whether this**
 17 **is something that ever went on from either you**
 18 **or Danny --**
 19 A. I'm Danny.
 20 **Q. I'm sorry. That's the third time.**
 21 **-- either you or Tyler to Eric or**
 22 **Dave?**
 23 A. We would often prepare more documents
 24 than we would discuss and bring up in meetings.
 25 So I don't know whether this was one

Page 99

1 the very first two lines.
 2 A. Yes, I do.
 3 **Q. And that objective relates to**
 4 **establishing a personal relationship with five**
 5 **candidates outside of Missouri who could be**
 6 **called upon for personal favors during Eric's**
 7 **campaign for governor; correct?**
 8 A. Yes.
 9 **Q. So this document also focuses, as the**
 10 **agenda in Exhibit 11 did, on our future race**
 11 **for governor; correct?**
 12 A. Yes.
 13 **Q. And it doesn't refer to -- Tyler, in**
 14 **this document, is not referring to any other**
 15 **potential office; correct?**
 16 A. Correct.
 17 **Q. Do you see, in the second line there,**
 18 **it says, "Gain experience delivering political**
 19 **speeches in a relatively safe environmental."**
 20 **Was that something you discussed with**
 21 **Tyler?**
 22 A. I don't remember.
 23 **Q. Do you remember in any of these**
 24 **meetings, you know, the whole sort of five or**
 25 **six or seven meetings that you had in 2014,**

Page 98

1 specifically -- I don't have recollection of
 2 it, but it would not have been unusual for us
 3 to prepare ten documents and only use four.
 4 **Q. So in other words, this might have**
 5 **been a brainstorming document between you and**
 6 **Tyler?**
 7 A. Or it could have been one that was
 8 discussed. I don't know.
 9 **Q. Okay. Flipping to the --**
 10 A. I didn't write this, though. This is
 11 clearly written by Tyler.
 12 **Q. It says, "To print for ERG."**
 13 **Do you remember printing something out**
 14 **to bring to that meeting?**
 15 A. I must have. We printed multiple
 16 things for every meeting, so that's not
 17 strange.
 18 **Q. But the fact that you printed it to**
 19 **bring to the meeting doesn't tell you whether**
 20 **or not it was shared with David and Eric at the**
 21 **meeting?**
 22 A. I have no idea.
 23 **Q. Switching to the second page in this**
 24 **document, the first page of the proposal, do**
 25 **you see where he lists an objective there? At**

Page 100

1 discussing giving political experience -- or
 2 political speeches in a safe environment during
 3 2014 with Eric or Dave?
 4 A. I'm sure we talked about it.
 5 **Q. What was the nature of those**
 6 **discussions?**
 7 A. I'm sure we talked about giving
 8 Eric -- Eric had never before given political
 9 speeches of any kind, so getting experience
 10 giving some kind of political speech for
 11 political audience was important, with the
 12 caveat worth getting on the record, which is
 13 tons of things you'll see in -- what you've
 14 given me in this and forward, just because
 15 there's a proposal doesn't mean it happened.
 16 So I don't remember that happening,
 17 but I remember discussing it.
 18 **Q. So you don't remember him actually**
 19 **giving speeches in 2014 that would have been**
 20 **given, in part, to lay the groundwork for a**
 21 **future political campaign?**
 22 A. He may have given speeches in the end
 23 of the year, not in May.
 24 **Q. Do you know if he gave any speeches,**
 25 **in his capacity as director or CEO of The**

Page 101

1 **Mission Continues, during this time frame?**
 2 A. I have no idea.
 3 **Q. So was it ever discussed that he would**
 4 **have a speaking opportunity, in his capacity as**
 5 **The Mission Continues, that would be useful for**
 6 **laying the groundwork for a future run for**
 7 **office?**
 8 A. It never was a conversation.
 9 **Q. Lower down in this email -- or in this**
 10 **proposal that Tyler sent to you to print, it**
 11 **says, "Establish a connection with major donors**
 12 **also supporting this candidate"; correct?**
 13 A. One second -- yes, right here.
 14 **Q. Is that something you discussed with**
 15 **Tyler leading up to this May 24th meeting?**
 16 A. I don't remember specifically, but,
 17 you know, we had -- Eric was going to have to
 18 raise \$10 million from somewhere, so I'm sure
 19 there was conversations.
 20 **Q. What was said about what that**
 21 **somewhere would be between you and Tyler?**
 22 A. I can't recall.
 23 **Q. Was anything said in the meetings you**
 24 **had with Dave and Eric as well about where that**
 25 **money would be raised from?**

Page 102

1 A. No. Oftentimes when Tyler and I would
 2 bring up our concerns about money, Eric would
 3 say, "It's not going to be an issue," and
 4 relatively shut down those conversations. So
 5 we didn't, at this point, game it out.
 6 **Q. So you had conversations with Eric**
 7 **where you expressed concerns or raised as an**
 8 **issue the need to raise a very substantial**
 9 **amount of money for this political campaign?**
 10 A. Yes. It's -- it's fairly often that
 11 you tell a candidate they need to raise money,
 12 and they say, "Oh, that's easy."
 13 So we were stressing point that it was
 14 a significant amount of money and it would be
 15 much harder than he anticipated.
 16 **Q. But did he -- his response to that was**
 17 **to express optimism about his ability to raise**
 18 **it?**
 19 A. Yes.
 20 **Q. But do you recall him discussing any**
 21 **details at all about how he would raise that**
 22 **money?**
 23 A. I'm sure -- I don't -- I don't recall.
 24 **Q. Do you recall The Mission Continues**
 25 **ever being mentioned specifically in connection**

Page 103

1 **with those discussions of his fundraising**
 2 **capacity?**
 3 A. The only recollection I have is that
 4 he has raised significant money before for The
 5 Mission Continues. Thus, he feels he is good
 6 at raising money.
 7 **Q. And that is something that he said to**
 8 **you and Tyler?**
 9 A. Yes.
 10 MR. SAUER: Exhibit 13.
 11 (Exhibit 13 was marked for
 12 identification.)
 13 THE WITNESS: Thank you.
 14 BY MR. SAUER:
 15 **Q. You recognize this document?**
 16 A. Can I read it one second, please?
 17 **Q. Sure.**
 18 A. (Witness reviews document.)
 19 Yes.
 20 **Q. And this is an email chain involving**
 21 **Dave Whitman, yourself, and Tyler on May 26th**
 22 **and May 27th; correct?**
 23 A. Yes.
 24 **Q. It includes, I think, some side**
 25 **comments between you and Tyler; right?**

Page 104

1 A. Yes.
 2 **Q. Okay. And so this email exchange**
 3 **happens the Monday and Tuesday after that**
 4 **Saturday meeting on May 24th at Eric's house;**
 5 **right?**
 6 A. Yes.
 7 **Q. Before we get into this document, do**
 8 **you remember anything else in particular that**
 9 **was discussed at that May 24th Saturday**
 10 **meeting?**
 11 A. It's very lengthy, and it was -- we
 12 basically went through the entire agenda that
 13 you outlined in a previous exhibit.
 14 **Q. Do you know which agenda was followed**
 15 **at that meeting? Was it the Exhibit 11 agenda?**
 16 A. Yes.
 17 **Q. So at that meeting, you discussed all**
 18 **these items in this page-and-a-half agenda, and**
 19 **that's the last two pages of Exhibit 11?**
 20 A. I think we got cut short towards the
 21 end of the second page, but, yes, that was the
 22 agenda we followed.
 23 **Q. And did you discuss anything else**
 24 **other than what was on this agenda?**
 25 A. Not that I can recall.

Page 105

1 **Q. Do you remember anything specific that**
2 **was said, for example, about demography of**
3 **turnout?**
4 A. No.
5 **Q. How about campaign messaging?**
6 A. I don't remember specifics.
7 **Q. How about exit polling? And, for**
8 **example, the agenda says "dig into 2012**
9 **governor's race." Do you remember discussing**
10 **that?**
11 A. No.
12 **Q. Again, do you remember discussing the**
13 **candidate profiles of Catherine Hanaway, Tom**
14 **Schweich, John Brunner, Chris Koster and Eric**
15 **Greitens?**
16 A. Yes.
17 **Q. What was said about that?**
18 A. We just went through the candidates
19 one -- potential candidates one-by-one and
20 discussed those items: weaknesses, strengths
21 and their biography, and how they would match
22 up in a race.
23 **Q. Is this a situation where essentially**
24 **you and Tyler are making a presentation doing**
25 **most of the talking or is it more like in the**

Page 107

1 A. I don't.
2 **Q. Let's flip back to Exhibit 13. So the**
3 **Monday following that meeting, Dave Whitman**
4 **sent you a document prepared by Mason Fink;**
5 **correct?**
6 A. Yes.
7 **Q. Who is Mason Fink?**
8 A. Mason Fink is a national finance
9 consultant. I don't know how he met Eric. He
10 met Eric at some point and Eric brought him
11 into this informal advisor's orbit that we were
12 all in.
13 **Q. When you say "we were all," who else**
14 **is in that orbit?**
15 A. Steve Michael, Mike Hafner, David
16 Barklage, Tyler, Mark Bobak. I mean, all these
17 people that start talking to him, I would bring
18 Mason Fink into that group.
19 **Q. Okay. Does Mason Fink have any**
20 **connect to The Mission Continues that you know**
21 **of?**
22 A. Not to my knowledge.
23 **Q. Do you know if he's a donor to The**
24 **Mission Continues?**
25 A. I have no idea.

Page 106

1 **context of a round-table discussion?**
2 A. Conversational.
3 **Q. So there was back-and-forth where Eric**
4 **or Dave would ask questions about any of these**
5 **items?**
6 A. Yes, most of these items.
7 **Q. Did you -- skipping to the next page**
8 **of the agenda, did you talk about scenarios**
9 **where Schweich would decide not to run for**
10 **governor?**
11 A. Yes.
12 **Q. Did you talk about Hanaway possibly**
13 **dropping out of the race?**
14 A. Yes.
15 **Q. What was said about that?**
16 A. I don't recall exactly what the
17 specifics were.
18 **Q. But to the best of your recollection,**
19 **it was a lengthy meeting that essentially**
20 **followed this agenda and didn't go into any**
21 **further details?**
22 A. Yes.
23 **Q. And do you remember anything specific**
24 **of any kind being said about fundraising in**
25 **that meeting?**

Page 108

1 **Q. And the thing he's attached refers to**
2 **manage priorities.**
3 Do you recall reviewing that document
4 that's the third page in this document, the
5 one-page attachment?
6 A. I don't recall reviewing it, but I'm
7 sure I did.
8 **Q. And you, in fact, sent a side email to**
9 **Tyler calling it silly; right? "This is**
10 **silly."**
11 A. Yes, I must have said that.
12 **Q. And you say -- in the middle of the**
13 **first page in this document, you say, "Is it**
14 **worth me creating a better version based off**
15 **what E.R.G. said with what we discussed";**
16 **right?**
17 A. Yes, I say that.
18 **Q. And you say that you could whip up**
19 **something rather easily that would blow this**
20 **out of water in formatting logic and action**
21 **items; correct?**
22 A. Yes.
23 **Q. Okay. So this attachment is a**
24 **fundraising plan; right? Or at least includes**
25 **a fundraising plan; right?**

Page 109

1 A. Looks like that's one of the five
 2 components of it.
 3 **Q. It's that first component; right?**
 4 A. Looks like it's one of the five
 5 components.
 6 **Q. It's the first one listed; correct?**
 7 A. First of the five, yes.
 8 **Q. And Mason Fink estimated that that**
 9 **should be involved 50 percent of calendar time;**
 10 **right?**
 11 A. Looks like that.
 12 **Q. When you say you could create a better**
 13 **version of planning priorities based off what**
 14 **E.R.G. said in the May 24th meeting, did that**
 15 **include a discussion of fundraising or how much**
 16 **time should be allocated to fundraising?**
 17 A. Yes.
 18 **Q. What was said about that in that May**
 19 **24th meeting; do you recall?**
 20 A. That it needed to be a significant or
 21 a majority percentage of Eric's time.
 22 **Q. Anything else in particular that**
 23 **you're referring to here about what E.R.G. said**
 24 **during that May 24th meeting?**
 25 A. I don't remember.

Page 110

1 **Q. You don't remember anything else that**
 2 **he said that had to do with fundraising?**
 3 A. I don't remember.
 4 **Q. Do you remember The Mission Continues**
 5 **coming up in that May 24th meeting at all?**
 6 A. I'm sure it came up in the context of
 7 Eric raising money for The Mission Continues.
 8 Thus, he should be able to raise significant
 9 dollars for governor. I don't have a
 10 recollection specifically of other instances of
 11 TMC coming up.
 12 **Q. Lower in the email, Tyler sends an**
 13 **email back Tuesday, today, where he says,**
 14 **"Dave, it is too bad you had to take off before**
 15 **hours 7 through 10 on Saturday"; correct?**
 16 A. Yes.
 17 **Q. To your recollection, did that meeting**
 18 **on May 24th last for ten hours?**
 19 A. I think so.
 20 **Q. And it took ten hours to get through**
 21 **that page-and-a-half agenda?**
 22 A. I think so.
 23 **Q. So there was a lot discussed in that**
 24 **meeting; right?**
 25 A. I think so.

Page 111

1 **Q. And based on the agenda, it all**
 2 **focused on future run for governor and gaming**
 3 **out various scenarios for that; right?**
 4 A. Yes, sir. It was conversational.
 5 **Q. So --**
 6 A. So that added to the length. It
 7 wasn't a presentation.
 8 **Q. Right. In other words, there was a**
 9 **lot of talking --**
 10 A. Back and forth.
 11 **Q. -- back and forth, sharing ideas and**
 12 **so forth? Correct?**
 13 A. Yes, sir.
 14 **Q. And sharing ideas that all related to**
 15 **a future campaign for the governor of Missouri;**
 16 **correct?**
 17 A. Yes, sir.
 18 **Q. But other than mentioning that Eric**
 19 **was an effective fundraiser because of his**
 20 **experience of raising money for The Mission**
 21 **Continues, you don't remember any other**
 22 **reference to The Mission Continues in that**
 23 **meeting?**
 24 A. Not that I can recall.
 25 **Q. And you don't remember anything else**

Page 112

1 **specific about fundraising in that meeting?**
 2 A. I'm sure we talked about it, and the
 3 importance of it, but I can't recall anything
 4 specifically.
 5 **Q. Flipping to the second page of this**
 6 **exhibit, at the end there on Tuesday,**
 7 **May 27th, you sent an email back to Dave**
 8 **Whitman; right?**
 9 A. Yep.
 10 **Q. And you say, "I do think the Oppo is**
 11 **critical." Correct?**
 12 A. Yes. That's reference --
 13 **Q. That's a reference to the**
 14 **vulnerability study; correct?**
 15 A. Yes, sir.
 16 **Q. And but this doesn't jog your memory**
 17 **as to whether or not that may have been**
 18 **actually conducted in this time frame, the**
 19 **first half of 2014?**
 20 A. It wasn't conducted.
 21 **Q. Okay. In the second paragraph of this**
 22 **email, you say, "Great to catch up on Sunday as**
 23 **well"; right?**
 24 A. Yes.
 25 **Q. So Sunday would have been May 25th;**

Page 113

1 correct?
 2 A. Yes.
 3 **Q. Do you recall, how did you catch up?**
 4 **Did you guys talk on the phone? Did you meet**
 5 **face-to-face? Do you remember?**
 6 A. Dave, Tyler and I met for about an
 7 hour.
 8 **Q. Okay. And what was the nature of that**
 9 **meeting?**
 10 A. To debrief the ten-hour meeting
 11 without Eric.
 12 **Q. When you say "debrief," what was**
 13 **discussed? Was Dave kind of giving you**
 14 **follow-up tasks or what was the --**
 15 A. More informal net -- Dave trying to
 16 sense what our reactions were, what we thought
 17 of it, what we thought the viability of it was.
 18 It was informal.
 19 **Q. Okay. So Dave was asking you**
 20 **questions about what do we think, do we think**
 21 **this is a viable path at that time?**
 22 A. Yes. And we were trying to get --
 23 Tyler and I were trying to understand kind of
 24 what Eric's thinking was.
 25 **Q. Was fundraising talked about in that**

Page 114

1 **meeting?**
 2 A. I don't think so.
 3 **Q. Did you gain an understanding from**
 4 **Dave as to what Eric's thinking was?**
 5 A. I don't recall.
 6 **Q. Was The Mission Continues mentioned in**
 7 **a meeting?**
 8 A. I don't believe so.
 9 **Q. In the next sentence in the email, you**
 10 **say, "In regards to what you mentioned on, I**
 11 **would be open to discussing any of the**
 12 **possibilities, whether it's TGG staff,**
 13 **project-by-project basis, et cetera, depending**
 14 **on what you and EG think is best"; correct?**
 15 A. Yes.
 16 **Q. So was there a discussion in that**
 17 **meeting with Dave Whitman about you being hired**
 18 **in some capacity?**
 19 A. Yeah. Dave asked if I was open to
 20 discussing working for them in some capacity.
 21 **Q. Did he mention what capacities he**
 22 **thought? It looks like you guys talked about**
 23 **multiple possibilities at that meeting.**
 24 A. It was pretty open-ended.
 25 **Q. So he just said would you be willing**

Page 115

1 **to -- would you be open to --**
 2 A. To considering.
 3 **Q. -- considering working with Dave and**
 4 **Eric in some capacity?**
 5 A. Yes.
 6 **Q. And at this time you have a job at the**
 7 **Sandlot organization; correct?**
 8 A. Yes.
 9 **Q. And so they were essentially**
 10 **suggesting -- Dave was suggesting that you**
 11 **might switch to work full time for Dave and**
 12 **Eric in some capacity?**
 13 A. At that time it was -- it was -- we're
 14 talking -- it was so loose, it could have been
 15 project by project. It could have been
 16 consulting through Sandlot. It could have been
 17 advising. It -- I don't think it was that far
 18 down the road of full-time employment at that
 19 point.
 20 **Q. Now, you mentioned whether it's TGG**
 21 **staff; right?**
 22 A. Yeah.
 23 **Q. What is -- in other words, was there a**
 24 **discussion that you would be hired full time to**
 25 **work for The Greitens Group?**

Page 116

1 A. It was very more open-ended than that.
 2 I don't -- I can't recall.
 3 **Q. So you don't know who may have floated**
 4 **the notion that you would work for TGG as a**
 5 **staff member?**
 6 A. I suspect it wasn't me.
 7 **Q. So you believe Dave may have floated**
 8 **that as a possibility?**
 9 A. Probably.
 10 **Q. What sort of work did he anticipate**
 11 **you would do if you were hired as a TGG staff**
 12 **member?**
 13 A. I don't recall.
 14 **Q. Was there any discussion of bringing**
 15 **you onboard The Mission Continues in any**
 16 **capacity?**
 17 A. Never.
 18 **Q. Going down to the next paragraph in**
 19 **this email, you say, "Before Mason goes and**
 20 **sets up a 'vehicle,' the ramification needs to**
 21 **be thought through." Right?**
 22 A. Yes.
 23 **Q. What is the vehicle that you put in**
 24 **square quotes there?**
 25 A. Vehicle here refers to whether --

Page 117

1 whether -- the conversation is based on whether
 2 we were going to open a PAC or an exploratory
 3 or file -- a vehicle here refers to somewhere
 4 where a political candidate or future candidate
 5 can park donations.
 6 **Q. So when you say a vehicle, the vehicle**
 7 **that you're referring to would be a formal**
 8 **campaign committee or political action**
 9 **committee of some kind?**
 10 A. Some legal entity where you could
 11 raise money to.
 12 **Q. And right now, an issue is I guess**
 13 **that if money were raised now, in 2014, there**
 14 **would be no place to deposit it, because**
 15 **there's no formal campaign vehicle; right?**
 16 A. Or PAC or super PAC or all those
 17 questions.
 18 **Q. And you say the ramification needs to**
 19 **be thought through of that; correct?**
 20 A. I do say that.
 21 **Q. What are you talking about?**
 22 A. There's optics and political
 23 calculations that need to be considered.
 24 **Q. What do you mean by "optics and**
 25 **political calculations"?**

Page 118

1 A. Politics is about methodical timing
 2 and him outing himself as someone who is
 3 looking at running for governor would have been
 4 politically detrimental, and when you file a
 5 committee or a PAC or a super PAC or a vehicle,
 6 it's public record. And so there's political
 7 ramifications that come to that information.
 8 So that's what I was flagging.
 9 **Q. So you're flagging for Dave that this**
 10 **Mason Fink wants -- it sounds like he's pushing**
 11 **for Eric to take that formal step right away**
 12 **and you think we have to have very serious**
 13 **consideration of timing; right?**
 14 A. Absolutely.
 15 **Q. And in particular you think delay**
 16 **would make sense; right?**
 17 A. Absolutely.
 18 **Q. Because doing it right now, even if he**
 19 **has decided that that's definitely what he**
 20 **wants to do, may have political downsides;**
 21 **right?**
 22 A. It was my belief then that Eric's key
 23 to victory was timing and this would have
 24 disrupted that.
 25 **Q. And the timing -- in particular, what**

Page 119

1 **timing do you think was optimal?**
 2 A. Of when to get in the race.
 3 **Q. Right. What did you think was the**
 4 **right time to get in the race?**
 5 A. The later the better.
 6 **Q. Why is that?**
 7 A. It goes into political theory, but
 8 mathematically speaking, you want to raise as
 9 much money as possible, you want to get into
 10 the race as late as possible and peak at the
 11 right time so that people don't have time to
 12 destroy you down before election day. The
 13 longer you're in the race, the more vulnerable
 14 you are in a race like this.
 15 **Q. Is it also true that the longer -- the**
 16 **shorter you're in the race, the less time you**
 17 **have to raise money?**
 18 A. That is true.
 19 **Q. But you thought that that calculus**
 20 **would favor a late entry for Greitens in**
 21 **particular?**
 22 A. Yes.
 23 **Q. Does early entry favor some**
 24 **candidates?**
 25 A. Depends on the scenario, yes. For

Page 120

1 instance, Catherine Hanaway getting in early
 2 was a smart move for her.
 3 **Q. Why was that?**
 4 A. She was an established candidate. She
 5 had an established relationship with donors and
 6 she was trying to be the de facto nominee, and
 7 it fit her strategy well. It would not have
 8 fit Eric's strategy well.
 9 **Q. Okay. So essentially when you're**
 10 **talking about the ramifications, you're saying**
 11 **even if he's definitely going to do it, we have**
 12 **to do it at the right time; right?**
 13 A. Absolutely.
 14 **Q. And that time, on your view, in your**
 15 **advice, was later is better than sooner; right?**
 16 A. Yes.
 17 **Q. And, in fact, he didn't form a**
 18 **vehicle, in your words, or a formal committee**
 19 **of any kind until?**
 20 A. February of 2015.
 21 **Q. So late February 2015?**
 22 A. Yes.
 23 **Q. Was that timing done on your advice?**
 24 A. I don't know if I gave myself that
 25 much credit. It was my advice. I don't know

Page 121

1 if that was my only -- I was the only person.
 2 That's definitely what I believed was the right
 3 thing to do.
 4 **Q. In this same paragraph you say, "Of**
 5 **course he, being Mason Fink, is going to push**
 6 **for now because then he can start making**
 7 **money"; correct?**
 8 A. Yes.
 9 **Q. So is that referring to the fact that**
 10 **Mason Fink is a professional fundraiser who**
 11 **gets a commission on or some kind of cut of the**
 12 **money that he raises for the vehicle?**
 13 A. That's what I was speculating at the
 14 time.
 15 **Q. Okay. Was that, in fact, true, do you**
 16 **know?**
 17 A. I don't remember Mason ever making
 18 money off of Eric, but I don't know that.
 19 **Q. You go on to say, "Once money is**
 20 **parked, it's harder to move unnoticed and may**
 21 **draw attention that is harmful."**
 22 **What do you mean by that?**
 23 A. If he starts a committee called Yay,
 24 Missouri, parks \$500,000 in it, and then a year
 25 later transfers Yay, Missouri to Greitens for

Page 122

1 Governor, that becomes -- people start to ask a
 2 lot of questions. That's what I was referring
 3 to.
 4 **Q. Is that legal in Missouri? I don't**
 5 **even know.**
 6 A. Yes. Because there's no limits. At
 7 the time there was no limits.
 8 **Q. So in other words, he can create a**
 9 **campaign -- create an entity called Yay,**
 10 **Missouri.**
 11 A. A PAC.
 12 **Q. A PAC. And then -- that he**
 13 **controlled, and later on donate all the money**
 14 **from Yay, Missouri to Greitens for Governor or**
 15 **whatever?**
 16 A. Yes.
 17 **Q. But you say that would draw harmful**
 18 **attention?**
 19 A. Yes.
 20 **Q. Okay. So -- and you say, "This is why**
 21 **I stressed with E.G. that there needs to be a**
 22 **comprehensive finance plan that encompasses how**
 23 **and where the raised money will go"; correct?**
 24 A. Yes.
 25 **Q. And so there was a discussion of a**

Page 123

1 **comprehensive finance plan at the May 24th**
 2 **meeting; right?**
 3 A. Or the need for one.
 4 **Q. Do you remember any further details**
 5 **about what was said at the May 24th meeting**
 6 **on that front?**
 7 A. No, but it looks like I left the
 8 meeting thinking that there wasn't one and
 9 there needed to be one.
 10 **Q. Do you know whether Dave and/or Eric**
 11 **accepted your advice about timing?**
 12 A. I have no idea.
 13 **Q. Exhibit 14.**
 14 **(Exhibit 14 was marked for**
 15 **identification.)**
 16 THE WITNESS: Thank you.
 17 BY MR. SAUER:
 18 **Q. Do you recognize this document?**
 19 A. I do.
 20 **Q. Okay. What is this document?**
 21 A. Appears to be a nondisclosure
 22 agreement sent by Dave Whitman.
 23 **Q. So in other words, on the cover here,**
 24 **email, Dave Whitman sent you an email copying**
 25 **Eric Greitens, sending you a nondisclosure**

Page 124

1 **agreement used by The Greitens Group; correct?**
 2 A. Yes.
 3 **Q. And you forwarded that to Tyler;**
 4 **right?**
 5 A. Can I say something?
 6 **Q. Yeah. Go ahead.**
 7 A. It's not The Greitens Group. It --
 8 clearly it says the confidentiality agreement
 9 is made between Eric Greitens personally and
 10 me. It doesn't say TGG on here.
 11 **Q. Right. Okay. So the nondisclosure**
 12 **agreement -- let me ask you this: Did you end**
 13 **up signing this nondisclosure agreement?**
 14 A. I did.
 15 **Q. Do you know if Eric signed it too?**
 16 A. I don't.
 17 **Q. But you at some point signed and**
 18 **returned this?**
 19 A. I did.
 20 **Q. Did you do it promptly?**
 21 A. Yes.
 22 **Q. Why did you do that?**
 23 A. It was my interpretation that all
 24 parties at this point who were informally
 25 talking to Eric were -- were signing this, and

