

KRYSTAL PROCTOR 3/16/2018

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<p>1 IN RE: THE MISSION CONTINUES)) CID NO.) 24-18</p> <p>2 3 4</p> <p style="text-align: center;">DEPOSITION OF KRYSTAL PROCTOR</p> <p>5 6 APRIL 13, 2018 7 Sheryl A. Pautler, MO-CCR 871, IL-CSR 084-004585 8 (The proceedings began at 12:38 p.m.) 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 INDEX OF EXHIBITS CONTINUED 2 3 NO. PAGE MKD. 4 Exhibit 19 (April 22, 2015 e-mail screen shot.) 107 5 Exhibit 20 (Nondisclosure agreement.) 125 6 Exhibit 21 (The Mission Continues Team Member handbook.) 134 7 Exhibit 22 (October 20, 2015 e-mail.) 142 8 9 (Whereupon the exhibits were attached to the original only.) 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
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<p>1 QUESTIONS BY: PAGE NO. 2 Mr. Martinich-Sauter 6 3 Mr. Sauer 112 4</p> <p style="text-align: center;">INDEX OF EXHIBITS</p> <p>5 NO. PAGE MKD. 6 Exhibit 1 (October 16, 2013 e-mail.) 20 7 Exhibit 2 (October 17, 2013 e-mail chain.) 29 8 Exhibit 3 (November 19, 2013 e-mail.) 30 9 Exhibit 4 (March 21, 2014 e-mail.) 34 10 Exhibit 5 (Missouri Read-Ahead memorandum.) 40 11 Exhibit 6 (February 27, 2014 e-mail.) 42 12 Exhibit 7 (Schedule of meetings.) 44 13 Exhibit 8 (March 4, 2015 e-mail.) 49 14 Exhibit 9 (Spreadsheet.) 49 15 Exhibit 10 (March 24, 2014 e-mail.) 60 16 Exhibit 11 (March 26, 2014 e-mail chain.) 62 17 Exhibit 12 (November 20, 2012 e-mail.) 68 18 Exhibit 13 (May 8, 2014 e-mail.) 74 19 Exhibit 14 (All Donors 1K Total and Up list.) 79 20 Exhibit 15 (Attorney General's civil investigative demand for production of documents.) 82 21 Exhibit 16 (October 15, 2014 e-mail.) 87 22 Exhibit 17 (January 6, 2015 e-mail.) 98 23 Exhibit 18 (January 28, 2015 e-mail.) 103 24 25</p>	<p>1 IN RE: THE MISSION CONTINUES)) CID NO.) 24-18</p> <p>2 3</p> <p style="text-align: center;">DEPOSITION OF WITNESS, KRYSTAL PROCTOR,</p> <p>4 produced, sworn, and examined on the 13th day of April, 5 2018, between the hours of twelve o'clock noon and six 6 o'clock in the afternoon of that day, at Regus Business 7 Center, 7733 Forsyth Boulevard, St. Louis, Missouri, before 8 SHERYL A. PAUTLER, a Certified Court Reporter within and 9 for the State of Missouri, in a certain cause now pending 10 IN RE: THE MISSION CONTINUES. 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>

1 (Pages 1 to 4)

1 APPEARANCES
 2 For the Missouri Attorney General:
 3 Mr. Michael Martinich-Sauter
 Mr. John Sauer
 4 Attorney General's Office of Missouri
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 7
 8 For the Witness:
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 16
 17 Also Present:
 18 Missouri Attorney General Joshua D. Hawley
 19
 20
 21
 22
 23
 24
 25

1 A. Any, sorry, what?
 2 **Q. Health or other reason, if you're having some**
 3 **mental impairment or --**
 4 A. Oh, no.
 5 **Q. Thanks. Sometimes I talk fast or ramble. If**
 6 **you don't understand one of my questions, do you mind just**
 7 **telling me that you don't understand, rather than**
 8 **answering?**
 9 A. Yes.
 10 **Q. Great. Thank you. My name is Mike**
 11 **Martinich-Sauter. And these are my colleagues, John Sauer**
 12 **and Josh Hawley. As you know, your attorney, Mark Hammer,**
 13 **is here. Do you mind if I just ask some general background**
 14 **questions first?**
 15 A. Uh-huh.
 16 **Q. Have you -- do you have a college degree?**
 17 A. I do.
 18 **Q. What did you study in college?**
 19 A. I studied corporate and legal communications.
 20 **Q. Okay. And did you have any graduate school**
 21 **training?**
 22 A. I did.
 23 **Q. Did you graduate with a graduate degree?**
 24 A. Yes.
 25 **Q. And what is that graduate degree in?**

1 IT IS HEREBY STIPULATED AND AGREED, by and
 2 between counsel that the deposition of KRYSTAL PROCTOR may
 3 be taken in shorthand by Sheryl A. Pautler, shorthand
 4 reporter, and afterwards transcribed into typewriting; and
 5 the signature of the witness is expressly waived.
 6 *****
 7 KRYSTAL PROCTOR,
 8 of lawful age, being produced, sworn and examined, deposes
 9 and says:
 10 [EXAMINATION]
 11 QUESTIONS BY MR. MARTINICH-SAUTER:
 12 **Q. Ms. Proctor, thanks for being here. Could you**
 13 **state your name for the record, please.**
 14 A. Krystal Proctor.
 15 **Q. And have you gone by any other last name**
 16 **previously?**
 17 A. Yes. Before I was married, I went by Krystal
 18 Taylor.
 19 **Q. Great. Thank you. And you understand that**
 20 **you're under oath today?**
 21 A. Yes.
 22 **Q. And you promise to tell the truth today?**
 23 A. Yes.
 24 **Q. Is there any health or any other reason why**
 25 **you wouldn't be able to testify truthfully today?**

1 A. A master's in public policy administration.
 2 **Q. Okay. And are you currently employed?**
 3 A. Yes.
 4 **Q. Who's your current employer?**
 5 A. Argent Capital.
 6 **Q. What do you do for Argent?**
 7 A. I'm on the client service team.
 8 **Q. And what sort of work does that entail?**
 9 A. Working with clients, managing -- you know,
 10 ensuring everything's going correctly in their accounts and
 11 hosting events, client events and that sort of thing.
 12 **Q. Great. Before you were at Argent, who was**
 13 **your prior employer?**
 14 A. Before I was at Argent, I worked for Greitens
 15 for Missouri and the Greitens Group.
 16 **Q. At Greitens for Missouri, what was your**
 17 **position?**
 18 A. When I was on staff at Greitens for Missouri,
 19 I think my position was operations director, was my title.
 20 **Q. What sort of work did you do in that role?**
 21 A. Oh, I was also the scheduler. Sorry. I
 22 should have mentioned that. Scheduler and operations
 23 director.
 24 **Q. Great. And what did you do in each of those**
 25 **roles?**

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1 A. In my role as scheduler and operations
 2 director for Greitens for Missouri, I was in charge of
 3 scheduling meetings, you know, ensuring all the travel
 4 and -- travel and whatnot was booked. And really
 5 maximizing Eric's time on a daily basis.

6 **Q. And when you say maximizing his time, what
 7 does that mean?**

8 A. It means, you know, ensuring he has a full
 9 schedule, ensuring that he's getting in front of the right
 10 supporters, so donors, grassroots supporters. Ensuring
 11 travel is booked and he's getting from Point A to Point B
 12 and, you know, that events are going smoothly and things
 13 are sort of -- sort of running smoothly.

14 **Q. During what time period were you employed by
 15 Greitens for Missouri?**

16 A. So I don't recall the exact month and year
 17 that I was officially employed. But probably in late 2015,
 18 early 2016, I would have officially joined, you know, the
 19 Greitens for Missouri payroll.

20 **Q. And during the time period that you were
 21 employed by Greitens for Missouri, in your role as
 22 scheduler, were you aware of essentially all of
 23 Mr. Greitens' events?**

24 A. Yes.

25 **Q. And all of his meetings?**

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1 A. I mean anything that was -- anything that was
 2 campaign focused, anything that was for his, you know,
 3 professional endeavors, yes.

4 **Q. And what caused you to leave Greitens for
 5 Missouri and join Argent Capital?**

6 A. So I -- I didn't have much of an interest in
 7 being in politics. So that was a big piece of it. And I
 8 obviously worked for Eric at that point, I don't know, five
 9 plus years and sort of was ready to move on and do
 10 something else. I started working for him right out of
 11 college. So I was ready for a new task. And then I was
 12 also getting married that year. So planning a wedding and,
 13 you know, being on a campaign was a little bit -- a little
 14 bit challenging.

15 **Q. Understood. You mentioned that you had been
 16 employed by the Greitens Group; is that correct?**

17 A. Yes.

18 **Q. And when were you employed by the Greitens
 19 Group?**

20 A. So I was employed by the Greitens Group from
 21 when I first started working for Eric, which would have
 22 been January of 2011, until I left in May of 2016.

23 **Q. So you were simultaneously employed by both
 24 Greitens for Missouri and the Greitens Group?**

25 A. Yes.

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1 **Q. What was your role at the Greitens Group?**

2 A. So on the Greitens Group, again my primary
 3 role was really always to maximize Eric's time. So it was
 4 ensuring he, you know, had speaking engagements on his
 5 calendar, ensuring that he -- if he was on a book tour,
 6 that those media appearances were on his calendar and
 7 everything having to do with the book tour. Handling any
 8 requests for his time, if, you know, people wanted to hire
 9 him to come speak to their group, I handled all of that.
 10 Travel arrangements again, making sure scheduling wise,
 11 travel wise, everything was running smoothly.

12 **Q. Did you ever do any research work for him?**

13 A. For the Greitens Group?

14 **Q. Yes. For the Greitens Group. Thank you.**

15 A. I guess what do you mean by research?

16 **Q. Either policy research or research for his
 17 books or research for -- substantive research of any other
 18 kind.**

19 A. No, not typically. I wasn't -- I wasn't
 20 really in that role. I did at one point when we were
 21 working on the Resilience book, which was his last book, I
 22 was in charge of sort of researching, you know, quotations
 23 and that sort of thing and ensuring that we were citing
 24 them correctly in the book. But for the most part, no, I
 25 did not do substantial amounts of research for the Greitens

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1 Group, no.

2 **Q. Were you ever employed by The Mission
 3 Continues?**

4 A. Yes.

5 **Q. When were you employed by The Mission
 6 Continues?**

7 A. So when I started working for Eric in January
 8 of 2011, I was also employed by The Mission Continues. And
 9 my employment would have ended like the summer 2014. I
 10 don't know the exact date.

11 **Q. So you were -- sorry.**

12 A. Maybe around June.

13 **Q. So you were simultaneously employed by both
 14 the Greitens Group and The Mission Continues; is that
 15 right?**

16 A. Yes.

17 **Q. What did your average day look like in terms
 18 of splitting time between those two entities?**

19 A. I mean, I kind of just bounced back and forth
 20 typically, whatever was highest priority. You know, so if
 21 there was a speaking engagement and things were going wrong
 22 or travel was going wrong, I would, you know, focus on that
 23 speaking engagement and making sure he was fulfilling that
 24 contract. Or if he was traveling or if his day was mostly
 25 full of Mission Continues, you know, donor meetings and

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1 donor calls, that sort of thing, I would focus on that. So
 2 really it was sort of like I just bounced back and forth to
 3 whatever was most important that day.

4 **Q. Sure. Understanding that it would vary from**
 5 **day-to-day, approximately what percentage of your time did**
 6 **you work on Mission Continues, versus Greitens Group work?**

7 A. I mean it's hard to say. I would say
 8 50/50ish. But it kind of depends on what time period we're
 9 talking about too, you know. Depending on what we were
 10 doing at that time.

11 **Q. Did it change -- I realize that from**
 12 **day-to-day, it could vary significantly. Sort of over**
 13 **time, whether over the course of months or years, did you**
 14 **notice changes in that distribution between the**
 15 **organizations' work?**

16 A. I mean I don't -- I don't think so. It was
 17 usually pretty -- I mean, like I said, depending on what
 18 day it was and what month it was and what project we were
 19 focused on. But for the most part, I would say it probably
 20 balanced out to around 50/50.

21 **Q. Now, did you have two offices, one for each**
 22 **entity when you were working at both?**

23 A. I personally did not have two offices. I, you
 24 know, had one office. But there were two offices. There
 25 was The Mission Continues office and a Greitens Group

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1 office in the same space, but two separate areas generally.

2 **Q. But you had one office from which you worked**
 3 **on both entities?**

4 A. Yes.

5 **Q. Did you have -- how many computers did you**
 6 **have in that offers?**

7 A. I had one.

8 **Q. And you used that one computer for work on**
 9 **both entities?**

10 A. Uh-huh. Yes.

11 **Q. When you were, you know, saving files or using**
 12 **e-mail on that computer, did you have sort of two different**
 13 **workspaces and two different e-mail interfaces or did you**
 14 **have some other arrangement?**

15 A. Certainly not two different workspaces. As
 16 far as e-mail, both organizations operated off of Gmail
 17 business. And so I had two separate domains, but they kind
 18 of filtered into the same screen, if that make sense.

19 **Q. So when you opened up your e-mail, you could**
 20 **see your e-mail from The Mission Continues and the Greitens**
 21 **Group together?**

22 A. Yes.

23 **Q. When you were looking at those e-mails, were**
 24 **you able to, just by eyeballing them, distinguish e-mails**
 25 **that came from one account rather than the other?**

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1 A. If I clicked into the e-mail, the
 2 distinguishing factor would typically be what e-mail
 3 address, you know, it was associated with. But no, if I
 4 was just looking at my inbox, it wasn't like color coded or
 5 something.

6 **Q. When you sent e-mails, were you able to choose**
 7 **which e-mail address your sent e-mail came from?**

8 A. Yes.

9 **Q. Did you ever mean to send e-mail from your**
 10 **Mission Continues address, but actually send it from your**
 11 **Greitens Group address and vice versa?**

12 A. I'm sure I did. You know, you're working 12
 13 hours a day and you're just trying to get things done. So
 14 I'm sure I did at some point. I can't recall a moment when
 15 I was like, oh, my gosh, I shouldn't have sent that from
 16 that e-mail address.

17 **Q. Sure. But the mere fact that an e-mail you**
 18 **sent came from one address rather than the other doesn't**
 19 **necessarily mean that you were on one entity's time rather**
 20 **than the other; it's possible it could be an error?**

21 A. Could you repeat the question?

22 **Q. I knew we'd get there. I'm not sure it's**
 23 **important to ask.**

24 **What -- other than salary, what sorts of**
 25 **employee benefits or other compensation did you receive**

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1 **when you were employed by Mission Continues and Greitens**
 2 **Group?**

3 A. So when I was a dual employee of The Mission
 4 Continues and the Greitens Group, obviously I received
 5 compensation from both. And my benefits package was
 6 through The Mission Continues. So that would have been
 7 health care, 401K at some point. I don't think we had that
 8 when I started, but. And I think that's probably --
 9 whatever typical benefits are.

10 **Q. Sure. You said that The Mission Continues is**
 11 **providing your benefits. Are you aware of any agreement**
 12 **between The Mission Continues and Greitens Group on**
 13 **splitting the cost of those benefits in any way?**

14 A. I am not. I don't -- I don't remember how
 15 that would have been worked out. So no, I'm not aware.

16 **Q. During the time that you were a dual employee**
 17 **of those entities, was anyone else similarly a dual**
 18 **employee of those entities?**

19 A. To my knowledge, the only other dual employee
 20 would have been Eric.

21 **Q. And did Eric have one office or two?**

22 A. He had one.

23 **Q. And did he have one computer in that office or**
 24 **two?**

25 A. I believe he just had one computer.

1 **Q. Okay.**
 2 A. It's possible that at one point, he had like a
 3 desktop and a laptop. But for all intents and purposes, it
 4 was one computer.
 5 **Q. In your role facilitating his work, did you**
 6 **have access to Mr. Greitens' e-mail account or computer?**
 7 A. I had access to his e-mail accounts. I
 8 typically didn't have access to his computer unless I was,
 9 you know, doing something for him. If he wanted me to
 10 download an app or something, you know, something like
 11 that, but typically no.
 12 **Q. Did he ever have you send e-mails on his**
 13 **behalf?**
 14 A. Yes.
 15 **Q. What sorts of e-mails would he have you send?**
 16 A. Typically -- I mean I drafted almost all of
 17 his e-mails. And then typically he would go in and make
 18 changes and hit send. But I on occasion did hit send from
 19 his e-mail address. And typically -- I mean it was really
 20 almost any e-mail that came in, unless it was something
 21 that I didn't have, you know, knowledge of or didn't know
 22 how to reply to. Typically if I didn't know, I'd ask him
 23 how do you want me to reply to this and I would draft a
 24 response, so.
 25 **Q. When you say that you at least initially**

1 **drafted most or almost all of his e-mails, was that for**
 2 **both The Mission Continues and the Greitens Group?**
 3 A. Yes.
 4 **Q. Okay. I've got some documents here --**
 5 A. I should also clarify that I typically did not
 6 draft e-mails that were going to people who worked
 7 internally with us. Typically they were external e-mails.
 8 **Q. So you would say -- would it be fair to say**
 9 **most of the out -- external e-mails from Mr. Greitens'**
 10 **account, were at least initially drafted by you, but most**
 11 **of the internal e-mails were mostly drafted by him?**
 12 MR. HAMMER: And just to clarify, these would
 13 be external e-mails that would be going out that she would
 14 be aware of. He obviously may have been sending out
 15 e-mails on his own that she wasn't aware of.
 16 THE WITNESS: Yes.
 17 MR. HAMMER: Is that true?
 18 THE WITNESS: Yes, yes. I mean he had access
 19 to his inbox. He could send an e-mail any time he wanted
 20 to send an e-mail. But typically it was part of my job to
 21 maximize his time and ensure that he wasn't spending a lot
 22 of time, you know, drafting e-mails on things that really
 23 weren't high priority items, things like that.
 24 **Q. (By Mr. Martinich-Sauter) So your drafting of**
 25 **e-mails, was it limited to only non-high priority e-mails**

1 **or did it also include some high priority e-mails?**
 2 A. It probably was mostly non-priority e-mails.
 3 Because if they were -- typically if they were really
 4 important, I might not know how to reply. And he would
 5 either reply because it was, you know, important or I'd
 6 have to ask him for -- for guidance on how to reply to the
 7 e-mail.
 8 **Q. What sorts of e-mails would be either high**
 9 **priority e-mails to your mind or e-mails that you wouldn't**
 10 **know how to respond to?**
 11 A. E-mails that I would not know how to respond
 12 to, if somebody e-mailed and wanted to set up a meeting and
 13 I didn't know who they were, but they seemed like they knew
 14 who Eric was or seemed important in some way, typically I
 15 would not draft an e-mail to those sorts of things.
 16 Typically if it was like about, you know, money or
 17 personnel or something like that, typically I would not --
 18 I would not draft responses. Those come to the top of
 19 mind. But it's hard for me to think back to specifics.
 20 **Q. During 2011, 2012, 2013, how would you**
 21 **characterize the business that the Greitens Group did; what**
 22 **sort of work did it do?**
 23 A. So the work that the Greitens Group really did
 24 was kind of running Eric's book business. So book tours
 25 and book sales. And then speaking engagements. So