Page 125

1 for me to proceed with conversations with Eric,
 2 that I had to sign this, so thus, I did.
 3 **Q. Do you -- is that usual in these kinds**
 4 **of arrangements to have an NDA like this?**
 5 A. It's more usual than less usual. It
 6 is unusual this early in the process, but an
 7 NDA for -- an NDA for a campaign or exploratory
 8 is not unusual at all.
 9 **Q. Were there any -- did you review this**
 10 **NDA before you signed it?**
 11 A. Probably not as thoroughly as I should
 12 have.
 13 **Q. Let me ask you this: You forwarded**
 14 **this email to Tyler; right?**
 15 A. Apparently I said, "Hmmm."
 16 **Q. Yeah. Do you know what you meant by**
 17 **"hmmm," H-M-M-M?**
 18 A. Yeah. I thought it was weird.
 19 **Q. Why was it weird?**
 20 A. It was early in the -- it was too
 21 early in the process. I've never signed an NDA
 22 in my political career, if you call it that,
 23 for someone that wasn't paying me.
 24 **Q. So he wanted an NDA even though you**
 25 **weren't paid yet; right?**

Page 126

1 A. I think he references that here too.
 2 **Q. Where is that?**
 3 A. He says paid and unpaid somewhere, I
 4 believe.
 5 **Q. Is that there in David Whitman's email**
 6 **on the first-to-second line?**
 7 A. Is that in the email -- yes. Paid and
 8 nonpaid, yes.
 9 **Q. And he describes this as "our**
 10 **Nondisclosure Agreement that all employees,**
 11 **consultants, paid and nonpaid, interns and**
 12 **advisors signed as part of our standard**
 13 **operating procedures"; correct?**
 14 A. That's what it appears.
 15 **Q. Who is the "our" that he's referring**
 16 **to?**
 17 A. He must mean him and Eric.
 18 **Q. Okay. Did you ever discuss this with**
 19 **Eric directly?**
 20 A. No.
 21 **Q. Did you ever discuss it with Dave**
 22 **Whitman?**
 23 A. No.
 24 **Q. Did you ever discuss it with anybody**
 25 **else?**

Page 127

1 A. Probably Tyler.
 2 **Q. Do you remember what you guys said to**
 3 **each other?**
 4 A. Probably said what I just told you,
 5 which, is I've never signed a Nondisclosure
 6 Agreement, NDA, for a client who I'm not
 7 getting paid by.
 8 **Q. But you did, in fact, sign it; right?**
 9 A. I did.
 10 **Q. Why?**
 11 A. I felt like that for me to proceed
 12 with informally advising Eric, I had to.
 13 **Q. And you wanted to continue that**
 14 **process?**
 15 A. Yes.
 16 **Q. Did you anticipate that you might get**
 17 **paid work out of it eventually?**
 18 A. I was hoping that eventually it would
 19 turn into that.
 20 **Q. Okay. Just turning to the**
 21 **Nondisclosure Agreement, it's dated May 28th,**
 22 **2014; correct? At the top.**
 23 A. Yes, sir.
 24 **Q. And, I think, Dave in his email asked**
 25 **you to return it by June 3rd.**

Page 128

1 A. Yes, sir.
 2 **Q. Do you know if you signed it and**
 3 **returned it by that date?**
 4 A. I did.
 5 **Q. And about two-thirds of the way down**
 6 **in the first page of the agreement there's a**
 7 **definition of confidential information; right?**
 8 A. Yes.
 9 **Q. And actually, let's go up to the**
 10 **recitals --**
 11 A. Okay.
 12 **Q. -- section. Do you see Paragraph A**
 13 **where it says, "EG is exploring plans regarding**
 14 **a potential career endeavor involving public**
 15 **service"?**
 16 A. Yes.
 17 **Q. Quote, plans with a capital P;**
 18 **correct?**
 19 A. Yes, sir.
 20 **Q. What was your understanding of what he**
 21 **meant by "potential career endeavor involving**
 22 **public service"?**
 23 A. Run for governor or lieutenant
 24 governor.
 25 **Q. So this was a future political**

Page 129

1 campaign that he's referring to in this NDA, in
 2 your understanding?
 3 A. Yes.
 4 Q. And this confidentiality agreement
 5 essentially makes confidential any kind of
 6 information or discussions related to those
 7 plans; is that right?
 8 A. Yes.
 9 Q. Did you actually abide by this
 10 agreement?
 11 A. I believe so.
 12 Q. Two-thirds of the way down in the
 13 definition of confidential information, do you
 14 see where it refers, about halfway down, to
 15 donor lists?
 16 A. I don't. Where does it say that? Oh,
 17 right there, document, donor lists, vendor or
 18 contractor lists. Yes, I see it.
 19 Q. Was the issue of donor lists being
 20 kept confidential something that was ever
 21 discussed by you with Eric or Dave Whitman?
 22 A. Not specifically.
 23 Q. Was something discussed in general
 24 terms of that nature?
 25 A. I don't believe so.

Page 131

1 confidentiality of Mission Continues
 2 information?
 3 A. Never.
 4 MR. SAUER: Very briefly, Exhibit
 5 15.
 6 (Exhibit 15 was marked for
 7 identification.)
 8 THE WITNESS: Thank you.
 9 BY MR. SAUER:
 10 Q. This is an email sent by you to Dave
 11 and Tyler a couple of days after you got that
 12 proposed NDA; correct?
 13 A. Yes, sir.
 14 Q. And you refer to America Rising here.
 15 Do you know what that is?
 16 A. Another research firm.
 17 Q. So this is another email on that topic
 18 of doing the vulnerability study; correct?
 19 A. Yes.
 20 Q. And you say any type of time frame
 21 about EG has given on what he's comfortable on
 22 moving forward; correct?
 23 A. Yes.
 24 Q. Do you know what exactly you're
 25 referring to there about what he's comfortable

Page 130

1 Q. So you don't remember any discussion
 2 of keeping donor lists confidential?
 3 A. I don't believe so.
 4 Q. Do you know whether Eric signed any
 5 similar agreement in connection with his
 6 employment at The Mission Continues?
 7 A. I have no idea.
 8 Q. So have you ever reviewed any
 9 documents that reflect confidentiality policies
 10 of The Mission Continues?
 11 A. Never.
 12 Q. Did you ever discuss with Eric any
 13 obligations of confidentiality that might have
 14 flowed from his work for The Mission Continues?
 15 A. Never.
 16 Q. Did you ever discuss that with anybody
 17 else? That topic, confidentiality as to The
 18 Mission Continues information? Was that topic
 19 ever discussed by you with anybody else?
 20 A. I don't believe so.
 21 Q. How about Krystal Taylor? Is it
 22 anything that ever came up with her?
 23 A. Can you rephrase the question?
 24 Q. Did you and Krystal Taylor ever
 25 discuss any issues regarding the

Page 132

1 moving forward on?
 2 A. The green light on the vulnerability
 3 study.
 4 Q. Okay. So nothing other than that?
 5 A. Correct.
 6 Q. So is this email referring, for
 7 example, to the suggestion of Mason Fink that a
 8 vehicle should be created?
 9 A. No, this is -- this email is clearly
 10 pertaining just to research.
 11 Q. Do you know whether America Rising has
 12 ever done any work for The Mission Continues?
 13 A. They were conflicted -- oh, sorry.
 14 No.
 15 Q. What they were conflicted out of?
 16 A. I thought you were asking -- I
 17 apologize. I thought you were asking if they
 18 did work for the campaign, and they were
 19 conflicted out from working on the campaign.
 20 Q. Is that because they worked for one of
 21 the other candidates?
 22 A. They were working for a super PAC in
 23 Missouri in the coordination issues.
 24 Q. It was a super PAC supporting Eric
 25 Greitens, effectively?

Page 133

1 A. No, the super PAC was attacking Chris
 2 Koster.
 3 **Q. Okay.**
 4 A. It was aptly named Missouri Rising.
 5 It was.
 6 MR. SAUER: Exhibit 16.
 7 (Exhibit 16 was marked for
 8 identification.)
 9 THE WITNESS: Thank you.
 10 BY MR. SAUER:
 11 **Q. This is an email dated June 30th,**
 12 **2014; correct?**
 13 A. Appears that way.
 14 **Q. And it's an email chain between you**
 15 **and Dave Whitman; right?**
 16 A. Yes, sir.
 17 **Q. Tyler is not copied on these emails,**
 18 **is he?**
 19 A. Does not appear to be.
 20 **Q. And in the first email on the chain**
 21 **you say, "Dave, had a great sitdown with Eric**
 22 **on Friday about what you foreshadowed. Is**
 23 **there a good time this afternoon to discuss?"**
 24 **Correct?**
 25 A. Yes.

Page 135

1 **Q. Do you know whether it was during this**
 2 **time frame?**
 3 A. I thought it was. I thought it was
 4 the summer of 2014, but I don't know.
 5 **Q. So to the best of your recollection --**
 6 **the best of your understanding, it may well**
 7 **have been around the time frame of this**
 8 **particular email?**
 9 A. Maybe.
 10 **Q. Do you have any reason to believe that**
 11 **this issue that Dave foreshadowed had anything**
 12 **to do with Eric stepping down from The Mission**
 13 **Continues?**
 14 A. I don't suspect it did.
 15 **Q. Why not?**
 16 A. It really wasn't something that he
 17 was -- ever brought to me or talked about to
 18 me.
 19 **Q. So you didn't discuss with Dave Eric's**
 20 **stepping down from The Mission Continues?**
 21 A. I don't remember ever doing that.
 22 **Q. Do you remember having individual,**
 23 **face-to-face meetings with Eric during this**
 24 **time frame, separate from the five or six group**
 25 **meetings during 2014 that you testified**

Page 134

1 **Q. Do you recall what you're referring to**
 2 **when you say that Dave had foreshadowed**
 3 **something that you then discussed with Eric**
 4 **face-to-face?**
 5 A. Not the slightest idea. I don't know.
 6 **Q. And Dave responds, "Yeah, man, can**
 7 **talk any time after 1 p.m. Give me a call,**
 8 **look forward to it"; correct?**
 9 A. Yes.
 10 **Q. And it looks like you guys did have a**
 11 **meeting. You say, "Rocks, will be closer to**
 12 **2"; right?**
 13 A. A phone call.
 14 **Q. Right. There was a -- to the best of**
 15 **your recollection, was there a phone call**
 16 **between you and Dave?**
 17 A. One was set up. I don't know. I
 18 don't remember this at all.
 19 **Q. So you don't have any recollection of**
 20 **what was discussed here?**
 21 A. No idea.
 22 **Q. Do you know when Eric actually stepped**
 23 **down from his role as CEO of The Mission**
 24 **Continues?**
 25 A. I don't know the timing.

Page 136

1 **earlier?**
 2 A. I don't. But at this time, Tyler and
 3 I were meeting sometimes without Dave in these
 4 meetings. So I don't know. We were meeting
 5 about on a monthly basis.
 6 **Q. You mean that you and Tyler were**
 7 **meeting with Eric on a monthly basis at this**
 8 **time frame?**
 9 A. About.
 10 **Q. So this reference to a sit-down with**
 11 **Eric may have been a meeting with you and Tyler**
 12 **and Eric without Dave present; correct?**
 13 A. It could have been. I don't remember
 14 this phone call or the reference to this
 15 meeting at all.
 16 **Q. These roughly monthly meetings that**
 17 **you and Tyler had with Eric, are those included**
 18 **in your earlier estimate of five to six**
 19 **meetings overall with Eric to discuss these**
 20 **political campaign issues during 2014?**
 21 A. I think what I said was roughly half a
 22 dozen, but possibly more. I don't have a
 23 recollection of an exact number, so I wouldn't
 24 agree that it's five to six.
 25 But yes, I think that those -- those

Page 137

1 are kind of included. We met on about a
 2 monthly basis.
 3 **Q. And I don't mean to put words in your**
 4 **mouth. A half a dozen –**
 5 A. I just don't know.
 6 **Q. And I understand your testimony is you**
 7 **do not know the specific number of meetings.**
 8 A. Yes, that is my testimony.
 9 **Q. In any of those meetings, where you**
 10 **had these sit-downs, where it's you and Tyler**
 11 **and Eric, do you remember discussing The**
 12 **Mission Continues?**
 13 A. Not any -- in any frame other than
 14 I've already discussed of, "I've raised a lot
 15 of money, The Mission Continues is a part my
 16 story, and think I can raise money really well
 17 for a gubernatorial campaign, because I've done
 18 it before."
 19 **Q. In any of those statements, was**
 20 **there -- did he, Eric, ever make any specific**
 21 **reference to going back to the same people to**
 22 **get money from them, that he already contacted**
 23 **through The Mission Continues?**
 24 A. I don't recall, but I would argue that
 25 it was -- yeah, I don't recall.

Page 138

1 **Q. What would you argue -- or did you**
 2 **think that that was implied?**
 3 A. Yes.
 4 **Q. So you understood that he was implying**
 5 **not just that "I am an effective fundraiser,**
 6 **but that I already have a large number of**
 7 **useful contacts that I previously raised money**
 8 **from"?**
 9 A. Yes, I thought it was implied that he
 10 had a Rolodex of people that he had personal
 11 relationships with.
 12 **Q. Do you remember anything specific that**
 13 **he said about that?**
 14 A. No.
 15 **Q. Do you remember any specific reference**
 16 **to The Mission Continues in that connection?**
 17 A. Not other than what I've just said,
 18 no.
 19 MR. SAUER: Exhibit 17.
 20 (Exhibit 17 was marked for
 21 identification.)
 22 THE WITNESS: There it is.
 23 BY MR. SAUER:
 24 **Q. We have -- this is another reference**
 25 **to America Rising?**

Page 139

1 A. That is the actual proposal.
 2 **Q. Okay. And so this is the same issue**
 3 **that's foreshadowed in Exhibit 15; right --**
 4 A. Yes, sir.
 5 **Q. -- where you asked Dave if he had**
 6 **gotten anything from America Rising; right?**
 7 A. Yes.
 8 **Q. Was Dave your principal point of**
 9 **contact during this time frame to talk about**
 10 **this -- sort of political planning issues?**
 11 A. Yes.
 12 **Q. And I take it that you've said before**
 13 **that this America Rising was never hired;**
 14 **right?**
 15 A. Yes, they were conflicted out, but I
 16 would say in terms of -- I would say, in terms
 17 of contact, Tyler had far more contact with
 18 Mr. Whitman than I did.
 19 **Q. So --**
 20 A. He was a conduit.
 21 **Q. Okay. Tyler was the person who talked**
 22 **to him most?**
 23 A. Yes, for sure.
 24 **Q. When the campaign was actually formed,**
 25 **what was Tyler's role? Did you say earlier it**

Page 140

1 **was fundraising?**
 2 A. Tyler wasn't involved in the campaign
 3 when it was formed.
 4 MR. BOXERMAN: You were thinking
 5 of Mr. Hafner.
 6 BY MR. SAUER:
 7 **Q. You're right.**
 8 **Hafner was involved in fundraising**
 9 **when the campaign was formed; correct?**
 10 A. Yes, prior to the campaign being
 11 formed, he was brought on to assist with
 12 exploratory fundraising.
 13 **Q. And I take it that Hafner is in a**
 14 **different silo than you at this time frame --**
 15 A. Yes.
 16 **Q. -- using the metaphor earlier;**
 17 **correct?**
 18 A. Yes.
 19 **Q. What role, if any, did Tyler end up**
 20 **having in the campaign?**
 21 A. Tyler was an informal advisor for
 22 nearly all of the process, the key informal
 23 advisor. He was hired somewhere around late
 24 summer 2015.
 25 **Q. So he was unpaid through late summer**

Page 141

1 of 2015?
 2 A. Yes.
 3 **Q. And he was -- he was hired by the**
 4 **campaign in 2015?**
 5 A. Yes.
 6 **Q. You were hired much earlier, right, by**
 7 **the campaign?**
 8 A. From its inception.
 9 **Q. Do you know why they picked you**
 10 **instead of Tyler to be the one they hired?**
 11 A. I don't have any idea.
 12 **Q. I take it Tyler was your friend**
 13 **through this process; right?**
 14 A. Yes, and Tyler also had a full-time
 15 private sector job at the time, and I'm not
 16 sure he wanted to -- not putting words in his
 17 mouth, I'm not sure he wanted to transition at
 18 the time. He had a great, nonpolitical job.
 19 **Q. What was his job?**
 20 A. He was working for some healthcare,
 21 start-up company in St. Louis.
 22 **Q. So he may not have been available for**
 23 **that --**
 24 A. Yeah. I don't know the details.
 25 **Q. Okay. Exhibit 18.**

Page 142

1 (Exhibit 18 was marked for
 2 identification.)
 3 THE WITNESS: Thank you.
 4 BY MR. SAUER:
 5 **Q. Do you recognize this document?**
 6 A. I do.
 7 **Q. Was it prepared by you?**
 8 A. In part by me, yes.
 9 **Q. And was the other person who prepared**
 10 **it Tyler?**
 11 A. No. This was all our firm.
 12 **Q. So this is --**
 13 A. This is the Sandlot firm.
 14 **Q. Okay. But -- and so this was a**
 15 **proposal that Sandlot prepared for -- to submit**
 16 **to Eric?**
 17 A. Yes.
 18 **Q. And was it, in fact, submitted?**
 19 A. I don't think it was ever submitted,
 20 or if it was submitted, it wasn't accepted. I
 21 don't believe it was ever actually submitted.
 22 I think it was talked about and then decided to
 23 go a different direction.
 24 MR. SAUER: Set that one to one
 25 side for a minute.

Page 143

1 Exhibit 19.
 2 (Exhibit 19 was marked for
 3 identification.)
 4 BY MR. SAUER:
 5 **Q. How about this document, do you**
 6 **recognize this one?**
 7 A. I don't believe I wrote it.
 8 **Q. Have you seen this before, do you**
 9 **think?**
 10 A. I don't remember.
 11 **Q. Do you see how this document refers to**
 12 **a pre-rollout process?**
 13 A. I do.
 14 **Q. Do you know what that means?**
 15 A. I didn't -- I don't know where the
 16 document came from or who wrote it. I mean, I
 17 know what a pre-rollout is, but I don't know
 18 what this is referring to.
 19 **Q. What is a pre-rollout?**
 20 A. Well, a rollout would be a launch for
 21 a campaign. A pre-rollout would be everything
 22 that happens before launch with a campaign.
 23 **Q. A pre-rollout is a process before the**
 24 **campaign is formally announced?**
 25 A. Yeah. It's not a term I would use,

Page 144

1 but yes, it is, you know, the time leading up
 2 to a campaign announcement.
 3 MR. SAUER: Exhibit 20.
 4 (Exhibit 20 was marked for
 5 identification.)
 6 THE WITNESS: Thank you.
 7 BY MR. SAUER:
 8 **Q. Do you recognize this document?**
 9 A. It looks like an updated version of
 10 Exhibit 18 to me.
 11 **Q. Me as well.**
 12 **In other words, this appears to be an**
 13 **updated version of the strategic plan proposal**
 14 **that's Exhibit 18 that you said was prepared by**
 15 **you and Sandlot; right?**
 16 A. Yes.
 17 **Q. And this one has a cover letter on it**
 18 **as well; right?**
 19 A. Looks like a formal submission.
 20 **Q. Do you know whether this was actually**
 21 **submitted, now that you're seeing Exhibit 20?**
 22 A. It looks like it was, but I don't
 23 remember exactly.
 24 **Q. You don't remember specifically one**
 25 **way or another whether this actually went to**

Page 145

1 **Eric Greitens?**
 2 A. It looks like it was submitted to --
 3 **Q. And Dave?**
 4 A. To Dave and Eric. That's what it
 5 looks like, but I don't -- I don't recall
 6 handing it to them.
 7 **Q. Let me ask you this. The first**
 8 **sentence of the cover letter says, "Please see**
 9 **the attached preliminary proposal for a**
 10 **Missouri-based, grassroots book tour to**
 11 **coincide with the "Resilience" launch; correct?**
 12 A. Yes.
 13 **Q. So "Resilience" was a book that Eric**
 14 **was then writing; is that fair to say?**
 15 A. I think it was done then, but it was
 16 about to be released.
 17 **Q. So this is on July -- this cover**
 18 **letter is dated July 28th, 2014; right?**
 19 A. Yes.
 20 **Q. So what was discussed among you and**
 21 **Eric and Dave about the role of the**
 22 **"Resilience" book tour in connection with the**
 23 **future political planning?**
 24 A. What was discussed is that, typically,
 25 with Eric's previous books, there was a

Page 147

1 **"Resilience" book tour that would be valuable**
 2 **for the future political campaign; correct?**
 3 A. Yes.
 4 **Q. And when you actually go in to the**
 5 **strategic plan and scope of work proposal,**
 6 **starting on the second page of this exhibit,**
 7 **you go into details of this proposal; right?**
 8 A. Yes.
 9 **Q. And you talk about focusing on the top**
 10 **10 GOP primary counties by proportion of total**
 11 **vote; right?**
 12 A. Yes.
 13 **Q. So there's a very specific plan to**
 14 **focus the "Resilience" book tour on the key**
 15 **vote-getting counties for the Republican**
 16 **primary; right?**
 17 A. According to this proposal.
 18 **Q. Was this strategy eventually followed?**
 19 A. No.
 20 **Q. Tell me about that. What strategy was**
 21 **eventually followed?**
 22 A. Like a lot of these proposals you're
 23 seeing, they were great thought exercises, and
 24 they just never came to fruition.
 25 **Q. And I think he actually formed the**

Page 146

1 national focus based on getting on late-night
 2 shows and, you know, speaking gigs in New York
 3 and all that stuff.
 4 And then for "Resilience," obviously
 5 doing all that but also doing a
 6 Missouri-centric approach of using the book
 7 tour to spend time traveling around Missouri.
 8 **Q. And I take it the idea is he would be**
 9 **getting a lot of politically valuable exposure**
 10 **by focusing much of the book tour in the state**
 11 **of Missouri; right?**
 12 A. Yes.
 13 **Q. And the purpose of that, of course,**
 14 **would be to give him a boost as he launched the**
 15 **campaign; right?**
 16 A. Yes.
 17 **Q. And that's something that all three of**
 18 **you discussed and -- is it fair to say that**
 19 **everyone planned on doing that?**
 20 A. Yes.
 21 **Q. So when you talk about a proposal for**
 22 **a Missouri-based, grassroots book tour to**
 23 **coincide with the "Resilience" launch, your**
 24 **focus is on setting up Missouri-based events**
 25 **and meetings in connection with the**

Page 148

1 **campaign and announced that he was running**
 2 **before the book tour, correct, or no?**
 3 A. I don't have the date. It was all
 4 around the same time. I believe -- I don't
 5 know the exact dates.
 6 **Q. So you used the phrase "moneyball**
 7 **counties," correct, in this document?**
 8 A. Yes.
 9 **Q. What does that mean?**
 10 A. Moneyball counties are counties where
 11 other people would pay less attention to,
 12 because they didn't have huge population bases,
 13 but places that we believe that Eric's bio
 14 could pick up a larger than majority of the
 15 primary vote there; thus, spending time there
 16 would be more advantageous than it would appear
 17 to other people.
 18 **Q. And under the plan, Item 3, Media**
 19 **Meeting/Press, you refer to using the book tour**
 20 **to "create, catalog and maintain relationships**
 21 **with people"; correct?**
 22 A. Yes.
 23 **Q. And you go on to say that "information**
 24 **must be collected, harvested stored and**
 25 **utilized"; right?**

Page 149

1 A. Yes.

2 **Q. What sort of information had to be**

3 **collected, to your mind?**

4 A. Well, this never happened. So

5 hypothetically speaking, it would have been

6 these media contacts, these people he's meeting

7 along the way on his book tour.

8 **Q. And your proposal, in the last page,**

9 **has a \$15,000 estimated cost; right?**

10 A. Yes.

11 **Q. I take it you were not, in fact,**

12 **retained to do that?**

13 A. Correct.

14 **Q. And neither you nor Sandlot was**

15 **actually paid \$50,000 [sic]?**

16 A. 15. And no.

17 **Q. Sorry. I thought that's what I said.**

18 MR. SAUER: Exhibit 21.

19 (Exhibit 21 was marked for

20 identification.)

21 THE WITNESS: Thank you.

22 BY MR. SAUER:

23 **Q. Do you recognize this email?**

24 A. I do.

25 **Q. Who is Will Ritter?**

Page 151

1 A. Yes.

2 **Q. And then you moved again to Virginia?**

3 A. Yes.

4 **Q. How long was that time in between,**

5 **when you stopped working for Eric's campaign**

6 **and when you started working for Poolhouse?**

7 A. About a year -- year and a half.

8 **Q. And who did you work for during that**

9 **time frame?**

10 A. I worked for a variety of candidates

11 outside of the state of Missouri.

12 **Q. Were they all in Ohio?**

13 A. No. Congressional in Michigan, Senate

14 candidate in Louisiana.

15 **Q. Did you have, like -- were you**

16 **affiliated with a firm during that period?**

17 A. I was independent.

18 **Q. So you sort of were working**

19 **personally?**

20 A. I have a single-person LLC.

21 **Q. What's that called?**

22 A. P2 Strategies.

23 **Q. Do you see in this email, in the very**

24 **bottom, it says, "I also don't want to step on**

25 **Steve Grand's toes," and "Grand" is in square**

Page 150

1 A. Will Ritter is a partner at Poolhouse.

2 **Q. What is Poolhouse?**

3 A. The firm I currently work at.

4 **Q. What does that firm do?**

5 A. We do general consulting and media

6 consulting for political candidates.

7 **Q. So that's -- is it similar to Sandlot?**

8 A. Yes.

9 **Q. But it's based here in the D.C. area?**

10 A. It's based in Richmond, Virginia.

11 **Q. Do you do work principally for East**

12 **Coast candidates?**

13 A. We do work everywhere in the country.

14 **Q. How long have you worked there?**

15 A. About a year.

16 **Q. So did you go straight from the**

17 **campaign to work there?**

18 A. No, I did some other independent

19 consulting work in between.

20 **Q. Where was that based, in Missouri, or**

21 **was that based in Virginia?**

22 A. It was based -- principally based in

23 Ohio.

24 **Q. Did you actually move from Missouri to**

25 **Ohio?**

Page 152

1 **bracket?**

2 A. Yes.

3 **Q. What is that referring to?**

4 A. Why is it in brackets or --

5 **Q. What does that sentence mean?**

6 A. Well, it's in brackets because there's

7 two Steves right now, Steve Michael and Steve

8 Grand. So if I said "Steve," it would be

9 confusing.

10 Steve Grand is an informal advisor to

11 Eric, who also owns a media consulting company

12 called Wilson Grand and who has known Eric

13 since Eric was in high school, who wanted to

14 get the media work on Eric's campaign and was

15 an informal advisor.

16 **Q. Do you know when media consultants**

17 **were hired?**

18 A. Yes.

19 **Q. When?**

20 A. The early part of 2015.

21 **Q. So would that have been January?**

22 A. I want to say a little bit later than

23 that.

24 **Q. Would it have been in a run-up to the**

25 **time when the actual formal campaign was**

Page 153

1 launched?

2 A. No, it was significantly after that.

3 I mean, it could have been April or May even.

4 **Q. So it was after the campaign was**

5 **formed?**

6 A. Yeah. The campaign only was formed to

7 raise money.

8 **Q. Was there any discussion of using**

9 **media consultants from The Mission Continues in**

10 **connection with the campaign?**

11 A. No idea. Not when I was a part of

12 that, nor do I know who -- I don't know any

13 vendors to The Mission Continues anyway.

14 (Recess.)

15 (Exhibit 22 was marked for

16 identification.)

17 BY MR. SAUER:

18 **Q. Do you recognize this document?**

19 A. Give me a second.

20 (Witness reviews document.)

21 I do.

22 **Q. What's going on in this email**

23 **exchange?**

24 A. Well, this is what is known as a

25 preliminary research brief, where, when someone

Page 154

1 with a complicated history, like Eric, you tend

2 to give your research firm an outline of what

3 you want to look at specifically.

4 And that's what this document appears

5 to be, to the best of my knowledge.

6 **Q. In this document, on the first page,**

7 **it's dated October 4th, 2014; correct?**

8 A. Yes.

9 **Q. So this would still be in the time**

10 **frame when you were unpaid by Eric or the**

11 **campaign; right?**

12 A. Yes, sir.

13 **Q. And in the first page, you say, "I**

14 **would like to send this to Eric on Monday and**

15 **to review it with him on Tuesday"; right?**

16 A. Yes.

17 **Q. So do you recall having a meeting with**

18 **Eric in this time frame to discuss this issue?**

19 A. I don't recall the meeting, but I'm

20 sure that there was some kind of -- I remember

21 eventually reviewing a version of this with

22 Eric. I don't remember whether it was that

23 meeting or another meeting.

24 **Q. And this -- I take it this attachment**

25 **that you made of a draft vulnerability study is**

Page 155

1 kind of the outline of what an opposition

2 research firm would do; correct?

3 A. Yes, sir.

4 **Q. So you're kind of still pushing him to**

5 **actually invest in this vulnerability study;**

6 **right?**

7 A. Yes.

8 **Q. Do you know -- there are comments in**

9 **the document that's attached here. Are those**

10 **your comments?**

11 A. They're clearly Tyler's.

12 **Q. Okay. So you prepared the document,**

13 **and Tyler inserted the comments; correct?**

14 A. Yes. I don't use the comment function

15 of documents anyway.

16 **Q. Turning to the third page of the**

17 **document, the second page of the attachment, do**

18 **you see there's a Section 4 that discusses The**

19 **Mission Continues?**

20 A. I do.

21 **Q. And under B, it says "Donors"; right?**

22 A. Yes.

23 **Q. Why did you include "The Mission**

24 **Continues Donors" as a bullet point in this**

25 **document?**

Page 156

1 A. Because if there was a donor to The

2 Mission Continues, that -- the purpose of a

3 vulnerability study is to put everything on the

4 table that could possibly be attacked.

5 If there was a donor to The Mission

6 Continues that was significant and public, and

7 that person had a history of doing illegal

8 things, it would likely show up in a television

9 ad.

10 **Q. So the idea would be you had to do**

11 **opposition research on who are the significant**

12 **donors to The Mission Continues, because Eric**

13 **could be linked to them?**

14 A. I think the question -- I think this

15 document was reviewed with Eric. I think the

16 question was, to Eric, "As you go through this,

17 Eric" -- or Dave or whoever -- and I think Dave

18 may have been gone by then -- but "Eric, are

19 there any donors to The Mission Continues that

20 could possibly be an issue or come back to

21 haunt us?"

22 I think that's where these two names

23 came from, who I'm not familiar with.

24 **Q. So you don't know who that [REDACTED]**

25 **[REDACTED] and [REDACTED] is, do you?**

Page 157

1 A. I think [REDACTED] is a hedge fund guy, but
 2 I don't know. I'm not familiar with either of
 3 them.
 4 **Q. So that's -- when you refer to the**
 5 **board members, you're referring to the fact**
 6 **that he has Democrat board members and that**
 7 **might be used to criticize him in a Republican**
 8 **primary?**
 9 A. I suspect.
 10 **Q. You don't remember specifically?**
 11 A. I remember Tyler and I did this
 12 document together and we reviewed it with Eric.
 13 I don't remember who added them on, but that
 14 would make sense to me.
 15 **Q. A salary is listed as a bullet point**
 16 **here; correct?**
 17 A. Yes.
 18 **Q. Circling back to donors, was there any**
 19 **discussion of it being a vulnerability issue**
 20 **that he might be raising a lot of money from**
 21 **former donors from The Mission Continues?**
 22 A. Never an issue, never brought up in my
 23 presence.
 24 **Q. Salary, what's the issue there?**
 25 A. I don't remember.

Page 159

1 **Q. Who had flagged it?**
 2 A. I suspect Eric, but I don't know that.
 3 **Q. So a letter of deferred prosecution is**
 4 **some kind of settlement agreement with some**
 5 **kind of prosecutor; is that fair to say?**
 6 A. I have no idea.
 7 **Q. So you don't know -- do you know**
 8 **anything more specific about this particular**
 9 **issue?**
 10 A. I remember that it was -- it was
 11 something that was settled between the State
 12 and Eric about something about insurance with
 13 The Mission Continues. I don't know any more
 14 about it.
 15 **Q. It says, "What actions could**
 16 **Nixon/Koster take in the next two years re:**
 17 **TMC"; right?**
 18 A. Yes.
 19 **Q. What was discussed with that?**
 20 A. I believe that's referring to the
 21 deferred prosecution and a way to drudge that
 22 up.
 23 I want to say the deferred prosecution
 24 was sealed or not public or something. And I
 25 remember there being a conversation about

Page 158

1 **Q. Was there a discussion that Eric's**
 2 **salary at The Mission Continues may have been**
 3 **too high or anything like that?**
 4 A. I'm suspecting that's why it was
 5 flagged to talk about. I don't remember there
 6 being a specific -- there being a specific
 7 conversation about it, but I imagine that's why
 8 it's there.
 9 **Q. Do you know, was it ever a discussion**
 10 **that he might be accused of drawing a salary**
 11 **from The Mission Continues while he was really**
 12 **doing work that was essentially political in**
 13 **nature?**
 14 A. Not that I was a part of.
 15 **Q. Do you know if he was paid when he was**
 16 **a board member of The Mission Continues?**
 17 A. I have no idea.
 18 **Q. Next bullet point says, "E. Letter of**
 19 **deferred prosecution."**
 20 **Do you know what that refers to?**
 21 A. Yes. There was some legal issue to
 22 The Mission Continues of failure to provide
 23 some kind of insurance to something that was
 24 flagged. I don't have the information on it,
 25 but that's why it's there.

Page 160

1 whether they could do something to make it
 2 public. I think that is the question, but I
 3 don't know the legal jargon.
 4 **Q. And I take it you discussed this --**
 5 **this entire document, this kind of draft**
 6 **vulnerability study outline, is something you**
 7 **discussed face to face with Eric; right?**
 8 A. At length.
 9 **Q. And did you discuss it with Dave**
 10 **Whitman as well?**
 11 A. At some point Dave Whitman left.
 12 **Q. When you say he left, he left The**
 13 **Greitens Group?**
 14 A. He was terminated.
 15 **Q. Do you know what point that was?**
 16 A. I don't know. I roughly think it was
 17 about -- somewhere in the two- or three-month
 18 span, either way, of October, but he -- yes.
 19 So -- I mean, clearly it was after --
 20 hold on. Clearly it was after August, since
 21 August he's on this last email.
 22 Is he on this email? No, this is
 23 Tyler.
 24 So at some point, he was terminated
 25 for reasons that you can probably find.

Page 161

1 **Q. What are those reasons?**
 2 A. He was allegedly stealing from The
 3 Greitens Group.
 4 **Q. In fact, he was convicted for that,**
 5 **wasn't he?**
 6 A. That's what I believe.
 7 **Q. So he was -- Dave had been terminated**
 8 **at some point.**
 9 A. Once that came to light.
 10 **Q. But you don't remember specifically**
 11 **when that was?**
 12 A. No, it would have been around this
 13 time. Like I said, he's cc'd on the email on
 14 August 19th. So somewhere -- a month or two,
 15 either way, of October makes sense to me.
 16 **Q. Okay. Do you remember anything else**
 17 **that was discussed about The Mission Continues**
 18 **in your -- the lengthy discussions with Eric**
 19 **about this document?**
 20 A. About the vulnerability study? No.
 21 The large part of the lengthy conversation was
 22 spent on 3 and 6.
 23 **Q. So 3 had to do with his naval career,**
 24 **and 6 had to do with the fact that he**
 25 **previously had been identified as a Democrat?**

Page 162

1 A. Yes, sir.
 2 **Q. So did you spend a significant amount**
 3 **of time talking about The Mission Continues?**
 4 A. No.
 5 **Q. And Item A lists 990s.**
 6 **What does that refer to?**
 7 A. I believe that's the IRS report a
 8 nonprofit files every year.
 9 **Q. What was talked about in connection**
 10 **with that?**
 11 A. That they're publicly available
 12 documents and we should review them to make
 13 sure there is nothing potentially harmful. I
 14 believe that is the kind of thing that has his
 15 salary and other things listed, but I don't
 16 know.
 17 **Q. Was there anything specific that was**
 18 **identified by anybody as might be in those**
 19 **documents that might be of concern?**
 20 A. No. As with the rest of this list,
 21 this was just -- it's viewed as things to go
 22 through, not necessarily of concern.
 23 **Q. Are you aware of anyone from The**
 24 **Mission Continues providing any kind of input**
 25 **in identifying these issues for the campaign?**

Page 163

1 A. Not to my knowledge.
 2 **Q. Did Eric provide input for items of**
 3 **concern as to The Mission Continues?**
 4 A. I suspect that's where the names under
 5 Donor 1 -- 1 and 2, [REDACTED] and [REDACTED] came
 6 from, but I don't know for sure.
 7 **Q. And I take it there was no direct**
 8 **communications between either you or Tyler with**
 9 **anyone at The Mission Continues about potential**
 10 **political vulnerabilities for Eric?**
 11 A. Correct.
 12 **Q. And the next page at the very end,**
 13 **it's Subparagraph D, under "Internet dredge,"**
 14 **it says, "what others have posted including TMC**
 15 **staff."**
 16 **What are you referring to there?**
 17 A. An Internet dredge is when somebody
 18 goes through people connected to Eric and sees
 19 what they say online, and I'm assuming this
 20 means looking to see if people -- whether they
 21 were high-level positions at TMC or otherwise
 22 who are around Eric said things that would be
 23 potentially damaging or embarrassing about
 24 anything that could come back to haunt Eric.
 25 **Q. So in other words, the idea would be**

Page 164

1 **you'd do an Internet search to see if anyone at**
 2 **TMC might have said something that could become**
 3 **a campaign issue?**
 4 A. Correct.
 5 **Q. Were any particular individuals at The**
 6 **Mission Continues mentioned in this connection?**
 7 A. I don't remember.
 8 **Q. And do you remember who added this to**
 9 **the -- provided this as an item for this**
 10 **vulnerability outline?**
 11 A. I don't, but since it's underlined,
 12 someone did.
 13 **Q. Someone other than you would have done**
 14 **that?**
 15 A. I think. I can't remember.
 16 **Q. You don't remember any specific**
 17 **discussions or anything specific about concerns**
 18 **of staff at The Mission Continues?**
 19 A. No, nothing was singled out in my
 20 mind.
 21 **Q. Do you remember any input from any**
 22 **staff at The Mission Continues about that being**
 23 **a concern?**
 24 A. No.
 25 MR. SAUER: It's noon, and this

Page 165

1 is a breaking point. Do you want to do a quick
 2 lunch break?
 3 (Luncheon recess taken from
 4 12:03 p.m. to 12:25 p.m.)
 5 (Exhibit 23 was marked for
 6 identification.)
 7 BY MR. SAUER:
 8 **Q. Do you recognize this email?**
 9 A. I'm a little offended on emails, but,
 10 yeah, I think that I do recognize this.
 11 **Q. What do you mean by "a little**
 12 **offended"?**
 13 A. I was going to make a joke that I
 14 probably shouldn't make, so I'm not making it.
 15 I'm withdrawing that statement. It was going
 16 to be funny, though.
 17 **Q. This is an email from Krystal Taylor**
 18 **at her Greitens Group email address to you and**
 19 **Tyler; correct?**
 20 A. It appears that way.
 21 **Q. On October 15th, 2014?**
 22 A. Yes.
 23 **Q. Do you remember getting this email?**
 24 A. No, but I'm sure I did.
 25 **Q. Do you remember having a discussion**

Page 166

1 where -- or having communications with Krystal
 2 who was trying to set up a meeting to discuss
 3 fundraising for a future political campaign?
 4 A. Yes.
 5 **Q. And you see, kind of two-thirds of the**
 6 **way down in the first page, she describes the**
 7 **goal of a planning session to address questions**
 8 **around fundraising; right?**
 9 A. Yes.
 10 **Q. And she mentioned how much, by when,**
 11 **and what vehicle and so forth; correct?**
 12 A. Yes.
 13 **Q. And then she goes -- and I take it**
 14 **"vehicle" means the legal entity that the money**
 15 **would be donated to; right?**
 16 A. Yes.
 17 **Q. Okay. And then she says, "To get us**
 18 **there, we need the following information";**
 19 **right?**
 20 A. Okay.
 21 **Q. And she talks about research that was**
 22 **discussed the prior week and a general budget**
 23 **for the primary; right?**
 24 A. Yes.
 25 **Q. And Item 3 says, "all of the donor**

Page 167

1 **lists that we've collected so far"; right?**
 2 A. It does say that.
 3 **Q. And she goes on to say, "I can handle**
 4 **No. 3," referring back to the donor lists;**
 5 **right?**
 6 A. Uh-huh.
 7 **Q. Do you know what donor lists had been**
 8 **collected so far?**
 9 A. As of this date?
 10 **Q. Correct.**
 11 A. Yeah.
 12 **Q. I'm asking about your knowledge on**
 13 **October 15th, 2015.**
 14 A. On October 15th I don't recall.
 15 **Q. When you got this email, do you know**
 16 **if you were aware of donor lists?**
 17 A. Can I talk to Sandy for a second?
 18 MR. SAUER: Absolutely. Do you
 19 want us to step out?
 20 MR. BOXERMAN: We can step out.
 21 We'll go next door.
 22 (Pause.)
 23 BY MR. SAUER:
 24 **Q. Do you recall my question?**
 25 A. If you could ask it one more time.

Page 168

1 **Q. On October 15th, 2014, were you**
 2 **aware of donor lists that had been collected?**
 3 A. I'm aware sometime around this time
 4 there was a meeting in which I saw donor lists.
 5 I don't remember when exactly that meeting was,
 6 but it was around this time.
 7 **Q. When Krystal asked you about donor**
 8 **lists in this email, did you know what donor**
 9 **lists she was referring to?**
 10 A. I don't know at the time. I knew
 11 there was donor lists at the time. I don't
 12 know specifically -- I don't remember my
 13 feelings in response to this email.
 14 **Q. Do you know whether those -- were you**
 15 **aware then that those donor lists might include**
 16 **a donor list of The Mission Continues?**
 17 A. Yes.
 18 **Q. And so at this time you were aware**
 19 **that there was -- around this time -- let me**
 20 **ask you this: Around this time did you become**
 21 **aware for the first time that Krystal had a The**
 22 **Mission Continues donor list?**
 23 A. Yes. Whenever this meeting is -- not
 24 this meeting specifically. I'm imagining
 25 Monday's planning meeting would be the meeting.

Page 169

1 **Q. Let me give you -- put that -- hold on**
 2 **to that one. Let me give you Exhibit 24.**
 3 **(Exhibit 24 was marked for**
 4 **identification.)**
 5 BY MR. SAUER:
 6 **Q. Is this a calendar invite for a -- the**
 7 **first page, for a meeting on Monday,**
 8 **October 20th --**
 9 A. Yes.
 10 **Q. -- of 2014?**
 11 A. Yes.
 12 **Q. And this is the Monday planning**
 13 **meeting that's referred to in Krystal's email**
 14 **of Wednesday, October 15th?**
 15 A. I don't know that.
 16 **Q. But certainly this is the Monday that**
 17 **followed that October 15th email; correct?**
 18 A. Yes.
 19 **Q. And do you see how it says the inviter**
 20 **is Eric Greitens?**
 21 A. Yes.
 22 **Q. And he's using his The Mission**
 23 **Continues email address to invite you to this**
 24 **meeting; correct?**
 25 A. That's what it appears.

Page 171

1 We produced it, yes.
 2 BY MR. SAUER:
 3 **Q. Can you turn to the agenda that's**
 4 **attached to this, on the second page of the**
 5 **document.**
 6 **Is this the agenda for the**
 7 **finance-related meeting -- the**
 8 **fundraising-related meeting that occurred on**
 9 **October 20th?**
 10 A. Yes, sir.
 11 **Q. And did you, in fact, discuss these**
 12 **issues, together with Krystal and Eric, that**
 13 **are set forth on the agenda?**
 14 A. Yes, sir.
 15 **Q. Who else attended this meeting?**
 16 A. I believe -- I believe, but I'm not
 17 certain, that this was a large meeting, larger
 18 than the people listed on the invite.
 19 **Q. So did these people attend, Jennae**
 20 **Neustadt, Krystal --**
 21 A. Mark.
 22 **Q. -- Chris --**
 23 A. Yes.
 24 **Q. -- and you --**
 25 A. For sure these people attended. I

Page 170

1 **Q. And the video call link also is a**
 2 **Mission Continues video call link; is that**
 3 **right?**
 4 A. Looks like that.
 5 **Q. Did he use his Mission Continues email**
 6 **address during this time frame?**
 7 A. I had no idea of him using his Mission
 8 Continues email address until I was asked to
 9 provide you documents, and I found out these
 10 calendar invites were sent from an
 11 egreitens@missioncontinues. Prior to me
 12 pulling those documents a couple of weeks ago,
 13 I had no idea.
 14 **Q. In the process of pulling documents**
 15 **together, did you discover other instances**
 16 **where he was using Mission Continues email to**
 17 **communicate about these political things?**
 18 A. I've never had an email from it. It
 19 was all calendar invites. And we prepared a
 20 set calendar invites from that email to you
 21 guys.
 22 **Q. You produced those to us; correct?**
 23 MR. BOXERMAN: You used the word
 24 "prepared." You meant we produced it?
 25 THE WITNESS: Oh, sorry. Yes.

Page 172

1 also think there was larger folks.
 2 So sorry, there's multiple meetings
 3 here. I'm trying to decipher them.
 4 I believe one of these meetings Mason
 5 Fink was also a part of. I believe it was this
 6 one.
 7 **Q. Going to the bottom of the agenda,**
 8 **where it says "Meeting 3, Determine how much**
 9 **money exists in our current network."**
 10 **Do you see that?**
 11 A. I do.
 12 **Q. It says, "Review donor lists."**
 13 A. I do see that.
 14 **Q. Was a donor list reviewed at this**
 15 **meeting or this series of meetings?**
 16 A. Yes. In one of these meetings, I
 17 recall a stack of donor lists being on the
 18 table.
 19 **Q. Did you actually review them?**
 20 A. I didn't flip through it myself, but
 21 there was a post -- a half, yellow Post-it note
 22 on top that either said "The Mission Continues
 23 Donor List" or "TMC Donor List." It was a
 24 stack about an inch thick of multiple bound
 25 lists, the top being "The Mission Continues

Page 173

1 Donor List."

2 **Q. So you specifically recollect a**

3 **Mission Continues donor list being discussed at**

4 **this meeting?**

5 A. A hard copy.

6 **Q. Was it reviewed by people at the**

7 **meeting?**

8 A. I can't tell you exactly whether it

9 was flipped through. It was certainly on the

10 desk.

11 **Q. Who -- what was said about that list**

12 **at this meeting?**

13 A. Just that these -- I don't recall

14 exactly what was said, but something to the

15 effect of, "These are the lists we have," and

16 it was that list, and it was a few other donor

17 lists of non-Mission Continues lists.

18 **Q. Who said that?**

19 A. I believe Krystal.

20 **Q. And this -- the agenda goes on to say**

21 **that there would be an estimate of a**

22 **conservative giving amount for each donor and a**

23 **plan for each person and timing of ask.**

24 **Are those things that were discussed**

25 **at this meeting?**

Page 175

1 A. I don't know what the meeting was

2 about. I don't remember the meeting.

3 **Q. You don't remember having a one-to-one**

4 **meeting with him?**

5 A. I don't remember that at all, nor does

6 it suggest here that it was fundraising.

7 **Q. Did anyone in this meeting -- did**

8 **anyone in this meeting talk about The Mission**

9 **Continues donor list as a source of future**

10 **political fundraising?**

11 A. I believe the conversation was about

12 Mission Continues donors being a source. I'm

13 not sure whether that was pertaining to the

14 list or not.

15 **Q. Did Eric Greitens himself refer to**

16 **Mission Continues donors being a source of**

17 **fundraising?**

18 A. Yes.

19 **Q. Did other people refer to that as**

20 **well?**

21 A. To the best of my knowledge, yes.

22 **Q. What did Mr. Greitens say about that?**

23 A. I can't recall exactly. It was more

24 of a fluid conversation.

25 **Q. Can you remember what the sense of the**

Page 174

1 A. I don't remember that.

2 **Q. Do you remember anything else that was**

3 **said about The Mission Continues donor list at**

4 **this October 20th meeting?**

5 A. Not specifically.

6 **Q. Do you remember anybody looking at it?**

7 A. I remember it was passed around the

8 table.

9 **Q. And did people flip through it and**

10 **look at who was in it?**

11 A. I believe so.

12 **Q. Do you remember anybody specifically**

13 **who did that?**

14 A. I don't.

15 **Q. Did you flip through it, to your**

16 **recollection?**

17 A. I don't believe so, but I don't

18 remember.

19 **Q. And at the top of this agenda, at the**

20 **very top, it says, "One-to-one between Eric and**

21 **Danny Laub to also take place"; correct?**

22 A. It does say that.

23 **Q. Did that meeting occur, a one-to-one**

24 **meeting between you and Eric, to discuss**

25 **fundraising?**

Page 176

1 **conversation was?**

2 A. Yes. It came down to, I believe, we

3 can raise a significant amount of money from

4 previous donors that Eric has relationships

5 with.

6 **Q. Meaning Mission Continues donors?**

7 A. Yes, sir.

8 **Q. Was there any statement by anybody at**

9 **this meeting about whether or not Mission**

10 **Continues had authorized the use of its donor**

11 **list?**

12 A. No.

13 **Q. Was it discussed -- was that topic,**

14 **about whether or not there was permission to**

15 **contact these people or to use these lists --**

16 **was that discussed at all?**

17 A. No.

18 **Q. Who is Jennae Neustadt?**

19 A. At the time, she was an informal

20 advisor. She was chief of staff to Senator

21 Onder at the time, I believe. She's now the

22 Governor's legislative director.

23 **Q. Do you know -- never mind.**

24 **Was there a follow-up meeting the next**

25 **day, October 21st?**

Page 177

1 A. I have no idea.
 2 **Q. So you don't know when that one-to-one**
 3 **meeting referred to there took place? I think**
 4 **you said that; right?**
 5 A. I have no idea.
 6 **Q. Did anyone say anything specific about**
 7 **how The Mission Continues donor list would be**
 8 **used in this meeting?**
 9 A. I don't believe so.
 10 **Q. Was there any discussion of**
 11 **specifically taking the following information**
 12 **out of that list and putting it in other lists?**
 13 A. I don't remember.
 14 **Q. I believe you testified there was a**
 15 **stack of lists, it wasn't just The Mission**
 16 **Continues list; correct?**
 17 A. Yes.
 18 **Q. Do you remember what other lists were**
 19 **passed around the table at that meeting?**
 20 A. One of them was a Tom Schweich list,
 21 one of them was a Mason Fink national
 22 fundraising list, and I don't recall what other
 23 lists were there.
 24 **Q. Were there other lists?**
 25 A. Yes.

Page 179

1 **Q. Do you know what she was -- what that**
 2 **document is --**
 3 A. Yes.
 4 **Q. -- that she's referring to?**
 5 A. Yes.
 6 **Q. What is that document?**
 7 A. It's a document about who Jennae
 8 thought was important for Eric to receive the
 9 endorsement of.
 10 **Q. What role did Jennae have at this time**
 11 **with respect to Eric's political plans? Was**
 12 **she being paid, or was she an informal**
 13 **consultant, or what was her role?**
 14 A. Her role had been the same as mine or
 15 Steve Michael or Mike Hafner or Tyler Holman,
 16 who was an informal advisor that Eric was
 17 seeking advice. She started volunteering some
 18 of her time around this time to do things like
 19 this.
 20 **Q. Do you know whether there was any**
 21 **information taken from The Mission Continues**
 22 **donor list to place into that "Strategic**
 23 **Endorsements" Google Doc?**
 24 A. To the best of my recollection, I
 25 don't think there was. This was all, "You

Page 178

1 **Q. But you don't remember what the other**
 2 **ones were?**
 3 A. No.
 4 **Q. Was there any discussion of whether or**
 5 **not there was authority or permission to use**
 6 **the other lists?**
 7 A. There was no discussion of authority
 8 or permission to use any of the lists there.
 9 MR. SAUER: Exhibit 25.
 10 (Exhibit 25 was marked for
 11 identification.)
 12 BY MR. SAUER:
 13 **Q. This is an email that Jennae Neustadt**
 14 **sent you a couple of days later; right?**
 15 A. Yes.
 16 **Q. And there's a follow-up chain between**
 17 **you and her?**
 18 A. Yes.
 19 **Q. In the very first line of this email,**
 20 **she says, "Hi, Danny. Yesterday I shared the**
 21 **Strategic Endorsements Google Doc that I**
 22 **created for Eric with you. I wanted to follow**
 23 **up and see if you had any questions about the**
 24 **same"; correct?**
 25 A. I see that.