1 contracting with different companies to have Eric come in
 2 and give like motivational speeches. That was the bulk
 3 of -- that was really the business.
 4 **Q. Is there any other business or activities that**
 5 **the Greitens Group was involved in?**
 6 A. To my knowledge, the only other thing that
 7 comes to mind is Eric did some consulting a little bit here
 8 and there. There were a couple of times I can recall that
 9 he was consulting for other businesses, giving them
 10 guidance on hiring or things like that.
 11 (Whereupon Exhibit 1 was marked for
 12 identification.)
 13 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 14 **this document which is labeled as Exhibit 1?**
 15 MR. HAMMER: I'm going to make a record of
 16 something in just a second. We're kind of getting into
 17 some of the specifics. So my client is here on a civil
 18 investigative demand pursuant to 407.040. I don't believe
 19 necessarily that any of her responses are going to
 20 necessarily incriminate her or subject her to
 21 incrimination. Nevertheless, we're going to go ahead and
 22 invoke just generally and then I'll refer, if necessary,
 23 specifically as we go through the course of the deposition
 24 to the protections of 407.045, which provide that she
 25 cannot refuse to answer questions that are subject to a

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1 civil investigative demand, but nevertheless would be
 2 subject to use immunity if at any point in time she was
 3 subject to a criminal investigation or criminal prosecution
 4 from information that she provided during the course of
 5 this deposition. So we'll just go ahead and put that on
 6 the record at this time.
 7 MR. MARTINICH-SAUTER: And on the record, the
 8 Attorney General's Office is aware of your invocation of
 9 those rights.
 10 MR. HAMMER: Okay. Very good. So your
 11 question is whether or not she recognizes Exhibit 1?
 12 MR. MARTINICH-SAUTER: Correct.
 13 MR. HAMMER: You can answer that.
 14 A. I mean it was in 2013, so it's not something
 15 that I remember. But I can see that I'm copied on it. So
 16 yes, I recognize the document.
 17 **Q. (By Mr. Martinich-Sauter) Do you remember**
 18 **receiving this e-mail?**
 19 A. Yes.
 20 **Q. Who is Steve Michael?**
 21 A. So Steve Michael, my understanding, is a
 22 political consultant. And as Eric started to consider
 23 running for office in Missouri, Steve would come in and
 24 meet with him and I assume give him advice and -- you know,
 25 on political strategy and that sort of thing. I think

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1 he -- at the time that I knew him, I believe he worked for
 2 Victory Enterprises. But I'm not sure what he does now.
 3 **Q. And you mentioned during the time that**
 4 **Mr. Greitens had begun to think about running. When was**
 5 **that? When did he start thinking about running to your**
 6 **knowledge?**
 7 A. I mean to my knowledge, I didn't really start
 8 hearing about it from him directly probably until around
 9 this time, 2013, 2014. There was always sort of, you know,
 10 discussion that he is interested in that sort of thing.
 11 But I don't -- I don't believe I saw e-mails like this or
 12 meetings until probably -- probably the year of 2013 or
 13 something like that.
 14 **Q. And around this time in 2013, what did he --**
 15 **what did Mr. Greitens tell you about his interest in**
 16 **running for office?**
 17 A. That he was interested in, you know, running
 18 for a statewide office in Missouri. My understanding, that
 19 he was -- he was interested in either governor or
 20 lieutenant governor.
 21 **Q. Did he tell you why he was interested in those**
 22 **positions rather than any other position?**
 23 A. No.
 24 **Q. When you were speaking to him in 2013 about**
 25 **these topics, did you have the impression that he was just**

Page 23

1 **considering running for office or that he had actually**
 2 **decided that he was going to run?**
 3 A. I mean at this time in 2013, I'd say my
 4 impression was that he was considering it.
 5 **Q. Do you remember when you became convinced that**
 6 **he had decided he was running for sure?**
 7 A. Probably sometime in 2014, early 2014. I
 8 became more convinced because he started sort of planning
 9 for a transition or stepping down as CEO from The Mission
 10 Continues and focusing, you know, on a little bit more on
 11 the idea.
 12 **Q. When did he, if ever, expressly tell you, I,**
 13 **Eric, am going to run for office?**
 14 A. I do not remember. I don't remember.
 15 **Q. You mentioned that Mr. Greitens had been**
 16 **thinking about a transition out of The Mission Continues.**
 17 **To your knowledge, was that transition solely because he**
 18 **planned to run for office or were there other reasons**
 19 **driving it as well?**
 20 A. I didn't have conversations with him. I never
 21 really asked. But my impression was that he was sort of
 22 ready to move on, you know, to something -- to a new job,
 23 to something bigger and that his transition away from The
 24 Mission Continues was to potentially run for office, yes.
 25 **Q. Are you aware of whether or not Mr. Greitens**

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1 **shared his intent to run for office with other Mission**
 2 **Continues employees during 2014?**
 3 A. I don't -- I don't remember like
 4 conversations. But I would assume that he did. I mean
 5 it's a small organization, tight-knit organization. I
 6 would assume that he did at some point.
 7 **Q. Turning back to Exhibit 1 here, do you see**
 8 **that at about a quarter way down the page there is what**
 9 **appears to be text from an e-mail sent on Tuesday,**
 10 **October 15, 2013?**
 11 A. Yes.
 12 **Q. And do you see where it says: Thanks, Steve,**
 13 **great to see you and [REDACTED] the other day?**
 14 A. Yes.
 15 **Q. Do you know what that sentence refers to?**
 16 A. I assume it refers to like a meeting of some
 17 sort. I do not right now recall who [REDACTED] is or was.
 18 **Q. Do you see in the first line of substantive**
 19 **text on the main e-mail where it says: Finishing up on**
 20 **some of those to-do lists?**
 21 A. Yes.
 22 **Q. Do you know what that phrase refers to?**
 23 A. I do not know what that phrase refers to.
 24 **Q. Do you see that this e-mail appears to have an**
 25 **attachment?**

Page 25

1 A. Yes.

2 **Q. Do you remember seeing the attachment to this**

3 **e-mail?**

4 A. I do.

5 **Q. What was the attachment to this e-mail?**

6 A. I -- if my memory serves me correctly, it was

7 a donor list of Schweich.

8 **Q. Do you know where that list came from?**

9 A. I believe that it came from Steve Michael.

10 **Q. Do you know where Steve Michael got that list?**

11 A. I do not.

12 **Q. Did you ever have conversations with anyone**

13 **about where Steve Michael got that list?**

14 A. I don't believe so. No, I don't believe so.

15 **Q. Did it strike you at all strange that Steve**

16 **Michael might have been sending Tom Schweich's donor list?**

17 A. I'm sure it did at the time. I don't really

18 remember how I was feeling reading this e-mail at the time.

19 I'm sure I might have thought it was interesting.

20 MR. HAMMER: Can I have just a minute? Let's

21 go off the record for a second.

22 (Whereupon there was an off-the-record

23 discussion.)

24 MR. HAMMER: So I have heard you speak

25 previously about the fact -- and Mr. Hammer is speaking to

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1 his client specifically -- that you have read newspaper

2 articles and you have become aware of inquiries into this

3 whole affair obviously, correct?

4 THE WITNESS: Yes.

5 MR. HAMMER: Okay. And I just want to make

6 sure that we're clear here that the information that you're

7 going to provide during this deposition is things that you

8 have specific knowledge of. So for example, you indicated

9 in your response to the last question that you remember --

10 or that you think -- I can't remember exactly what your

11 response was. It was something to the effect of that you

12 thought maybe it was unusual or something getting this

13 Schweich list or whatever.

14 I just want to make sure that it's clear that

15 what they're asking of you, unless they ask something

16 different, is specifically at the time you got this list

17 whether or not there was any specific feeling that you had

18 or thought that you had at that time. What I'm driving at

19 here is that obviously you have received information since

20 that time about why everybody's now interested in this list

21 and why it might be important. But what's critical here is

22 what you may have been thinking at that time that you got

23 it. Is that clear?

24 THE WITNESS: Yeah, that's helpful.

25 MR. HAMMER: And I'm not suggesting to you

Page 27

1 that you should have been thinking anything in particular.

2 We're just being honest today about what you may or may

3 have thought of at that time. Is that clear?

4 THE WITNESS: Yes, that's helpful. Because at

5 that time in October of 2013, I had very little knowledge

6 of who Tom Schweich -- I don't even know if I knew who he

7 was. So I honestly probably would not have thought

8 anything about the list. Later I came to know about who he

9 was.

10 MR. HAMMER: And as you're going through the

11 deposition, if you did have a distinct feeling or you heard

12 something or received information that might be important

13 to the inquiry here, I want you to go ahead and let them

14 know what it is. But obviously, I don't want your

15 testimony here today to be tainted by the mass amount of

16 publicity that we've all been listening to with respect to

17 what's going on here. Is that clear?

18 THE WITNESS: Yes.

19 MR. HAMMER: Great. Thank you. Go ahead and

20 continue.

21 MR. MARTINICH-SAUTER: Thank you.

22 **Q. (By Mr. Martinich-Sauter) Did you ever discuss**

23 **this attachment, this Schweich list, with anyone at the**

24 **Greitens Group?**

25 A. I do not remember.

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1 **Q. Do you know -- do you remember if you ever**

2 **downloaded this Schweich list to your computer?**

3 A. Yes. I did download the list.

4 **Q. Did anyone instruct you to download the list?**

5 A. Yes.

6 **Q. And who instructed you to do that?**

7 A. Well, it would have been an instruction to

8 send the list to, you know, someone else. And so I would

9 have had to have downloaded the list to send it. And that

10 would have been Eric.

11 **Q. Do you have any specific recollection of**

12 **downloading the list?**

13 A. No.

14 **Q. Do you have any recollection of in late 2013**

15 **discussing this list with Eric or with anyone else?**

16 A. I do not remember discussing it, no.

17 MR. HAMMER: Can I ask a separate question?

18 MR. MARTINICH-SAUTER: Sure.

19 MR. HAMMER: When you would receive an e-mail

20 that would have an attachment of this kind, as part of your

21 job duties for Mr. Greitens at that time, would it have

22 been your practice and procedure to download the attachment

23 to the computer?

24 THE WITNESS: I mean it depends on what it

25 was. If he had told me that this was an important

Page 29

1 document, yes, I would have downloaded and it saved it
 2 somewhere.
 3 MR. HAMMER: Okay. So you would have
 4 downloaded it if you received a specific instruction from
 5 your boss, Mr. Greitens, to go ahead and download it?
 6 THE WITNESS: Yes.
 7 MR. HAMMER: And it is your recollection that
 8 you downloaded the document? You think you did --
 9 THE WITNESS: I think I did.
 10 MR. HAMMER: -- because you distributed it
 11 later to others?
 12 THE WITNESS: Yes.
 13 MR. HAMMER: Thank you. That's all.
 14 (Whereupon Exhibit 2 was marked for
 15 identification.)
 16 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 17 **this document which has been labeled as Exhibit 2?**
 18 A. Yes.
 19 **Q. What is this document?**
 20 A. It's an e-mail from Eric Greitens to Steve
 21 Michael and I am copied on the e-mail. And he is thanking
 22 Steve for the list and mentioned that he looked over it.
 23 **Q. Do you remember receiving this e-mail?**
 24 A. Yes.
 25 **Q. Do you remember around the time of this e-mail**

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1 **discussing the list with Eric?**
 2 A. I don't remember. It's possible, but I don't
 3 remember.
 4 **Q. Around the time of this e-mail, how frequently**
 5 **did Mr. Greitens meet with Mr. Michael?**
 6 A. I -- I do not remember. If I had to make an
 7 educated -- or if I had to sort of guess, I would say once
 8 a month maybe.
 9 **Q. Do you remember when those meetings between**
 10 **Mr. Greitens and Mr. Michael started approximately?**
 11 A. I do not remember.
 12 **Q. To the best of your recollection, do you think**
 13 **they started in 2013?**
 14 A. I would say that they probably started in
 15 2013, yes.
 16 **Q. Do you remember any other follow-up with or by**
 17 **Eric about this Schweich list in late 2013?**
 18 A. I do not remember any follow-up, no.
 19 **Q. Do you remember when Eric met with Steve**
 20 **Michael next after this e-mail?**
 21 A. No, I do not remember.
 22 (Whereupon Exhibit 3 was marked for
 23 identification.)
 24 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 25 **this document which is labeled as Exhibit 3?**

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1 A. Having looked at it again now, yes, I remember
 2 the document.
 3 **Q. And you remember, I guess, sending this**
 4 **e-mail?**
 5 A. I mean I only remember sending it through
 6 looking at it currently. But, yes.
 7 **Q. Do you see where the e-mail says: I hope your**
 8 **meeting with Eric was productive?**
 9 A. Yes.
 10 **Q. Do you know what that sentence refers to?**
 11 A. I assume it refers to a meeting that they had.
 12 But I -- I couldn't tell you the specifics, like the
 13 meeting or the date or the time.
 14 **Q. Do you have any recollection of what they may**
 15 **have discussed at that meeting?**
 16 A. No.
 17 **Q. To the best of your recollection, did you**
 18 **attend that meeting?**
 19 A. I do not remember. I don't remember.
 20 **Q. Did you ever attend the meetings between Eric**
 21 **and Steve Michael?**
 22 A. I mean it's possible that I would get like
 23 pulled in or something. My office was right next to Eric's
 24 office. So I'm sure that I -- I at least would sit in for
 25 bits and pieces of it. But I don't -- I don't remember

Page 32

1 sitting in. I can't think of a time when I was in a room
 2 with Eric and Steve specifically at this -- in 2013.
 3 **Q. To the best of your recollection, when those**
 4 **meetings between Eric and Steve took place, where did they**
 5 **take place?**
 6 A. To the best of my knowledge, they took place
 7 probably in his office or at his home.
 8 **Q. And "his," means Eric's?**
 9 A. Yes, Eric's home or Eric's office.
 10 **Q. And when you say Eric's office, are you**
 11 **referring to the office from which he did his Mission**
 12 **Continues and Greitens Group work?**
 13 A. Yes.
 14 **Q. Do you see on Exhibit 3 here the sentence that**
 15 **says: First I wanted to see when you two might be free to**
 16 **grab a coffee or a meal?**
 17 A. Yes.
 18 **Q. Do you remember why you made that request?**
 19 A. I do not remember, no.
 20 **Q. Around this time in mid to late 2013, was Eric**
 21 **meeting with any political consultants other than Steve**
 22 **Michael?**
 23 A. He would have been meeting with Steve Michael
 24 or whoever Steve Michael was associated with at that time.
 25 I don't -- I can't recall off the top of my head. But I

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1 know that Steve had, you know, co-workers that he would
 2 bring in. So I'm sure he was meeting with Steve's
 3 colleagues. I don't know if he was -- I don't know if
 4 Steve was at Victory at that time or not. It's possible
 5 that he might have been meeting with other political
 6 consultants from Victory. And he also probably would have
 7 been meeting with Tyler Holman, at that time potentially
 8 Danny Laub, but that's all. I'm just thinking if there was
 9 anyone else.

10 **Q. Who's Tyler Holman?**

11 A. Tyler, I believe my understanding is that at
 12 some point before I actually started working for Eric in
 13 January 2011, Tyler had interned or was a member of the
 14 Greitens Group in some way and had sort of become friends
 15 with Eric and they kept in contact. And my understanding
 16 is that Tyler was in politics at the time. I don't know if
 17 he still is. And so that's what Eric and Tyler would have
 18 been talking about, you know, would have been consulting in
 19 a political manner.

20 **Q. And the political consultants that Eric was**
 21 **meeting with at that time, what sort of services were they**
 22 **providing him?**

23 A. I mean to my knowledge, giving him guidance
 24 on, you know, who people are in Missouri politics. I don't
 25 know that to that point he was very familiar with it. And

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1 helping him, you know, meet other people in politics, I
 2 guess other potential supporters and donors.

3 **Q. To your knowledge, were they helping him to**
 4 **plan a campaign?**

5 A. At this time in 2013?

6 **Q. Uh-huh.**

7 A. I do not know.

8 **Q. Were you ever present for any of Eric's**
 9 **meetings with Tyler Holman?**

10 A. At this time in 2013?

11 **Q. In 2013. Uh-huh.**

12 A. I do not remember being present for any of
 13 their meetings, but it's certainly possible that I was.

14 **Q. Did you schedule Eric's meetings with Tyler in**
 15 **this time?**

16 A. I probably scheduled some of them, but Tyler
 17 and Eric had a close relationship. So it's possible that
 18 there were meetings that existed and that I didn't know
 19 about.

20 **Q. Do you know whether Tyler and Eric remain**
 21 **close?**

22 A. I do not know.
 23 (Whereupon Exhibit 4 was marked for
 24 identification.)

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

Page 35

1 **this document which is labeled as Exhibit 4?**

2 A. I -- yes, I recognize the document now that it
 3 is in front of me.

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

5 A. Is it an e-mail that I am sending to Mason
 6 Fink with Dave Whitman and Eric Greitens CC'ed. Subject,
 7 Missouri Read-Ahead.

8 **Q. Who's Dave Whitman?**

9 A. Dave Whitman was managing -- I think his title
 10 was managing director of the Greitens Group. I think
 11 that's what his title was.

12 **Q. What did Dave do at the Greitens Group?**

13 A. Dave was in charge of kind of running the
 14 company, booking speaking engagements and contracting the
 15 and advising Eric. That was his -- his role.

16 **Q. In 2013 and 2014, about how many employees**
 17 **were there at the Greitens Group?**

18 A. At this time, including Eric, five.

19 **Q. And who were the other employees other than**
 20 **you, Dave and Eric?**

21 A. The other employees were Tim Ly and Katie
 22 Ricks.

23 **Q. What did Tim Ly do at the Greitens Group?**

24 A. Tim Ly, his title, I think, was like associate
 25 or something. He did research and helped Eric sort of

Page 36

1 research for his books and compile his books. Kind of a
 2 research assistant, I guess.

3 **Q. Other than -- other than doing research for**
 4 **books, did Tim do any other sort of research for Eric?**

5 A. I'm sure that he did. It's possible that he
 6 might have compiled political research and news articles
 7 and that sort of thing for him as well.

8 **Q. Do you have any recollection of Tim doing that**
 9 **or is that just your suspicion?**

10 A. I do remember a -- like a daily e-mail or
 11 something that Tim would compile in the mornings and send
 12 to Eric that would sort of be the top political headlines
 13 when Eric was trying to get up to speed on what was going
 14 on.

15 **Q. Do you know whether Eric asked him to compile**
 16 **those e-mails?**

17 A. I do not know.

18 **Q. Who is Mason Fink?**

19 A. Mason Fink, my understanding is that he --
 20 he's a businessman. But that he had done some fundraising
 21 for Mitt Romney's campaign and he was trying to help out
 22 Eric, support Eric.