Page 180

1 should meet with State Senator blah, blah,
 2 blah, or State Rep X." So I don't know why it
 3 would have.
 4 **Q. So you don't believe that -- same**
 5 **question as to the other donor list: Do you**
 6 **believe there would have been information from**
 7 **other donor lists in that particular "Strategic**
 8 **Endorsements" document?**
 9 A. No, I don't think there would be any
 10 donor information at all.
 11 **Q. And you actually reviewed that**
 12 **document; correct?**
 13 A. I did.
 14 **Q. But you don't remember anything**
 15 **specific about it, other than that?**
 16 A. I remember it did not involve donors.
 17 MR. SAUER: Exhibit 26.
 18 (Exhibit 26 was marked for
 19 identification.)
 20 THE WITNESS: Thank you.
 21 BY MR. SAUER:
 22 **Q. Do you recognize this email?**
 23 A. I do.
 24 **Q. This is an email that Krystal Taylor**
 25 **sent you on December 1st of 2014; right?**

Page 181

1 A. The first day I started working
 2 full-time.
 3 **Q. Okay. Interesting. You were hired
 4 full-time in this time frame?**
 5 A. December 1st was my official start
 6 date.
 7 **Q. Who was your employer? Was it The
 8 Greitens Group? Was it Eric personally? Who
 9 was paying you?**
 10 A. Eric Greitens, LLC.
 11 **Q. And that is -- that is the
 12 organization of which The Greitens Group is a
 13 d/b/a; correct?**
 14 A. I have no idea.
 15 **Q. Okay. So you were hired by Eric
 16 Greitens, LLC. And what work were you hired to
 17 do?**
 18 A. I was work [sic] to prepare political
 19 plans, help with the book tour, and just
 20 generally aid Eric in whatever endeavors he
 21 needed.
 22 **Q. A substantial part of your job was to
 23 help prepare for the political campaign; right?**
 24 A. Certainly.
 25 **Q. Was that the principal one of your**

Page 182

1 **duties?**
 2 A. I don't know if it was principal, but
 3 it was a majority.
 4 **Q. And then you also were going to work
 5 on the book tour; right?**
 6 A. Yeah, I did a handful of Greitens
 7 Group work that was nonpolitical too.
 8 **Q. But the majority of it would have been
 9 political?**
 10 A. Yes.
 11 **Q. And you talked about the book tour,
 12 and I think you testified earlier that the
 13 expectation at this time was that the book tour
 14 would be a launching pad for the political
 15 campaign, potentially; correct?**
 16 A. Yes.
 17 **Q. In other words, the book tour would
 18 have -- or least it would have significant
 19 advantages for the political campaign as well;
 20 correct?**
 21 A. Yes. It never quite came to fruition
 22 that way, but that was the theory.
 23 **Q. And that's what -- that was the theory
 24 shared by you and Eric Greitens and Krystal
 25 Taylor at this time?**

Page 183

1 A. Yes.
 2 **Q. Okay. Flipping to the second page,
 3 where it talks about -- the attachment in this
 4 document, do you know who prepared it?**
 5 A. Originally, I believe it was written
 6 by either Krystal or Eric, or a combination of
 7 the two, one of those things.
 8 **Q. It says, "Candidate's intent by 1 June
 9 2015: Be prepared to launch an exploratory
 10 committee for governor," right, at the very top
 11 of the attachment?**
 12 A. Yes, I see that.
 13 **Q. What did you understand "Candidate's
 14 intent" to mean?**
 15 A. Guiding documents, plan, outline.
 16 **Q. In other words, the intent was to get
 17 the governor campaign launched in the next
 18 several months; right?**
 19 A. The way it was described to me was
 20 Eric used to do something like this when he was
 21 a SEAL commander, that was called the
 22 commander's intent, before they launch an
 23 operation. And this was him adapting that work
 24 flow to running for office.
 25 **Q. So this was kind of the battle plan**

Page 184

1 **for the campaign?**
 2 A. That's the way I understood it to be.
 3 **Q. It's an implementation document, in
 4 other words, where we decided to do this, and
 5 this is how we're going to get it done; right?**
 6 A. That's my interpretation of what this
 7 document was.
 8 **Q. Okay. Was that consistent with your
 9 conversations with Eric and Krystal at this
 10 time frame, that there was a firm decision that
 11 we're going to launch the campaign, and we're
 12 talking about getting it implemented?**
 13 A. Yes, these steps were pushing towards
 14 that direction of exploratory committee for
 15 governor, yes, sir.
 16 **Q. The very first bullet point there
 17 says, "Achieve robust financial strength of
 18 8 million in commitments, Krystal"; correct?**
 19 A. Uh-huh.
 20 **Q. Do you know whether Krystal was
 21 involved in trying to get financial commitments
 22 during this time frame?**
 23 A. I don't know that she was soliciting
 24 financial commitments. I know that, at the
 25 beginning, Krystal was the person overseeing

Page 185

1 fundraising in terms of preparation and
 2 operationally.
 3 I don't think Krystal was reaching out
 4 to people, but I do believe that she was in
 5 charge of -- you know, document coordination
 6 and plans and that kind of stuff on the
 7 fundraising side.
 8 **Q. Was anybody reaching out to people at**
 9 **this time?**
 10 A. I don't believe so.
 11 **Q. Was there any discussion from Krystal**
 12 **or Eric or anyone else about using The Mission**
 13 **Continues donor list to achieve those**
 14 **commitments?**
 15 A. Only in as -- as -- that I referenced
 16 before, in the meeting, where the list was on
 17 the table, and it was an asset talked about, as
 18 well as other lists.
 19 **Q. Was -- so it was talked about as an**
 20 **asset at that meeting?**
 21 A. In -- in -- I can't stress this
 22 enough: In combination with the other lists.
 23 It wasn't singled out. It was one of many
 24 donor lists that were talked about as a -- as a
 25 group.

Page 186

1 **Q. And those collectively were an**
 2 **asset --**
 3 A. To the future campaign.
 4 MR. SAUER: Exhibit 27.
 5 (Exhibit 27 was marked for
 6 identification.)
 7 BY MR. SAUER:
 8 **Q. Do you recognize this email?**
 9 A. Yes.
 10 And I misspoke. This was the meeting
 11 that Mason Fink was at where that donor list --
 12 the stack of donor lists were on the table. It
 13 was this meeting, not the other one.
 14 **Q. Gotcha.**
 15 A. Sorry.
 16 **Q. So there was a December 5th meeting**
 17 **where the stack of donor lists was on the**
 18 **table?**
 19 A. That was this meeting.
 20 **Q. And Mason Fink attended that meeting**
 21 **as well as the other people in the prior**
 22 **meeting?**
 23 A. Correct.
 24 **Q. And at that meeting, The Mission**
 25 **Continues donor list was passed around, along**

Page 187

1 **with other donors lists, and people flipped**
 2 **through it and reviewed it?**
 3 A. Yes, sir.
 4 **Q. You don't remember specifically**
 5 **whether you reviewed it; correct?**
 6 A. I don't remember that.
 7 **Q. Can you flip to the agenda for this**
 8 **meeting that's the last page of this document?**
 9 A. Yes, sir, I'm here.
 10 **Q. Did you prepare that agenda?**
 11 A. I don't remember, but by the email
 12 traffic, it looks like I did and Krystal
 13 rewrote it.
 14 **Q. Okay. Does this agenda here reflect**
 15 **what was talked about at the meeting?**
 16 A. To my recollection, it wasn't this
 17 structured, but these were the topics.
 18 **Q. And was there anything else, other**
 19 **than what you've already testified about --**
 20 **when we're talking about the October 20th**
 21 **meeting, was there anything else said about The**
 22 **Mission Continues donor list at this meeting?**
 23 A. I don't remember specifically, but
 24 yes, I believe there was.
 25 **Q. What was said about it?**

Page 188

1 A. I believe it was said about which
 2 donors that could be reached out to that were
 3 on The Mission Continues list. I don't
 4 remember the specific conversation.
 5 **Q. But there was discussion of individual**
 6 **donors on The Mission Continues list who could**
 7 **be contacted for political fundraising?**
 8 A. Yes.
 9 **Q. Were individuals named in the**
 10 **discussion from that list?**
 11 A. I can't remember.
 12 **Q. Were people flipping through the list**
 13 **and picking out names and saying, "What about**
 14 **this person?"**
 15 A. I can't remember that.
 16 **Q. But to the best of your recollection,**
 17 **there was reference to specific, individual**
 18 **donors from The Mission Continues list at this**
 19 **meeting?**
 20 A. Yes.
 21 **Q. Who made those references?**
 22 A. Eric.
 23 **Q. Anybody else?**
 24 A. I can't remember.
 25 **Q. But you specifically remember Eric**

Page 189

1 **singling out Mission Continues donors on The**
 2 **Mission Continues donor list as potential**
 3 **sources for future fundraising?**
 4 A. Yes.
 5 **Q. Do you remember anything specific that**
 6 **he said?**
 7 A. No.
 8 **Q. At the bottom of this agenda, it says,**
 9 **"Leveraging the 'Resilience' book tour";**
 10 **correct?**
 11 A. It does say that.
 12 **Q. What was said about that?**
 13 A. Similar back to what we were
 14 discussing earlier of -- of using the book tour
 15 to -- to get --
 16 Oh, I misspoke again. Sorry. It's
 17 coming back to me now.
 18 Leveraging the "Resilience" book tour
 19 was in terms of -- when Eric was going to do a
 20 book tour, of seeing what finance events he
 21 could set up in other cities that coincided
 22 with the book tour.
 23 So when he was in New York or when he
 24 was in California and he was doing media hits,
 25 that he could also set up national donor

Page 191

1 A. We needed a place to park money
 2 legally.
 3 **Q. So the idea was you wanted to**
 4 **accelerate the actual fundraising efforts?**
 5 A. Wanted to get the money in the bank.
 6 **Q. Yeah. And you -- by the time you were**
 7 **hired on December 1st, it was still the plan**
 8 **to launch the campaign in the beginning of June**
 9 **of 2015; right?**
 10 A. We were having conversations about the
 11 timeline. We had conversations on the timeline
 12 up until the launch day. It was a very fluid
 13 conversation, about 60 days.
 14 **Q. But the expectation was -- in other**
 15 **words, it got accelerated after this December**
 16 **meeting -- sometime after this December meeting**
 17 **that date was moved up?**
 18 A. Yes, because if Eric was going to go
 19 meet with hedge fund guy X in New York, it's
 20 pretty tough for him to say, "And I'm going to
 21 come back in eight months and get a check from
 22 you." So that's what sped up the process.
 23 **Q. So the idea was, it was decided, based**
 24 **on this discuss of leveraging, that it would be**
 25 **advantageous to have the legal vehicle in place**

Page 190

1 meetings.
 2 **Q. In this time frame, was it still the**
 3 **plan or expectation that there would be a**
 4 **specific, Missouri-focused portion of the book**
 5 **tour to promote his name recognition and lay**
 6 **the groundwork for a political campaign?**
 7 A. Kind of. It was sort of warped. It
 8 became less and less so as we moved down this
 9 path.
 10 **Q. That became less and less part of the**
 11 **plan?**
 12 A. Yes.
 13 **Q. Why was that?**
 14 A. It became less and less of a focus in
 15 terms of how much resources we're wanting to
 16 dedicate to it and then everything else that
 17 was going on; obviously, the national book
 18 tour, the media, you know, getting prepared to
 19 run.
 20 As you can see, the timeline gets
 21 rapidly sped up pretty quickly here. This --
 22 this Candidate's Intent mentions a June launch.
 23 We launched in February. So it got jarbled
 24 [sic] a little bit.
 25 **Q. Why did you launch in February?**

Page 192

1 **already before the book took occurs, because**
 2 **he's going to be using time in the book tour to**
 3 **also set up donor meetings in other cities?**
 4 A. Yes, and donor meetings in Missouri
 5 and other places. So as he's meeting with
 6 donors and establishing his connections, being
 7 able to accept a check, which he wouldn't be
 8 able to accept if a vehicle didn't exist.
 9 **Q. And that was one of the reasons why it**
 10 **was decided to formally establish the campaign**
 11 **committee before the book tour started?**
 12 A. I don't know exactly when the book
 13 tour started, but it all happened around that
 14 time. That was the calculus.
 15 **Q. At least it was determined that it**
 16 **would be advantageous to have a campaign**
 17 **vehicle in place while the book tour was**
 18 **occurring; correct?**
 19 A. I don't know the timeline of that, but
 20 around that time, as he's meeting with people,
 21 both in the book tour and not in the book tour,
 22 about political fundraising, being able to
 23 collect checks was advantageous.
 24 MR. SAUER: Exhibit 28.
 25 (Exhibit 28 was marked for

Page 193

1 identification.)
 2 THE WITNESS: Thank you.
 3 BY MR. SAUER:
 4 **Q. Do you recognize this email?**
 5 A. I do.
 6 **Q. Who is Jeff Stuerman?**
 7 A. He became the treasurer of Greitens
 8 for Missouri.
 9 **Q. When was he retained?**
 10 A. It was a volunteer position.
 11 **Q. When did he commence in that role?**
 12 A. Early 2015.
 13 **Q. Do you remember exactly when? Was it**
 14 **right from the beginning of the formation of**
 15 **the, quote, vehicle?**
 16 A. Yes, filed the paperwork. So it was
 17 prior to the vehicle. He was in charge of
 18 filing the paperwork on that -- on that
 19 February committee. So it would have been
 20 prior to that.
 21 **Q. Is he someone affiliated with The**
 22 **Mission Continues?**
 23 A. I do not know.
 24 **Q. Do you know how he knew Eric or**
 25 **Dave -- I guess Dave is out of the picture now;**

Page 194

1 right?
 2 **Do you know how he knew Eric?**
 3 A. That's why I'm hesitant to say I -- he
 4 and Eric had a relationship. I don't know
 5 where that relationship came from.
 6 **Q. Do you know if he was a Mission**
 7 **Continues donor?**
 8 A. I don't have any idea. I know that it
 9 was -- it was Eric's idea to have him serve as
 10 treasurer.
 11 MR. SAUER: Exhibit 29.
 12 (Exhibit 29 was marked for
 13 identification.)
 14 THE WITNESS: Thank you very
 15 much.
 16 BY MR. SAUER:
 17 **Q. Do you recognize this calendar invite?**
 18 A. No.
 19 **Q. This is a calendar invite sent by Eric**
 20 **Greitens to you and someone at Barklage's firm;**
 21 **right?**
 22 A. Michael Hafner.
 23 **Q. And was Hafner involved in financial**
 24 **issues at this time?**
 25 A. Yes. He was retained to oversee all

Page 195

1 finance.
 2 **Q. And this was described in the calendar**
 3 **invite as a finance meeting to occur on**
 4 **January 7th; right?**
 5 A. It looks that way.
 6 **Q. Of 2015; correct?**
 7 A. Yes.
 8 **Q. Did you know whether that meeting**
 9 **occurred?**
 10 A. I don't know, but I have no reason to
 11 believe it didn't.
 12 **Q. So this meeting would have been just**
 13 **between you, Eric Greitens and Michael Hafner?**
 14 A. It appears that way.
 15 **Q. And Eric Greitens sent this invite**
 16 **from his Mission Continues email address?**
 17 A. More accurately, I'm sure Krystal sent
 18 it, but yes. I do not believe Eric sent this.
 19 **Q. Did Krystal -- did Krystal attend that**
 20 **meeting?**
 21 A. It doesn't say here, but it would have
 22 been weird for her not to.
 23 **Q. During this entire time frame, was**
 24 **Krystal working on political issues, generally**
 25 **speaking?**

Page 196

1 A. She was working on everything. She
 2 was principally in charge of the book tour. At
 3 some point, she became the vice president
 4 versus the executive assistant. So she was
 5 working -- she was very much involved in the
 6 political too, but it was a piece of what she
 7 did, in terms of my perspective.
 8 **Q. At what time frame did she become**
 9 **involved in the political stuff?**
 10 A. From before I was there.
 11 **Q. From the entire time when you were in**
 12 **contact with Eric Greitens in 2014, Krystal was**
 13 **involved in political activities?**
 14 A. At least on an operational level.
 15 **Q. What does that mean?**
 16 A. At least in terms of meeting invites
 17 and setting up -- sitting in meetings and
 18 coordinating is probably a better word.
 19 **Q. She would set up meetings. Would she**
 20 **attend the meetings?**
 21 A. Not in most of the early stuff, but
 22 towards the latter part of the year, certainly.
 23 And then I don't think there was a meeting she
 24 didn't sit in. Once we moved from Eric's
 25 central west end house to the 4500 West Pine

Page 197

1 meetings, I don't think there was a meeting
 2 that she didn't sit in.
 3 **Q. So in 2014, especially in late 2014,**
 4 **she was spending a substantial amount of her**
 5 **time on political activities?**
 6 A. I can't speak for her. It appeared to
 7 me that she was working on political
 8 activities. I can't tell you how much.
 9 **Q. But in your experience, she was**
 10 **frequently and regularly working on political**
 11 **activities; fair to say?**
 12 A. Yes, oftentimes she was.
 13 **Q. And you believed that she probably**
 14 **sent this calendar invite from Eric Greitens'**
 15 **Mission Continues email address?**
 16 A. Certainly believe that to be true.
 17 **Q. Are you aware of her accessing The**
 18 **Mission Continues computers or email addresses**
 19 **for other political purposes any time during**
 20 **this time frame?**
 21 A. As I've stated earlier, I didn't know
 22 even during this time -- I just got a calendar
 23 invite. I didn't know that it was from a
 24 Mission Continues email. So until a couple of
 25 weeks ago, when I was asked to produce

Page 198

1 documents for you guys, I didn't know.
 2 So, no, I had no knowledge of her
 3 using any Mission Continues email at all, and
 4 clearly did. But I didn't know at the time.
 5 **Q. How about her having access to any**
 6 **other resources of The Mission Continues during**
 7 **this 2014 time frame?**
 8 A. Not to my recollection.
 9 **Q. How about in 2015, once the campaign**
 10 **was launched, are you aware of her having**
 11 **access to any kind of Mission Continues**
 12 **resources?**
 13 A. Not to my recollection.
 14 MR. SAUER: Exhibit 30.
 15 (Exhibit 30 was marked for
 16 identification.)
 17 THE WITNESS: Thank you.
 18 BY MR. SAUER:
 19 **Q. Do you recognize this email?**
 20 A. I do.
 21 **Q. This is an email from Krystal Taylor**
 22 **to you and Michael Hafner, also sent on**
 23 **June 6th, 2015 [sic]; correct?**
 24 MR. BOXERMAN: You said "June."
 25 You meant January?

Page 199

1 BY MR. SAUER:
 2 **Q. I'm sorry. January 6th, 2015;**
 3 **correct?**
 4 A. That's what it looks like from this
 5 email.
 6 **Q. And this email was sent four minutes**
 7 **after the calendar invite to the January 7th**
 8 **finance meeting, which is Exhibit 29; right?**
 9 A. It appears that way.
 10 **Q. Do you have any reason to dispute that**
 11 **that was the timing of these?**
 12 A. Let me look. Hold on.
 13 (Witness reviews document.)
 14 No, I have no reason to dispute that.
 15 **Q. Do you recall getting this email?**
 16 A. No.
 17 **Q. And so, in other words, you believe**
 18 **Krystal sent you the calendar invite to a**
 19 **finance meeting and then followed up a few**
 20 **minutes later with an email attaching four**
 21 **donor lists; correct?**
 22 A. That's what it looks like.
 23 **Q. And the first attachment to this email**
 24 **is, in fact, a donor list of donors from The**
 25 **Mission Continues; right?**

Page 200

1 A. All donors 1K and up. Yeah, it does
 2 appear that way.
 3 **Q. And, in fact she describes it as,**
 4 **"hyphen, The Mission Continues list"; right?**
 5 A. Yes, I see that now.
 6 **Q. And she also -- and do you have any**
 7 **reason to dispute that this was The Mission**
 8 **Continues donor list?**
 9 A. No.
 10 **Q. And she also refers to an "E.G.**
 11 **finance prospects-Mason Fink's list"?**
 12 A. That's the national list I referenced
 13 earlier.
 14 **Q. Okay. And the "fundraising tacker**
 15 **list, our internal list"?**
 16 A. I believe it should say "tracker," but
 17 yes.
 18 **Q. What was that?**
 19 A. I honestly don't remember, but
 20 apparently it's attached here so I can refresh
 21 myself.
 22 **Q. It says it's an internal Google Doc of**
 23 **the sort of prospective campaign's own internal**
 24 **list.**
 25 A. Okay.

Page 201

1 **Q. And then the Schweich list?**
 2 A. Which is this one, yes.
 3 **Q. Okay. Did you have access to that**
 4 **document at the time?**
 5 It says here "Danny has access to
 6 **updated Google Doc."**
 7 Do you recall that?
 8 A. I don't recall, but if it says that --
 9 I don't remember.
 10 **Q. Were you involved in assembling the**
 11 **information in the internal tracker list?**
 12 A. I don't remember this list. I do not
 13 remember that. I will --
 14 Sorry. Go ahead.
 15 MR. BOXERMAN: I just wanted to
 16 make our record clear that what's being
 17 referred to within this big, thick group of
 18 Exhibit 30 is a smaller stapled four-page
 19 document with columns, and just for reference,
 20 in the upper left-hand column of each page, the
 21 column that says "in Salesforce?" just so we
 22 know what he's talking about.
 23 BY MR. SAUER:
 24 **Q. That's what we're talking about;**
 25 **right, sir?**

Page 202

1 A. Yes.
 2 THE WITNESS: Thank you, Sandy.
 3 BY MR. SAUER:
 4 **Q. Let me ask you this: Are you aware of**
 5 **anyone taking information from The Mission**
 6 **Continues list and adding it to the internal**
 7 **list for the future campaign?**
 8 A. Yes.
 9 **Q. Who did that?**
 10 A. I believe, based on my recollection,
 11 that this meeting was Krystal passing
 12 information to Michael Hafner, who then
 13 combined these lists into one internal list.
 14 **Q. This list -- this is the first time**
 15 **you received this list in electronic format;**
 16 **right?**
 17 A. Which list are you specifying, sir?
 18 **Q. Sorry, The Mission Continues list.**
 19 A. To the best of my recollection, though
 20 I would say I saw it at the meeting we
 21 previously discussed in 2014. I don't know.
 22 As far as I'm concerned, this would be the
 23 first time, to my knowledge, that I think it
 24 was sent electronically to me.
 25 **Q. Did you review the list when you**

Page 203

1 received it?
 2 A. No.
 3 **Q. And you were not the source of this**
 4 **list? You did not provide it to the campaign**
 5 **or anyone in the campaign; correct?**
 6 A. No, sir.
 7 **Q. And are these four lists the same four**
 8 **lists that were passed around the table at the**
 9 **December 5th finance meeting?**
 10 A. Sorry. This is the first time I'm
 11 seeing this obviously since January 6th, so
 12 I'm trying to figure all this out.
 13 I believe the answer to the question
 14 is, the Schweich list, the national finance
 15 list, and The Mission Continues list were three
 16 of the lists. I can't tell you on the fourth.
 17 MR. SAUER: Exhibit 31.
 18 (Exhibit 31 was marked for
 19 identification.)
 20 THE WITNESS: Thank you.
 21 BY MR. SAUER:
 22 **Q. Do you recognize Exhibit 31?**
 23 A. No.
 24 **Q. Does this appear to be an agenda for a**
 25 **fundraising meeting that occurred at 10 a.m. on**

Page 204

1 **January 7th of 2015?**
 2 A. Appears to be.
 3 **Q. And that is the date and time of the**
 4 **calendar invite that you got in Exhibit 29, the**
 5 **day before January 6th; correct?**
 6 A. Appears to be true, sir.
 7 **Q. Do you recall having an agenda at that**
 8 **meeting, the 10 a.m. meeting?**
 9 A. I don't remember.
 10 **Q. Do you remember what was discussed at**
 11 **that 10 a.m. meeting on January 7th?**
 12 A. Yes. I believe that was close to when
 13 Michael Hafner was brought on as a consultant
 14 to oversee fundraising, and this was kind of
 15 the fundraising, planning, passing the torch
 16 from Krystal to Mike, kind of getting Mike up
 17 to speed on what Krystal was doing and Eric was
 18 doing on fundraising and having the
 19 conversation about it.
 20 **Q. Did Krystal attend that meeting as**
 21 **well?**
 22 A. I don't remember.
 23 **Q. When you say "passing the torch," is**
 24 **it fair to say that Krystal had overseen**
 25 **fundraising -- political fundraising plans up**

Page 205

1 **until now?**
2 **(Interruption.)**
3 A. It's fair to say that -- as much as
4 that happened -- there wasn't a lot happening,
5 but as much of an organization person in terms
6 of collecting and organizing, yes, that was her
7 responsibility.
8 **Q. Let me ask you this: Was she the one**
9 **who was maintaining these donor lists that were**
10 **passed around in December?**
11 A. I don't think -- if you're referring
12 to the previous exhibit, she was for sure
13 keeping the Google Doc in tracker. The other
14 lists, I don't know what she was doing with.
15 **Q. Was there any discussion of The**
16 **Mission Continues list specifically at this**
17 **meeting?**
18 A. I don't recall. I don't remember the
19 meeting happening at all.
20 **Q. So you don't know -- let me ask you**
21 **this: In this time frame when you received**
22 **this email that is attached to The Mission**
23 **Continues list, do you remember any discussion**
24 **of The Mission Continues list with anyone**
25 **during that time frame of early January 2015?**

Page 206

1 A. I don't remember a specific instance.
2 **Q. Do you remember talking about it with**
3 **Eric Greitens in any way?**
4 A. I don't.
5 **Q. Do you remember talking about it with**
6 **anyone at The Mission Continues?**
7 A. Absolutely not. I wasn't having
8 communications with anyone from The Mission
9 Continues.
10 **Q. Do you remember talking about it with**
11 **Michael Hafner?**
12 A. I don't, but I will caveat with this:
13 My job was to oversee all of Eric's political
14 endeavors at this time, not to be overly in the
15 weeds on anything. So Mike was heading up
16 fundraising. So potentially there was a
17 conversation, but I can't recall it directly.
18 He would be more privy to that than I would.
19 MR. SAUER: Let me give you this,
20 Exhibit 32.
21 (Exhibit 32 was marked for
22 identification.)
23 THE WITNESS: Thank you.
24 BY MR. SAUER:
25 **Q. Do you recognize this document?**

Page 207

1 A. Yes. It's the same thing that was in
2 here.
3 **Q. So this is, in fact, another copy of**
4 **the internal tracking fundraising list that was**
5 **being prepared for the campaign; correct?**
6 A. Yes, this is the same list that was
7 referred to in Exhibit 30, fundraising tracker
8 as of October 10th PDF. That's this list.
9 **Q. Okay. And so this is something that's**
10 **maintained in a Google Doc by -- by Krystal**
11 **until it's handed off to Michael; is that**
12 **right?**
13 A. Appears that way.
14 **Q. Okay. And is there -- to your**
15 **knowledge, is there information in this**
16 **internal document that was taken from The**
17 **Mission Continues list?**
18 A. Can I have a second to review?
19 **Q. Absolutely.**
20 A. (Witness reviews document.)
21 All right. I'm ready.
22 **Q. Same question: Is there information**
23 **that was taken from The Mission Continues list**
24 **in this internal document?**
25 A. I don't know.

Page 208

1 **Q. In the relationship field, the**
2 **second-to-last column of the list, it refers**
3 **repeatedly to people's relationship to The**
4 **Mission Continues; correct?**
5 A. Yes.
6 **Q. Do you know where that information --**
7 **in other words, the relationship of each**
8 **potential donor -- to The Mission Continues**
9 **came from?**
10 A. I don't. I would caveat with saying
11 that Krystal has a near encyclopedic knowledge
12 of previous things. So I don't know where she
13 got this information from, but it is not beyond
14 speculation that she would remember that these
15 people were supporters.
16 **Q. But it's your review that the**
17 **information in this document came from Krystal?**
18 A. It is my interpretation that that is
19 correct.
20 **Q. And did you -- did you have any input**
21 **on this document?**
22 A. I don't remember ever -- sorry. It's
23 stapled funny.
24 I don't remember adding anything to
25 this document.

Page 209

1 MR. SAUER: Exhibit 33.
 2 (Exhibit 33 was marked for
 3 identification.)
 4 THE WITNESS: Thank you.
 5 BY MR. SAUER:
 6 **Q. Do you recognize this document?**
 7 A. I do not.
 8 **Q. And this also at the top indicates**
 9 **that it's an agenda for the January 7th**
 10 **meeting relating to political fundraising;**
 11 **right?**
 12 A. Looks to me like it's a build-out of
 13 Exhibit 31.
 14 **Q. In other words, a build-out being**
 15 **somebody has added notes and details for each**
 16 **of the agenda items listed in the shorter**
 17 **document, Exhibit 31?**
 18 A. That is true.
 19 **Q. Do you know who did the build-out?**
 20 A. I suspect it was Michael Hafner, but I
 21 have no idea.
 22 **Q. But it was not done by you?**
 23 A. Correct.
 24 **Q. Okay. Do you know if this was done**
 25 **during the meeting or after the meeting or**

Page 211

1 **Q. Who did that?**
 2 A. I believe it was Michael Hafner.
 3 **Q. Did you do that on anyone's**
 4 **instructions?**
 5 A. I don't know.
 6 **Q. Do you know if --**
 7 A. I believe -- I believe so.
 8 **Q. Who?**
 9 A. Well, it was Eric's.
 10 **Q. So you believe that Eric instructed**
 11 **Michael to merge The Mission Continues donor**
 12 **list into a future campaign donor list?**
 13 A. I believe so.
 14 **Q. Is there any other database that**
 15 **you're aware of that might be being referred to**
 16 **here when it says "merging The Mission**
 17 **Continues database with new database"?**
 18 A. I have no idea.
 19 **Q. But you believe that at some time**
 20 **shortly after this, Michael Hafner did, in**
 21 **fact, take information from The Mission**
 22 **Continues list and integrate it into a donor**
 23 **list for the future political campaign?**
 24 A. Yes, and documents we produced.
 25 **Q. So you're confident that that**

Page 210

1 **what?**
 2 A. I have no idea.
 3 **Q. Can you flip to what is the fourth**
 4 **page of this document?**
 5 A. Are you talking about the top of it?
 6 **Q. Sorry.**
 7 A. Is it the one that says "500 to 2500"?
 8 **Q. Yes.**
 9 A. Okay. I'm here.
 10 **Q. You see in Subpart 4, "building the**
 11 **new model, how it can be done," there's a**
 12 **bullet point that says "merging The Mission**
 13 **Continues' database with new database";**
 14 **correct?**
 15 A. I see that.
 16 **Q. What is that referring to?**
 17 A. I don't know.
 18 **Q. Was there any discussion at that**
 19 **January 7th finance meeting about merging**
 20 **information from some The Mission Continues**
 21 **database with a campaign database?**
 22 A. I don't recall this meeting at all,
 23 but I do know that after -- sometime after
 24 this, I do know the lists were merged into one
 25 document.

Page 212

1 **happened?**
 2 A. I'm confident that someone did that,
 3 and I'm fairly confident that that person was
 4 Michael Hafner.
 5 **Q. And you believe that he did that on**
 6 **the instructions of Eric Greitens?**
 7 A. Yes.
 8 MR. SAUER: Exhibit 34.
 9 (Exhibit 34 was marked for
 10 identification.)
 11 THE WITNESS: Thank you.
 12 BY MR. SAUER:
 13 **Q. Do you recognize this document?**
 14 A. I don't.
 15 **Q. So this appears to be notes from a**
 16 **January 8th meeting relating to fundraising;**
 17 **correct?**
 18 A. Okay.
 19 **Q. Do you know if you attended such a**
 20 **meeting?**
 21 A. I have no idea.
 22 **Q. Does that ring a bell at all?**
 23 A. This looks more foreign than the other
 24 one.
 25 **Q. Okay. So to the best of your**

Page 213

1 knowledge, you didn't -- you don't recognize
 2 seeing this document before?
 3 A. I don't recall.
 4 Q. Do you know if these names listed
 5 under the heading "Phase 1 Exploratory as
 6 Potential Donors," do you know if these are The
 7 Mission Continues donors?
 8 A. Some are.
 9 Q. Do you know who is a The Mission
 10 Continues donor?
 11 A. Mark Bobak is.
 12 Q. Who else?
 13 A. ██████ man. I think Goldman Sachs
 14 was a big donor to The Mission Continues. ██████
 15 ██████ was a donor to The Mission Continues. The
 16 ██████ were. ██████ who is
 17 related to the ██████ were. ██████
 18 was. ██████ was. I believe ██████
 19 and ██████ both were.
 20 Q. A significant number of the names on
 21 this first page were; correct?
 22 A. ██████ and ██████ were. ██████
 23 ██████ was. Yes.
 24 Q. Do you know how these names are pulled
 25 together in this document?

Page 215

1 friends with ██████
 2 A. "Monu."
 3 Q. Who is Monu Joseph?
 4 A. Friends with ██████ Also
 5 ██████ has a ██████ in his name.
 6 He was a connection to Eric through
 7 ██████ and ██████ was a donor in
 8 California, early donor.
 9 Q. Donor to the campaign?
 10 A. Yes.
 11 Q. Do you know if ██████ was a
 12 donor to The Mission Continues?
 13 A. I don't believe so. That was a Mason
 14 Fink connection.
 15 Q. Do you know if Monu Joseph was a donor
 16 to The Mission Continues?
 17 A. No idea.
 18 Q. Do you know what either of those men's
 19 relationship to Eric Greitens was?
 20 A. I know Monu Joseph called Eric
 21 Greitens a lot.
 22 Q. Do you know what they talked about?
 23 A. No idea.
 24 Q. And at some point Monu Joseph was
 25 going to come visit St. Louis. I remember

Page 214

1 A. No idea.
 2 Q. About three-quarters of the way down,
 3 you see there's a reference to someone called
 4 Alex Rogers in Hong Kong.
 5 A. I do see that.
 6 Q. Do you know who that is?
 7 A. I remember a conversation about Alex
 8 Rogers being in Hong Kong, but I don't remember
 9 anything else.
 10 Q. Do you remember any involvement with
 11 Alex Rogers with The Mission Continues?
 12 A. Not to my recollection, but I want to
 13 get clearly on the record, I wasn't involved in
 14 The Mission Continues, so I don't know.
 15 Q. Same question as to the campaign: Did
 16 Alex Rogers have any involvement in the
 17 campaign?
 18 A. I have no idea.
 19 Q. So you don't remember his name coming
 20 up in connection with the campaign?
 21 A. I know his name was on lists, but I
 22 don't remember -- I couldn't tell you if he
 23 even gave.
 24 Q. A little further down there's a
 25 reference to someone called Monu Joseph,

Page 216

1 that.
 2 Q. Did that occur?
 3 A. I don't remember. I think so, and I
 4 remember that ██████ FedExed a check
 5 for \$50,000.
 6 Q. Do you know -- to the campaign?
 7 A. Yes.
 8 Q. Did Monu Joseph end up having any
 9 other role in the campaign at all?
 10 A. Not to my knowledge.
 11 Q. Did he donate to the campaign?
 12 A. I thought he was supposed to. I don't
 13 remember if he actually did.
 14 Q. Okay. Did he have any other
 15 involvement of any kind in connection with the
 16 campaign, to your knowledge?
 17 A. I don't know.
 18 A. Not to my knowledge, at least when I
 19 was there.
 20 Q. When did you stop at the campaign?
 21 A. I resigned the last week in October of
 22 2015.
 23 Q. Why did you resign?
 24 A. There were personality conflicts, as
 25 happens in these campaigns a lot, power

Page 217

1 struggle.

2 **Q. Power struggles between you and who?**

3 A. Various consultants and advisors,

4 particularly Mark Bobak.

5 **Q. So in other words, Mark -- you believe**

6 **Mark kind of forced you out? Is that fair to**

7 **say?**

8 A. Yes.

9 **Q. How about Austin Chambers? Was he**

10 **involved in the campaign at that time?**

11 A. Yes.

12 **Q. Was that part of this power struggle?**

13 A. Yes.

14 **Q. And you believe that Austin Chambers**

15 **forced you out?**

16 A. I believe that Austin Chambers didn't

17 help me.

18 **Q. Was Austin involved at all in this**

19 **time frame, January of 2015?**

20 A. No. Austin wasn't involved until Nick

21 Ayers was hired.

22 **Q. Who was Nick Ayers?**

23 A. Currently he's the chief of staff to

24 the vice president of the United States.

25 **Q. Okay.**

Page 219

1 **principally to Mark Bobak?**

2 A. Among other things, yes.

3 **Q. Why do you think you were forced out?**

4 **What were they unhappy about?**

5 A. I think it was -- I think it was a

6 growing set of strategic and personality

7 conflicts over a couple-month period. Mark and

8 I weren't getting along for a long period of

9 time, and Mark has Eric's ear and

10 **Q. Okay. Were there any specific policy**

11 **decisions that Mark didn't like or actions that**

12 **you took that he didn't like?**

13 A. He didn't like a lot of my actions in

14 terms of hiring people and doing things without

15 his, necessarily, stamp of approval. He didn't

16 like the way I managed the ship.

17 **Q. Okay. Was there anything that you did**

18 **in any way that related to The Mission**

19 **Continues that they might have been unhappy**

20 **about?**

21 A. Not that was ever brought to me.

22 **Q. Okay. When you received this The**

23 **Mission Continues donor list and you saw the**

24 **December 5th meeting, is that something that**

25 **gave you concern or made you uncomfortable in**

Page 218

1 A. But at the time --

2 **Q. What was he at the time?**

3 A. At the time he ran a consulting

4 company called C5 Creative.

5 **Q. Uh-huh.**

6 A. Based in Atlanta, Georgia, and we -- I

7 say "we" here to mean Eric and I -- brought in

8 Nick to serve as our general strategist

9 sometime close to early summer of 2015. Nick

10 brought in Austin to help.

11 **Q. And also Austin was sort of assigned**

12 **by Nick to work a lot on Eric's campaign?**

13 A. Yeah. He was a consultant for a few

14 races, one of which being Eric. He was in

15 St. Louis every now and then, and then he later

16 took over as manager when I resigned.

17 **Q. When you say Austin Chambers didn't**

18 **help you, what do you mean?**

19 A. You asked if he forced me out, and I

20 don't think he forced me out. I don't think he

21 stuck his neck out to keep me around, but I

22 don't think he was instrumental in forcing me

23 out.

24 **Q. Why do you think -- so I take it you**

25 **attribute the fact that you got forced out**

Page 220

1 **any way?**

2 A. I knew at the time that Mark Bobak was

3 a lawyer, and I knew that he had engaged a D.C.

4 law firm of Wiley Rein earlier. So I did --

5 did not cause me any alarm, and I assumed that

6 if there was something to be raised, that the

7 legal professional in the room would have done

8 it.

9 **Q. So you assumed that this had been**

10 **vetted and was acceptable?**

11 A. I didn't even think that much into it.

12 It wasn't a thing in terms of a conversation.

13 It was just another donor list in the stack.

14 There wasn't a separate conversation of the

15 validity of it.

16 MR. SAUER: Exhibit 35.

17 (Exhibit 35 was marked for

18 identification.)

19 THE WITNESS: Thank you.

20 BY MR. SAUER:

21 **Q. Do you recognize this calendar invite?**

22 A. I do not.

23 **Q. So were there -- this is a calendar**

24 **invite from Eric Greitens from The Mission**

25 **Continues' email address; correct?**

Page 221

1 A. That's what it appears to be.
 2 **Q. And, again, it's sent to Michael**
 3 **Hafner and you; correct?**
 4 A. Appears to be.
 5 **Q. And do you recall -- and, again, it's**
 6 **an invitation to a finance meeting, this time**
 7 **to occur on January 19th; correct?**
 8 A. Looks that way.
 9 **Q. Do you recall having multiple finance**
 10 **meetings with Eric and with Michael Hafner**
 11 **during January?**
 12 A. Yes.
 13 **Q. What was discussed at these finance**
 14 **meetings?**
 15 A. It was -- Eric's number one priority
 16 was to talk about what raising money looked
 17 like and the majority of where Eric's stress
 18 lied. So he often wanted to be updated
 19 personally about finance stuff. He also had
 20 wavering faith in Michael Hafner, so he wanted
 21 more and more direct contact.
 22 **Q. Was Michael Hafner eventually replaced**
 23 **as the fundraiser for the campaign?**
 24 A. His contract was not renewed.
 25 **Q. When did that happen?**

Page 222

1 A. I believe it would have been March,
 2 but I don't know for sure.
 3 **Q. So around March of 2015?**
 4 A. Yes, sir.
 5 **Q. Who replaced him to head up**
 6 **fundraising for the campaign?**
 7 A. There was a gap but shortly after
 8 Meredith Gibbons was brought in.
 9 MR. SAUER: Exhibit 36.
 10 (Exhibit 36 was marked for
 11 identification.)
 12 THE WITNESS: Thank you.
 13 BY MR. SAUER:
 14 **Q. You see this email?**
 15 A. I do.
 16 **Q. And do you recognize it?**
 17 A. No.
 18 **Q. And, in fact, this is an email from**
 19 **Michael Hafner to himself; right?**
 20 A. So it would be really weird if I
 21 recognized it.
 22 **Q. You might have read his email.**
 23 **This is not the same day as that**
 24 **January 19th fundraising meeting; right?**
 25 A. Hold on. Yes, sir, it is.

Page 223

1 **Q. Okay. So apparently he's emailing**
 2 **himself a reminder of action items from today's**
 3 **meeting; right?**
 4 A. Yes.
 5 **Q. Okay. And the second action item**
 6 **says, "Meeting with Lindsay Hodges and Krystal**
 7 **Taylor regarding TMC contribution list, meet**
 8 **with sometime this week." Correct?**
 9 A. That's what it says.
 10 **Q. Do you recall that issue being**
 11 **discussed at this January 19th meeting?**
 12 A. I do not. Doesn't mean it didn't
 13 happen. I'll also specify and say -- it's
 14 probably a good time to say I was involved in
 15 all things strategic with Eric. I was often
 16 cc'd or to'd or invited to meetings I didn't
 17 show up at. I came in and out of stuff.
 18 So I don't know that I sat in that
 19 meeting. I don't recall this meeting, and I
 20 don't recall this happening. So just because
 21 there was a calendar invite doesn't necessarily
 22 mean I was physically present.
 23 **Q. Do you know who Lindsay Hodges is?**
 24 A. According to your CID that you served
 25 us, she changed her name sometime, got married

Page 224

1 sometime, but that's the only thing I know
 2 about her.
 3 **Q. Do you know what her role was with**
 4 **respect to this campaign?**
 5 A. I believe she worked for The Mission
 6 Continues.
 7 **Q. What's your basis for that belief?**
 8 A. Just believe that to be true.
 9 **Q. Do you remember Eric Greitens ever**
 10 **telling Michael Hafner to sit down and meet**
 11 **with a fundraiser from The Mission Continues?**
 12 A. I don't remember that, but I don't
 13 remember this meeting, so . . .
 14 **Q. And you don't remember Lindsay Hodges**
 15 **at all?**
 16 A. I do remember the name "Lindsay
 17 Hodges." I know she's close with -- or was
 18 close with Krystal Taylor personally.
 19 **Q. Is it your understanding that she was**
 20 **involved in fundraising for The Mission**
 21 **Continues?**
 22 A. I had no idea what her role at The
 23 Mission Continues was.
 24 **Q. So you don't know why it says -- it**
 25 **says, "meeting regarding the TMC contribution**

Page 225

1 list."
 2 Do you know why that was referred to?
 3 A. I have no idea.
 4 Q. And you don't remember any -- again, I
 5 take it -- you've said you don't even know if
 6 you went to the January 19th meeting?
 7 A. Right.
 8 Q. So I take it you don't recall whether
 9 The Mission Continues donor list was
 10 specifically discussed at that meeting?
 11 A. I don't remember the meeting at all.
 12 Q. Okay. Meredith Gibbons, you said,
 13 ended up replacing Michael Hafner as the lead
 14 fundraiser for the campaign. Is that fair to
 15 say?
 16 A. Yes. Michael Hafner was a consultant
 17 who was kind of bridging the gap; I don't think
 18 was ever going to be the full-time financial
 19 director. Meredith Gibbons was brought on as
 20 an actual finance director. So they had
 21 similar, but different, roles. But, yes, she
 22 became the head of fundraising, which Michael
 23 Hafner was during this time.
 24 Q. Do you know whether Meredith Gibbons
 25 ever met with Lindsay Hodges about the TMC

Page 227

1 Q. Did you prepare this document?
 2 A. No.
 3 Q. Are you confident you did not prepare
 4 it?
 5 A. Do you want a yes or no, or do you
 6 want my commentary?
 7 Q. Both.
 8 A. It says "send to Danny." So I would
 9 find it hard to believe that I would prepare a
 10 document to send to myself. So, no, I feel
 11 extremely confident that I did not create
 12 something to send to myself.
 13 Q. Do you know if it was sent to you?
 14 A. This document?
 15 Q. Yeah.
 16 A. I don't recall ever seeing this
 17 document.
 18 Q. Okay. About halfway down the page,
 19 you see the square bullet point where it says,
 20 "Meeting with Lindsay Hodges and KT regarding
 21 TMC contribution list"?
 22 A. I don't. Hold on one second.
 23 Q. It's the fifth bullet.
 24 A. Oh, towards the bottom.
 25 Q. Yes.

Page 226

1 contribution list?
 2 A. I have no idea.
 3 Q. So you don't know if there were any
 4 discussions between Meredith Gibbons -- do you
 5 know whether there were any discussions between
 6 Meredith Gibbons and anyone at The Mission
 7 Continues about using The Mission Continues
 8 donor list?
 9 A. I have no idea.
 10 Q. And do you recall Eric ever saying
 11 anything about having someone from the campaign
 12 meet with Lindsay Hodges?
 13 A. I have no idea.
 14 MR. SAUER: Very briefly,
 15 Exhibit 37.
 16 (Exhibit 37 was marked for
 17 identification.)
 18 THE WITNESS: Thank you.
 19 BY MR. SAUER:
 20 Q. Here's -- do you recognize this
 21 document?
 22 A. No.
 23 Q. Do you use square bullet points like
 24 this?
 25 A. No.

Page 228

1 A. Yeah, I got you. Yes.
 2 Q. Again, does this jog your memory as to
 3 whether or not you have any knowledge whether
 4 or not a meeting like that occurred?
 5 A. No knowledge of the meeting, and I've
 6 never seen this document before.
 7 Q. Do you recall any situation where Eric
 8 Greitens mentioned Lindsay Hodges in any
 9 connection?
 10 A. Lindsay Hodges was only mentioned to
 11 me in the aspect of Krystal Taylor being
 12 personal friends with Lindsay.
 13 Q. That was mentioned to you by Krystal?
 14 A. Yes, on multiple occasions but not in
 15 reference to The Mission Continues.
 16 Q. Did she say -- oh, so she didn't say
 17 that that friendship dates to her time at The
 18 Mission Continues?
 19 A. I don't remember the details of it. I
 20 don't think Eric has ever mentioned Lindsay
 21 Hodges to me that I remember.
 22 Also, I'm intrigued by the bourbon
 23 whiskey at the bottom.
 24 Q. I wasn't going to ask about that.
 25 Exhibit 38 --

Page 229

1 A. That's how you know it's not mine: I
 2 don't drink whiskey.
 3 (Exhibit 38 was marked for
 4 identification.)
 5 BY MR. SAUER:
 6 **Q. Do you recognize this document?**
 7 A. I do.
 8 **Q. Did you send this email?**
 9 A. I did.
 10 **Q. And was there a lengthy meeting**
 11 **involving all these people on Friday,**
 12 **January 23rd of 2015?**
 13 A. Yes.
 14 **Q. And I take it you prepared -- you also**
 15 **prepared the strategy session agenda that's**
 16 **attached to this email?**
 17 A. Clearly formatted by Krystal, but it
 18 looks like I wrote it.
 19 **Q. Just flipping to the very last page,**
 20 **Item 8, where it talks about fundraising from**
 21 **2:30 p.m. to 3:15 p.m.**
 22 A. Got it.
 23 **Q. Was fundraising discussed at this**
 24 **meeting?**
 25 A. Yes.

Page 231

1 A. Or Mission Continues donors
 2 specifically.
 3 **Q. Okay. Just generally in this time**
 4 **frame, January of 2015, we've talked about a**
 5 **series of meetings. What sort of things were**
 6 **said about The Mission Continues donors?**
 7 A. Talking about what the base looks like
 8 of the first set of financial commitments to
 9 Eric and where those people were going to come
 10 from in terms of donors.
 11 **Q. And those -- was it said that The**
 12 **Mission Continues would form a critical part of**
 13 **that initial base?**
 14 A. Yes.
 15 **Q. And was that said by Eric Greitens?**
 16 A. Yes.
 17 **Q. Was it said by other people in these**
 18 **meetings?**
 19 A. Yes.
 20 **Q. Did Michael Hafner share that view?**
 21 A. I don't know whether Michael Hafner
 22 specifically said that. But Michael Hafner's
 23 job was to raise as much early money as
 24 possible; and it was very clear that the
 25 strategy of raising early money was going to

Page 230

1 **Q. Was The Mission Continues list**
 2 **discussed at this meeting?**
 3 A. I don't remember.
 4 **Q. Do you know if donors from The Mission**
 5 **Continues or targeting The Mission Continues**
 6 **donors was mentioned at this meeting?**
 7 A. I don't.
 8 **Q. Do you remember anything about the use**
 9 **of The Mission Continues donor information**
 10 **being discussed in this time frame?**
 11 A. I don't.
 12 I want to stress to you that it wasn't
 13 a thing. It was part of casual -- it was
 14 brought up that -- that there wasn't specific
 15 instances where a lightbulb went off and
 16 someone said, "Mission Continues." It was part
 17 of the larger fundraising conception.
 18 So I'm sure it was talked about in
 19 conversations in this meeting and other
 20 meetings, but I can't remember specifically.
 21 But it wasn't a non-thing. It was something
 22 that was discussed.
 23 **Q. So you remember in general terms that**
 24 **there were ongoing discussions in these**
 25 **meetings of The Mission Continues donor list?**

Page 232

1 come from previous TMC donors.
 2 **Q. And why is raising early money**
 3 **important for a political campaign?**
 4 A. On a very basic level, you can't spend
 5 it until you've raised it. More so, it's a --
 6 to show viability. And if you're going to have
 7 to raise \$10 million eventually, you better get
 8 started sooner rather than later.
 9 **Q. So in other words, it is a critical**
 10 **part of the campaign strategy to make a very**
 11 **strong start on fundraising; correct?**
 12 A. Yes.
 13 **Q. And that was a general understanding**
 14 **as to this particular campaign; correct?**
 15 A. Yeah. And I would argue that you hit
 16 low-hanging fruit first in a similar way that
 17 you go to your friends and family network.
 18 It's -- Eric's friends and family network was
 19 The Mission Continues donors.
 20 **Q. So he so -- so he said specifically**
 21 **that the initial fundraising push would focus**
 22 **on The Mission Continues donors?**
 23 A. I don't know if it was initial
 24 fundraising push or if it was that a
 25 significant part of our fundraising strategy is

Page 233

1 going to come from The Mission Continues
 2 donors. I don't know whether he specified that
 3 as the initial push or just in general.
 4 **Q. Did he ever express to you a sense of**
 5 **how much money could be raised from The Mission**
 6 **Continues donor network?**
 7 A. I don't believe there was a dollar
 8 amount he set on it.
 9 **Q. But would it be fair to say that you**
 10 **understood that he anticipated raising**
 11 **thousands and thousands of dollars from those**
 12 **people?**
 13 A. Millions.
 14 **Q. He anticipated raising millions of**
 15 **dollars from The Mission Continues donor list?**
 16 A. I want to be clear: He -- raising
 17 millions from previous Mission Continues
 18 donors.
 19 **Q. But he indicated to you that he**
 20 **anticipated raising millions of dollars from**
 21 **Mission Continues donors?**
 22 A. Yes.
 23 **Q. Okay. And this is something that was**
 24 **talked about in all those January meetings;**
 25 **right?**

Page 234

1 A. Right. And it wasn't -- it wasn't a
 2 hush-hush, secret thing.
 3 **Q. Yeah.**
 4 A. It was fairly -- it was -- it was in
 5 the same breath of, We're going to reach out to
 6 the ten Missouri mega-donors and sit down and
 7 try to get \$100,000 checks from them -- in the
 8 same kind of vein. It was just part of -- part
 9 of everyday nuts and bolts in this campaign.
 10 **Q. There was a general expectation that**
 11 **that was going to be part of the initial**
 12 **fundraising strategy?**
 13 A. Yes. It wasn't -- it was just very
 14 obvious to everyone involved.
 15 MR. SAUER: Exhibit 39.
 16 (Exhibit 39 was marked for
 17 identification.)
 18 THE WITNESS: Thank you.
 19 BY MR. SAUER:
 20 **Q. Do you recognize this email?**
 21 A. Can I read it? One second.
 22 **Q. Oh, please.**
 23 A. I do recognize this email.
 24 **Q. What is this email?**
 25 A. Appears to be an email to Krystal

Page 235

1 Taylor, Chris Bobak and me about Salesforce.
 2 **Q. So is this a situation where Michael**
 3 **Hafner is asking for assistance in finding**
 4 **contact information for potential donors?**
 5 A. That's what it appears to be.
 6 **Q. And did you respond to this email, do**
 7 **you know?**
 8 A. I have no idea.
 9 **Q. Do you recall him making this inquiry?**
 10 A. No.
 11 MR. SAUER: Let me give you
 12 Exhibit 40.
 13 (Exhibit 40 was marked for
 14 identification.)
 15 THE WITNESS: Thank you.
 16 BY MR. SAUER:
 17 **Q. Do you recognize this email?**
 18 A. Hold on. Need to read.
 19 This is Krystal's reply?
 20 **Q. Is this Krystal's reply to --**
 21 A. Hold on. I'm trying to --
 22 **Q. Go ahead. I'm sorry.**
 23 A. All these emails are formatted weird.
 24 So this is Mike's email. This is
 25 Krystal's reply.

Page 236

1 MR. BOXERMAN: Let's be clear:
 2 The first "this" was Exhibit 39?
 3 THE WITNESS: 39 was Hafner's
 4 email. 40 is Krystal's response to Hafner's
 5 email.
 6 BY MR. SAUER:
 7 **Q. Do you recall receiving this response**
 8 **from Krystal on January 28th?**
 9 A. No.
 10 **Q. Here Krystal responds by giving him**
 11 **guidance on where he could get contact**
 12 **information for potential campaign donors;**
 13 **correct?**
 14 A. That's what it appears.
 15 **Q. And her Item 2 -- her Item 1 says, "Go**
 16 **to our Salesforce account"; correct?**
 17 A. Okay.
 18 **Q. And that's a Greitens Group Salesforce**
 19 **account?**
 20 A. That's what it appears to be.
 21 **Q. Item 2 says, "Some of these will not**
 22 **be in Salesforce. If not, I would suggest**
 23 **checking The Mission Continues list, attached**
 24 **here"; correct?**
 25 A. Okay.

Page 237

1 **Q. And, in fact, she has attached The**
 2 **Mission Continues donor list?**
 3 A. The same list you presented earlier.
 4 **Q. It is, in fact, the same list that was**
 5 **attached to her email of January 6th;**
 6 **correct?**
 7 A. Yes, sir.
 8 **Q. Did you instruct her to resend Hafner**
 9 **The Mission Continues donor list?**
 10 A. No.
 11 **Q. At any time, did you tell Krystal to**
 12 **send The Mission Continues donor list to**
 13 **anyone?**
 14 A. No.
 15 **Q. Did you ever authorize her to share it**
 16 **with anyone?**
 17 A. No.
 18 **Q. Who -- to your knowledge, are you**
 19 **aware of anyone else authorizing Krystal Taylor**
 20 **or instructing her to share The Mission**
 21 **Continues donor list with anyone?**
 22 A. Not to my knowledge.
 23 **Q. Do you know if Michael Hafner, in**
 24 **fact, consulted The Mission Continues list to**
 25 **build out contact information for the campaign**

Page 239

1 Mission -- Monu and Andrew Hauptman, Gabriel
 2 Gomez, those kind of folks.
 3 **Q. Do you understand that Michael Hafner**
 4 **then did, in fact, consult The Mission**
 5 **Continues list that's attached to Exhibit 40 to**
 6 **build out contact information and donor**
 7 **information into the list that he attached to**
 8 **Exhibit 39?**
 9 A. Without seeing it, I don't -- I don't
 10 know, because I have him asking, and I have
 11 Krystal attaching the list saying, This is
 12 where you'll find it. I don't know what
 13 Michael did after that.
 14 MR. SAUER: Exhibit 41.
 15 (Exhibit 41 was marked for
 16 identification.)
 17 BY MR. SAUER:
 18 **Q. This is a February 2nd, 2015, email**
 19 **from Michael Hafner to you; correct?**
 20 A. Hold on. "Here is the list I gave to
 21 Eric. To my knowledge, he did not make any
 22 calls."
 23 **Q. Do you know what this list is?**
 24 A. I haven't looked at it yet.
 25 (Witness reviews document.)