23 **Q. And help Eric in what way?**

24 A. My understanding is to help him get in front
 25 of potential supporters and donors.

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1 **Q. And when you say supporters and donors, are**
 2 **you referring to political supporters and political donors?**
 3 A. Yes.
 4 **Q. And what office or offices would Eric have**
 5 **been trying to get donors and supporters for, for what**
 6 **campaigns?**
 7 A. I mean at this time, there was no campaign. I
 8 don't believe that there was an exploratory committee
 9 either. So it was just sort of forward thinking, I guess.
 10 **Q. At the time of this e-mail, do you know**
 11 **whether Eric had decided to run for office in 2016?**
 12 A. Sorry. Can you repeat that?
 13 **Q. At the time of this e-mail labeled as**
 14 **Exhibit 4, do you know whether Eric had definitively**
 15 **decided that he was going to run for office in 2016?**
 16 A. I -- I do not know. I would assume from
 17 reading the e-mail, that -- that he was very interested.
 18 **Q. Do you know how Eric met Mason Fink?**
 19 A. I do not. I do not know. At least I can't
 20 recall.
 21 **Q. Do you know whether Eric and Mason had a**
 22 **relationship that predated that e-mail by a long time?**
 23 A. I do not know. I just -- I don't remember how
 24 they met. So I couldn't -- I wouldn't know.
 25 **Q. Do you see in the second sentence of the**

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1 **e-mail, it says: Thanks for letting me know your travel**
 2 **plans?**
 3 A. Yes.
 4 **Q. Do you know what that sentence refers to?**
 5 A. I'm thinking that he was coming to visit Eric
 6 here in St. Louis.
 7 **Q. Do you remember that Mr. Fink came to**
 8 **St. Louis at about this time?**
 9 A. I do, yes.
 10 **Q. What was the nature of that trip or the**
 11 **purpose of that trip?**
 12 A. Again, I think the nature of that trip would
 13 have been Mason was interested in being supportive of Eric
 14 if he was going to, you know, run -- run for governor. And
 15 so the nature of it would have been talking through
 16 fundraising, how to fundraise, potential donors and
 17 supporters, that sort of thing.
 18 **Q. Do you know whether Eric asked Mason to come**
 19 **to St. Louis?**
 20 A. I do not remember.
 21 **Q. Do you remember whether Eric asked you or**
 22 **instructed you to send this e-mail to Mason Fink?**
 23 A. I -- I do not remember specifically. But I'm
 24 sure that he did.
 25 **Q. Why are you sure?**

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1 A. Because I -- I wouldn't have been -- I don't
 2 think at this time, early 2014, I don't think that I would
 3 have been pulling this sort of information or sending it
 4 unless I had direction. Because at this time, I was still
 5 focused on The Mission Continues and the Greitens Group.
 6 **Q. Do you see that this e-mail appears to have an**
 7 **attachment?**
 8 A. Yes.
 9 **Q. Do you remember the attachment to this e-mail?**
 10 A. I do not remember the attachment, no.
 11 **Q. Do you see in the second paragraph of the**
 12 **e-mail, the second sentence says: Attached you'll find**
 13 **bios for the candidates who are likely running for governor**
 14 **in 2016. Also, you'll find relevant information from the**
 15 **2012 Missouri elections.**
 16 A. Yes.
 17 **Q. Do those sentences jog your memory on what the**
 18 **attachment to this e-mail might have been?**
 19 A. Yes, they do.
 20 **Q. Do you remember now what the attachment to**
 21 **this e-mail was?**
 22 A. I mean I would assume it's bios for candidates
 23 who are likely running for governor in 2016 and 2012
 24 Missouri election data.
 25 **Q. Other than those facts, do you remember**

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1 **anything about the attachment to this e-mail?**
 2 A. No.
 3 (Whereupon Exhibit 5 was marked for
 4 identification.)
 5 **Q. (By Mr. Martinich-Sauter) Keep Exhibit 4**
 6 **handy. Do you recognize this document which is labeled as**
 7 **Exhibit 5?**
 8 A. After seeing it again, yes, I can remember it.
 9 **Q. What is Exhibit 5?**
 10 A. It is a memorandum titled Missouri Read-Ahead.
 11 And it is to Mason Fink from myself, Krystal Taylor. And
 12 it's CC'ing Eric Greitens and Dave Whitman.
 13 **Q. So is it accurate that Exhibit 5 is the**
 14 **attachment to the e-mail that is Exhibit 4?**
 15 A. Yes.
 16 **Q. Did you prepare Exhibit 5?**
 17 A. I do not remember.
 18 **Q. Do you know why Exhibit 5 includes only**
 19 **prospective candidates for the 2016 Missouri governor's**
 20 **race and not any other political race?**
 21 A. I would assume it's because that Eric
 22 wanted -- at this time, he was focused on the governor's
 23 position.
 24 **Q. Do you recall whether Eric gave any**
 25 **instructions or input on what should be in this memorandum?**

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1 A. I do not recall, no.

2 **Q. Given the sort of work that you were doing at**

3 **the Greitens Group in early 2014, would writing this sort**

4 **of memorandum be the sort of thing you did?**

5 A. Not typically. Typically if we were preparing

6 Eric for a meeting or something on The Mission Continues

7 side, it was a donor meeting. So the development team

8 would be responsible for creating memos like this. Then

9 typically if he was going into a meeting for the Greitens

10 Group, probably Tim Ly or Dave Whitman might be responsible

11 for preparing him with information like this. So

12 typically, no, this was not my -- this was not something I

13 would have prepared.

14 **Q. So if you had prepared a document of this**

15 **nature, it would have been unusual; is that right?**

16 A. Yes, it would have been unusual. I'm also not

17 sure that I prepared it. It's possible that someone else

18 sent me information and I sort of just compiled it into a

19 Word document and made it look nice.

20 **Q. Can you think of any reason why you or someone**

21 **else would have put your name in the from field if someone**

22 **else had written it?**

23 A. Because I was sending it in the e-mail.

24 **Q. Would it be accurate to say about this time,**

25 **it was your understanding that Eric had settled on the 2016**

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1 **Missouri governor's race?**

2 A. Yes, I would say that that's accurate.

3 (Whereupon Exhibit 6 was marked for

4 identification.)

5 **Q. (By Mr. Martinich-Sauter) Sorry. I'm slow**

6 **with these exhibits. Do you recognize this document which**

7 **is labeled as Exhibit 6?**

8 A. Yes, I recognize it now that it -- yes, now

9 that it's in front of me, I recognize it.

10 **Q. Who is Monu Joseph?**

11 A. So Monu was a good friend of Eric's. They met

12 in school or something or at some sort of like leadership

13 academy or something along those lines. I can't remember

14 exactly where they met. But they were like long-time

15 friends.

16 **Q. Did you regularly interact directly with Monu?**

17 A. No. Actually, typically I did not. Because

18 he typically did not prefer to interact with me. So he

19 would e-mail, text and call Eric directly most of the time.

20 **Q. Do you know why Monu preferred not to interact**

21 **with you?**

22 A. I mean I would assume it's because Eric was

23 his good friend.

24 **Q. Do you know beyond purely personal friend**

25 **activities, did Monu and Eric ever have business or**

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1 **political or other enterprises or activities together?**

2 A. Did Monu and Eric -- sorry.

3 **Q. It was a terrible question.**

4 **Do you know whether Monu and Eric ever had**

5 **business partnerships or projects together?**

6 A. I do not know.

7 **Q. Do you know whether Monu and Eric ever**

8 **discussed political matters?**

9 A. Yes, I'm sure that they did.

10 **Q. And why are you sure?**

11 A. Because Monu would be someone if Eric was

12 traveling, who might help set up different meetings with

13 potential supporters. And he also would come into

14 St. Louis quite often during the campaign to sort of help

15 out, be around, so.

16 **Q. When did Monu start helping set up potential**

17 **supporter meetings for Eric?**

18 A. I do not remember.

19 **Q. Do you remember was it in 2013, 2014?**

20 A. I would say the earliest would be probably

21 like late 2013.

22 **Q. When he would set up those meetings, would you**

23 **be involved in that logistical process or would he do it**

24 **directly with Eric?**

25 A. Probably both. Sometimes I'd have the

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1 logistics, you know, the meeting place, the meeting time,

2 who he was meeting with. And then sometimes when Eric was

3 traveling, Monu would just sort of drive him around. And I

4 didn't really know what was necessarily going on.

5 **Q. Do you know what Monu does for a living?**

6 A. I do not.

7 **Q. Did you say that you remember this particular**

8 **e-mail with Monu, Exhibit 6?**

9 A. I remember having it in front of me. After

10 having it in front of me, yes.

11 **Q. Do you see this e-mail appears to have had an**

12 **attachment?**

13 A. Yes.

14 **Q. Do you think you'd recognize that attachment**

15 **if you saw it?**

16 A. Probably, yes.

17 (Whereupon Exhibit 7 was marked for

18 identification.)

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

20 **this document which is labeled as Exhibit 7?**

21 A. Yes, I do.

22 **Q. And what is Exhibit 7?**

23 A. There is a schedule that I believe Monu would

24 have compiled and sent to Eric. Eric was traveling to

25 California. And this was a schedule of meetings that they

Page 45

1 were going to be having.

2 **Q. Do you know what the nature of those meetings**

3 **was?**

4 A. Yeah. I would -- I would say that the nature

5 of those meetings was to start thinking about getting

6 support and money from these people for when he would run

7 for office.

8 **Q. Do you see that on the schedule, it looks like**

9 **there are a number of meetings scheduled for Monday -- a**

10 **Monday?**

11 A. Yes.

12 **Q. Was it usual for Eric to be away from the**

13 **office during the week on non Mission Continues work?**

14 A. No. No, it was not usual.

15 **Q. Do you remember --**

16 A. Well, sorry. I take that back. If he was

17 traveling for the Greitens Group, that would be typical.

18 But he would -- typically he was traveling for The Mission

19 Continues or the Greitens Group.

20 **Q. Do you remember approximately how frequently**

21 **Eric would travel for Greitens Group business?**

22 A. Yes. I would say probably around three days a

23 week, two to three days a week.

24 **Q. So two to three days a week, Eric would be out**

25 **of the office on Greitens Group business?**

Page 46

1 A. Yes.

2 **Q. On the days when Eric was in the office, do**

3 **you remember approximately how much of his time was**

4 **dedicated to the Greitens Group, versus The Mission**

5 **Continues?**

6 A. I mean, no, I don't remember. It would be

7 based on the day. Like I said, sometimes there were a lot

8 of Mission Continues meetings and sometimes there were a

9 lot of Greitens Group meetings. So I don't remember.

10 **Q. But taking into account this Greitens Group**

11 **travel, would you say he spent substantially more of his**

12 **time on the Greitens Group than on The Mission Continues?**

13 A. I mean, no. I think typically when he was

14 traveling, he was still doing work for The Mission

15 Continues. If he wasn't in the office, he still might be

16 making donor calls and sending donor e-mails and that sort

17 of thing. Just because he wasn't in the office didn't mean

18 he wasn't working.

19 **Q. Other than making donor calls and sending**

20 **donor e-mails, what sorts of work did Eric do for The**

21 **Mission Continues in 2013, 2014?**

22 A. In 2013 and 2014, probably a big chunk of his

23 time was really just fundraising. In the earlier days,

24 that was different. But he also would have been -- I mean

25 he would have also been communicating with Spencer Kympton

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1 who was the -- I don't know what his title was at this

2 time, like president or something. He would have been

3 communicating with him about kind of the day-to-day stuff.

4 But his core responsibility at this time probably would

5 have been fundraising.

6 **Q. Did Spencer run the day-to-day operations in**

7 **The Mission Continues at this time?**

8 A. I would say in late 2013 and 2014, yes.

9 **Q. Turning back to Monu. Did Mr. Joseph come to**

10 **St. Louis regularly once the campaign -- Mr. Greitens' 2016**

11 **campaign started?**

12 MR. HAMMER: I'm sorry. Can you repeat the

13 question?

14 **Q. (By Mr. Martinich-Sauter) Sure. Did**

15 **Mr. Joseph come St. Louis or Missouri regularly once**

16 **Mr. Greitens' 2016 campaign started?**

17 A. Like how would you define regularly?

18 **Q. How often did he come to Missouri or St. Louis**

19 **during that time?**

20 A. I mean I worked for the campaign until May of

21 2016. And I'd say I could probably count on two hands how

22 many times he came in. So maybe five to ten.

23 **Q. Do you know whether while the campaign was**

24 **going on, Mr. Greitens met up with Mr. Joseph outside of**

25 **Missouri whether in California or elsewhere?**

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1 A. Yes.

2 **Q. Do you remember anything about those meetings?**

3 A. I remember meetings often in California. And

4 I also remember them taking a trip to Aspen. I think it

5 was maybe for like the Aspen institute or something or some

6 sort of like retreat type of thing. I'm sure there are

7 others, but those are the two most -- those are the two I

8 remember.

9 **Q. Do you know whether Mr. Joseph was helping to**

10 **raise money for Mr. Greitens' campaign?**

11 A. Yes, I believe he was setting up meetings.

12 **Q. Do you know who those meetings were with?**

13 A. I mean I know some of them from looking at

14 this exhibit. And off the top of my head, I don't think

15 that I could name off a list, but I'm sure if I had

16 something in front of me, it would be a refresher.

17 **Q. To the best of your recollection, do you know**

18 **whether the donor meeting that Mr. Joseph was setting up**

19 **involved some of Mr. Greitens' largest donors?**

20 A. I -- I do not know.

21 **Q. Would you say that the meetings set up by**

22 **Mr. Joseph involved large donors?**

23 A. Yes.

24 **Q. But do you recall, other than the names on**

25 **that sheet, who those large donors were?**

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1 A. I do not.
 2 (Whereupon Exhibit 8 was marked for
 3 identification.)
 4 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 5 **this document that's labeled Exhibit 8?**
 6 MR. HAMMER: Before you go on to No. 8 --
 7 that's fine. You can pass it over. Let's go off the
 8 record for a second.
 9 (Whereupon there was an off-the-record
 10 discussion.)
 11 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 12 **this document which is labeled as Exhibit 8?**
 13 A. Yeah. I'm copied on the e-mail. These are
 14 actually e-mails to me, but I don't recall the -- I don't
 15 recall what the attachment is.
 16 **Q. Do you remember ever seeing a document or**
 17 **using a document that was named Public Service Categories**
 18 **for Consideration?**
 19 A. I do not remember.
 20 (Whereupon Exhibit 9 was marked for
 21 identification.)
 22 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 23 **this document which is labeled as Exhibit 9?**
 24 A. Yes, I recognize this.
 25 **Q. What is this document?**

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1 A. I believe that it is a document with different
 2 categories that are of consideration for planning a run for
 3 governor.
 4 **Q. Do you know who created this document?**
 5 A. I do not know. I would assume from this
 6 e-mail and the exhibit prior to this document, that Eric
 7 would have created it. But I do not know that for a fact.
 8 **Q. Do you remember discussing this document with**
 9 **anyone?**
 10 A. I mean, yeah. Yes, I'm sure that we did.
 11 It's just hard for me to remember like a specific
 12 discussion or conversation.
 13 **Q. Do you remember discussing this document with**
 14 **Mr. Greitens at some point?**
 15 A. I don't remember. But I mean, like I said,
 16 I'm sure that we did. I just don't remember a specific
 17 instance.
 18 **Q. On the first page, do you see there's a column**
 19 **entitled Financial Strength?**
 20 A. Yes.
 21 **Q. Do you see in that column, there's a name**
 22 **Jonathan Levey or Levy?**
 23 A. Yes.
 24 **Q. Who is that person?**
 25 A. Jonathan Levey is also a good friend of

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1 Eric's. I believe that they grew up together here in
 2 St. Louis and -- he's a good friend Eric's. He's also a
 3 donor.
 4 **Q. Do you know whether Mr. Levey recruited other**
 5 **donors for Mr. Greitens' campaign?**
 6 A. Yes, I believe that he did.
 7 **Q. Do you recall who those donors were?**
 8 A. I certainly recall working with him in several
 9 instances to ensure that there were good meetings on Eric's
 10 calendar when he was traveling and that sort of thing. I
 11 can't think of specific names of those people. But he
 12 certainly -- he certainly set up donor meetings.
 13 **Q. Do you remember whether the donors that**
 14 **Mr. Levey put Eric in touch with, were they big donors?**
 15 A. I do not -- I don't remember.
 16 **Q. Do you see in the financial strength column,**
 17 **it has the name Alex Rogers?**
 18 A. Yes.
 19 **Q. Who is Alex Rogers?**
 20 A. Alex Rogers, I believe is also another one of
 21 Eric's friends. I think they might have gone to Oxford
 22 together. And he's a good friend of Eric's that also
 23 helped arrange donor meetings and supporter meetings.
 24 **Q. Do you know where the donor meetings that**
 25 **Mr. Rogers set up took place?**

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1 A. Alex Rogers, when I was working with him,
 2 didn't live in the United States. I think he lived in -- I
 3 think London or something. But did some traveling. And if
 4 my memory served me correctly, I'd say the meetings that
 5 Alex Rogers had set up were in New York mostly.
 6 **Q. Do you remember the names of any of the donors**
 7 **that Alex Rogers put Eric in touch with?**
 8 A. I don't remember specific names. I'm sure I
 9 could -- I'm sure my memory would trigger if I saw them.
 10 But no, I don't remember specific names off the top of my
 11 head.
 12 **Q. Do you know whether those donors that**
 13 **Mr. Rogers recruited were big donors?**
 14 A. I do not know.
 15 **Q. Do you know whether Mr. Joseph, Mr. Levey or**
 16 **Mr. Rogers recruited donors for any Super PAC or any**
 17 **political entity, other than Mr. Greitens' campaign**
 18 **committee itself?**
 19 A. I do not know. Typically I just knew, you
 20 know, who the meeting was with and the logistics behind it.
 21 I did not look at that information.
 22 **Q. To the best of your information when you saw**
 23 **this document first and when you may have discussed it with**
 24 **others, had Eric decided at that point to run for governor?**
 25 A. Yes, I would say so.