Page 238

1 **donor list that he was preparing?**
 2 A. These people appear to be -- in terms
 3 of my very quick, cursory glances, appear to be
 4 heavy Mission Continues donors.
 5 **Q. In fact, what's attached to this email**
 6 **is, in fact, a Mission Continues donor list**
 7 **that's attached to the January 6th email;**
 8 **correct?**
 9 A. I'm talking about this previous
 10 exhibit.
 11 **Q. Sorry. So you're going back to**
 12 **Exhibit 39; right?**
 13 A. On Exhibit 39, there was -- sorry.
 14 Okay.
 15 So what's the question?
 16 **Q. You're saying that the list that**
 17 **Michael Hafner had already prepared that just**
 18 **includes names that's attached to Exhibit 39,**
 19 **you say that that appears to be heavy on**
 20 **Mission Continues donors?**
 21 A. Yeah. There's some people that
 22 obviously aren't -- I don't think, like, David
 23 Farr. Some of these people are people -- you
 24 know, Michael Lukacs, for sure, that donated
 25 to -- Eric Karlovic -- that donated to

Page 240

1 Yes, I do.
 2 **Q. What is this list?**
 3 A. The combined master fundraising list.
 4 **Q. Does the combined master fundraising**
 5 **list include information from The Mission**
 6 **Continues donor list that was attached to**
 7 **Exhibit 40?**
 8 A. I'm not certain, but it -- I would say
 9 it appears that way.
 10 **Q. Do you know whether Eric Greitens**
 11 **instructed Michael Hafner to use The Mission**
 12 **Continues list to get donor contact information**
 13 **or other donor information?**
 14 A. I don't recall.
 15 **Q. Do you know whether Eric Greitens**
 16 **instructed Krystal Taylor to share The Mission**
 17 **Continues list with Michael Hafner or anybody**
 18 **else?**
 19 A. I don't know, but in my interactions
 20 with Krystal Taylor, she tends to not do those
 21 things on her own.
 22 **Q. So you would -- you would expect that**
 23 **Krystal wouldn't have done that on her own, but**
 24 **she would have been instructed by her boss,**
 25 **Eric Greitens.**

Page 241

1 A. I suspect that Krystal -- it would not
 2 be in Krystal's character, that I knew, to do
 3 something like that without explicit permission
 4 from Eric.
 5 **Q. And I think you testified earlier, you
 6 never instructed or authorized her to share
 7 that list with anybody; right?**
 8 A. Correct; nor would I have authority
 9 to.
 10 **Q. How about anyone at The Mission
 11 Continues? Are you aware of anyone at The
 12 Mission Continues authorizing or instructing
 13 Krystal to share that donor list with anyone?**
 14 A. I have no idea about the inner
 15 workings of The Mission Continues.
 16 **Q. And specifically, you have no idea as
 17 to whether anyone made that kind of instruction
 18 or authorization?**
 19 A. I have no idea.
 20 **Q. Do you have any idea whether anyone at
 21 The Mission Continues authorized Michael Hafner
 22 to use that list or to access that list?**
 23 A. I have no idea.
 24 MR. SAUER: Exhibit 42.
 25 (Exhibit 42 was marked for

Page 243

1 **Q. Right. And it says -- Hafner says,
 2 "This is a list built from roughly five lists,
 3 (The TMC donor list, the one random list, the
 4 Mason Fink list, top 200 traditional R donor
 5 and top 15 R Super Donor list)." Correct?**
 6 A. Looks that way.
 7 **Q. So he indicates that he used the TMC
 8 donor list to build this list; correct?**
 9 A. Yes.
 10 **Q. Is that correct -- is that true, to
 11 your knowledge?**
 12 A. That's what it says here.
 13 **Q. Did he discuss that with you in this
 14 time frame? Other than mentioning it in this
 15 email.**
 16 A. I don't recall a conversation.
 17 **Q. At time time frame, did you have a
 18 general understanding that he was using The
 19 Mission Continues donor list for fundraising
 20 purposes?**
 21 A. Yes.
 22 **Q. Okay. And do you remember anything
 23 specific -- any conversation that would have
 24 given rise to that understanding?**
 25 A. No.

Page 242

1 identification.)
 2 THE WITNESS: Thank you.
 3 BY MR. SAUER:
 4 **Q. This is another email from Michael
 5 Hafner to you on February 2nd; correct?**
 6 A. Appears that way.
 7 **Q. Do you recall receiving this email?**
 8 A. No.
 9 **Q. Do you recognize the list that's
 10 attached to this email?**
 11 A. Not specifically, but I understand
 12 what it is.
 13 **Q. What is it?**
 14 A. It appears to be a combined donor
 15 list.
 16 **Q. So this is a combined donor list for
 17 the campaign; correct?**
 18 A. Looks that way.
 19 **Q. In fact, the title of the attachment
 20 is "Greitens for Missouri Finance" with a date;
 21 correct?**
 22 A. Yeah.
 23 **Q. And "Greitens for Missouri" was the
 24 name of the campaign; right?**
 25 A. And the date was the date.

Page 244

1 **Q. What is the one random list?**
 2 A. No idea.
 3 MR. SAUER: Very briefly, Exhibit
 4 43.
 5 (Exhibit 43 was marked for
 6 identification.)
 7 THE WITNESS: Okay.
 8 BY MR. SAUER:
 9 **Q. Do you recognize this email?**
 10 A. Give me a second.
 11 (Witness reviews document) --
 12 I do.
 13 **Q. Is this an -- what is this email chain
 14 about, generally speaking?**
 15 A. Eric and I went to Washington, D.C. at
 16 some point in January to meet with possible
 17 vendors for a political campaign. One of those
 18 vendors is named Image. Eric thought maybe he
 19 wanted to test them out in terms of their work,
 20 and that the thought was to have them doing a
 21 little bit of work on his book tour to see how
 22 they performed; and thus, they sent information
 23 about that.
 24 **Q. So you traveled with Eric to
 25 Washington, D.C.?**

Page 245

1 A. I did.

2 **Q. Who paid for your travel?**

3 A. The Greitens Group or Eric Greitens'

4 LLC, whatever you call it.

5 **Q. Flipping to the third page of this**

6 **document, there's an email from Eric that spans**

7 **the second page to the third page; right?**

8 A. "I am leaning toward not hiring them."

9 **Q. Right.**

10 A. I got that.

11 **Q. Item 3 talks about there being 980,000**

12 **conservatives in Missouri on Facebook and**

13 **640,000 very conservative; and asks about doing**

14 **targeted advertising on that point and asks for**

15 **your opinion. Correct?**

16 A. Yes.

17 **Q. Where did those numbers come from?**

18 A. I have no idea.

19 **Q. Do you know what discussion was had**

20 **about targeting conservatives on Facebook in**

21 **this time frame?**

22 A. I don't remember. Clearly those

23 numbers were given to us by Image.

24 **Q. Okay. At the bottom of that same**

25 **page, the third page of the email chain, do you**

Page 247

1 **least getting his name out there to Missouri**

2 **conservatives?**

3 A. Yes, but less so -- as you see this

4 progression happen, less so as in he's going to

5 travel around to all Missouri's 114 counties

6 and speak; and more so, what could we do online

7 or what could we do to push this to audiences

8 that would later be helpful politically.

9 **Q. So in other words "this" that's being**

10 **pushed is in fact the book "Resilience" and its**

11 **launch; right?**

12 A. Yes

13 **Q. And the idea would be use the online**

14 **platforms in promoting the book to create a**

15 **good brand for the name Eric Greitens that**

16 **would be useful for the campaign; correct?**

17 A. I would argue he already had a good

18 brand. More of a political brand, more of a --

19 you know, non -- he went from being a

20 nonpartisan Navy SEAL guy to being more

21 political.

22 **Q. And so a useful way to accomplish that**

23 **would be through the book "Resilience" and its**

24 **launch?**

25 A. It would be an option.

Page 246

1 **see another email from Eric Greitens to you and**

2 **Krystal?**

3 A. I do.

4 **Q. And then it says on Item 3, "Danny, do**

5 **you think it's worth it to engage a firm to**

6 **help us advertise to key demographics for the**

7 **book launch with the idea that we get Missouri**

8 **conservatives thinking about me as "Resilience"**

9 **Navy SEAL guy before they hear about me**

10 **politically?" Do you see that?**

11 A. I do.

12 **Q. Were there discussions between you and**

13 **Eric Greitens in this time frame -- early**

14 **February of 2015 -- about employing the book**

15 **tour as a way to get Missouri conservatives to**

16 **think about him as a Navy SEAL?**

17 A. Yes.

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

19 **discussions?**

20 A. Just as you outlined.

21 **Q. So in other words, it was still an**

22 **active discussion that the book launch for**

23 **"Resilience" would serve as a useful**

24 **application purpose of introducing Eric to**

25 **Missouri conservative voters as a -- as a -- at**

Page 248

1 **Q. Do you know what you said in response**

2 **to that, when he said, "Danny, do you think**

3 **it's worth it?"**

4 A. I don't know. Are my emails here?

5 **Q. I believe so.**

6 A. Sorry. They are chronologically

7 messed up.

8 So I say, "On 3, I don't want to shoot

9 from the hip. Let me think about it, put some

10 thoughts on paper, ask some folks I trust on

11 cost and reach and loop back by the end of the

12 week."

13 **Q. And you say, "I think it could be done**

14 **cheaply and could go a long way"; right?**

15 A. Yes.

16 **Q. In other words, you agreed that it**

17 **might be something you would pursue that -- to**

18 **do some sort of online or social media**

19 **promotion of Eric through the "Resilience" book**

20 **launch to promote him to Missouri**

21 **conservatives; correct?**

22 A. I think my email clearly states here

23 that I want to think about it and get back to

24 him.

25 **Q. But it's under active discussion?**

Page 249

1 A. Absolutely under active discussion.
 2 MR. SAUER: Exhibit 44.
 3 (Exhibit 44 was marked for
 4 identification.)
 5 BY MR. SAUER:
 6 **Q. Do you recognize this email?**
 7 A. No.
 8 **Q. Do you remember being copied on the**
 9 **email from Michael Hafner to Eric Greitens?**
 10 A. No.
 11 **Q. It's a call list of potential donors**
 12 **to target at the beginning of the campaign;**
 13 **correct?**
 14 A. Yes.
 15 **Q. Do you know whether the donors in this**
 16 **call list are Mission Continues donors?**
 17 A. Becky Baun is. Tim Noonan is. It
 18 seems to say here which ones are.
 19 **Q. And that's all you know about it? You**
 20 **don't remember seeing this document when it was**
 21 **sent to you?**
 22 A. No. We had already the fact that I
 23 was copied on everything that was happening.
 24 So I don't remember opening this. It looks
 25 like this was Eric's call list that Hafner put

Page 251

1 **Q. And the third paragraph of the cover**
 2 **email, Mike Michael Hafner says, "For the time**
 3 **being, please do not call anyone you are**
 4 **uncomfortable with."**
 5 **Do you know what he's talking about**
 6 **there?**
 7 A. Let me read it.
 8 (Witness reviews document.)
 9 Yes, because Michael Hafner has added
 10 in the top political donors -- started adding
 11 in top political donors in Missouri. There's
 12 Brauer and Farr and Albrecht and Hoberock --
 13 and Ill and -- so I suspect, because Eric
 14 doesn't have a relationship with these people,
 15 that's what Mike means, that if he needs more
 16 information, don't call someone without
 17 information.
 18 MR. SAUER: Exhibit 45.
 19 (Exhibit 45 was marked for
 20 identification.)
 21 THE WITNESS: Thank you.
 22 BY MR. SAUER:
 23 **Q. Do you recognize this document?**
 24 A. Yes.
 25 **Q. And this is an email that you sent to**

Page 250

1 me on.
 2 **Q. So the idea was that this is a list**
 3 **that -- of people that Hafner would give Eric**
 4 **to call that week or in the immediate**
 5 **short-term; correct?**
 6 A. Yes. It's clearly a call list.
 7 **Q. Okay. And do you know if Eric was**
 8 **making calls to get donor commitments in this**
 9 **time frame?**
 10 A. I do know he was. I don't know
 11 whether -- I don't know what list he was
 12 working off of, but, yes, he was indeed making
 13 calls.
 14 **Q. Do you know specifically who he was**
 15 **calling?**
 16 A. I can't hypothesize necessarily, but I
 17 will say a lot of these people were early
 18 donors, the exploratory committee.
 19 **Q. And at this time, no vehicle exists**
 20 **for these people to give money to; correct?**
 21 A. Not for another 20 days or so.
 22 **Q. So at this time he's getting**
 23 **commitments but not actually getting checks;**
 24 **right?**
 25 A. Yes.

Page 252

1 **someone called Joel at Push Digital; right?**
 2 A. Yes.
 3 **Q. Who is -- what is Push Digital?**
 4 A. They're a digital consulting firm
 5 based in South Carolina.
 6 **Q. So they do kind of marketing through**
 7 **online and social media?**
 8 A. Yes.
 9 **Q. Do they do basically political**
 10 **marketing only, or do they do other things?**
 11 A. They do all of the above. They do
 12 corporate work too.
 13 **Q. Who is Wesley Donehue?**
 14 A. The CEO.
 15 **Q. So both those people are Push Digital**
 16 **people; right?**
 17 A. Yeah.
 18 **Q. Was Push Digital actually hired by the**
 19 **campaign to promote the book -- the**
 20 **"Resilience" book?**
 21 A. They were hired by The Greitens Group
 22 to promote the book, but they were also later
 23 hired by the campaign as the campaign's first
 24 digital vendor.
 25 **Q. So in this exchange, you're talking**

Page 253

1 about having them hired by The Greitens Group;
 2 correct?
 3 A. Yes.
 4 Q. And so -- and, in fact, The Greitens
 5 Group did pay them to promote the book
 6 "Resilience" on social media; correct?
 7 A. Yes.
 8 Q. And in Item 2 of your email -- your
 9 email at the top, you talk about there being
 10 980,000 conservatives in Missouri on Facebook
 11 and 640,000 folks self-identified as very
 12 conservative on Facebook; correct?
 13 A. It says, "According to another
 14 proposal we got, they claim" -- then followed
 15 by what you said.
 16 Q. So was there an understanding that
 17 Push Digital would, in fact, engage in
 18 marketing of the book "Resilience" targeted to
 19 Missouri, in particular?
 20 A. Yes.
 21 Q. And that was -- the reason for that
 22 was to have the book be a good launching pad or
 23 to promote the political campaign; correct?
 24 A. Yes.
 25 Q. Okay. And then flipping to the second

Page 254

1 page in this document, Wesley Donehue in the
 2 middle of the page sends an email to you --
 3 sends an email to Joel.
 4 Who is Joel Sawyer?
 5 A. At the time, he was Wes' No. 2.
 6 Q. Okay. And he says, "We own the email
 7 list from that one US Senate campaign that
 8 shall not be named."
 9 Do you know what he's referring to?
 10 A. No idea.
 11 Q. Is that the Akin campaign,
 12 potentially?
 13 A. Could be. I have no idea.
 14 Q. He talks about there being hard-core
 15 Missouri conservatives and good Missouri donors
 16 on their list.
 17 A. So I think your conclusion is not far
 18 off.
 19 Q. And he talked about targeting those
 20 people on Facebook; correct?
 21 A. That's what it looks like.
 22 Q. So he was -- Push Digital was paid by
 23 The Greitens Group during this time frame to
 24 target Missouri conservatives on Facebook;
 25 right?

Page 255

1 A. Among other things, yes.
 2 Q. Okay. And does Push Digital have any
 3 relationship with The Mission Continues
 4 financially or otherwise, to your knowledge?
 5 A. To my knowledge, no. But I don't
 6 know.
 7 MR. SAUER: Exhibit 46.
 8 You know what, can I withdraw
 9 this exhibit? Let's not use it. I'm sorry.
 10 We're not going to call that 46.
 11 MR. BOXERMAN: Sorry I wrote on
 12 it.
 13 MR. SAUER: This will be Exhibit
 14 46.
 15 THE WITNESS: I was going to say,
 16 you weren't going to like what I had to say
 17 about that anyway.
 18 MR. BOXERMAN: Now he wants it.
 19 BY MR. SAUER:
 20 Q. Let me ask you this: Without getting
 21 the exhibit back, what were you going to say
 22 about it?
 23 A. I just didn't have any information for
 24 you. I shouldn't have said anything at all. I
 25 just didn't have any information for you.

Page 256

1 THE COURT REPORTER: So this is
 2 46.
 3 THE WITNESS: 46.20.
 4 MR. SAUER: It's the only 46.
 5 MR. BOXERMAN: We don't want to
 6 mess up our record.
 7 (Exhibit 46 was marked for
 8 identification.)
 9 BY MR. SAUER:
 10 Q. That's a recipe for future confusion.
 11 Do you recognize this email chain?
 12 A. Give me a second.
 13 (Witness reviews document.)
 14 I do.
 15 Q. And who is Steve Michael?
 16 A. Steve Michael is the Victory
 17 Enterprises political consultant we referred to
 18 earlier.
 19 Q. And he's the one who provided the
 20 Schweich list?
 21 A. I believe so.
 22 Q. Do you have any reason to think that
 23 the Schweich list was obtained illegally or
 24 improperly?
 25 A. I have no idea.

Page 257

1 **Q. Is it possible that it was?**
 2 A. I don't believe Victory Enterprises
 3 worked for Tom Schweich.
 4 **Q. So they got it somehow, but you don't**
 5 **know how?**
 6 A. No idea.
 7 **Q. Okay.**
 8 A. I didn't know they had it until you
 9 told me.
 10 **Q. Do you know who [REDACTED] is?**
 11 A. I do.
 12 **Q. Who is [REDACTED]?**
 13 A. Yes, she was [REDACTED] fiancée.
 14 **Q. So he was -- he's essentially pushing**
 15 **the Greitens campaign to hire his fiancée?**
 16 A. I don't know whether she's the fiancée
 17 or former fiancée at this point. One of those
 18 two is correct. I don't know which one is --
 19 **Q. Let me ask you this: Did [REDACTED]**
 20 **end up having any role in the Greitens**
 21 **campaign?**
 22 A. No.
 23 **Q. You see here in the second paragraph**
 24 **of Steve Michael's email, he says, "[REDACTED] is**
 25 **interested in transitioning out of the party at**

Page 258

1 some point in time and is specifically
 2 interested in nonprofit fundraising"; correct?
 3 A. Because she was working for the
 4 Missouri Republican party at the time.
 5 **Q. And that was -- and she wanted to move**
 6 **on to a new job; correct?**
 7 A. Yes, sir.
 8 **Q. And she wanted to get involved in**
 9 **nonprofit fundraising; right?**
 10 A. That's what that says.
 11 **Q. Okay. It goes on to say, "Recently,**
 12 **Eric mentioned a potential opening at The**
 13 **Mission Continues, which could be a good fit**
 14 **for both and allow [REDACTED] to help with the**
 15 **campaign in her free time"; correct?**
 16 A. Yes.
 17 **Q. Did you have any knowledge of that**
 18 **discussion occurring between Eric Greitens and**
 19 **Steve Michael?**
 20 A. No, sir.
 21 **Q. And so I take it what Steve is saying**
 22 **is that [REDACTED] can come work as a fundraiser for**
 23 **The Mission Continues and also work on the**
 24 **campaign; correct?**
 25 A. I have no idea. I don't know how to

Page 259

1 interpret it because I didn't write it.
 2 **Q. And you didn't have any knowledge of**
 3 **those -- those -- those facts being discussed?**
 4 A. Correct. All I know is what is in
 5 this email I'm reading.
 6 **Q. Okay. Are you aware of any situation**
 7 **where someone who worked for The Mission**
 8 **Continues in the fundraising capacity also**
 9 **assisted the campaign in any way?**
 10 A. No.
 11 **Q. How about Meredith Gibbons?**
 12 A. What about her?
 13 **Q. Was she a fundraiser at The Mission**
 14 **Continues?**
 15 A. No; she was working in D.C., and she
 16 moved back to St. Louis to work for Eric.
 17 **Q. I'm sorry. I have the names confused.**
 18 **Lindsay Hodges, was she involved in**
 19 **the campaign in any way?**
 20 A. Not to my knowledge, other than what
 21 I'm learning through your exhibits.
 22 **Q. Okay. On the second page in this**
 23 **exhibit there's an email from Eric Greitens on**
 24 **February 14th where he says, "Steve and**
 25 **Danny, if you think it's wise, maybe we could**

Page 260

1 ask [REDACTED] to stop by for a few minutes in
 2 Lincoln Days. I'd be happy to introduce her to
 3 the team at The Mission Continues and also
 4 suggest a few other fundraising leads she might
 5 want to look into"; correct?
 6 A. It says that, yes.
 7 **Q. Do you recall Eric sending you an**
 8 **email that said that?**
 9 A. No.
 10 **Q. Do you remember if people at The**
 11 **Mission Continues were present with Eric**
 12 **Greitens at Lincoln Days?**
 13 A. I was present with Eric Greitens at
 14 the Lincoln Days in Kansas City, and I don't
 15 recall anyone, to my knowledge, involved in The
 16 Mission Continues being there.
 17 **Q. Do you recall if [REDACTED] came and**
 18 **met with Eric Greitens in Lincoln Days in this**
 19 **time frame?**
 20 A. I know she was there because the party
 21 puts on Lincoln Days and she was working for
 22 the party. I don't know if she met with Eric.
 23 I suspect she did.
 24 I also know Eric met with a hundred
 25 people that weekend.

Page 261

1 **Q. Do you know if he discussed with her**
2 **the possibility of her working as a Mission**
3 **Continues fundraiser and also assisting on the**
4 **campaign?**
5 A. I have no idea.
6 MR. SAUER: Exhibit 47.
7 (Exhibit 47 was marked for
8 identification.)
9 BY MR. SAUER:
10 **Q. Do you recognize this document?**
11 A. Sorry. It's hard to read.
12 (Witness reviews document.)
13 I don't.
14 **Q. So this document purports to be an**
15 **email sent on April 22nd of 2015; correct?**
16 A. To Meredith, yeah.
17 **Q. From Krystal?**
18 A. Yes.
19 **Q. Copying someone called Danny?**
20 A. It appears that way.
21 **Q. Do you recall receiving this email?**
22 A. I don't, but I'm going to assume that
23 "Danny" is me.
24 **Q. And in this time frame, you're still**
25 **in charge of the campaign; right?**

Page 262

1 A. I am.
2 **Q. And Meredith is the name -- is that**
3 **Meredith Gibbons, who is now in charge of**
4 **fundraising for the campaign?**
5 A. Yes. If you look below, it says her
6 full name.
7 **Q. Yes. And she says, "Thank you so**
8 **much." I see that.**
9 **So this is definitely sent to you and**
10 **Meredith Gibbons on April 22nd; correct?**
11 A. It's definitely send to Meredith
12 Gibbons copying someone named Danny. I suspect
13 that is me, but I don't remember this.
14 **Q. So you don't remember seeing this**
15 **email before?**
16 A. No, I don't.
17 **Q. Okay. And it says -- in the email,**
18 **Krystal says to Meredith and probably to you,**
19 **"Here are three docs that you probably want to**
20 **have on hand"; correct?**
21 A. I'm going to argue that she sent it to
22 Meredith and cc'd me, but -- so I think to
23 Meredith, she said that.
24 **Q. Okay. And she said, "The first**
25 **document is all donors 1K and up -- is The**

Page 263

1 **Mission Continues donor list through May 2014**
2 **when Eric stepped down as CEO"; correct?**
3 A. Yes.
4 **Q. And she goes on to say, "So anything**
5 **in late 2014 won't be included here or anything**
6 **from 2015"; correct?**
7 A. That's what it says.
8 **Q. And under the attachments, there**
9 **appears to be The Mission Continues donor list**
10 **attached here.**
11 A. That's what appears.
12 **Q. And you said you don't recall ever**
13 **seeing this email before; right?**
14 A. Correct.
15 **Q. So you don't recollect being copied on**
16 **an email where Krystal Taylor sent The Mission**
17 **Continues donor list to Meredith Gibbons after**
18 **Meredith had joined the campaign as the lead**
19 **fundraiser?**
20 A. It clearly looks that way. I don't
21 remember this email.
22 **Q. Let me ask you this question: Did you**
23 **authorize or instruct Krystal, during this**
24 **April 2015 time frame, to send The Mission**
25 **Continues list to Meredith Gibbons?**

Page 264

1 A. I don't believe I did.
2 **Q. Are you confident that you did not?**
3 A. I said I don't believe I did. I don't
4 believe I did.
5 **Q. Why don't you believe that?**
6 A. It doesn't make sense to me that I
7 would. I may have said something to the effect
8 of -- of -- to Krystal, Give all the documents
9 from Mike, or I may have said, Send all the
10 finance stuff to Meredith, or it may just have
11 been her doing a document dump on her own.
12 I don't think that -- I can't surmise
13 from this that I ordered this email to take
14 place.
15 **Q. But are you confident that there was**
16 **no specific instruction from you that mentioned**
17 **The Mission Continues donor list and sharing**
18 **that with Meredith?**
19 A. I can't recall the conversation. I
20 don't -- I don't believe I said that.
21 **Q. Are you aware whether there was any**
22 **conversation at all?**
23 A. Not that I recall.
24 **Q. So you don't remember that there was**
25 **any conversation?**

Page 265

1 A. Correct.

2 **Q. And you don't believe that you ever**

3 **told her, Send The Mission Continues donor list**

4 **to Meredith Gibbons?**

5 A. No; and there's other lists here

6 attached too, which would be strange.

7 **Q. At the very bottom of the email, do**

8 **you know who Chad is? Do you see how there's a**

9 **thing from Meredith Gibbons to Chad?**

10 A. I was confused by that when I read it.

11 I don't know, but that was prior to my -- or

12 after my departure. So it's dated 12/8/15,

13 after I resigned from the campaign. So I have

14 no idea who Chad is.

15 **Q. Okay. Do you know whether Meredith**

16 **Gibbons shared The Mission Continues donor list**

17 **with anyone else, whether their name was Chad**

18 **or not?**

19 A. I have no idea. It was my knowledge

20 at the time that everyone was working off a

21 master fundraising list that already

22 encompassed the TMC list.

23 MR. SAUER: Do you want to take a

24 break now? It's a good break point.

25 (Recess.)

Page 267

1 **list had become an issue in the media?**

2 A. 2016.

3 **Q. Sorry. In 2016 it became an issue in**

4 **the media?**

5 A. Yes, sir.

6 **Q. And eventually was there an ethics**

7 **complaint filed against Greitens for Missouri**

8 **based on its use of this donor list?**

9 A. To my knowledge, that's correct.

10 **Q. Did you have any communication with**

11 **anyone affiliated with Eric Greitens or**

12 **Greitens for Missouri from the time you left**

13 **the campaign up until the resolution of that**

14 **ethics complaint about the TMC donor list?**

15 A. Yes; on both primary election and

16 general election night, Nick Ayers and I traded

17 emails that were cordial but not --

18 non-substantive. And then a few times, as

19 people would reach out to me with an invoice or

20 a media call, I would email that to Austin

21 with -- that was the only thing up until what I

22 believe is this phone call sitting in front of

23 me in Exhibit 48.

24 MR. BOXERMAN: I'm not sure you

25 heard his question correctly.