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1 **Q. Do you remember whether this document was**
 2 **shared with anybody other than you, Eric or Dave Whitman?**
 3 A. If my memory serves me correctly, I would say
 4 it was probably shared with some of the political
 5 consultants, potentially Steve Michael and Tyler Holman,
 6 Danny Laub potentially. Like I said, I'm just trying to
 7 remember.
 8 **Q. Do you see at the very bottom of the first**
 9 **page towards the middle, it says: You want a job, go raise**
 10 **\$ and show me that you are committed?**
 11 A. Where is that?
 12 MR. HAMMER: Right down at the bottom.
 13 A. Oh. Yes, I see that.
 14 **Q. (By Mr. Martinich-Sauter) Do you know what**
 15 **that sentence refers to?**
 16 A. I do not know what that sentence refers to.
 17 **Q. Do you remember discussing that sentence with**
 18 **anyone at any point?**
 19 A. I do not remember.
 20 **Q. Do you see on the far right column titled**
 21 **Defense and Contingencies, about four lines down, it says**
 22 **█ etc.?**
 23 A. Yes.
 24 **Q. Do you know what that refers to?**
 25 A. The only █ that comes to mind is Eric's

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1 accountant. But his last name isn't there, so I couldn't
 2 say for sure.
 3 **Q. Understood. Do you mind turning to the second**
 4 **page. Do you see the first column on the left which is**
 5 **titled Campaign Plan?**
 6 A. Yes.
 7 **Q. Do you see that a little ways down, there's**
 8 **the sentence: Financial, declare with \$5M, raise more than**
 9 **any other candidate for governor in U.S. history?**
 10 A. Yes, I see that.
 11 **Q. Do you remember either discussing with Eric or**
 12 **hearing him discuss with other people a desire to raise**
 13 **more money than any other candidate for governor in U.S.**
 14 **history?**
 15 A. Yes, I remember him saying that.
 16 **Q. Do you know, was that a goal of his?**
 17 A. I do not know -- I don't know if it was a
 18 specific goal. He is someone who, you know, likes to think
 19 big and go big. So, you know, it makes sense that that was
 20 his -- it would make sense that that would be his goal.
 21 **Q. Do you remember at any point Mr. Greitens**
 22 **identifying a specific amount of money that he hoped to**
 23 **raise during his 2016 campaign?**
 24 A. I mean I remember there certainly being goals,
 25 like to raise during X quarter and the next quarter, but I

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1 don't remember what those amounts are.
 2 **Q. Do you see in the second column on Page 2 of**
 3 **Exhibit 9, the column is titled March 2014?**
 4 A. Yes.
 5 **Q. Do you see a few lines down, the sentence:**
 6 **Put together a plan to get to \$5M for launch and \$50M for**
 7 **campaign?**
 8 A. Yes, I see that.
 9 **Q. Do you remember any discussions involving**
 10 **Mr. Greitens about a desire to raise \$50 million for his**
 11 **gubernatorial campaign?**
 12 A. I do not remember discussing that with him,
 13 no.
 14 **Q. Do you see a few lines below that where it**
 15 **says: CA follow through and identify names and donors?**
 16 A. Yes.
 17 **Q. Do you know what that refers to?**
 18 A. I believe it would refer to California
 19 follow-up and identify names and donors. So following up
 20 on meetings he had in California.
 21 **Q. Do you know which meetings in California that**
 22 **might refer to?**
 23 A. I would assume that they were -- that referred
 24 to the meetings that Monu had arranged in California. I
 25 don't have, you know, a calendar in front of me. So that's

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1 what I would assume.
 2 **Q. Do you see probably about eight to ten lines**
 3 **down from there, the sentence: Review The Mission**
 4 **Continues latest data and results?**
 5 A. Yes.
 6 **Q. Do you know what that refers to?**
 7 A. When -- from time to time, Eric would -- would
 8 want to know like the latest numbers on how many fellows
 9 have gone through the program, you know, how much money The
 10 Mission Continues has raised and that sort of thing. So
 11 that when he's out speaking to people and they're asking
 12 him these things, he has answers.
 13 **Q. Do you know why that might have been a**
 14 **document that appears to be a campaign plan?**
 15 A. I mean I would assume it's because up to this
 16 point, this was sort of, you know, what he had done with
 17 his life. So when he talked about what he was doing in his
 18 career and the organization he built and giving people
 19 background on himself, that he would have been giving, you
 20 know, some statistics along with that back ground and using
 21 them in meetings.
 22 **Q. Where would those data and results about The**
 23 **Mission Continues be obtained from?**
 24 A. Typically I would e-mail or he would e-mail
 25 someone from The Mission Continues to just get like an

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1 updated list of statistics.

2 **Q. When you would send those e-mails or he would**

3 **send those e-mails, would they identify a purpose for**

4 **getting the data?**

5 A. I don't recall. I mean it was kind of a

6 normal thing to do. So probably -- I don't remember.

7 **Q. The data that you would get in response to the**

8 **e-mails, is that information that someone outside The**

9 **Mission Continues could have obtained or is it information**

10 **that only would have been accessible to someone who is an**

11 **employee of The Mission Continues?**

12 A. No. I mean someone outside The Mission

13 Continues could go on the website and look at their, you

14 know, statistics. All of that information is on the

15 website. But it might not be like up to date to, you know,

16 that date. It might be a little outdated. But anyone

17 could go and look at that information, I would assume.

18 **Q. So to the best of your understanding, The**

19 **Mission Continues latest data and results referred to here,**

20 **refers to information that was available on The Mission**

21 **Continues website?**

22 A. Yes, to the best of my understanding, it would

23 be information that would also be posted on the website or

24 brochure materials, promotional materials, that sort of

25 thing.

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1 **Q. Do you see about halfway down the second**

2 **column, there's the phrase: List of potential volunteer**

3 **campaign?**

4 A. Yes.

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

6 A. I mean I think it probably refers to

7 volunteers, recruiting volunteers for a potential campaign.

8 **Q. Were you ever present for any discussions**

9 **about strategies for recruiting campaign volunteers?**

10 A. At this time? 2014?

11 **Q. In 2014.**

12 A. It's possible. I -- I can't think of a time

13 like a meeting specifically. But it's possible, yes.

14 **Q. Do you remember what those volunteer**

15 **recruitment strategies were that you heard discussed?**

16 A. I mean the only thing that I really remember

17 is getting sort of groups together. So like on this first

18 page, targeting, you know, police officers for Greitens or

19 firefighters for Greitens, things like that. Getting

20 groups that have sort of a common thread to volunteer for

21 the -- for him in a potential campaign.

22 **Q. Do you remember any discussions about using**

23 **Mission Continues volunteers as a target audience for**

24 **campaign volunteer recruitment?**

25 A. No, I don't recall a specific conversation. A

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1 lot of The Mission Continues volunteers were, you know,

2 Eric's friends and family. So I'm sure that it would make

3 sense that they would volunteer for a campaign. But I

4 don't recall any specific conversations, no, to the best of

5 my knowledge.

6 **Q. Do you see that on the top row of this second**

7 **page here, you have March 2014, April 2014, each month all**

8 **the way through to April 2015?**

9 A. Yes.

10 **Q. Do you see at the far right end of the**

11 **spreadsheet under April 2015, it says: Declare?**

12 A. Yes.

13 **Q. Is it your recollection that about this time,**

14 **Eric had come up with a time line where he would declare**

15 **his candidacy in April 2015?**

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

17 **Q. Do you remember discussing that time line with**

18 **him?**

19 A. I mean, yes, we discussed that time line in

20 the -- in the sense that before he, you know, declared

21 running for office, we needed to get through the Resilience

22 book tour. And the Resilience book tour was in March of

23 2015. So we would have discussed it in that framework.

24 And I'm sure we discussed it at other times too.

25 **Q. Do you remember any discussions about how the**

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1 **Resilience book tour might provide good publicity to help**

2 **the campaign launch?**

3 A. Yes, I do.

4 **Q. What do you remember about those discussions?**

5 A. A big part of running a book tour is, you

6 know, booking media appearances and interviews. And since

7 he was considering running for governor of Missouri, it

8 would make sense to sort of target a lot of media outlets

9 in Missouri.

10 MR. MARTINICH-SAUTER: I would propose doing

11 two more exhibits and then taking our break.

12 MR. HAMMER: That's great. That takes us to

13 around 10 or 11 of 15 or so, somewhere in that ballpark?

14 We talked generally about the possibility that there might

15 be 10 or 15 exhibits, is that still the thought?

16 MR. MARTINICH-SAUTER: Go off the record.

17 (Whereupon there was an off-the-record

18 discussion.)

19 (Whereupon Exhibit 10 was marked for

20 identification.)

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

22 **this document which is labeled as Exhibit 10?**

23 A. Yes, I do.

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

25 A. This document is an e-mail from myself to Eric

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1 Greitens and copying Dave Whitman. And it's titled
 2 Salesforce Tags for Top 100.
 3 **Q. What was the context of this e-mail?**
 4 A. So the Greitens Group had a Salesforce CRM
 5 system. And when Eric would travel and meet people that he
 6 thought might be specifically helpful to a potential
 7 campaign, we would put a tag on that contact name in the
 8 database and the tag was top 100.
 9 **Q. Do you know why the phrase "top 100" was**
 10 **chosen?**
 11 A. I do not know. I would assume it just means
 12 like top 100 supporters or that sort of thing. But I don't
 13 know exactly why.
 14 **Q. Were there names in the Salesforce system**
 15 **other than potential political contacts?**
 16 A. Yes.
 17 **Q. And what sorts of folks would those be?**
 18 A. I mean anyone Eric had, you know, did a speech
 19 for, come in contact with at a meeting, any business card
 20 he had would be -- generally go into Salesforce.
 21 **Q. Did The Mission Continues use Salesforce?**
 22 A. Yes. They also used Salesforce.
 23 **Q. Were those two Salesforce systems connected?**
 24 A. They were separate.
 25 **Q. Does this e-mail, Exhibit 10, include some**

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1 **Salesforce tags that you proposed?**
 2 A. Yes, it does.
 3 **Q. Did anyone ask you to come up with those tags?**
 4 A. Yes.
 5 **Q. Who asked you to do that?**
 6 A. Eric would have asked me to come up with those
 7 tags.
 8 **Q. Did he explain why he wanted you to come up**
 9 **with those tags?**
 10 A. I mean I can't recall the specific
 11 conversation, but my understanding is that it wasn't just,
 12 you know, good enough to understand that they wanted to be
 13 supportive of a potential campaign, but it would be helpful
 14 to understand in what way they would be supportive. So
 15 would they be a volunteer or donor, potential staff member,
 16 etc.
 17 **Q. Did you ever discuss this list of tags with**
 18 **Eric?**
 19 A. I mean, yes. I'm sure we discussed that list
 20 of tags, yes.
 21 **Q. Do you remember anything about those**
 22 **discussions?**
 23 A. No.
 24 (Whereupon Exhibit 11 was marked for
 25 identification.)

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1 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 2 **this document which is labeled as Exhibit 11?**
 3 A. Yes.
 4 **Q. What is Exhibit 11?**
 5 A. It is an e-mail from myself to Eric copying
 6 Dave Whitman in reply to an e-mail from Eric asking to
 7 discuss these Salesforce tags.
 8 **Q. Do you remember anything about the -- let me**
 9 **take that back.**
 10 **If you put Exhibit 11 alongside of Exhibit 10,**
 11 **do you see any differences between the lists of tags?**
 12 A. I see that in the first version of the tags,
 13 there's just the word "volunteer." In the second version,
 14 there's "volunteer leader." I also see that I'm asking a
 15 question about how to tag Republican party insiders or
 16 Republican party influencers in Missouri.
 17 **Q. Do you remember why those changes were made to**
 18 **the list of tags between e-mails?**
 19 A. I don't remember why. I can -- you know, from
 20 following the e-mail chain, I can infer that I had a
 21 discussion with Eric which prompted changes to the list.
 22 And I'm sending it back to him the next day after we spoke.
 23 MR. MARTINICH-SAUTER: I think now might be a
 24 good time for a break.
 25 (Whereupon there was a short break.)

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1 **Q. (By Mr. Martinich-Sauter) If you don't mind,**
 2 **I'd like to turn back to a couple quick items before we**
 3 **move on to the next document. One question I have is, did**
 4 **you say that Monu didn't like to interact directly with you**
 5 **when he was scheduling?**
 6 A. Yes.
 7 **Q. Did he ever tell you that directly?**
 8 A. No.
 9 **Q. Did Eric tell you that directly?**
 10 A. No.
 11 **Q. What makes you think that he didn't like to**
 12 **interact with you directly?**
 13 A. Because I would reach out to him to coordinate
 14 meetings and logistics and he would never reply to me.
 15 **Q. Would he reply to Eric?**
 16 A. Yes.
 17 **Q. And how did you find out that he had replied**
 18 **to Eric?**
 19 A. I mean generally I had access to Eric's e-mail
 20 or, you know, Eric would tell me he talked to him and he
 21 knows what's going on, not to worry or whatever.
 22 **Q. Was it your sense that Eric knew Monu didn't**
 23 **like to interact with you directly?**
 24 A. Yes. Yes.
 25 **Q. Did Eric ever comment on that?**

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1 A. Not that I can recall. I just -- I would make
 2 comments because it was hard to do my job without having
 3 like information about, you know, where and when and who
 4 and that sort of thing. But, no, I can't recall him
 5 specifically making a comment about it.

6 **Q. When you would make a comment, would Eric ever**
 7 **say anything in response to that comment?**

8 A. Not that I can recall.

9 **Q. Other than Mr. Joseph, was there anyone else**
 10 **who you felt like didn't like to go through you?**

11 A. Like from a donor prospective or friends --
 12 friend prospective?

13 **Q. Anyone who was trying to reach Mr. Greitens**
 14 **and it would have been within your job duties to facilitate**
 15 **those communications.**

16 A. Jonathan Levey to some extent. But my
 17 assumption was always that they have known Eric for a long
 18 time so they preferred to interact with him.

19 **Q. And did Jonathan ever tell you directly that**
 20 **he preferred to interact with Eric directly rather than**
 21 **through you?**

22 A. No.

23 **Q. You surmised that in much the same way as**
 24 **Mr. Joseph; is that right?**

25 A. Yes.

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1 **Q. Other than those two individuals, was there**
 2 **anyone else you had the sense they didn't want to go**
 3 **through you?**

4 A. I'm sure there are others, but there are no
 5 other names that stick out right now.

6 **Q. Are there any categories of people, even if**
 7 **not specific individuals, where you felt like they didn't**
 8 **want to go through you?**

9 A. I mean generally, people who had known Eric
 10 for a long time who had a close personal relationship with
 11 him preferred, you know, sort of not to go through his
 12 assistant, which made sense to me. It's not really -- I
 13 can't think of any other group of people.

14 **Q. All right. Do you mind fishing out Exhibit**
 15 **No. 3? And do you remember this document?**

16 MR. HAMMER: Just to be clear, we're looking
 17 at a document that is presumably an e-mail sent by Krystal
 18 on November 19 to Steve Michael?

19 MR. MARTINICH-SAUTER: Correct.

20 MR. HAMMER: Okay.

21 A. Yes. I remember this e-mail.

22 **Q. (By Mr. Martinich-Sauter) And there's a**
 23 **sentence about midway through where it says: First, I**
 24 **wanted to see when you two might be free to grab coffee or**
 25 **a meal.**

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1 **Do you see that sentence?**

2 A. Yes.

3 **Q. Do you know whether you ever in fact did grab**
 4 **coffee or a meal with Steve?**

5 A. With Steve and Mitch?

6 **Q. Either or both.**

7 A. I'm sure that later in the -- as the campaign
 8 progressed and Steve was a consultant for the campaign, I
 9 might have grabbed coffee with him or something. But I
 10 don't recall the meeting that this e-mail references.

11 **Q. And do you recall a coffee or meal meeting**
 12 **with Steve or Mitch in late 2013?**

13 A. I don't recall. It's very possible that there
 14 was a meeting. I just can't -- I don't remember.

15 **Q. And in the next sentence where it says Dave,**
 16 **who is Dave in that e-mail?**

17 A. Dave is Dave Whitman.

18 **Q. Okay. Thank you. We were discussing the**
 19 **Resilience book tour. Did you say that the book tour was**
 20 **targeted in particular at Missouri locations?**

21 A. I wouldn't -- I wouldn't say that it was
 22 targeted in particular at Missouri, but it was certainly an
 23 opportunity to -- to, you know, as you're building out a
 24 media plan, you've obviously got your Today Show and
 25 your -- you know, your big shows that you want to target.

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1 And Missouri was a part of that plan, yes.

2 **Q. When you were -- when you or Eric or anyone at**
 3 **the Greitens Group was working up the Resilience book tour**
 4 **plan, was part of your strategy having the book tour**
 5 **facilitate Eric's political campaign or announcement of a**
 6 **political campaign?**

7 A. Part of the strategy was to build name
 8 recognition in Missouri, which would in turn benefit a
 9 potential campaign.

10 **Q. And the purpose of building name recognition**
 11 **would be to facilitate a statewide political campaign; is**
 12 **that right?**

13 A. Yes.

14 (Whereupon Exhibit 12 was marked for
 15 identification.)

16 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 17 **this document which is labeled as Exhibit 12?**

18 A. Yes, I recognize this document.

19 **Q. Do you remember sending this e-mail?**

20 A. After reading through this e-mail now, yes, I
 21 remember sending the e-mail.

22 **Q. Do you remember what the general context of**
 23 **this e-mail was?**

24 A. The context was that as a part of my job, I
 25 was in charge of building a holiday card list that Eric and

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1 his wife would send every year. And this e-mail is
 2 regarding that list and gathering the addresses.
 3 **Q. Do you know whether individuals at The Mission**
 4 **Continues were aware that Eric sent out holiday cards?**
 5 A. Yes. They would have been aware that Eric
 6 sent out holiday cards.
 7 **Q. Would it be fair to say that Eric sent out**
 8 **holiday cards to major donors for The Mission Continues?**
 9 A. Yes.
 10 **Q. Do you know whether other individuals at The**
 11 **Mission Continues were aware that he did that?**
 12 A. I believe that they would be aware that he did
 13 that, yes.
 14 MR. HAMMER: And aware -- the question is
 15 aware that he sent out holiday cards to major Mission
 16 Continues donors; is that the question?
 17 MR. MARTINICH-SAUTER: Correct.
 18 MR. HAMMER: Okay.
 19 A. Yes. I believe that they would be aware that
 20 he sent holiday cards.
 21 **Q. (By Mr. Martinich-Sauter) Do you see about**
 22 **midway through this e-mail, it says: I have also attached**
 23 **a spreadsheet here from the TMC Salesforce system which**
 24 **includes some of the top donors?**
 25 A. Yes.