Page 266

1 BY MR. SAUER:

2 **Q. Just turning back to Exhibit 47 --**

3 A. Yes.

4 **Q. -- which is the April 22nd email**

5 **from Krystal to Meredith copying you. Do you**

6 **see that?**

7 A. Yes.

8 **Q. I just want to summarize what you've**

9 **testified about this.**

10 **Is it fair to say that you are very**

11 **confident that you did not authorize or**

12 **instruct Krystal Taylor to share The Mission**

13 **Continues donor list with Meredith Gibbons?**

14 A. Yes, I'm very confident of that.

15 **Q. Do you know who, if anyone, would have**

16 **authorized Krystal to do that?**

17 A. I don't, but her direct report was

18 Eric.

19 MR. SAUER: Exhibit 48.

20 (Exhibit 48 was marked for

21 identification.)

22 BY MR. SAUER:

23 **Q. I want to jump ahead in time. Is it**

24 **fair to say that in 2017, at some point you**

25 **became aware that this Mission Continues donor**

Page 268

1 BY MR. SAUER:

2 **Q. In other words, these are just**

3 **contacts that you had that didn't relate to The**

4 **Mission Continues donor list; correct?**

5 A. Can you rephrase the question? Sorry.

6 **Q. What I meant to ask was, was there**

7 **any -- not whether there was any contact at**

8 **all, but whether there was any contact between**

9 **you and anyone affiliated with Greitens for**

10 **Missouri about the TMC donor lists before you**

11 **had this particular phone call in the phone**

12 **record in Exhibit 48.**

13 A. Sorry. To correct that, the answer is

14 no.

15 **Q. So, for example, when Nick Ayers**

16 **emailed you on the primary and general election**

17 **night in a cordial way, there was no discussion**

18 **of The Mission Continues donor list?**

19 A. Correct. I thought you were talking

20 broadly.

21 **Q. But there were some cordial contacts**

22 **during this time frame?**

23 A. Yes.

24 **Q. But no reference to The Mission**

25 **Continues donor list?**

Page 269

1 A. Correct.

2 **Q. So -- and we've alluded to Exhibit 48**

3 **reflecting a phone call. Is it fair to say**

4 **that you received an incoming phone call at**

5 **11:25 a.m. on April 24th, 2017, that related**

6 **to The Mission Continues donor list?**

7 A. Yes.

8 **Q. Okay. And the number was**

9 **██████████ correct?**

10 A. Yes, which I believe is Austin

11 Chambers' cell phone.

12 **Q. Do you recall having a phone call with**

13 **Austin Chambers about the ethics complaint**

14 **relating to The Mission Continues donor list?**

15 A. Yes.

16 **Q. What was said in that phone**

17 **conversation?**

18 A. Austin called me in the morning and

19 said, for the first probably four or five

20 minutes -- we hadn't spoken since about a week

21 after I resigned from the campaign. So there

22 was a lot of, "How are you," catching up. you

23 know, Austin is Southern, speaks slower, kind

24 of having a back-and-forth conversation. How

25 are you, what are you doing, how is the

Page 271

1 manager of the campaign at the time or in

2 charge of the campaign at the time.

3 **Q. So did he say anything more specific**

4 **about that?**

5 A. No.

6 **Q. Did he -- did he say anything that**

7 **stated or implied that he was offering you any**

8 **kind of benefit in exchange for using your name**

9 **to resolve the ethics complaint?**

10 A. No. I believed, in my split-second

11 decision of a brain, that it may have endeared

12 myself to the consultants and Eric and may be a

13 way of cooperating -- with getting this

14 bullshit complaint dismissed would have been a

15 way to maybe mend that relationship; but that

16 wasn't explicit.

17 **Q. Was it important to you to mend that**

18 **relationship?**

19 A. I would have liked to.

20 **Q. Why?**

21 A. Politics is a small business, and he

22 was the governor of a state that I hoped to do

23 business in in the future.

24 **Q. And so it was important to you to sort**

25 **of be cooperative and supportive because it**

Page 270

1 campaign, how is life, kind of catch-up session

2 for the first couple of minutes.

3 And then Austin says to me, "I don't

4 know if you know this, but there's a bullshit

5 ethics complaint filed against us by the

6 Democrat party about this Mission Continues

7 donor list."

8 And he said, "I need someone who was

9 on the campaign at the time, because I wasn't,

10 to put their name down so we can get this

11 bullshit complaint dismissed. We will pay" --

12 assuming him and the campaign -- "will pay the

13 fine, but we need to put someone's name down

14 who was on the campaign at the time, and I was

15 not."

16 And he said, "Can we put your name

17 down?"

18 **Q. And what did you say?**

19 A. I said yes.

20 **Q. Why did you agree to that?**

21 A. Because I was on the campaign at the

22 time when the list was around.

23 **Q. When he said put your name down, do**

24 **you know what he was referring to?**

25 A. I assumed it meant that I was the

Page 272

1 **might influence your future career?**

2 A. Yes.

3 **Q. Did Austin say anything -- Austin**

4 **Chambers say anything that stated or implied**

5 **that it would be important to your future**

6 **career to let them use your name in resolving**

7 **the complaint?**

8 A. No.

9 **Q. Did he offer to allow you to review**

10 **the filing that they were going to do?**

11 A. No.

12 **Q. Have you ever reviewed that filing?**

13 A. I read it a week later when I started

14 getting media calls about it being filed

15 publicly.

16 **Q. And what was your reaction to that**

17 **filing?**

18 A. That what was represented there was

19 not what I thought I told Austin on the phone

20 he could use my name for.

21 **Q. Do you remember -- you used some**

22 **specific language. Do you remember what**

23 **Austin's exact words were? Did he used the**

24 **phrase "put your name down"?**

25 A. Vividly things I remember are

Page 273

1 "bullshit complaint," "dismissed," "put your
 2 name down because you were there at the time,"
 3 "because I wasn't," was the phrasing I remember
 4 specifically.
 5 **Q. Was there any – after you said yes,
 6 to agree to let them, quote, put your name
 7 down, was there any further discussion of this
 8 situation between you and Austin on that phone
 9 call?**
 10 A. Yes. I mentioned that sometime in
 11 2016 David Lieb with the AP reached out to me
 12 about this Mission Continues list he was
 13 writing a story on. And I said, If there's
 14 press -- press starts bothering me about this,
 15 what should I say? And he said -- about this
 16 complaint being dismissed, what should I say?
 17 And he kind of walked me through that
 18 their plan is to not respond and he would
 19 advise that I not respond but I can really do
 20 what I want.
 21 **Q. Okay. So you discussed with him about
 22 what you should say to the media?**
 23 A. I asked him if it was going to be
 24 public, and he said he thought so. And that's
 25 when I asked, What should I say? But at that

Page 275

1 THE WITNESS: Thank you.
 2 BY MR. SAUER:
 3 **Q. Do you recognize this document?**
 4 A. Looks like an ethics quarterly.
 5 **Q. And in fact, is this the amended
 6 filing that the Greitens for Missouri submitted
 7 to resolve the ethics complaint?**
 8 A. I wasn't a party to that. Apparently.
 9 That's what it looks like.
 10 **Q. You said a week after your discussion
 11 with Austin you reviewed their amended filing;
 12 is that fair to say?**
 13 A. Not the amended filing. I viewed
 14 their -- whatever you call the settlement
 15 agreement, I reviewed that, which was not what
 16 I agreed to. I reviewed that document for the
 17 first time.
 18 **Q. And that was when you reacted to
 19 that -- let me ask you this: When you reviewed
 20 that document, did you feel like you had been
 21 affirmatively misled by Austin?**
 22 A. Yes.
 23 **Q. You felt that Austin had, in effect,
 24 deceived you in mischaracterizing the use that
 25 your name would be put to resolve the ethics**

Page 274

1 point, I didn't know what the document stated.
 2 **Q. Was there anything else said in this
 3 conversation with Austin Chambers on
 4 April 24th of 2018?**
 5 A. Not that I can remember.
 6 **Q. Was there anything else about the
 7 discussion of the ethics complaint or The
 8 Mission Continues list?**
 9 A. Not other than what I've previously
 10 told you.
 11 **Q. Did anyone other than Austin Chambers
 12 or a reporter ever approach you to discuss
 13 either the ethics complaint or The Mission
 14 Continues donor list?**
 15 A. A lot of reporters.
 16 **Q. Other than reporters, anyone else?**
 17 A. No.
 18 **Q. Did anyone ever state or imply to you
 19 that you could get some benefit if you let the
 20 campaign use your name to resolve the ethics
 21 complaint?**
 22 A. No.
 23 MR. SAUER: Exhibit 49.
 24 (Exhibit 49 was marked for
 25 identification.)

Page 276

1 **complaint?**
 2 A. Yes, because I would never have agreed
 3 for it to be perceived or otherwise that I
 4 in-kind of a list that I did not in-kind.
 5 **Q. Can we flip to --**
 6 A. The last page?
 7 **Q. I have it as the ninth page, so it's
 8 kind of in the middle.**
 9 A. I'm here.
 10 **Q. Do you see at the very bottom of that
 11 page you are listed as a donor to the campaign
 12 for the first quarter of the campaign's
 13 existence?**
 14 A. I do see that.
 15 **Q. It says "Danny Laub, Greitens for
 16 Missouri campaign manager"; right?**
 17 A. I do see that. I would contend that I
 18 wasn't the campaign manager, in title or
 19 otherwise, on March 1st, 2015, but yes.
 20 **Q. What was your role on March 1st,
 21 2015?**
 22 A. I was helping getting everything
 23 organized. I guess I was effectively in
 24 charge, but I wasn't given the campaign manager
 25 role until summer of 2015.

Page 277

1 **Q. And March 1st of 2015 would have**
2 **been immediately after the formation of the**
3 **campaign; right?**
4 A. Like eight days later.
5 **Q. Okay. And this lists an in-kind**
6 **contribution in the value of \$600; right?**
7 A. Correct.
8 **Q. And it's your understanding that that**
9 **\$600 is referring to the TMC donor list in this**
10 **amended filing; correct?**
11 A. That's what it said. When Austin
12 talked to me about it, the \$600 never came up,
13 or that it would be an in-kind contribution
14 that -- was -- it was -- that didn't come up.
15 But this first time I did that was when I
16 referenced the settlement agreement to the
17 ethics complaint.
18 **Q. And, in particular, you never**
19 **authorized Austin to use your name as someone**
20 **who had donated the list, the TMC, list to the**
21 **campaign as an in-kind contribution?**
22 A. Because that's untrue.
23 **Q. In other words, you -- you testified**
24 **earlier that you were not the source of this**
25 **list; correct?**

Page 279

1 A. Yes.
2 **Q. And you believe you were deceived into**
3 **allowing your name to be used in this**
4 **connection by Austin Chambers; correct?**
5 A. Yes.
6 **Q. Did -- do you believe that anyone else**
7 **deceived you or induced you to do this?**
8 A. Rephrase.
9 **Q. Did anyone else deceive you or induce**
10 **you to authorize the use of your name to**
11 **resolve the Eric Greitens ethics complaint?**
12 A. Only conversation I had was this
13 8-minute phone call with Mr. Chambers.
14 MR. SAUER: Exhibit 50?
15 THE WITNESS: Yes, it would be
16 50.
17 (Exhibit 50 was marked for
18 identification.)
19 BY MR. SAUER:
20 **Q. Do you recognize this document?**
21 A. Far too familiar.
22 **Q. Is this the settlement agreement**
23 **between Greitens for Missouri and the ethics**
24 **commission that you referred to having reviewed**
25 **earlier?**

Page 278

1 A. Correct.
2 **Q. And this date, March 1st, 2015,**
3 **nothing that you're aware of happened with the**
4 **list on that date at all; correct?**
5 A. I have no idea. Right.
6 **Q. And, in fact, based on the emails**
7 **we've seen today, that list was in the hands of**
8 **Krystal Taylor by December 5th of 2014;**
9 **right?**
10 A. If not earlier, yes.
11 **Q. And, in fact there's an October 15th**
12 **email that seems to refer to it; correct?**
13 A. Yes, sir.
14 **Q. And certainly on January 6th and**
15 **January 28th, she forwarded it to you and**
16 **Michael Hafner; correct?**
17 A. Yes, sir.
18 **Q. And at no point were you the source of**
19 **the TMC list being provided to anyone on**
20 **Greitens' political side; correct?**
21 A. Correct.
22 **Q. So it's your view that this report of**
23 **you making an in-kind contribution to the**
24 **campaign on March 1st, 2015, is false in**
25 **every particular; correct?**

Page 280

1 A. Yes, sir.
2 **Q. And let me ask you this: On Page 7 of**
3 **this document, do you see the signature block**
4 **for Respondent Hon. Eric Greitens?**
5 A. Yes.
6 **Q. Is that, in fact, his signature, do**
7 **you know?**
8 A. Looks like it.
9 **Q. And you've seen his signature on**
10 **numerous occasions; is that fair to say?**
11 A. Yes.
12 **Q. Okay. Flipping back to the third page**
13 **of the document, Paragraph 10 --**
14 A. Yes.
15 **Q. -- do you see where it says, "On or**
16 **about" blank and April 28th is handwritten**
17 **in, "2017"?**
18 A. I see that.
19 **Q. Is this the -- is this the paragraph**
20 **in the ethics complaint that you claim was**
21 **false and incorrect?**
22 MR. BOXERMAN: Well, not the
23 complaint but the --
24 MR. SAUER: Sorry, sorry.
25 MR. BOXERMAN: -- the document

Page 281

1 resolving the complaint.
 2 BY MR. SAUER:
 3 **Q. Sorry, in the settlement agreement.**
 4 A. One second.
 5 (Witness reviews document.)
 6 Yes, I believe that is inaccurate.
 7 **Q. And you reviewed this particular --**
 8 **and, in fact, everything it says about you**
 9 **making an in-kind contribution is untrue;**
 10 **right?**
 11 A. Yes. I also want to be clear that
 12 this is not my handwriting.
 13 **Q. Do you know who wrote that in here?**
 14 A. I have no idea.
 15 **Q. And down there where it says "Daniel**
 16 **Laub," with a squiggle or initials underneath**
 17 **it, do you know who wrote that?**
 18 A. I have no idea.
 19 **Q. Do you know whose initials are --**
 20 **those are? It looks like to me like it's an**
 21 **M.A.?**
 22 A. Which would be Mike Adams.
 23 **Q. Who is Mike Adams?**
 24 A. He's the attorney.
 25 **Q. He was an attorney for the campaign?**

Page 282

1 A. Yeah. He's listed at the end of this
 2 packet.
 3 **Q. Okay. So you would understand that to**
 4 **be Michael Adams filling in these blanks;**
 5 **right?**
 6 A. I have no idea who filled in the
 7 blanks, but that would make sense. I know it
 8 was not me.
 9 **Q. You said you reviewed this document**
 10 **about a week after your phone call with Austin**
 11 **Chambers; right?**
 12 A. When I started getting calls from
 13 reporters.
 14 **Q. Was there anything else in this**
 15 **document that you reacted to in any way?**
 16 A. Yes, whole document made me sick.
 17 **Q. Tell me why.**
 18 A. One, because it was misrepresented;
 19 and two, because now I was in a round of news
 20 stories falsely portraying what happened.
 21 **Q. In particular, those news stories**
 22 **reported that you had contributed the list as**
 23 **an in-kind contribution?**
 24 A. Yeah. And they're still happening.
 25 **Q. And in your view that's not true?**

Page 283

1 A. No. And the facts of this say it's
 2 not true. Yes.
 3 **Q. Let me ask you this: Has the media**
 4 **coverage of this incident affected your career**
 5 **in any way?**
 6 A. Yes. I mean, I would like to say no,
 7 but yes.
 8 **Q. How has it done that? Has it made it**
 9 **harder for you to get a job or made clients**
 10 **less willing to work with you? How has it done**
 11 **so?**
 12 A. I mean, I work with a very wonderful
 13 firm who fully supports me, but it
 14 definitely -- you know -- when you Google
 15 people and you've been in hundreds and now
 16 thousands, probably, with the last couple of
 17 weeks of news stories, it certainly -- I can
 18 trace it back to -- we've done two pitches in
 19 Missouri which we haven't gotten, and I know
 20 that this links back to this.
 21 **Q. When you say "we," were you personally**
 22 **involved in those pitches?**
 23 A. Yes.
 24 **Q. And so you -- do you believe that you**
 25 **are persona non grata in Missouri, potentially,**

Page 284

1 **because anyone who Googles you knows about**
 2 **your -- you name was used in this connection?**
 3 A. Yeah. I can only speculate reasons
 4 why people do stuff, but it certainly hasn't
 5 been helpful. And I would say it's -- it's
 6 caused -- it caused harm.
 7 **Q. Can you quantify that harm? Would you**
 8 **be able to put a dollar value on it?**
 9 A. I mean, in terms of money we would
 10 have made or contracts I would have lost,
 11 significant tens of thousands of dollars.
 12 MR. SAUER: Let me give you
 13 Exhibit 51.
 14 (Exhibit 51 was marked for
 15 identification.)
 16 THE WITNESS: Thank you.
 17 BY MR. SAUER:
 18 **Q. Sorry I'm jumping way back in time**
 19 **here to November 6th, 2014.**
 20 **Do you remember this email with**
 21 **Krystal Taylor?**
 22 A. I do.
 23 **Q. What's this?**
 24 A. This is about Eric got allotted some
 25 amount of money through the Templeton grant at

Page 285

1 Wash U for things involving Eric I don't know
 2 the details on. And part of my work for Eric
 3 in terms of book tour and speaking stuff was
 4 paid out of this Templeton grant.
 5 **Q. What is a Templeton grant, in your**
 6 **understanding?**
 7 A. It was a grant -- a large grant from
 8 Wash U to Eric. I don't know what the details
 9 are.
 10 **Q. So was the Templeton grant -- was it**
 11 **in some way connected with the "Resilience"**
 12 **book?**
 13 A. I think so, but I'm not intimately
 14 involved with the grant.
 15 **Q. And the second -- the first page of**
 16 **this email towards the bottom, Krystal**
 17 **instructs you to send a contract and an invoice**
 18 **to The Greitens Group and to Wash U giving a**
 19 **grant number; correct?**
 20 A. Yes.
 21 **Q. Was it explained to you why you would**
 22 **be invoicing Washington University for work you**
 23 **had done?**
 24 A. Yes; because that's how they paid the
 25 grants.

Page 286

1 Apparently, instead of the grants
 2 being a lump sum to Eric Greitens' LLC that
 3 they dish out, I guess for accountability
 4 reasons, you had to submit individual invoices
 5 to Wash U, and then they paid the grants, per
 6 grant.
 7 **Q. And do you know what work you were**
 8 **invoicing to Washington University?**
 9 A. Yeah, I don't think this was the
 10 actual breakdown here. I think it changed, but
 11 what it was was work on the book tour for
 12 "Resilience."
 13 **Q. Okay. Were you party to any**
 14 **communications between Eric Greitens' or anyone**
 15 **at The Greitens Group and Wash U with**
 16 **"Resilience" and the book tour?**
 17 A. Zero.
 18 **Q. Do you know if there were any**
 19 **discussions between those -- any of those**
 20 **people and Washington University about the sort**
 21 **of plan or expectations that the book tour**
 22 **would be used to leverage the political**
 23 **campaign?**
 24 A. I have no idea.
 25 **Q. How were you paid, generally speaking,**

Page 287

1 **during this time frame? So this is November of**
 2 **2014. Is this around when you were paid for**
 3 **the first time for political work for Eric**
 4 **Greitens?**
 5 A. I believe you -- I believe that was
 6 part of documents we produced, but I would
 7 say -- I would, say at that point, income was
 8 coming from three sources. At first it was
 9 Eric Greitens' LLC, The Greitens Group; second,
 10 it was coming from the Templeton grant; and
 11 third, it started to come from Greitens for
 12 Missouri as a contractor. Those would be the
 13 three.
 14 MR. BOXERMAN: Just to clarify,
 15 because you said "around that time," so he may
 16 have expanded it. I don't think any money
 17 began coming to you until December 1st and
 18 afterwards.
 19 THE WITNESS: Yes, sir.
 20 MR. BOXERMAN: And this is all
 21 dated November of 2014. So there may be a
 22 mismatch in terms of what you meant when you
 23 said "around this time" and how you interpreted
 24 it.
 25 THE WITNESS: Sorry. I never got

Page 288

1 paid a dime from any entities involved in this
 2 until after December 1st.
 3 BY MR. SAUER:
 4 **Q. So December 1st, 2015, is the first**
 5 **time you get paid?**
 6 A. Well, I actually got paid at the end
 7 of the month, but for work from December 1st
 8 on.
 9 MR. BOXERMAN: Again, you said
 10 2015, and it's 2014.
 11 MR. SAUER: I apologize again.
 12 MR. BOXERMAN: Right? Is it 2014
 13 or 2015?
 14 THE WITNESS: 2014. You are
 15 correct. Thank you.
 16 MR. SAUER: Thank you, Sandy.
 17 MR. BOXERMAN: It's all right.
 18 BY MR. SAUER:
 19 **Q. Were you paid by Wash U at some point?**
 20 A. Yes. I received two checks from this
 21 grant.
 22 MR. SAUER: Okay. Let's do
 23 Exhibit 52.
 24 (Exhibit 52 was marked for
 25 identification.)

Page 289

1 THE WITNESS: Thank you.
 2 BY MR. SAUER:
 3 **Q. This is your 1099 for 2014; correct?**
 4 A. Appears that way -- yes, this is my
 5 1099.
 6 **Q. And it indicates that you were paid**
 7 **\$5000 by Eric Greitens' LLC in 2014 as an**
 8 **independent contractor; is that right?**
 9 A. That was for December.
 10 **Q. And the second page of this document**
 11 **indicates that you were paid that on**
 12 **December 22nd, 2014; correct?**
 13 A. That's when I deposited it, yes.
 14 Sometime around there.
 15 **Q. So there was a check written to you.**
 16 **Who wrote the check?**
 17 A. Eric.
 18 **Q. Was it from Eric's personal account or**
 19 **was it from The Greitens Group?**
 20 A. I thought it was -- it was from Eric
 21 Greitens' LLC.
 22 **Q. Okay. So there was a check from Eric**
 23 **Greitens' LLC that you received for \$5,000.**
 24 **What was that paying you for?**
 25 A. That was paying for my contract

Page 291

1 MR. DUNKEL: We can redact --
 2 MR. SAUER: Why don't we just
 3 redact the official copy today before we leave,
 4 if I everyone can agree to that. Let's just
 5 take White-Out --
 6 MR. BOXERMAN: We'll have to do
 7 it a bunch of times in this exhibit.
 8 MR. DUNKEL: We've only got it on
 9 the front page. We missed it on the --
 10 THE WITNESS: It's like four
 11 times here, and -- then maybe on the last -- we
 12 can -- can we flag that?
 13 MR. BOXERMAN: Yeah. Can we have
 14 an agreement, before we give it to the court
 15 reporter, we'll redact what we'll give as the
 16 official exhibit?
 17 MR. SAUER: We can easily agree
 18 to that.
 19 THE WITNESS: Sorry. What was
 20 your question?
 21 BY MR. SAUER:
 22 **Q. Skipping ahead, it indicates that you**
 23 **were paid -- the third page indicates you were**
 24 **paid \$11,000 in a 1099 for 2015; right?**
 25 A. Yes, sir.

Page 290

1 services from December 1st through the end of
 2 December.
 3 **Q. And so these contract services**
 4 **included all the things you testified about**
 5 **early -- majority political work, also stuff on**
 6 **the book tour and then maybe a few small**
 7 **things?**
 8 A. Random things, yes.
 9 **Q. But the bulk of that \$5,000 was to**
 10 **compensate you for political work; correct?**
 11 A. That was my understanding.
 12 **Q. And that was sort of political**
 13 **consulting work, including all the meetings**
 14 **during this time frame that we've been talking**
 15 **about today; right?**
 16 A. Yes.
 17 **Q. Okay. Flip to the third page in this**
 18 **document --**
 19 A. Can I flag something? My Social
 20 Security is not redacted here.
 21 MR. DUNKEL: I just realized
 22 that.
 23 THE WITNESS: If this is going to
 24 be released or something, can we make sure that
 25 is clear?

Page 292

1 **Q. And what was -- and that was -- you**
 2 **were paid by Greitens for Missouri as an**
 3 **independent contractor in 2015?**
 4 A. Yes. Before we set up a payroll
 5 service, I was taking consulting checks; and
 6 then I was moved, at the end of April, to be a
 7 W-2 employee.
 8 **Q. Okay. So you were paid as an**
 9 **independent contractor until the end of April;**
 10 **and then you became an employee. And the next**
 11 **page is, in fact, a very illegible copy of your**
 12 **W-2, from which we will redact your Social**
 13 **Security number as well; correct?**
 14 A. Yes. I can't read it, but yes.
 15 **Q. So flipping to the end, the last**
 16 **document, this lists Daniel Laub, P2 Strategies**
 17 **revenue for 2015; right?**
 18 A. Yes.
 19 **Q. Okay. And so this document is**
 20 **prepared by you; is that fair to say?**
 21 A. My accountant.
 22 **Q. Okay. Is this an accurate summary of**
 23 **all the money that your personal -- what is P2**
 24 **Strategies?**
 25 A. My single-person LLC.

Page 293

1 **Q. So this is all the money that your**
2 **single-person LLC received in 2015; right?**
3 A. Yes.
4 **Q. Okay. And so first it indicates that**
5 **you received \$1,750 from The Greitens Group on**
6 **January 30th, 2015; correct?**
7 A. Yes.
8 **Q. What was that compensation for?**
9 A. January work.
10 **Q. So this January work is just like the**
11 **December work from 2014; right?**
12 A. Yes.
13 **Q. So that's -- the majority of that is**
14 **political work, political consulting on the**
15 **future campaign; right?**
16 A. Yes.
17 **Q. Some of it is the book tour, which**
18 **also relates to the campaign; right?**
19 A. Yes.
20 **Q. And then there may have been some**
21 **other tasks that were for other Greitens Group**
22 **matters?**
23 A. Yes.
24 **Q. Do you remember anything specific you**
25 **did that wasn't either the book tour or the**

Page 295

1 **with your work on the "Resilience" book?**
2 A. Yes, the Templeton grant.
3 **Q. Okay. So what do you know about the**
4 **Templeton grant? I know we talked about this a**
5 **bit before, but what was the Templeton grant**
6 **given for?**
7 A. It was a large grant, a lot larger
8 than what was given here, that Eric could spend
9 freely on "Resilience"-related things.
10 **Q. So the grant is for the book?**
11 A. I believe so. I wasn't intimately
12 involved in that process, but I believe so.
13 **Q. So all you know is that Krystal Taylor**
14 **told you to invoice work on the book directly**
15 **to Washington University, and they paid you?**
16 A. Yes.
17 **Q. And you don't know anything about what**
18 **arrangements may have existed with Washington**
19 **University?**
20 A. The only thing I do remember is
21 Krystal telling me that it was a sizable grant
22 and that other promo-type companies were
23 getting paid out of that grant too.
24 **Q. How much were you paid when you**
25 **eventually worked for the campaign?**

Page 294

1 **political campaign?**
2 A. Yeah. I mean I staffed -- I staffed
3 lectures. I went -- we did this thing where
4 Eric flew Southwest and read his book in the
5 air -- I guess that's a book-related thing.
6 Maybe not.
7 Actually, it may have all been
8 book-related, now that I think about it. I
9 can't remember anything specific.
10 **Q. Suffice to say that the vast majority,**
11 **if not all, was either straightforward**
12 **political consulting or working on the book?**
13 A. Probably close to that.
14 **Q. Okay. Now, I don't want to belabor**
15 **the point, but did you ever receive any**
16 **compensation of any kind, either in 2014 or**
17 **2015, from The Mission Continues?**
18 A. No.
19 **Q. Okay. So looking back to this P2**
20 **Strategies revenue document, it indicates that**
21 **you received two checks in the amount of \$3,250**
22 **from Washington University during 2015; right?**
23 A. That's the grant.
24 **Q. Okay. So this was money that**
25 **Washington University gave you in connection**

Page 296

1 A. Total?
2 **Q. On a monthly basis.**
3 A. Between 5- and \$7,000.
4 **Q. So you started off -- it looks like**
5 **you started off at \$5,000 a month in March and**
6 **April?**
7 A. And then Eric kept bonussing things,
8 and then it kind of moved up slowly to 6- and
9 then 6,5-
10 **Q. So the first time you got any money**
11 **was in late December, December 22nd, and that**
12 **was for work performed beginning December 1st**
13 **of 2015?**
14 MR. BOXERMAN: '14.
15 MR. SAUER: '14. 2014. I
16 apologize.
17 THE WITNESS: Yes. The \$5,000 I
18 received from Eric Greitens' LLC for work from
19 December 1st to December 31st was the first
20 time I ever got paid to work for anything
21 involving Eric Greitens.
22 MR. SAUER: Let me give you
23 Exhibit 53.
24 (Exhibit 53 was marked for
25 identification.)

Page 297

1 THE WITNESS: Thank you very
 2 much.
 3 BY MR. SAUER:
 4 **Q. Do you recognize this email chain?**
 5 A. I remember it now, yes.
 6 **Q. What is being discussed here between**
 7 **you and Tyler?**
 8 A. And Derrick. The attached proposal
 9 from Push Digital.
 10 **Q. And, again, what was Push Digital?**
 11 A. The South Carolina-based consulting
 12 firm.
 13 **Q. And I apologize if I'm recollecting**
 14 **incorrectly, but I believe you testified**
 15 **earlier that they were paid first by The**
 16 **Greitens Group to do social media promotion of**
 17 **Eric Greitens, and then later by the campaign;**
 18 **correct?**
 19 A. That's fairly accurate.
 20 **Q. Fairly or actually, completely**
 21 **accurate?**
 22 A. Completely accurate.
 23 **Q. And you were involved with negotiating**
 24 **with them, right, on behalf of the campaign?**
 25 A. Yeah. I negotiated all contracts.

Page 298

1 **Q. Okay. And who is Derrick Dickey? Is**
 2 **he a guy at Push Digital?**
 3 A. No.
 4 **Q. Who is he?**
 5 A. He is the chief of staff to Senator
 6 David Perdue from Georgia.
 7 **Q. At this time, was he in that role?**
 8 **What role was he in in January 21st of 2015?**
 9 A. Chief of staff to Senator David Perdue
 10 of Georgia.
 11 **Q. So why is he -- why are you emailing**
 12 **with him about this?**
 13 A. Derrick was involved with -- Derrick
 14 was involved with Dave Spence's run for
 15 governor in Missouri, was in Missouri for a
 16 while. Tyler worked on that race, so Derrick
 17 and Tyler know each other well.
 18 Derrick was originally going to work
 19 for Eric in some capacity before he took the
 20 chief of staff job. And Derrick introduced
 21 Eric to Nick Ayers, who later became the
 22 general consultant. That is Derrick's
 23 relevancy.
 24 **Q. Thank you. That was an exhaustive**
 25 **answer.**

Page 299

1 **Suffice to say that you negotiated**
 2 **some arrangement with them that differs**
 3 **somewhat from what's discussed in this email in**
 4 **Exhibit 53; right?**
 5 A. I believe so.
 6 MR. SAUER: Exhibit 54.
 7 (Exhibit 54 was marked for
 8 identification.)
 9 THE WITNESS: Thank you.
 10 BY MR. SAUER:
 11 **Q. Do you recognize this email chain, the**
 12 **one beginning on March 7th, 2015?**
 13 A. I do.
 14 **Q. And does this -- who is [REDACTED]?**
 15 A. He is the guy -- the guy that was on
 16 our account at Push Digital.
 17 **Q. This guy who was on your account at**
 18 **Push Digital. So at this time, this email**
 19 **chain at Push Digital had already been retained**
 20 **by the campaign?**
 21 A. Either The Greitens Group or the
 22 campaign.
 23 **Q. Okay. And you don't remember which it**
 24 **was; right?**
 25 A. Well, it was -- no, it was -- they

Page 300

1 were being paid by The Greitens Group first,
 2 and then they were being paid by the campaign.
 3 **Q. At this time, they already had been**
 4 **paid by The Greitens Group and later they were**
 5 **paid by the campaign?**
 6 A. Correct.
 7 **Q. And they talk about ads that kind of**
 8 **draw people to Eric Greitens' social media**
 9 **presence; is that fair to say?**
 10 A. I don't have the .pdfs here, but it
 11 looks like that.
 12 **Q. Okay. Switching to the second page of**
 13 **this document, the bottom of the first page,**
 14 **Joel Sawyer emails you and says, "Have you**
 15 **gotten invoice from us yet for the 5K"; right?**
 16 A. Okay.
 17 **Q. And do you recall him inquiring about**
 18 **an invoice for \$5,000 that he had submitted to**
 19 **you?**
 20 A. I don't, but I see it here.
 21 **Q. And you said, "No" in response to**
 22 **that; right?**
 23 A. Where are you reading that?
 24 **Q. The bottom of the first page.**
 25 A. Oh, on the first page. Yes, I see

Page 301

1 that.

2 **Q. And then Joel said, "Should go to The**

3 **Greitens Group"; correct?**

4 A. I see that.

5 **Q. And you responded "Greitens for**

6 **Missouri"; right?**

7 A. Okay.

8 **Q. And [REDACTED] said "For the ads they're**

9 **paid for by the exploratory"; correct?**

10 A. Okay.

11 **Q. And you responded, "Crap, they [sic] I**

12 **need a disclaimer. You are right TGG."**

13 **Correct?**

14 A. Yes.

15 **Q. Okay. Explain to me what's going on**

16 **there. Why did you first tell him to invoice**

17 **the campaign and then tell him to invoice The**

18 **Greitens Group?**

19 A. I don't recall, because I can't tell

20 from the ads whether they're "Resilience" ads

21 or whether they were quasi-political ads. I

22 can't tell you without seeing the ads why that

23 was the case.

24 **Q. When you say, "they I need a**

25 **disclaimer," what are you referring to?**

Page 303

1 **Missouri-specific promotion of "Resilience";**

2 **correct?**

3 A. Yes.

4 **Q. And you testified about that earlier;**

5 **correct?**

6 A. That is factual.

7 **Q. Did Eric instruct you to divide up the**

8 **invoices that way?**

9 A. Yes.

10 **Q. And I think I asked you this before:**

11 **Was there ever any attempt to use Mission**

12 **Continues resources to do this kind of social**

13 **media promotion through Push Digital?**

14 A. To the best of my knowledge, no.

15 **Q. How about the use of Mission Continues**

16 **resources to do this kind of promotion through**

17 **any other vendor?**

18 A. To the best of my knowledge, no.

19 **Q. Do you know whether Mission Continues**

20 **social media or Internet presence was ever used**

21 **to directly or indirectly promote the campaign?**

22 A. Not that I ever saw.

23 **Q. Do you know if personnel of The**

24 **Mission Continues were active on social media**

25 **or were instructed to be active on social media**

Page 302

1 A. If they're paid for by Greitens for

2 Missouri, they have to have a disclaimer on

3 them.

4 **Q. So was there a reason to prefer to**

5 **have them paid for by The Greitens Group so**

6 **they wouldn't have a political disclaimer on**

7 **them?**

8 A. No, at that point, it wouldn't matter

9 because the committee was already filed.

10 **Q. So why did you say "Crap, then I need**

11 **a disclaimer"? Why is that an issue in this**

12 **decision?**

13 A. I think I was saying "crap" because we

14 have to then change the art on all these ad

15 mockups.

16 **Q. Did you ever discuss with Eric**

17 **Greitens whether or when Push Digital should be**

18 **paid by either The Greitens Group or the**

19 **campaign?**

20 A. Yes, it was that "Resilience"-related

21 things would be paid for by The Greitens Group,

22 and then exploratory committee things would be

23 paid for by GFM.

24 **Q. And to be clear, the**

25 **"Resilience"-related things included**

Page 304

1 **in a way that would promote the campaign?**

2 A. I have no idea.

3 **Q. Did The Mission Continues promote the**

4 **book "Resilience"?**

5 A. I don't know. I have no idea.

6 **Q. Do you know if The Mission Continues**

7 **promoted the prior books, like "The Heart and**

8 **the Fist" and so forth?**

9 A. I don't know, but the difference would

10 have been that when "The Heart and the Fist"

11 came out and "Warrior's Heart" came out, Eric

12 was still the CEO of The Mission Continues. So

13 I don't know how that operated. But he would

14 have been the active CEO at the time, which he

15 wasn't during this book.

16 **Q. What was the most recent book before**

17 **"Resilience"?**

18 A. "The Warrior's Heart."

19 **Q. When did that come out, do you know?**

20 A. I don't know. It was the children's

21 version of "The Heart and the Fist."

22 **Q. Is there a book called "Courage and**

23 **Compassion"?**

24 A. "Strength and Compassion."

25 **Q. When did that come out?**

Page 305

1 A. That was the first book, and it's a
 2 photo book, and that was a long time ago. That
 3 was his humanitarian photo book.
 4 **Q. When was "The Heart and the Fist"?**
 5 A. "Heart and the Fist" -- I'm totally
 6 shooting blind here. I want to say like
 7 2008-2009, right at the heart of the Iraq walk.
 8 **Q. Let me ask you this: Other than**
 9 **"Resilience," did he come out with any books in**
 10 **2013 or later?**
 11 A. Not to my knowledge.
 12 MR. SAUER: Let me give you
 13 Exhibit 55.
 14 (Exhibit 55 was marked for
 15 identification.)
 16 THE WITNESS: Thank you.
 17 BY MR. SAUER:
 18 **Q. Do you recognize this email?**
 19 A. I do.
 20 **Q. And is this, in fact, the invoice from**
 21 **Push Digital in the amount of \$5,000 that we**
 22 **just were talking about?**
 23 A. Looks like it.
 24 **Q. And this invoice was, in fact, sent to**
 25 **The Greitens Group; correct?**

Page 306

1 A. Yes.
 2 **Q. And you instructed to have TGG pay**
 3 **this invoice; right?**
 4 A. Per Mark and Eric's instructions.
 5 **Q. So Eric and Mark, that is Eric**
 6 **Greitens and Mark Bobak?**
 7 A. Yes, sir.
 8 **Q. So they made the final decision as to**
 9 **to whom this particular invoice should be -- or**
 10 **by whom this particular invoice should be paid?**
 11 A. Correct. I had no control over TGG
 12 funds, so all that was decided by Eric and
 13 Mark.
 14 MR. SAUER: Exhibit 56.
 15 (Exhibit 56 was marked for
 16 identification.)
 17 BY MR. SAUER:
 18 **Q. Is this another invoice from Push**
 19 **Digital?**
 20 A. Yes.
 21 **Q. Same questions about this one: This**
 22 **is one that you received from Push Digital**
 23 **invoicing The Greitens Group; correct?**
 24 A. Yes.
 25 **Q. And this was for similar social media**

Page 307

1 **promotion of Eric and the book "Resilience"**
 2 **that we've been talking about; right?**
 3 A. No.
 4 **Q. What was this for?**
 5 A. The very bottom it says -- from
 6 Krystal -- "Can you pay this, Chris? This is
 7 from our first e-blast. Thanks! Krystal."
 8 **Q. What was "our first e-blast"?**
 9 A. Push handled electronic email blasted
 10 for "Resilience."
 11 **Q. Okay. So this was -- do you know what**
 12 **was in that -- what was in that particular**
 13 **email?**
 14 A. Yeah; I had like the book mocked up
 15 and had information about where you can buy it
 16 and what shows Eric's -- you know, just general
 17 book promotional stuff.
 18 **Q. Do you know whether -- do you know**
 19 **whether that e-blast was specifically targeted**
 20 **to Missouri conservatives?**
 21 A. No. It was targeted to every email
 22 that The Greitens Group possessed.
 23 MR. SAUER: Let me give you
 24 Exhibit 57.
 25 (Exhibit 57 was marked for

Page 308

1 identification.)
 2 BY MR. SAUER:
 3 **Q. What was your last day of the**
 4 **campaign?**
 5 A. End of October 2015.
 6 **Q. So this email is sent on**
 7 **October 20th, 2015; correct?**
 8 A. Looks like it.
 9 **Q. Were you still at the campaign at that**
 10 **time?**
 11 A. I have to look on the day I actually
 12 resigned. It was around this time. I couldn't
 13 tell you for sure.
 14 **Q. So -- and this is an email from**
 15 **Krystal Taylor at her Mission Continues address**
 16 **to Krystal at The Greitens Group address;**
 17 **correct?**
 18 A. Yes.
 19 **Q. At some point, did Krystal -- I may**
 20 **have asked you this already and I apologize if**
 21 **I have.**
 22 **At some point, did Krystal Taylor take**
 23 **on a formal role at the campaign?**
 24 A. Yes.
 25 **Q. When did that occur?**

Page 309

1 A. I don't know when it was official, but
 2 she started being paid exclusively by the
 3 campaign.
 4 **Q. Do you know the time frame when that
 5 happened?**
 6 A. You can look it up in the MEC records,
 7 but if I had to guess, it would be somewhere
 8 between the April-May-June region, but I don't
 9 remember.
 10 **Q. Prior to her being paid by the
 11 campaign, was she active on political issues in
 12 the way you've described already -- in other
 13 words, setting up meetings, attending
 14 meetings -- starting in late 2015?**
 15 A. Yes.
 16 **Q. So her involvement in political
 17 activity was already in full swing by the time
 18 she joined the campaign?**
 19 A. Yes. She was active in political
 20 things before I was even a part of meeting
 21 Eric.
 22 **Q. So her political activity went back
 23 over a year before she actually was employed by
 24 the campaign?**
 25 A. Yes.

Page 311

1 **Q. You say in this particular email,
 2 "Krystal is accessing her The Mission Continues
 3 email address on October 20th of 2015";
 4 correct?**
 5 A. That's what it says here.
 6 **Q. Were you aware of her accessing
 7 Mission Continues email accounts or computers
 8 while she was employed by the campaign?**
 9 A. I have no idea.
 10 **Q. Do you know if there were any -- were
 11 there any discussions between her and anyone at
 12 The Mission Continues about this, to your
 13 knowledge?**
 14 A. I have no idea.
 15 **Q. Do you know whether it is -- is this
 16 something that was ever mentioned to you by
 17 Eric Greitens?**
 18 A. I don't believe so.
 19 **Q. And I know you've -- I know you'll say
 20 no. But anyone at The Mission Continues ever
 21 discuss with you or anyone at the campaign, to
 22 your knowledge, allowing members of the
 23 campaign to access Mission Continues computers
 24 or email accounts?**
 25 A. Not to my knowledge. I didn't know

Page 310

1 **Q. And up until the time she was employed
 2 by the campaign, who was she employed by?**
 3 A. It's Eric Greitens' LLC, The Greitens
 4 Group.
 5 **Q. Was she ever paid by The Mission
 6 Continues, do you know?**
 7 A. I believe so.
 8 **Q. Do you know when that would have
 9 stopped?**
 10 A. I have no idea.
 11 **Q. Would the time she was paid for by --
 12 I guess you may not know the answer to this
 13 then. But was the time she was paid by The
 14 Mission Continues, did that overlap with the
 15 time she was active working with Eric on sort
 16 of political planning and political consulting?**
 17 A. Can you rephrase the question. I'm
 18 confused.
 19 **Q. Do you know whether there was a time
 20 period when Krystal Taylor was both paid by The
 21 Mission Continues, in whole or in part, and was
 22 also active in working with Eric on political
 23 issues?**
 24 A. I have no idea. That predates me by a
 25 long shot.

Page 312

1 that Krystal still had access to her TMC email
 2 at all.
 3 **Q. Do you know what's going on in this
 4 email? Do you know who Kim Daniels is in this
 5 email?**
 6 A. I have no idea.
 7 Looks like a script.
 8 **Q. And there is a script. And if you
 9 turn to the third page, about a third of the
 10 way down, the script terminates with, "Cut to
 11 Eric. Let's pass common-sense immigration
 12 reform and give people like Alejandro an earned
 13 path to citizenship and keep our military the
 14 best in the world."**
 15 **Do you see that?**
 16 A. I do.
 17 **Q. Are you aware of any video in which
 18 Eric advocated for the passage of the Dream Act
 19 or the passage of immigration reform that would
 20 give immigrants who are brought here illegally
 21 when they were minors a path to citizenship?**
 22 A. I have no idea. There's hundreds of
 23 hours of footage of Eric saying all sorts of
 24 stuff. I have no idea.
 25 **Q. So I know this is the very end of your**

Page 313

1 time at the campaign. Do you recall any
 2 discussion of getting hold of a script where --
 3 of a video where he takes a position on
 4 immigration reform and is sort of
 5 Democrat-oriented?
 6 A. No. This is the first time I've ever
 7 seen or heard of it.
 8 Q. Were you ever present when any
 9 fundraising calls were made to any donor of The
 10 Mission Continues?
 11 A. I'm sure I was. I can't name
 12 specifically, but I was often in the car with
 13 Eric or in the office with Eric when he was
 14 talking with donors and making fundraising
 15 calls. I can't remember specifically an
 16 instance, but I'm sure there was.
 17 Q. So in other words, you were present in
 18 the room frequently with Eric when he was
 19 making fundraising calls?
 20 A. I was with Eric a majority of the time
 21 for the better part of that year.
 22 Q. And so were you hearing one side of
 23 conversations during fundraising calls?
 24 A. Sometimes, if I was paying attention,
 25 yes.

Page 314

1 Q. Do you recall him referring to The
 2 Mission Continues in the course of fundraising
 3 calls?
 4 A. I refer to him to -- referring to The
 5 Mission Continues often, whether it be at a
 6 speech politically or whether it be in
 7 fundraising or otherwise. It's part of his
 8 life story and one that he particularly
 9 emphasized.
 10 So yes. I can't think of a specific
 11 instance, but it was normal.
 12 Q. And so that would be normal for him to
 13 emphasize that point in a fundraising call;
 14 correct?
 15 A. That he built this --
 16 Q. -- charity from the ground up.
 17 A. From nothing. And slept on a cot.
 18 You know, I heard the story a thousand times.
 19 Donated his combat pay, slept on a cot, had one
 20 bowl on his nightstand. It's a powerful story
 21 and one he told over and over.
 22 Q. And he would tell that story on
 23 fundraising calls?
 24 A. He would tell that story to anyone
 25 that would listen.

Page 315

1 Q. Did he ever tell -- did he ever say
 2 anything else about The Mission Continues in
 3 fundraising calls with donors? For example,
 4 did he ever say, you know, You gave to The
 5 Mission Continues and, therefore, I think you'd
 6 be inclined to give to my campaign?
 7 A. Not that I was a part of or remember.
 8 Q. Do you remember any other connection
 9 in which The Mission Continues came up in
 10 fundraising calls with donors?
 11 A. I don't.
 12 Q. Are you aware of anyone at The Mission
 13 Continues, either employed or affiliated with
 14 them, doing political fundraising for Eric
 15 Greitens?
 16 A. No.
 17 Q. Are you aware of anyone -- any
 18 volunteers at The Mission Continues also
 19 volunteering for the campaign?
 20 A. Not that I'm aware of, but it wouldn't
 21 surprise me.
 22 Q. Do you know if there was any effort by
 23 the campaign to sort of tap into a volunteer
 24 list at The Mission Continues to try and
 25 recruit those people to also volunteer for the

Page 316

1 campaign?
 2 A. I have no idea.
 3 MR. SAUER: Why don't we take a
 4 10-minute break.
 5 MR. BOXERMAN: Sounds good.
 6 (Recess.)
 7 BY MR. SAUER:
 8 Q. Just by way of some summary questions.
 9 A. Great.
 10 Q. You were not the source of The Mission
 11 Continues donor list; correct?
 12 A. Absolutely not.
 13 Q. You never provided it to anyone
 14 personally; correct?
 15 A. I do not believe I did.
 16 Q. And you never directed or authorized
 17 Krystal Taylor to share it with anyone;
 18 correct?
 19 A. Correct.
 20 Q. And that applies -- that answer
 21 applies to all of the emails that we've seen
 22 today that she shared it; correct?
 23 A. Yes.
 24 Q. And in other words, you did not
 25 authorize or instruct her to share it in the --

Page 317

1 at the December 5th meeting in 2014; correct?
 2 A. Correct.
 3 **Q. And you did not authorize or instruct**
 4 **her to email it on January 6th to yourself**
 5 **and Michael Hafner; correct?**
 6 A. Correct.
 7 **Q. You also did not authorize or instruct**
 8 **her to send that list when she sent it again on**
 9 **January 28th to Michael Hafner; correct?**
 10 A. Correct.
 11 **Q. And you also did not authorize or**
 12 **instruct her to send it to Meredith Gibbons on**
 13 **April 22nd of 2015; correct?**
 14 A. Correct.
 15 **Q. Are you aware -- other than what we've**
 16 **talked about today, are you aware of any other**
 17 **use of The Mission Continues donor list by the**
 18 **Greitens campaign or Eric Greitens or anyone**
 19 **else?**
 20 A. No.
 21 **Q. Are you aware of any discussions with**
 22 **The Mission Continues of any kind that related**
 23 **to the use of that donor list?**
 24 A. Sorry. Can you redo the question
 25 again, please.

Page 319

1 respect to -- let me ask you that same question
 2 with specific respect to The Mission Continues.
 3 Is there anything about any
 4 interaction with The Mission Continues that
 5 raised a red or even a yellow flag in your mind
 6 at any time during your involvement with Eric
 7 Greitens and the Greitens campaign and so
 8 forth?
 9 A. I had such infrequent conversation --
 10 I think only once via email -- with The Mission
 11 Continues on a PR issue. So no, I -- I didn't
 12 have contact with them.
 13 **Q. Did you -- what was that PR issue? Do**
 14 **you remember?**
 15 A. It was something to do with Eric
 16 resigning from the board -- either Eric
 17 resigning from the board or TMC was getting
 18 questions about Eric running for governor and
 19 they wanted advice or both.
 20 **Q. Let me ask you the same question about**
 21 **Washington University.**
 22 **Was there anything about any**
 23 **relationship with Washington University that**
 24 **made you concerned at any time during this**
 25 **process?**

Page 318

1 **Q. Are you aware of any discussions or**
 2 **conversations with anyone at The Mission**
 3 **Continues that related to the use of that donor**
 4 **list?**
 5 A. No, sir.
 6 **Q. Are you aware of any other usage of**
 7 **The Mission Continues resources, whether**
 8 **authorized or unauthorized, by the Greitens**
 9 **campaign, Eric Greitens, Dave Whitman, The**
 10 **Greitens Group or anyone else we've mentioned**
 11 **today?**
 12 A. Outside of what we've talked about
 13 today, not to my knowledge.
 14 **Q. So you're not aware of any other use**
 15 **of the resources of The Mission Continues?**
 16 A. Correct.
 17 **Q. Generally speaking, was there anything**
 18 **else that happened in the course of this**
 19 **campaign other than the stuff we've already**
 20 **talked about today that made you feel**
 21 **uncomfortable? Like things that were occurring**
 22 **that may have been unethical or legally**
 23 **questionable?**
 24 A. I don't believe so.
 25 **Q. Is there anything that happened with**

Page 320

1 A. Not in how it was represented to me.
 2 **Q. Okay. Let me ask you this: Are you**
 3 **aware of any involvement of Washington**
 4 **University in any of these events other than**
 5 **the fact that they were invoiced under the**
 6 **Templeton Foundation grant for some of the work**
 7 **you did for the "Resilience" book?**
 8 A. I have no idea.
 9 **Q. So the only involvement of Washington**
 10 **University that you're aware of was this**
 11 **Templeton grant for "Resilience"; correct?**
 12 A. Yes, and I went to one event with Eric
 13 on Wash U's campus.
 14 **Q. And that was unrelated to the book?**
 15 **That was just a campaign event, or was that a**
 16 **book tour event?**
 17 A. It was like their annual gala or
 18 dinner, and Eric was a guest of somebody, I
 19 think.
 20 **Q. Do you know who the point of contact**
 21 **was at Washington University for the Templeton**
 22 **grant?**
 23 A. No, no idea.
 24 **Q. So that's not information that Krystal**
 25 **may have ever shared with you?**

Page 321

1 A. You have virtually all of my
2 communications about the Templeton grant in
3 your documents we've produced.
4 MR. SAUER: I don't have any
5 further questions.
6 MR. BOXERMAN: No questions from
7 me.
8 (Discussion off the record with
9 the court reporter.)
10 MR. BOXERMAN: So we'll read and
11 sign.
12 (Deposition concluded at 3:30
13 p.m.)
14
15
16
17
18
19
20
21
22
23
24
25

Page 323

1 ALARIS LITIGATION SERVICES
2 April 19, 2018
3 SANFORD J. BOXERMAN, ESQ.
4 CAPES SOKOL
5 7701 Forsyth Boulevard, 12th Floor
6 St. Louis, Missouri 63105-1818
7
8 IN RE: IN RE: THE MISSION CONTINUES
9
10 Dear Mr. Boxerman,
11
12 Please find enclosed your copies of the deposition of
13 DANIEL LAUB taken on April 18, 2018 in the
14 above-referenced case. Also enclosed is the original
15 signature page and errata sheets.
16
17 Please have the witness read your copy of the
18 transcript, indicate any changes and/or corrections
19 desired on the errata sheets, and sign the signature
20 page before a notary public.
21
22 Please return the errata sheets and notarized
23 signature page to our office at 711 N 11th Street, St.
24 Louis, MO 63101 for filing prior to trial date.
25 Sincerely,

Gail L. Inghram Verbano
48385

Page 322

1 CERTIFICATE OF SHORTHAND REPORTER
2
3 I, Gail Inghram Verbano, Registered
4 Diplomate Reporter, Certified Realtime
5 Reporter, Certified Shorthand Reporter (CA) and
6 Notary Public, the officer before whom the
7 foregoing proceedings were taken, do hereby
8 certify that the foregoing transcript is a true
9 and correct record of the proceedings; that
10 said proceedings were taken by me
11 stenographically and thereafter reduced to
12 typewriting under my supervision; and that I am
13 neither counsel for, related to, nor employed
14 by any of the parties to this case and have no
15 interest, financial or otherwise, in its
16 outcome.
17
18
19
20
21 _____
22 Gail Inghram Verbano, CSR, RDR, CRR
23 CA-CSR No. 8635
24
25

Page 324

1 ERRATA SHEET
2 Witness Name: DANIEL LAUB
3 Case Name: IN RE: THE MISSION CONTINUES
4 Date Taken: APRIL 18, 2018
5 Page # _____ Line # _____
6 Should read: _____
7 Reason for change: _____
8
9 Page # _____ Line # _____
10 Should read: _____
11 Reason for change: _____
12
13 Page # _____ Line # _____
14 Should read: _____
15 Reason for change: _____
16
17 Page # _____ Line # _____
18 Should read: _____
19 Reason for change: _____
20
21 Page # _____ Line # _____
22 Should read: _____
23 Reason for change: _____
24
25 Witness Signature: _____

1 STATE OF _____)
2
3 COUNTY OF _____)
4
5 I, DANIEL LAUB, 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 DANIEL LAUB
21
22 _____
23 NOTARY PUBLIC
24 My Commission Expires:
25