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1 **Q. Do you see the following sentences that say:**
 2 **I've deleted the amount of the donations to maintain**
 3 **privacy, but please do keep this private, do not print this**
 4 **spreadsheet or distribute?**
 5 A. Yes.
 6 **Q. Did you in fact attach a spreadsheet from the**
 7 **TMC Salesforce that included major TMC donor?**
 8 A. Yes.
 9 **Q. Why did you inform the recipients of this**
 10 **e-mail -- let me back up. Did you in fact delete the**
 11 **amount of donations from that spreadsheet?**
 12 A. I do not recall doing so. But I -- from
 13 reading this e-mail, I assume that I did, yes.
 14 **Q. Do you know why you might have done that?**
 15 A. To maintain privacy.
 16 **Q. Was it your understanding that it would be**
 17 **important not to have the amount that someone contributed**
 18 **to The Mission Continues be disclosed to someone outside**
 19 **The Mission Continues?**
 20 A. Yes.
 21 **Q. Even to someone at the Greitens Group?**
 22 A. I'm -- yeah. I mean I'm assuming that whoever
 23 sent me this list from The Mission Continues probably asked
 24 me to delete the donation amounts out.
 25 **Q. Do you recall someone at The Mission Continues**

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1 **sending you this list?**
 2 A. I do not recall who sent me the list. But I
 3 don't believe that I knew how to pull donation lists from
 4 Salesforce. So someone would have had to have sent me the
 5 list.
 6 **Q. Would it be accurate to say that at this time,**
 7 **you believed that the amount that someone had contributed**
 8 **to The Mission Continues should not be disclosed outside**
 9 **The Mission Continues?**
 10 MR. HAMMER: Just a second.
 11 MR. MARTINICH-SAUTER: Off the record.
 12 (Whereupon there was a short break.)
 13 MR. HAMMER: So you can ask my client directly
 14 about this. But I think if I understand your question
 15 correctly, she doesn't remember whether or not somebody
 16 specifically directed her that it was important to go ahead
 17 and eliminate the donation amounts from the list that she
 18 would -- somebody directed her to do that because they felt
 19 it was important or whether or not it was something that
 20 she independently decided to do. I don't know if that
 21 answers your question for you.
 22 **Q. (By Mr. Martinich-Sauter) Let me ask a**
 23 **question differently as a general matter and not**
 24 **specifically with regards to this list. Was it your**
 25 **understanding at the time of this e-mail that the amount**

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1 **someone had donated to The Mission Continues was**
 2 **information that should not be disclosed outside of The**
 3 **Mission Continues?**
 4 MR. HAMMER: Do you understand his question.
 5 THE WITNESS: Uh-huh. Can you repeat that
 6 once more?
 7 **Q. (By Mr. Martinich-Sauter) I will try.**
 8 A. Sorry.
 9 **Q. At the time of this e-mail, speaking generally**
 10 **and not just as to this e-mail, was it your understanding**
 11 **that the amount someone had contributed to The Mission**
 12 **Continues was information that should not be disclosed to**
 13 **persons outside The Mission Continues?**
 14 A. Generally, yes. However, members of the
 15 Greitens Group often -- there was often information shared
 16 with members of the Greitens Group for purposes like the
 17 holiday card list. And I don't know that I would have
 18 found that to be, you know, inappropriate.
 19 **Q. Other than the holiday card list, what**
 20 **purposes would Mission Continues information be shared with**
 21 **the Greitens Group?**
 22 A. I mean, I can't think of like specific
 23 examples. But I guess what I'm trying to say is for me,
 24 these were my colleagues, The Mission Continues people were
 25 my colleagues and the Greitens Group people were my

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1 colleagues. And I don't know that I was differentiating,
 2 you know, between the two.

3 **Q. So would you say in your mind, there wasn't a**
 4 **clear distinction between the Greitens Group and The**
 5 **Mission Continues?**

6 MR. HAMMER: My objection is that it's vague
 7 in terms of a distinction as to what between the two
 8 groups? There wasn't a clear distinction between The
 9 Mission Continues and the Greitens Group with respect to
 10 what?

11 **Q. (By Mr. Martinich-Sauter) Was there in your**
 12 **mind a clear distinction between the work that you did in**
 13 **the work of the Greitens Group and the work that you did in**
 14 **the work of The Mission Continues?**

15 A. Yes, there was a clear distinction of the work
 16 that we did between the two organizations, yes.

17 **Q. So when you said that -- and I'm approximating**
 18 **here. When you said that you didn't necessarily**
 19 **distinguish between the two, what did you mean by that?**

20 MR. HAMMER: I think her testimony was that
 21 she saw these were colleagues that she had at The Mission
 22 Continues and she had colleagues that she had at the
 23 Greitens Group. She works for both those entities and she
 24 had colleagues in both those locations; is that correct?
 25 THE WITNESS: Yes.

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1 MR. HAMMER: Let's go off the record for just
 2 a second.
 3 (Whereupon there was an off-the-record
 4 discussion.)
 5 (Whereupon Exhibit 13 was marked for
 6 identification.)

7 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 8 **this document which is labeled as Exhibit 13.**

9 A. Yes, I do.

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

11 A. This is an e-mail from Lori Stevens to Eric
 12 Greitens and copying Spencer Kympton, myself and Lindsey
 13 Hodges.

14 **Q. Who's Lori Stevens?**

15 A. Lori Stevens at the time was, I think, the
 16 vice president of development for The Mission Continues.

17 **Q. What was her general role at The Mission**
 18 **Continues in that position; what did she do?**

19 A. Her role was to fundraise, development.

20 **Q. Does she work closely with Mr. Greitens on**
 21 **fundraising?**

22 A. Yes. She worked close with him. She was
 23 based in Boston, so she wasn't here in St. Louis. But yes,
 24 they worked closely.

25 **Q. Did you interact directly with Lori on a**

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1 **regular basis?**

2 A. Yes.

3 **Q. What sorts of things would you interact with**
 4 **her about regularly?**

5 A. Well, you know, it was my role to -- it was my
 6 job to maximize Eric's time. So any time he was -- I mean
 7 any day had to be full of productive meetings and phone
 8 calls. So I would interact with her to ensure that he had
 9 Mission Continues donor meetings and calls on his schedule.

10 **Q. Who's Lindsey Hodges?**

11 A. Lindsey Hodges at that time was also on the
 12 development team. I can't think of her exact title.
 13 Director of development or something.

14 **Q. What sort of work did Lindsey do?**

15 A. Lindsey also did development work. So
 16 fundraising and -- that was her role.

17 **Q. And did Lindsey work directly with Eric on a**
 18 **regular basis?**

19 A. Yes.

20 **Q. What was the context of this e-mail?**

21 A. The context of this e-mail in May of 2014, you
 22 know, Eric had, I guess, made it known to The Mission
 23 Continues that he was going to be stepping down as CEO. So
 24 this e-mail is a list of documents encouraging him to start
 25 sort of making calls to donors to let them know that he was

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1 stepping down as CEO.

2 **Q. Do you know what the purpose of those calls**
 3 **was?**

4 A. I believe the purpose of those calls were to
 5 communicate that he was, you know, stepping down as CEO and
 6 he would move into a board role. And then also to
 7 encourage people to give money and support The Mission
 8 Continues.

9 **Q. Do you know whether Greitens was given any**
 10 **guidance from The Mission Continues on what he was supposed**
 11 **to say during those phone calls?**

12 A. Probably in the call list, there would have
 13 been notes on what to say.

14 **Q. Do you know who would have prepared those**
 15 **notes?**

16 A. Probably some combination of Lori Stevens,
 17 Lindsey Hodges and I probably would have potentially made
 18 some notes as well.

19 **Q. What sorts of notes would you have contributed**
 20 **to that document?**

21 A. Any -- I mean anything that I thought was
 22 missing as far as who these people were and any helpful
 23 background information, anything that I thought was missing
 24 from what Lori and Lindsey had already, you know, wrote
 25 down as notes.

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1 **Q. Do you see in sort of the first real sentence**
 2 **of the e-mail, it says: Here is the transition call info?**
 3 A. Yes, I do.
 4 **Q. Was there in fact a telephone call about**
 5 **Eric's transition?**
 6 A. Telephone call?
 7 **Q. Do you know whether there was a telephone call**
 8 **about Eric's transition that is referred to in this e-mail?**
 9 A. Telephone call between?
 10 **Q. Do you see the sentence where it says: Here**
 11 **is the transition call info?**
 12 A. Yes.
 13 **Q. Do you know what that sentence refers to?**
 14 A. Oh. Oh, yeah. I would assume there was
 15 probably like a conference call or -- I don't know. From
 16 reading it now, I was kind of just thinking that these were
 17 his calls to make. There probably was some sort of
 18 transition phone call, conference call to discuss these
 19 documents.
 20 **Q. Do you -- do you remember anything about that**
 21 **call if it happened?**
 22 A. I do not remember the specific phone call, no.
 23 **Q. Do you know whether Eric was given any**
 24 **instructions about -- let me take that back.**
 25 **Do you see that there's a five-item list here**

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1 as of 5/7/14.
 2 **Q. Would you recognize that list if you saw it**
 3 **today?**
 4 A. Yeah, I would. I would recognize the list.
 5 (Whereupon Exhibit 14 was marked for
 6 identification.)
 7 **Q. (By Mr. Martinich-Sauter) Do you recognize**
 8 **this document that's labeled as Exhibit 14?**
 9 A. Yes, I do.
 10 **Q. And what is that document?**
 11 A. This is the all donors 1K total and up as of
 12 5/7/14 Excel spreadsheet.
 13 **Q. Do you remember downloading that document**
 14 **after you received this e-mail?**
 15 A. I do not remember downloading it. It's
 16 possible, very possible that I did. But I don't vividly
 17 remember downloading it, no.
 18 **Q. If you had downloaded it, would it have been**
 19 **at the direction of Eric?**
 20 A. Well, I'm sorry. I'm sure that I downloaded
 21 it because I'm sure that I had to print it for him because
 22 he would be making phone calls. So I'm sure that I would
 23 have had to have download it to be able to print it.
 24 **Q. Do you remember printing this document for**
 25 **Eric?**

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1 **in the e-mail?**
 2 A. Yes.
 3 **Q. Do you see the item 2 says: The \$1K plus**
 4 **list, thanks to [REDACTED]?**
 5 A. Yes.
 6 **Q. Do you know who Thalia is?**
 7 A. [REDACTED] was either a Mission Continues
 8 volunteer or maybe a part-time staff member with The
 9 Mission Continues. I don't think that she was full time.
 10 **Q. Did you ever interact directly with [REDACTED]?**
 11 A. Probably not. I would have probably
 12 interacted more so with Lindsey who [REDACTED] would have been
 13 managing -- or Lindsey would have been managing [REDACTED]
 14 **Q. Do you know what the 1K plus list is that's**
 15 **referred to here?**
 16 A. Yes, I do.
 17 **Q. And what was that?**
 18 A. My understanding is that it's a list of The
 19 Mission Continues donors that have given \$1,000 and up.
 20 **Q. And was that list attached to this e-mail to**
 21 **the best of your recollection?**
 22 A. Yes. I can see in this printout that it was
 23 attached to the e-mail.
 24 **Q. And what was the file name of that list?**
 25 A. The file name was All Donors 1K Total and Up

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1 A. I don't remember. But my assumption is that
 2 this e-mail and this document were -- was a list that he
 3 was going to be using to make transition phone calls.
 4 **Q. Do you remember whether Eric used this list to**
 5 **make his transition phone calls?**
 6 A. I mean, yes, he did. Yes.
 7 **Q. Do you remember whether he called everyone on**
 8 **the list or some subset?**
 9 A. I do not know if he called everyone on the
 10 list.
 11 **Q. Did you ever discuss this list with**
 12 **Mr. Greitens?**
 13 A. Yes.
 14 **Q. What did you discuss with him about this list?**
 15 A. I mean we discussed it in terms of using it
 16 for phone calls when he was, like I said, transitioning,
 17 stepping down as CEO of The Mission Continues. I'm sure we
 18 discussed it then. And then I believe that we also
 19 discussed it later on when he would run for governor.
 20 **Q. When did you have a discussion with**
 21 **Mr. Greitens about using the list for his run for governor?**
 22 A. Probably in late 2014, early 2015 when the --
 23 you know, things were sort of more formally coming together
 24 for a potential campaign.
 25 **Q. Do you remember what Mr. Greitens said about**

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1 **that topic?**

2 A. I mean my understanding was that, you know, he

3 had founded The Mission Continues. So this list is really

4 a list of his contacts, his friends and family and, you

5 know, colleagues. And that it would be helpful when he ran

6 for office because these are his supporters.

7 **Q. Is that what he said about the list?**

8 A. I mean, I can't -- again, I'm generalizing. I

9 can't tell you what he said in 2014. I don't remember.

10 But generally, yes, that's what he would have said.

11 **Q. Okay. So essentially, that's a summary of**

12 **things or a paraphrase of things he may have said about**

13 **this list?**

14 A. Yes.

15 **Q. I understand. Do you remember discussing this**

16 **e-mail or the list with Mr. Greitens in May 2014?**

17 A. I don't remember specifics. But I'm sure

18 that -- I mean I was in charge of his schedule. So I would

19 have had to have been talking with him about did he get

20 through these phone calls, you know, did he do what he was

21 supposed to do and making time for that on his schedule.

22 So I'm sure we discussed that.

23 **Q. Do you know whether anyone at The Mission**

24 **Continues ever said to you or to Eric that this list could**

25 **be used for purposes other than his transition phone calls**

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1 **for The Mission Continues?**

2 A. I don't know if they expressed that specific

3 language. But I do recall Lindsey Hodges who is CC'ed on

4 this e-mail, she's also one of my good friends, I do recall

5 her expressing some sort of hesitation about, you know,

6 pulling together this list and sending it to Eric.

7 **Q. What did Lindsey say?**

8 A. I do not remember specifically what she said.

9 But just that, you know, she didn't know if it was -- if it

10 was necessary or appropriate to be -- to be gathering this

11 list and sending it to Eric.

12 **Q. Did she say why she questioned whether it was**

13 **appropriate?**

14 A. I don't remember.

15 **Q. Do you remember whether she expressly alluded**

16 **to the fact that he might be running for office?**

17 A. I do not remember.

18 **Q. Other than that conversation with Lindsey**

19 **Hodges, did anyone at The Mission Continues, to your**

20 **knowledge, ever authorize or discuss Eric using this list**

21 **for political purposes?**

22 A. Not to my knowledge.

23 (Whereupon Exhibit 15 was marked for

24 identification.)

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

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1 **this document which is labeled as Exhibit 15?**

2 A. Yes, I recognize this document.

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

4 A. This document is the response that my attorney

5 put together on my behalf to the Attorney General's civil

6 investigative demand for production of documents.

7 **Q. Do you see on Page 1, Paragraph 2,**

8 **Subparagraph A, it says: Proctor produces the following**

9 **documents: Excel file labeled All Donors 1K and Up?**

10 A. Yes.

11 **Q. The file that's referred to there, is that the**

12 **same file as you received in May 2014 from The Mission**

13 **Continues?**

14 A. Yes.

15 **Q. Would you mind turning to Page 7 of this**

16 **document.**

17 A. Okay.

18 **Q. Do you see in Paragraph 11, it says: Proctor**

19 **states that the following people transmitted that file to**

20 **her?**

21 A. Yes.

22 **Q. Is it your understanding that the phrase "that**

23 **file" refers to the Excel file labeled All Donors 1K Total**

24 **and Up?**

25 A. Yes.

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1 **Q. Do you see in Paragraph 11, three individuals**

2 **are identified; Lori Stevens, Lindsey Hodges and Eric**

3 **Greitens?**

4 A. Yes.

5 **Q. To the best of your recollection, did each of**

6 **those individuals transmit the file to you?**

7 A. Yes. Well, I'm sorry. No. The only specific

8 instance or e-mail that I know for sure is that Lori

9 transmitted the file. I am in this document assuming that

10 at some point Lindsey or Eric could have also sent me the

11 file in some manner. But I do not have documentation or a

12 specific memory of that.

13 **Q. So do you recall an instance where Lindsey**

14 **Hodges transmitted the file to you in any form?**

15 A. I do not recall an instance. My response here

16 is that it's possible she could have, but I don't remember.

17 I didn't even remember who sent me it in the first place.

18 So I didn't know if it was Lori or Lindsey. So I thought

19 putting both of their names would make the most sense.

20 **Q. And do you remember an instance where Eric**

21 **Greitens transmitted this file to you?**

22 A. I don't remember a specific instance. But we

23 often, you know, forwarded e-mails to each other. So it's

24 possible that he transmitted the document to me by

25 forwarding the e-mail at some point.

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1 **Q. But there's no specific instance that you**
2 **recall him doing that?**
3 A. No.
4 **Q. Okay. Do you see in Paragraph 12, it says:**
5 **To the best of her recollection, Proctor states that she**
6 **would have transmitted that file to?**
7 A. Yes.
8 **Q. And is it your understanding that the phrase**
9 **"that file" refers to the Excel file titled All Donors 1K**
10 **Total and Up?**
11 A. Yes.
12 **Q. And do you see that in Paragraph 12, you**
13 **identify six individuals; Danny Laub, Michael Hafner,**
14 **Meredith Gibbons, Scott Turk, Austin Chambers and Eric**
15 **Greitens?**
16 A. Yes.
17 **Q. Do you remember transmitting that file to**
18 **Scott Turk?**
19 A. No.
20 **Q. So you do not have any recollection of**
21 **transmitting that file to Scott Turk?**
22 A. No. Again, I was putting his name on here
23 because it's hard to remember the e-mails you sent, you
24 know, two years ago, even a year ago. And I was sort of
25 just guessing at it's possible I could have sent it to him.

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1 I do not remember a specific instance where I sent it to
2 him.
3 **Q. Do you remember sending that file to Austin**
4 **Chambers?**
5 A. I do not remember a specific instance, but
6 it's likely that I could have sent it to him.
7 **Q. Why do you say it's likely you could have sent**
8 **it to him?**
9 A. Because he was the campaign manager for Eric.
10 **Q. Do you remember anyone ever instructing you to**
11 **send him donor lists?**
12 A. To send Austin donor lists?
13 **Q. Correct.**
14 A. No. Typically that wasn't my role. Typically
15 if he was receiving donor lists, it would have probably
16 come from the fundraising team, so Meredith Gibbons or
17 Scott Turk. Again, I don't have access to my e-mail so I
18 was just sort of guessing people I could have sent it to,
19 which is why his name is on this list.
20 **Q. Do you remember transmitting that file to Eric**
21 **Greitens?**
22 A. I -- I do not remember a specific instance.
23 But again, I just -- it's likely I could have sent it to
24 him, so I was trying to capture everyone that I could have
25 sent the file to --

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1 **Q. Understood.**
2 A. -- based on memory. But not specific, you
3 know, a specific time it was sent.
4 **Q. Understood. Other than the individuals that**
5 **you identified in No. 11, is there anyone else you can**
6 **think of that might have transmitted the list to you?**
7 MR. HAMMER: Other than in Paragraph 11,
8 people that may have transmitted it to her you said?
9 MR. MARTINICH-SAUTER: Uh-huh.
10 A. I don't believe so.
11 **Q. (By Mr. Martinich-Sauter) And other than**
12 **individuals you've identified in response to No. 12, are**
13 **there any individuals to whom you think you might have**
14 **transmitted that file?**
15 A. Based on memory, no, I don't believe that
16 there is anyone else I would have transmitted the file to.
17 (Whereupon Exhibit 16 was marked for
18 identification.)
19 **Q. (By Mr. Martinich-Sauter) Do you recognize**
20 **this document that's labeled as Exhibit 16?**
21 A. Yes, I recognize the document after reading
22 over it.
23 **Q. And did you send this e-mail?**
24 A. Yes, I would have sent this e-mail.
25 **Q. Do you see just over halfway down the first**

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1 **page, it says: The goal of our planning session then will**
2 **be to answer the following questions around fundraising?**
3 A. Yes, I see that.
4 **Q. Do you recall whether you came up with those**
5 **questions or whether someone else did?**
6 A. I do not recall. However, given that I had no
7 knowledge of campaign fundraising, I would assume someone
8 else gave me those questions.
9 **Q. Do you have any idea who that person who gave**
10 **the questions to you was?**
11 A. Based on my recollection and the e-mail here,
12 it says I had talked to Eric. So I assume it would have
13 been Eric.
14 **Q. A couple lines below the sentence I just**
15 **quoted, do you see where it says: In what vehicle? Legal?**
16 A. Yes.
17 **Q. Do you know what that refers to?**
18 A. I'm assuming at this time, it probably
19 referred to the fact that there wasn't like a legal entity
20 to raise money into. We hadn't founded a campaign or an
21 exploratory committee at this time. So I'm assuming that's
22 what the discussion was around. You can't just ask people
23 for money. You have to have somewhere to put it.
24 **Q. Do you recall Eric doing any political**
25 **fundraising before there was an exploratory committee?**

1 A. Can you repeat the question?
 2 **Q. Do you recall Eric doing any political**
 3 **fundraising before there was an exploratory committee?**
 4 A. I certainly recall him meeting with potential
 5 donors, yes.
 6 **Q. Do you remember whether he actually raised any**
 7 **money before there was an exploratory committee?**
 8 A. I do not. I do not know.
 9 **Q. Do you remember -- let me put a caveat here.**
 10 **If there were any conversations that would be responsive to**
 11 **my questions that involved an attorney, don't tell me. So**
 12 **setting those conversations aside --**
 13 A. Wait. Sorry. Repeat that.
 14 **Q. I'm going to ask you a question about certain**
 15 **conversations. If there was a conversation where an**
 16 **attorney was part of that conversation, please don't answer**
 17 **my question. Does that make sense?**
 18 A. Yes.
 19 **Q. Do you remember whether there were any**
 20 **conversations about when Eric needed to create an**
 21 **exploratory committee?**
 22 MR. HAMMER: So Part 1 of that question is do
 23 you remember witnessing or hearing about any conversation
 24 where Eric was talking with somebody about forming an
 25 exploratory committee. And the second part of that

1 **conversations, do you remember any discussion about the**
 2 **fact that there might be certain activities that Eric**
 3 **couldn't do until he had an exploratory committee?**
 4 A. There were certainly conversations about the
 5 fact that he couldn't fundraise until there was an
 6 exploratory committee.
 7 **Q. Who was part of those conversations?**
 8 A. I don't -- I don't remember. It's just kind
 9 of like generally I remember that being an issue that was
 10 talked about. But I can't like zero in on a specific
 11 conversation.
 12 **Q. Do you remember whether Eric was part of those**
 13 **conversations?**
 14 MR. HAMMER: Again, be careful if any of the
 15 conversations included an attorney or you think may have
 16 included an attorney, you wouldn't be answering that
 17 question.
 18 MR. MARTINICH-SAUTER: Correct.
 19 A. Yeah, I mean if -- yeah. If Eric was present,
 20 there was probably an attorney present if we were having
 21 those types of conversations.
 22 **Q. (By Mr. Martinich-Sauter) Thank you. Would**
 23 **you mind turning to Page 2 of that document. Actually, I'm**
 24 **sorry. Actually, could we turn back to Page 1. At the**
 25 **very bottom, do you see where it says: To get us there, we**

1 question is was it with an attorney. If it was with an
 2 attorney, then you're not going to answer it. If it was
 3 with somebody else, then you are going to answer it.
 4 **Q. (By Mr. Martinich-Sauter) I would rephrase**
 5 **that first question, but emphasize the second caveat. The**
 6 **question is, do you remember any conversations about when**
 7 **Eric would have to create an exploratory committee?**
 8 A. I do, but I'm -- I don't know if a lawyer --
 9 the lawyer was probably present for those conversations,
 10 yes.
 11 **Q. Do you remember any of those conversations**
 12 **that didn't involve a lawyer?**
 13 A. I mean we talked a lot outside of that about
 14 just timing. Because we were -- we had a book tour that I
 15 was running, that I was, you know, excited about. And
 16 didn't want that to intervene -- didn't want an exploratory
 17 committee or an announcement or whatever to kind of ruin
 18 the book tour. So there was a lot of talk about timing in
 19 that sense.
 20 There was also talk about just generally, but
 21 not -- you know, not -- not -- not starting it too early,
 22 not starting it too late and a lot about timing, of like
 23 when's best. But that's probably the only conversations
 24 that were had outside of an attorney being present.
 25 **Q. In those non-attorney meetings or**

1 **need the following information?**
 2 A. Yes.
 3 **Q. And do you see that following that, there's a**
 4 **three-item list?**
 5 A. Yes.
 6 **Q. Would you mind turning to Page 2. Do you see**
 7 **Item No. 3 says: All of the donor lists we've collected so**
 8 **far?**
 9 A. Yes.
 10 **Q. Do you know what that sentence refers to?**
 11 A. I'm assuming that it refers to donor lists
 12 that we had -- that had been sent to us. So the Tom
 13 Schweich list and The Mission Continues donor list, as well
 14 as I believe that there was a list that Mason Fink had sent
 15 of donors.
 16 **Q. Do you remember when Mason sent that list?**
 17 A. No, I do not remember. You know, based on the
 18 e-mails I've seen today, I would assume late 2014, but --
 19 around this time. But I don't remember a specific date.
 20 **Q. Do you know whether Eric asked Mason to send**
 21 **that list?**
 22 A. I do not know.
 23 **Q. Do you remember whether that list was sent**
 24 **directly to you?**
 25 A. I believe it was sent directly to Eric.

1 **Q. Do you see here on Page 2 a couple lines down,**
 2 **it says: I can handle No. 3. But if you have additional**
 3 **lists that you'd like us to consider, please let me know?**
 4 A. Yes.
 5 **Q. Do you remember whether Danny or Tyler**
 6 **provided any other lists?**
 7 A. I do not remember.
 8 **Q. Do you remember other than the Schweich list,**
 9 **The Mission Continues list and the Mason Fink list, do you**
 10 **remember whether anyone provided any other donor lists?**
 11 A. There were other lists like what Mason Fink --
 12 sorry -- what Monu Joseph had provided, which was sort of a
 13 schedule with donor names on it. There were certainly
 14 other versions of those. But I don't remember like a
 15 specific donor list that would just be names and addresses.
 16 I don't remember that.
 17 **Q. Do you remember showing The Mission Continues**
 18 **1,000 and over list to anyone in person, you know, in a**
 19 **paper copy?**
 20 A. Other than potentially having printed it for
 21 Eric and, you know, giving it to him to prepare for making
 22 phone calls during that transition period in May of 2014,
 23 no, I don't recall ever showing someone a paper copy of it.
 24 **Q. Do you remember telling Tyler Holman that you**
 25 **had a Mission Continues list?**

1 I can't recall like the specific meeting. But I know that
 2 I have talked with Meredith Gibbons, who was Eric's
 3 fundraiser, about the list in some form or fashion of a
 4 meeting. She would ask me questions from time to time
 5 about who people were on the list. So I don't know if you
 6 consider that a meeting. But, yes.
 7 And then I also recall knowing about a meeting
 8 in which Meredith Gibbons, who was Eric's fundraiser, met
 9 with Lindsey Hodges from The Mission Continues. And I was
 10 not involved in the meeting, but I was aware of the
 11 meeting.
 12 **Q. How did you become aware of that meeting?**
 13 A. I became aware of a meeting, A, because I'm
 14 good friends with Lindsey and I'm sure she mentioned she
 15 was going to be meeting with Meredith. And I think
 16 Meredith asked me, you know, what to expect, what was
 17 Lindsey like, that sort of thing. Because I had worked
 18 with her a long time and good friends with her, so.
 19 **Q. Was it your understanding that Meredith was**
 20 **meeting with Lindsey to help Meredith raise money for**
 21 **Eric's campaign?**
 22 A. Sorry. Repeat the question.
 23 **Q. Sure. Was it your understanding that the**
 24 **purpose of that meeting between Meredith and Lindsey was to**
 25 **help Meredith raise money for Eric's political campaign?**

1 A. I don't. I don't recall.
 2 **Q. Do you see that the subject line of this**
 3 **e-mail on Page 1 is: Preparing for Monday's planning**
 4 **meeting?**
 5 A. Yes, I do.
 6 **Q. Do you remember the meeting to which that**
 7 **refers?**
 8 A. No, I do not remember the meeting.
 9 **Q. Do you remember whether that meeting occurred**
 10 **at all?**
 11 A. I mean I -- I'm sure that it did. There was
 12 more than one meeting with Danny and Tyler, so it's hard
 13 for me to say whether it was this Monday meeting. But I'm
 14 sure that it happened, yes.
 15 **Q. Do you remember The Mission Continues list**
 16 **ever being discussed in any meetings that you were present**
 17 **for with political consultants or political supporters?**
 18 A. Can you repeat the question?
 19 **Q. Sure. Do you remember -- I'll state it more**
 20 **generally. Do you remember any meetings in which The**
 21 **Mission Continues list was discussed?**
 22 A. No. I do not remember any meetings in which
 23 The Mission Continues list was discussed.
 24 **Q. Do you remember --**
 25 A. I'm sorry. I do, yes. I'm remembering. I --

1 A. My understanding was that Eric asked Lindsey
 2 to meet with Meredith, and so Lindsey took the meeting with
 3 Meredith. I don't know -- I don't know that -- exactly
 4 what was discussed in the meeting.
 5 **Q. It's your understanding, though, that Eric**
 6 **asked Lindsey to take the meeting?**
 7 A. Yes.
 8 **Q. Did Lindsey tell you that?**
 9 A. I believe so, yeah. I mean, yes, I think she
 10 told me that.
 11 **Q. Do you know whether Eric ever offered Lindsey**
 12 **anything in exchange for taking that meeting?**
 13 A. No, I don't know he offered her anything.
 14 **Q. Do you know when that meeting between Meredith**
 15 **and Lindsey occurred?**
 16 A. It would have occurred in probably mid to late
 17 2015. Because Meredith didn't come onboard or whatever it
 18 was at the time of the exploratory committee, until March
 19 or something of 2015.
 20 **Q. Do you know approximately how far in advance**
 21 **of that meeting Eric asked Lindsey to take the meeting?**
 22 A. I have no idea.
 23 **Q. Other than that meeting, are you aware of any**
 24 **communications between Meredith and Lindsey about The**
 25 **Mission Continues list?**

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1 A. No.

2 **Q. Are you aware of Meredith having met with any**

3 **other current or former Mission Continues employees?**

4 A. Besides myself and Eric, no.

5 **Q. Other than the 1,000 and over Mission**

6 **Continues donor list, are you aware of Meredith or anyone**

7 **else who was working for Eric's political operations using**

8 **Mission Continues documents to do that?**

9 A. No.

10 **Q. After you left The Mission Continues, did you**

11 **ever correspond with Lori Stevens?**

12 A. Yes.

13 **Q. What was the nature of those communications?**

14 A. Just based on memory, Eric was still a board

15 member of The Mission Continues. After he stepped down as

16 CEO, he was still a board member. And so I would have

17 corresponded with Lori about any events that they wanted

18 him to attend still or potentially board meetings, board

19 phone calls or he still might have taken like donor

20 meetings from The Mission Continues as of -- in his role as

21 board member.

22 **Q. During those donor meetings, to your**

23 **knowledge, did he ever discuss the fact that he was**

24 **planning to run for office?**

25 A. I wouldn't have been present for the meetings,

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1 of time.

2 **Q. At the time of this e-mail, was Danny the**

3 **campaign manager?**

4 A. No. At the time of this e-mail, he was sort

5 of working on a consultant basis, like a 1099 consultant

6 basis.

7 **Q. When you look at the to line, do you see that**

8 **Danny's e-mail is dlaub@greitensgroup.com?**

9 A. Yes.

10 **Q. Was it ordinary for the Greitens Group to give**

11 **Greitens Group e-mails to its independent contractors?**

12 A. Yes. Yes, that was typical.

13 **Q. Do you see in this e-mail where it says: All**

14 **donors 1K and up, The Mission Continues list?**

15 A. Yes.

16 **Q. Does that refer to one of the attachments to**

17 **this e-mail?**

18 A. Yes.

19 **Q. And was that attachment to this e-mail the**

20 **same document that you obtained in May 2014 from Lori**

21 **Stevens?**

22 A. Yes.

23 **Q. In between the May 2014 e-mail and this**

24 **e-mail, did you ever use or refer to that Mission Continues**

25 **list?**

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1 so I do not know.

2 **Q. Other than the 1,000 and over donor list, are**

3 **you aware of any other list of donors or volunteers from**

4 **The Mission Continues that was obtained by the Greitens**

5 **campaign or the political operation that proceeded the**

6 **campaign?**

7 A. Can you repeat the question? Sorry. I'm

8 asking you to repeat the long ones.

9 **Q. No, no. That's a me problem. Other than the**

10 **1,000 and over donor list, are you aware of any other donor**

11 **or volunteer list from The Mission Continues that were**

12 **obtained by the Greitens campaign committee or by political**

13 **consultants working for Eric?**

14 A. I do not remember any other lists.

15 (Whereupon Exhibit 17 was marked for

16 identification.)

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

18 **this document that's labeled as Exhibit 17?**

19 A. Yes, I recognize this document.

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

21 A. This is an e-mail that I'm sending to Danny

22 Laub and Mike Hafner -- Michael Hafner with four Excel

23 spreadsheets attached.

24 **Q. Who is Danny Laub?**

25 A. Danny was Eric's campaign manager for a period

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1 A. I -- so my role was to maximize Eric's time.

2 So -- and schedule. So it's possible that I could have

3 used it if he -- you know, he might say set up a meeting

4 with so and so. Typically, I would go into my e-mail to

5 find their information, their contact information to go

6 about setting up the meeting. And if I couldn't find it in

7 my e-mail or in his e-mail, I might reference the list for

8 contact information. So it's possible that I could have

9 used it, yes.

10 **Q. Do you see in this e-mail where it says EG**

11 **fnce prospects, Mason Fink's list?**

12 A. Yes.

13 **Q. Does that phrase refer to one of the**

14 **attachments of this e-mail?**

15 A. Yes.

16 **Q. Where did that attachment come from?**

17 A. That attachment was a list that Mason Fink had

18 sent to Eric.

19 **Q. And what was that a list of?**

20 A. My understanding is it was a list of donors

21 that had given to Mitt Romney or that Mason Fink knew in

22 some way that might be inclined to also donate to a

23 potential campaign for Eric.

24 **Q. Do you see in this e-mail where it says:**

25 **Schweich list, Steve Michael sent over many months ago?**

1 A. Yes.

2 **Q. Is that the list that was attached to**

3 **Exhibit 1 that we looked at earlier?**

4 A. Yes.

5 **Q. And do you see in this e-mail where it says:**

6 **Fundraising -- I think -- tracker list, our internal list?**

7 A. Yes.

8 **Q. Does that refer to one of the attachments to**

9 **this e-mail?**

10 A. Yes.

11 **Q. What was the nature of that document?**

12 A. If I'm recalling correctly, I believe that it

13 was just a list of people that Eric thought they could --

14 thought that they might donate. So I just started --

15 somebody -- I think it is probably me or him or maybe some

16 combination of the both of us -- started just keeping a

17 list of people who might be inclined to donate to a

18 campaign.

19 **Q. Do you remember, did that list include friends**

20 **and family and business contacts of Eric?**

21 A. I do not remember, but I would assume so.

22 **Q. Do you remember whether Eric instructed you to**

23 **send this e-mail?**

24 A. I cannot recall if the instruction --

25 specifically if the instruction came via e-mail or in

1 person. But I do believe that he would have instructed me

2 to send this e-mail, yes.

3 **Q. And you do not believe you would have sent**

4 **this e-mail unless Eric had instructed you to do so?**

5 A. Yes. I do not believe I would have sent this

6 e-mail unless Eric instructed me to do so. Because these

7 were consultants, they weren't people that I had known and

8 worked with for a long time. I wouldn't have been sending

9 them information without instruction to do so.

10 **Q. Do you remember whether Eric expressly told**

11 **you which lists to send to these two individuals?**

12 A. I do not remember. I don't remember.

13 **Q. Do you remember discussing this e-mail with**

14 **Mr. Greitens?**

15 A. I mean, I don't remember discussing the

16 e-mail. I certainly remember in one way or the other being

17 told to send these, you know, donor lists. But no, I don't

18 remember having a discussion about it, I mean about the

19 content.

20 **Q. Do you know what the purpose of this e-mail**

21 **was? And by that, I mean do you know what Danny and**

22 **Michael were going to do with these lists?**

23 A. My understanding was that Danny and Mike were

24 going to start building out call lists for Eric and

25 meetings for him to take. And so these lists would help

1 influence the people who would put on the call lists or the

2 meetings that we would be scheduling.

3 **Q. When you say "call lists," what do you mean by**

4 **that?**

5 A. So it was basically a list of, you know, names

6 and numbers and background information of people Eric would

7 call and so -- he traveled a lot. So to maximize his time,

8 it was good to be making calls when he was sitting in cars

9 or in hotel rooms or whatever it is. So it was kind of

10 like a to-do list, but calls.

11 **Q. And what would those calls be about?**

12 A. I mean in this context, they would be about,

13 you know, getting support for a potential campaign.

14 **Q. Would they be about fundraising?**

15 A. I mean, yes, I would assume so.

16 (Whereupon Exhibit 18 was marked for

17 identification.)

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

19 **this document which is labeled as Exhibit 18?**

20 A. Yes, I recognize this list.

21 **Q. Is this an e-mail that you sent?**

22 A. Yes. This is an e-mail that I sent in reply

23 to Mike Hafner's e-mail regarding gathering contact

24 information from Salesforce for a call list.

25 **Q. Do you see that one of the individuals CC'ed**

1 **on this individual is named Chris Bobak?**

2 A. Yes.

3 **Q. Who is Chris Bobak?**

4 A. Chris was an employee of the Greitens Group.

5 I don't remember. His title was like associate or

6 something.

7 **Q. What were Chris' job duties at the Greitens**

8 **Group?**

9 A. Chris -- Chris was really responsible for --

10 at this time, originally, he was an intern. And at this

11 time, he would have been responsible for doing the Greitens

12 Group books, logging expenses, running errands, and then

13 also running our book sales off of the website for the

14 Greitens Group.

15 **Q. Do you know whether Chris ever worked on**

16 **politically oriented projects at the Greitens Group?**

17 A. I'm sure that he did. I can't -- there's not

18 like a project that comes to mind. But, you know, he

19 worked for Eric. So I'm sure he worked on some sort of

20 campaign project, yes, as -- while he was at the Greitens

21 Group. He later became an employee of the campaign.

22 **Q. Do you know what his role in the campaign was?**

23 A. I think his title and role was like deputy

24 treasurer, something along those lines.

25 **Q. Do you know when he moved on to that role?**

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1 A. Sorry?

2 **Q. Do you know when he took on that role with the**

3 **campaign?**

4 A. I do not know specifically. Generalizing,

5 probably late 2015, early 2016.

6 **Q. Do you see in this e-mail that you sent, the**

7 **second sentence says: I don't want to hold up the call**

8 **list?**

9 A. Oh, yes.

10 **Q. Do you remember why you wrote that?**

11 A. I think I was really busy running the

12 Resilience book tour and I just didn't have time to help

13 gather this contact information. So I didn't want to hold

14 up Mike Hafner's project or to-do list or whatever.

15 **Q. Do you remember whether there was any urgency**

16 **to pull together those call lists?**

17 A. I don't remember specifically. Everything is

18 sort of urgent when you work for Eric. So I'm sure it was

19 urgent. But no, I don't remember any like specific

20 urgency.

21 **Q. Understood. Do you see there's a three-item**

22 **list here in this e-mail?**

23 A. Yes.

24 **Q. Do you see that Item 2 says: Some of these**

25 **will not be in Salesforce. If not, I would suggest**

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1 **checking The Mission Continues list?**

2 A. Yes.

3 **Q. Was it your understanding that there might be**

4 **either individuals or contact information on The Mission**

5 **Continues list that wasn't in Salesforce?**

6 A. Yes, potentially.

7 **Q. So was it at least potentially the case that**

8 **without The Mission Continues list, there either would have**

9 **been people you didn't know about or people you didn't have**

10 **contact information for?**

11 A. I mean in this context, Mike Hafner has sent

12 me a fundraising list that has names, just no contact

13 information. So there are people we certainly knew that

14 Eric knew. But to be honest, we didn't do a very good job

15 of keeping the Greitens Group Salesforce up to date and so

16 that's most likely why they weren't there. So The Mission

17 Continues list would have that contact information.

18 **Q. So The Mission Continues list would have**

19 **contact information that wasn't in the Salesforce database?**

20 A. Yes.

21 **Q. And do you see that this e-mail has an**

22 **attachment?**

23 A. Yes, I do.

24 **Q. Is the attachment to this e-mail, the same**

25 **document that you received from Lori Stevens in 2014 to the**

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1 **best of your recollection?**

2 A. Yes.

3 **Q. Did Eric instruct you to send The Mission**

4 **Continues list to Michael and Danny on this occasion or any**

5 **other occasion?**

6 A. So to be clear, on this occasion, I believe

7 that it is attached because I had previously sent it. And

8 you can see my -- I mean I think it's attached because I

9 previously sent it to him. So he's replying to my e-mail,

10 I'd assume, or forwarding it, which is why it's attached.

11 And, yes, it is my understanding or based on my memory, I

12 believe that Eric had instructed me to send the list to

13 Mike Hafner and Danny Laub.

14 (Whereupon Exhibit 19 was marked for

15 identification.)

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

17 **this document which is attached -- or identified as**

18 **Exhibit 19?**

19 A. Yes, I recognize this document.

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

21 A. This is an e-mail that I have sent to Meredith

22 Gibbons and Danny Laub with three donor lists attached.

23 **Q. And is one of these attachments to this e-mail**

24 **The Mission Continues donor list that Lori Stevens sent to**

25 **you in May 2014?**

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1 A. Yes.

2 **Q. Is one of the attachments to this e-mail the**

3 **donor lists that Mason Fink provided to Eric in 2014?**

4 A. At some point. I don't know if it was in

5 2014, but yes.

6 **Q. Is that Mason Fink list the same list that you**

7 **had previously sent to Michael Hafner and Danny Laub?**

8 A. Yes.

9 **Q. And is one of the attachments to Exhibit 19**

10 **the Tom Schweich list that Steve Michael sent to Eric in**

11 **2013?**

12 A. Yes.

13 **Q. Did Eric instruct you to send this e-mail?**

14 A. Again, I cannot recall the specific

15 instruction. But yes, I believe that he would have

16 instructed me to send this e-mail.

17 **Q. And would you have sent this e-mail if he**

18 **hadn't given you some sort of instruction to do so?**

19 A. No, I don't believe so. Meredith had just

20 started working for us. And I believe that the purpose

21 would have been to get her these lists, that someone

22 probably would have instructed me to send them.

23 **Q. Would anyone other than Eric have instructed**

24 **you to send these lists to Meredith?**

25 A. It is possible that Danny Laub could have

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1 instructed me to send the list. But he would have been the
 2 only other person.
 3 **Q. Did you ever discuss these attachments with**
 4 **Meredith?**
 5 A. I am -- I'm sure that we discussed them.
 6 Because, like I said, my job was to fill Eric's schedule
 7 with donors and supporter meetings. And so I'm sure there
 8 are times that he might have been traveling and we were
 9 trying to fill time, that we might have met and referenced
 10 these lists.
 11 **Q. Do you have any specific recollections of**
 12 **conversations you may have had with Meredith about these**
 13 **lists?**
 14 A. No.
 15 **Q. Do you remember discussing this e-mail with**
 16 **anybody?**
 17 A. You mean in the context of to send the e-mail?
 18 **Q. Either before it was sent or after it was**
 19 **sent.**
 20 A. Oh, yes, I have discussed this e-mail.
 21 Because the reason I was able to produce this document is
 22 because Meredith sent me this -- this photo of this e-mail.
 23 **Q. So this photo -- this e-mail is not in your**
 24 **inbox right now?**
 25 A. No. I do not have access to that inbox.

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1 **Q. So Meredith Gibbons, after you received our**
 2 **civil investigative demand, provided this to you?**
 3 A. Yes.
 4 MR. HAMMER: Was it before or after?
 5 THE WITNESS: Well, it was before. It was
 6 before, yes.
 7 **Q. (By Mr. Martinich-Sauter) When did she provide**
 8 **it to you?**
 9 A. I don't remember the exact date. But when I
 10 was starting to get mentioned in the media for having sent
 11 donor lists, I was trying to recall sending the list or who
 12 I sent it to. And she was able to pull this up and just
 13 gave me some context for something that I didn't remember
 14 very well and I didn't have access to this e-mail.
 15 **Q. And in that context, what did you and Meredith**
 16 **say to one another about this e-mail?**
 17 A. Really just that I didn't -- I don't remember
 18 who I had sent it to or how I had received it and that if
 19 she had any -- if she had any e-mail correspondence
 20 relating to this list, that it would be helpful for me to
 21 have.
 22 **Q. Did you make a similar request to anybody**
 23 **other than Meredith?**
 24 A. No.
 25 **Q. Is there a reason you asked Meredith and**

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1 **nobody else?**
 2 A. The reason I would have asked Meredith is
 3 because she is a good friend of mine.
 4 **Q. And were you guys friends before she became**
 5 **associated with the Greitens campaign?**
 6 A. No.
 7 **Q. Is that how you guys got to know one another?**
 8 A. Yes.
 9 **Q. Other than the e-mails that we've looked at**
 10 **here today, do you recall transmitting or showing The**
 11 **Mission Continues list to anyone else or to these people on**
 12 **a different occasion? By "these people," I mean Michael**
 13 **Hafner, Danny Laub, Meredith Gibbons.**
 14 A. Like I said, I think earlier, I certainly
 15 remember sitting down with Meredith and trying to maximize
 16 Eric's time and potentially referencing these lists.
 17 Saying, okay, you know, he's going to be in California, who
 18 can he meet with, that sort of thing. But outside of that
 19 scope and then outside of the scope of having conversations
 20 with Meredith about did I send you this list that's being
 21 referenced in the media and do you have any record of it
 22 because I don't remember, other than those conversations, I
 23 don't recall other conversations.
 24 MR. MARTINICH-SAUTER: I think now might be a
 25 good time to take a break. We do have a few more

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1 documents, but it is a much smaller stack.
 2 (Whereupon there was a short break.)
 3 [EXAMINATION]
 4 QUESTIONS BY MR. SAUER:
 5 **Q. It's Ms. Proctor, right?**
 6 A. Yes.
 7 **Q. Ms. Proctor, I just want to kind of circle**
 8 **back through a lot of the documents that we've already**
 9 **looked at and just sort of make sure we have the right**
 10 **understanding of how this list kind of passed through your**
 11 **hands and who you talked to about it. So you remember**
 12 **Exhibit 13? Do you remember that?**
 13 MR. HAMMER: Can you tell us specifically what
 14 it was?
 15 MR. SAUER: It's the May 8, 2014 e-mail from
 16 Lori Stevens that attached the 1,000 plus donor list from
 17 The Mission Continues.
 18 MR. HAMMER: Okay.
 19 A. Yes, I remember this.
 20 **Q. (By Mr. Sauer) So this is an e-mail through**
 21 **which you got Exhibit 14, which is in fact the donor list**
 22 **that we've been talking about for a while, right?**
 23 A. Yes.
 24 **Q. And that's The Mission Continues donor list?**
 25 A. Yes.

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1 Q. And this same document, Exhibit 14, is
2 attached to this May e-mail that's Exhibit 13, as well as
3 the two January 2015 e-mails and the April 22, 2015 e-mail,
4 correct?
5 A. Yes.
6 Q. So all four of those are attaching the same
7 document which is The Mission Continues donor list, right?
8 A. Yes.
9 Q. So to the best of your recollection, this
10 May 8, 2014 e-mail from Lori Stevens is the first time you
11 came into possession of that document?
12 A. Yes.
13 Q. I think you were asked earlier if you had
14 downloaded it and I think you said you might have
15 downloaded it to print it?
16 A. Yes.
17 Q. Later on in the October e-mail -- do you
18 recall the October e-mail, which is I believe Exhibit 16,
19 where you had talked about collecting all the donor lists
20 we've collected so far and you said you'd be in charge of
21 doing that?
22 A. Yes.
23 Q. Do you know where this list was in the
24 interim? In other words, you got it in May of 2014, it's
25 attached to e-mails in 2015. Was it saved somewhere? Was

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1 it on a flash drive? Do you know where it was?
2 A. It's possible that it was saved somewhere.
3 It's also possible that it was just sitting in my e-mail
4 still.
5 Q. So it's possible it was just attached to an
6 e-mail the whole time?
7 A. Yes.
8 Q. You're using at this time, I guess, your
9 Greitens Group e-mail account; is that correct? Or no.
10 It's actually, yeah, your Greitens Group e-mail account; is
11 that correct?
12 A. Yes.
13 Q. So you don't specifically remember saving it
14 somewhere?
15 A. No, I don't specifically remember saving it
16 somewhere. But I'm sure that -- I'm sure that I might have
17 saved it somewhere. I just don't remember hitting save.
18 Q. And I can't remember if you answered this, but
19 with respect to Exhibit 16, the October 15, 2014 e-mail
20 where you talk about you being in charge of pulling
21 together, quote, all the donor lists we've collected so
22 far. Do you recall whether The Mission Continues donor
23 list was one of those donor lists we've collected so far?
24 A. Yes.
25 Q. So is it fair to say that at some point prior

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1 to October 15, 2014, there had been a discussion of the TMC
2 donor list as a donor list that you'd -- as one of the
3 donor lists you'd been collecting?
4 A. Yes.
5 Q. Do you remember when or what was the first
6 time when there was any discussion of using the TMC donor
7 list as part of the campaign or supporting the future
8 campaign in some way?
9 A. I mean I can't point to a specific discussion
10 or conversation, but, you know, it was my understanding
11 that this list was -- this Mission Continues donor list
12 was, you know, a list of Eric's contacts, his network that
13 he had developed over a number of years when he was CEO of
14 The Mission Continues, his family, friends, colleagues.
15 And that this would be an important list when he wanted to,
16 you know, run for governor and ask these people for
17 support.
18 Q. And you described that as your understanding
19 of the importance of this list for the future political
20 campaign. I take it you got that understanding from
21 discussions with Eric Greitens. correct?
22 A. Yes.
23 Q. Correct?
24 A. Correct.
25 Q. So in other words, there were discussions

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1 going back to prior to October of 2015 in which Eric had
2 talked to you about the importance of the TMC donor list to
3 support future political fundraising efforts, correct?
4 A. Yes.
5 Q. And you don't specifically recollect when
6 those started, but I take it it's something that came up
7 multiple times, right?
8 A. Yes.
9 Q. Because again, in Exhibit 16, the October 15,
10 2014 e-mail, you're referring to the TMC donor list already
11 in connection with a plan for political fundraising,
12 correct?
13 A. Yes.
14 Q. And you would not have done that or made that
15 reference until Mr. Greitens had told you that it was going
16 to have that purpose, right?
17 A. Yes.
18 Q. Then let me ask you this, this October 15
19 e-mail talks about you pulling together these donor lists.
20 Do you remember whether those donor lists were actually
21 used in the meeting that's referred to in this e-mail?
22 A. I do not remember.
23 Q. Do you remember maybe you printed them out and
24 showed them to the other people who were participating in
25 the meeting, Danny and Tyler?

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1 A. It's possible that I printed them. It's
 2 possible that I sent them via e-mail because -- I mean to
 3 save paper or something. But yeah, it's possible that I
 4 printed them. I just don't remember.

5 **Q. You don't remember how you did it, but I take**
 6 **it you do believe that in fact you did pull together those**
 7 **donor lists at that time and share them with Danny and**
 8 **Tyler?**

9 A. Yes.

10 **Q. And would you have done that without**
 11 **authorization from Eric Greitens to share that document**
 12 **with Danny and Tyler?**

13 A. No.

14 **Q. So it's your recollection that Eric Greitens**
 15 **did authorize that sharing?**

16 A. Yes.

17 **Q. Okay. Similar questions asked of this**
 18 **January 6 e-mail, Exhibit 17. Again, it's exactly the same**
 19 **document, this Mission Continues 1,000 and up donor list**
 20 **that's attached to this document as well, correct?**

21 A. Which one?

22 **Q. Exhibit 17. If you want to turn to it. It's**
 23 **the January 6, 2015 e-mail.**

24 A. Yes. Donor list -- The Mission Continues
 25 donor list is attached.

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1 supportive to a political campaign.

2 **Q. That's something he said to you, correct?**

3 A. I mean, yes. I can't recall the moment, the
 4 conversation, but yes.

5 **Q. From -- I take it it's not just one**
 6 **conversation. Because we're talking about conversations**
 7 **that occurred over several months, right, October of**
 8 **2015 -- or '14 and January of 2015, on into April of 2015,**
 9 **correct?**

10 A. Yes.

11 **Q. Correct?**

12 A. Correct.

13 **Q. So is it fair to say that he was kind of**
 14 **expressing a view to you that he kind of owned this list;**
 15 **is that fair to say? In other words, he had done the work**
 16 **to build up the contacts; is that right?**

17 A. Yes.

18 **Q. So he felt like he was entitled to use it for**
 19 **a political campaign; is that what you understood from him?**

20 A. Yes.

21 **Q. And specifically asked in this January e-mail,**
 22 **I take it you believe that or it's your recollection that**
 23 **in this specific time frame of early January 2015, he had**
 24 **specifically authorized you to share this list with Danny**
 25 **Laub and Michael Hafner, correct?**

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1 **Q. And again, that is Exhibit 14, which is the**
 2 **same attachment for Exhibit 13, Exhibit 16, Exhibit 17 and**
 3 **Exhibit 19, correct?**

4 A. I believe so.

5 **Q. Sorry. A lot of exhibit numbers in that**
 6 **question. In any event, The Mission Continues donor list**
 7 **that we've been talking about was attached to this e-mail,**
 8 **right?**

9 A. Yes.

10 **Q. And you sent it to Danny and Michael Hafner**
 11 **this time, right?**

12 A. Yes.

13 **Q. And I believe you testified earlier that you**
 14 **would not have done that unless Eric Greitens had been**
 15 **authorizing you to share that with those people, right?**

16 A. Yes.

17 **Q. Is it consistent with your recollection that**
 18 **in this time frame, January 2015, you had continued**
 19 **conversations with Mr. Greitens about using The Mission**
 20 **Continues donor list to support the political fundraising**
 21 **effort for his future political campaign?**

22 A. Yes. I -- my understanding was that these
 23 were his contacts that he had built over -- you know, since
 24 2007. And that because these people were supporting him,
 25 they would -- you know, it would make sense they would be

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1 A. Yes.

2 **Q. And similar questions without belaboring the**
 3 **point as to the January 28 e-mail, that's Exhibit 18,**
 4 **right? Do you remember that one, the e-mail where you sent**
 5 **the list to Chris Bobak and Danny Laub, right?**

6 MR. HAMMER: What's your question again?

7 A. Yes.

8 **Q. (By Mr. Sauer) Let me ask the question. As to**
 9 **this e-mail, my recollection is earlier you said, look, I**
 10 **sent this to -- back to Michael Hafner because Chris and I**
 11 **didn't have time to look up the address and contact**
 12 **information for these various donors, so I had sent him,**
 13 **you know, multiple resources that he could use to fill out**
 14 **that donor list or that call list that he was preparing,**
 15 **correct?**

16 A. Correct.

17 **Q. And one of the resources you sent to him, No.**
 18 **2 in your e-mail, was The Mission Continues list, correct?**

19 A. Correct.

20 **Q. And at this time, it was your understanding**
 21 **that Mr. Greitens had authorized and instructed you to**
 22 **share that list with people who were his future campaign**
 23 **staff, right?**

24 A. Yes. I had already sent the list to them
 25 once.

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1 Q. So while there may not have been a specific
 2 conversation with Mr. Greitens that preceded that e-mail,
 3 you understood because he had already authorized you to
 4 send it to future campaign staff on January 6, that you
 5 were still authorized and instructed to share it with them
 6 as they needed it on January 28, correct?
 7 A. Yes.
 8 Q. And I take it that Chris Bobak – no campaign
 9 committee of any kind existed at this time, right?
 10 A. No.
 11 Q. But it was your understanding that Chris Bobak
 12 and Danny Laub were actively preparing and working on a
 13 future political campaign, right?
 14 A. At this time, Chris Bobak was not.
 15 Q. Okay. Sorry. Go ahead.
 16 A. He was a staff member of the Greitens Group.
 17 Q. But Danny Laub -- is that true of Danny Laub
 18 at this time?
 19 A. Yes.
 20 Q. And then flipping back to Exhibit 17, same
 21 question as to Michael Hafner. It's your understanding
 22 that even though no campaign committee existed at this
 23 time, that actually Michael Hafner was working to support
 24 the political campaign?
 25 A. Yes.

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1 Q. Just that the timing hadn't happened such that
 2 the campaign had been formed at that time, right?
 3 A. Yes.
 4 Q. But Hafner had been hired, in fact his whole
 5 job was to work to support the future political campaign,
 6 right?
 7 A. Yes.
 8 Q. So there was no confusion in your mind when
 9 you were giving it to Michael Hafner on January 6, that you
 10 were giving it to someone who was going to use it to
 11 support the political campaign, correct?
 12 A. Yes. There was no confusion.
 13 Q. Same question on the 28th as to Danny Laub.
 14 Again, Danny Laub had been hired, even though no campaign
 15 exists, was being paid to work on a future political
 16 campaign, correct?
 17 A. Yes.
 18 Q. And when you shared it with him, there was no
 19 confusion in your mind that this was going to be used for
 20 political fundraising, right?
 21 A. Yes. There was no confusion.
 22 MR. HAMMER: At the request of Mr. Greitens?
 23 Q. (By Mr. Sauer) Next question. And you had the
 24 understanding that you were authorized and instructed by
 25 Mr. Greitens to share it with both of those individuals,

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1 Hafner and Laub, correct?
 2 A. Yes.
 3 Q. So similar questions as to the April 22 e-mail
 4 that's Exhibit 19. Here, I take it Meredith, very similar
 5 to Laub and Hafner, is being employed at this time for
 6 full-time political fundraising, correct?
 7 A. Yes.
 8 Q. She's not doing anything for The Mission
 9 Continues at this time, right?
 10 A. No. Meredith was never associated with The
 11 Mission Continues.
 12 Q. And when you sent this e-mail giving her the
 13 Schweich list and the Mason Fink list and The Mission
 14 Continues list, you were sharing it with her on the
 15 understanding that it would be used for political
 16 fundraising, correct?
 17 A. Yes.
 18 Q. And you were -- the reason you felt like you
 19 were to do that was because you had been authorized and
 20 instructed by Eric Greitens in a series of conversations to
 21 share this list with his political campaign, correct?
 22 A. Yes. It was my understanding that this --
 23 these lists would be used to fundraise and Meredith was our
 24 fundraiser.
 25 Q. There was no mystery here in other words,

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1 correct?
 2 A. No.
 3 Q. I mean she was being given The Mission
 4 Continues list to use it for political fundraising
 5 purposes, correct?
 6 A. Yes.
 7 Q. And in fact by April 22, 2015, a formal
 8 campaign committee of some type existed, right?
 9 A. Yes, I believe an exploratory committee
 10 existed.
 11 Q. And I take it that the plan had always been to
 12 create the political campaign and announce the campaign
 13 after the conclusion of the Resilience book tour, right?
 14 A. Yes.
 15 Q. But in fact, that got accelerated and got
 16 formed a bit earlier, perhaps in late February of 2015,
 17 correct?
 18 A. Yes.
 19 Q. So at this time, there's no mystery at all.
 20 Meredith is actually a full-time employee of the campaign,
 21 right?
 22 A. Yes.
 23 Q. Whereas, Danny and Hafner had been hired to
 24 work to support the campaign when it didn't yet exist,
 25 correct?

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1 A. Yes. They were consultants.
 2 **Q. They were consultants whose whole task was**
 3 **support the future political campaign, correct?**
 4 A. Yes.
 5 **Q. In other words, they weren't like consultants**
 6 **for The Mission Continues and they weren't trying to raise**
 7 **money for The Mission Continues, were they?**
 8 A. No.
 9 **Q. And again, just specifically as to Exhibit 19,**
 10 **the reason you sent this e-mail to Meredith is you had the**
 11 **understanding from conversations with Mr. Greitens that you**
 12 **were to share it with Meredith so that it could be used for**
 13 **political fundraising purposes, correct?**
 14 A. Yes.
 15 MR. SAUER: Let's move to another exhibit
 16 which I think is going to be Exhibit 20.
 17 (Whereupon Exhibit 20 was marked for
 18 identification.)
 19 **Q. (By Mr. Sauer) Okay. Ms. Proctor, do you**
 20 **recognize this document that's marked and labeled as**
 21 **Exhibit 20?**
 22 A. I do, yes.
 23 **Q. And this is a nondisclosure agreement that you**
 24 **signed when you started working for The Mission Continues,**
 25 **correct?**

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1 A. Yes. I believe I signed it in November of
 2 2012, which was almost a year after I started working for
 3 The Mission Continues, but yes.
 4 **Q. Do you remember why -- before I ask that, I**
 5 **see you're referring to Page 4. That is in fact your**
 6 **signature on Page 4, correct?**
 7 A. Yes.
 8 **Q. And that is the accurate date that you signed**
 9 **it, the 21st of November of 2012?**
 10 A. I believe so.
 11 **Q. Do you remember why you were asked to sign a**
 12 **nondisclosure agreement with respect to The Mission**
 13 **Continues?**
 14 A. I just thought it was pretty standard business
 15 practice. And so that's why I would be signing it.
 16 **Q. Was there anything that occasioned you being**
 17 **asked to sign it, you know, as you say, a year after you**
 18 **started working there?**
 19 A. I mean when I started working for The Mission
 20 Continues in January of 2011, it was a very small
 21 organization and there wasn't a lot of structure. And so
 22 this was just -- they were taking a lot of steps to become
 23 a little bit more like compliant and whatnot. So a
 24 handbook came out and this NDA came out and things like
 25 that.

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1 **Q. So this was kind of part of the growth of the**
 2 **organization?**
 3 A. Yes.
 4 **Q. It became bigger, got more established**
 5 **procedures and things like that?**
 6 A. Exactly.
 7 **Q. Do you know who asked you to sign this, was it**
 8 **Eric Greitens?**
 9 A. I do not remember who asked me to sign this.
 10 **Q. Okay. Do you remember signing it?**
 11 A. I mean, yes.
 12 **Q. Did you review it before you signed it?**
 13 A. I don't remember.
 14 **Q. Do you know --**
 15 A. I hope that I did.
 16 **Q. Do you know if Eric Greitens signed that**
 17 **document, a document like this?**
 18 A. I do not know.
 19 **Q. Okay. Can I direct your attention to**
 20 **Paragraph 1, definition of confidential information?**
 21 A. Yes.
 22 **Q. Do you see that paragraph?**
 23 A. Yes.
 24 **Q. Do you remember -- do you remember agreeing to**
 25 **keep things confidential, that you -- agreeing to keep**

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1 **information confidential that you learn in the course of**
 2 **your representation -- sorry -- the course of your work at**
 3 **The Mission Continues?**
 4 A. Yes.
 5 **Q. Okay. And then if you flip to the second**
 6 **page, Paragraph 2, there's a provision on nondisclosure of**
 7 **confidential information, correct?**
 8 A. Yes.
 9 **Q. That paragraph says basically that you've got**
 10 **to keep confidential information in strict confidence and**
 11 **you can't share it without authorization, correct?**
 12 A. Correct.
 13 **Q. And you go to Subparagraph B of that, it talks**
 14 **about, you know, having to receive specific authorization**
 15 **from The Mission Continues, being served with a subpoena or**
 16 **stuff becoming generally available in the public, correct?**
 17 A. Correct.
 18 **Q. When you worked at The Mission Continues, was**
 19 **that your understanding of how you were to treat The**
 20 **Mission Continues confidential information?**
 21 A. Yes.
 22 **Q. And was that understanding shared by other**
 23 **personnel at The Mission Continues to your knowledge?**
 24 A. Yes, to my knowledge. This wasn't a document
 25 that we were, you know, reminded of on an annual basis or

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1 anything. But to my knowledge, yes, people were, you know,
 2 aware that it's important to be confidential with
 3 information.
 4 **Q. So it wasn't just your understanding, but**
 5 **really other employees of The Mission Continues understood**
 6 **that confidential information couldn't be disclosed without**
 7 **authorization from The Mission Continues typically?**
 8 A. Yes.
 9 MR. HAMMER: I've just got to put a little
 10 objection on this about vagueness.
 11 I mean, do you have conversations with every
 12 employee there at The Mission Continues about this
 13 agreement and specifically that paragraph with respect to
 14 confidentiality?
 15 THE WITNESS: No.
 16 **Q. (By Mr. Sauer) But more generally, was**
 17 **confidentiality something that was discussed from time to**
 18 **time?**
 19 A. Like -- I guess can you ask it again?
 20 **Q. Do you remember ever discussing just the**
 21 **obligation of confidentiality as to Mission Continues**
 22 **confidential information that arose from this NDA with**
 23 **other people that worked for The Mission Continues?**
 24 A. Not really.
 25 **Q. Do you remember -- do you have an**

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1 **understanding of what other employees at The Mission**
 2 **Continues had as an expectation of confidentiality with**
 3 **respect to their employment there?**
 4 A. No. I never really discussed confidentiality
 5 or the NDA with other employees. I mean I had my own idea
 6 of what that was. But I don't know that I discussed it
 7 with other people.
 8 **Q. How about Eric Greitens; did you ever discuss**
 9 **keeping things confidential with Mr. Greitens?**
 10 A. In respect to The Mission Continues?
 11 **Q. Yes. With respect to The Mission Continues**
 12 **confidential information specifically.**
 13 A. I mean, no. I don't recall a conversation
 14 about confidentiality. I mean it was certainly part of my
 15 job to be thoughtful about information I was seeing. But
 16 no, we didn't regularly talk about confidentiality.
 17 **Q. So you believe it was part of your job to be**
 18 **discrete obviously, correct?**
 19 A. If there were conversations about
 20 confidentiality, it was regarding, you know, Eric's e-mails
 21 and the conversations that Eric was having.
 22 **Q. And he wanted you to keep those things --**
 23 A. Confidential.
 24 **Q. -- secret or confidential, correct?**
 25 A. Yes.

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1 **Q. So he did give you instructions to keep things**
 2 **confidential regarding e-mails he received and things of**
 3 **that nature?**
 4 A. Yes.
 5 **Q. I think you testified earlier that you had**
 6 **access to his e-mail account and could read all of his**
 7 **incoming e-mails, correct?**
 8 A. Yes.
 9 **Q. And he had instructed you to keep his private**
 10 **e-mail -- or his e-mail correspondence in his Mission**
 11 **Continues account confidential, correct?**
 12 A. In every account confidential, yes.
 13 **Q. Just directing your attention to the middle on**
 14 **the first page of this document, if you could flip back to**
 15 **that, you see Paragraphs C and D of Paragraph 1, definition**
 16 **of confidential information, correct?**
 17 A. Yes.
 18 **Q. And Paragraph C lists the identities of donors**
 19 **or investors and any personal information of donors or**
 20 **investors and any contact information for donors or**
 21 **investors as TMC confidential information, correct?**
 22 A. Correct.
 23 **Q. And then Paragraph D lists the identities of**
 24 **any persons in the Salesforce database of TMC and any**
 25 **personal information of any such persons and any contact**

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1 **information for any such persons as also TMC confidential**
 2 **information, correct?**
 3 A. Yes.
 4 **Q. And that was consistent with your**
 5 **understanding when you were working at TMC, that**
 6 **information of that nature set forth in C and D was in fact**
 7 **TMC confidential information, correct?**
 8 A. Correct.
 9 **Q. Do you know if Eric Greitens had the same**
 10 **understanding; had you ever discussed that with him?**
 11 A. I have not discussed that with him. To my
 12 knowledge, I have not discussed that with him. I do not
 13 know that he had that understanding.
 14 **Q. But based on your understanding from this**
 15 **nondisclosure agreement, you believe that you personally**
 16 **would have needed authorization from The Mission Continues**
 17 **to share identities of donors or investors, their personal**
 18 **information and their contact information with anyone**
 19 **outside The Mission Continues, correct?**
 20 A. Yes.
 21 **Q. Same question as to Paragraph D. You**
 22 **understood that you would have needed authorization from**
 23 **The Mission Continues to share the identities of any**
 24 **persons in the Salesforce database of TMC, personal**
 25 **information of such persons and contact information of such**

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1 persons to anyone outside of TMC, correct?

2 A. Correct.

3 Q. Did you ever receive -- as to the TMC donor

4 list that we've been talking about, Exhibit 14, that was

5 shared with these campaign people in January, did you ever

6 receive authorization from anyone other than Eric Greitens

7 who worked for The Mission Continues to share that

8 information with anyone on the campaign side?

9 A. No.

10 Q. So the only authorization you received was

11 authorization that you received from Eric Greitens,

12 correct?

13 A. Yes.

14 Q. And you received that authorization from him

15 after he already left The Mission Continues, correct?

16 A. I believe so.

17 Q. So in other words, I take it the time line was

18 you got the e-mail list in May of 2014 when he was on his

19 way out, correct?

20 A. Yes.

21 Q. And then it's not mentioned again in your

22 e-mails until that October e-mail when you referred to it

23 as a donor list that we've collected in discussions with

24 political consultants, correct?

25 A. Yes.

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1 Q. So sometime after Eric had left The Mission

2 Continues, he had conversations with you where he expressed

3 this notion that he owned that list, he had developed that

4 list personally, that he was entitled to use it for his

5 political campaign, correct?

6 A. Yes.

7 Q. And that's the only person who had any

8 affiliation with The Mission Continues who gave you any

9 authorization to share the list with anybody else, correct?

10 A. Yes. Eric was the only person.

11 (Whereupon Exhibit 21 was marked for

12 identification.)

13 MR. SAUER: I think you're looking at what's

14 been marked Exhibit 21, correct?

15 MR. HAMMER: Yes. That would be the next one

16 in line.

17 Q. (By Mr. Sauer) Do you recognize this document?

18 A. Yes, I do.

19 Q. This is essentially the employee handbook for

20 The Mission Continues, correct?

21 A. Yes.

22 Q. And they call it team member handbook, because

23 team member is kind of a positive phrase for people who

24 work there, correct?

25 A. Yes.

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1 Q. The very first page has a letter from our

2 founder and CEO, Eric Greitens, right? It's the third page

3 of the document, first page of text of the employee

4 handbook, correct?

5 A. Yes.

6 Q. Do you know what Eric Greitens' role was in

7 preparing this employee handbook?

8 A. I don't think that he was very involved. But

9 I couldn't say that for sure.

10 Q. So you don't know -- do you know who developed

11 it?

12 A. I would -- I know that one of the people

13 involved in developing it was a woman named Ayeesha Bell.

14 She was in charge of -- I honestly don't even know what her

15 title was -- but taking care of the team. And she worked

16 closely with our chief financial officer and that sort of

17 thing.

18 Q. Do you know if this is something that Eric as

19 CEO of The Mission Continues would have reviewed and

20 approved before it was circulated to employees?

21 A. I do not know.

22 Q. Did you actually receive a copy of this in

23 connection with your employment at The Mission Continues?

24 A. I did.

25 Q. And just circling back to something that you

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1 were asked earlier. I take it you were -- simultaneously,

2 you were an employee of The Mission Continues and the

3 Greitens Group, correct?

4 A. Yes.

5 Q. That overlap occurred for a period of 2011 to

6 2014, right?

7 A. Yes.

8 Q. And then you left The Mission Continues at the

9 same time Eric did?

10 A. Yes.

11 Q. And during that time, your pay came half from

12 the Greitens Group and half from The Mission Continues,

13 right?

14 A. So my pay was not quite half and half. I

15 don't know what the exact percentages were. But I had

16 more -- more of my salary came from The Mission Continues.

17 Q. And then The Mission Continues paid all your

18 benefits, right?

19 A. Yes.

20 Q. And I think you said that included health care

21 and maybe some 401K, right?

22 A. Yes. To my knowledge, they paid all of my

23 benefits. I don't know if there was a deal of some sort

24 worked out, but my benefits came from Mission Continues.

25 Q. When you say "deal," there was some agreement

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1 between The Mission Continues and the Greitens Group as to
2 how you'd be compensated, right?
3 A. Yes.
4 Q. I take it that really -- and you testified
5 that it may have worked out about 50/50. You really aren't
6 sure how the amount of time you spent for each entity
7 really hashed out in a given year, right?
8 A. Yes.
9 Q. But you estimated that it might have worked
10 out to about 50/50?
11 A. Yes.
12 Q. I take it there was no arrangement where you
13 would formally track your time and say I spent four hours
14 today on Mission Continues stuff and three hours on
15 Greitens Group stuff or anything like that, right?
16 A. No.
17 Q. So there was no formal tracking of the time to
18 separate out the time you worked for each of the two
19 entities, correct?
20 A. No, there was not.
21 Q. Can you flip ahead -- and this is going to go
22 far into the employee handbook -- to the page that's marked
23 TMC 1908. And you see the first page is 1841 so we're
24 going about 67 pages into the document.
25 MR. HAMMER: It looks like it's actually Page

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1 20 of the handbook.
2 Q. (By Mr. Sauer) Correct. This is the portion
3 of the employee handbook that talks about nondisclosure of
4 client matters, correct?
5 A. Yes.
6 Q. Do you recall reviewing this when you received
7 it from The Mission Continues?
8 A. I recall signing it. I don't know how closely
9 I reviewed it.
10 Q. Okay. Here, it talks about nondisclosure of
11 client matters on this particular page, right?
12 A. Yes.
13 Q. It lists donors, right? When it says in that
14 first paragraph: We identify a client as anybody whom we
15 interact with through our work at The Mission Continues.
16 Correct?
17 A. Yes.
18 Q. And this includes fellows, volunteers, donors
19 or other supporters, correct?
20 A. Correct.
21 Q. And then it cross references NDA, right?
22 A. Yes.
23 Q. So the employee handbook expresses and
24 reinforces the obligation of keeping donor information
25 confidential that's set forth in the nondisclosure

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1 agreement that's Exhibit 20, right?
2 A. Yes.
3 Q. And I take it, again, that was consistent with
4 your understanding when you worked at The Mission Continues
5 as to what your obligation was as to donor information,
6 right?
7 A. Yes.
8 MR. HAMMER: One second.
9 Q. (By Mr. Sauer) To maintain this professional
10 confidence, it says third paragraph, no team member shall
11 disclose client information to other clients, friends or
12 members of one's own family. Correct?
13 A. Correct.
14 Q. And I take it team member really refers to
15 employee, right?
16 A. Correct.
17 Q. So you testified earlier that you may not have
18 had specific conversations with other TMC employees about
19 the nondisclosure agreement, but it is your understanding
20 they were all subject to this same obligation through the
21 employee handbook, right?
22 A. Yes.
23 Q. And this page seems to indicate that they all
24 had signed a similar NDA, right?
25 A. Yes.

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1 Q. Is that consistent with your understanding
2 from conversations with other TMC people, that everyone had
3 signed such an NDA?
4 A. I don't know if we really discussed it, but my
5 assumption was if you were going to be employed, you had
6 signed an NDA.
7 Q. Then flipping on to the next page, the one
8 marked 1909 at the bottom. Under care of donor records in
9 the third paragraph, it says: Under no circumstances
10 should outside requests for donor material be fulfilled
11 unless prior written permission is received from your team
12 leader. Correct?
13 A. Correct.
14 Q. And so there's a specific reference to donor
15 material here; is that right?
16 A. Correct.
17 Q. And that's -- that understanding that you
18 would need written authorization from your team leader to
19 share donor material is consistent with your understanding
20 or what your obligations were as an employee of The Mission
21 Continues, correct?
22 A. Yes.
23 Q. And I take it -- you testified earlier that
24 the only human being who ever authorized you to share the
25 donor list was Eric Greitens, right?

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1 A. Yes.

2 **Q. And he did that after he was no longer a**

3 **member of the -- of The Mission Continues, right?**

4 A. Yes.

5 **Q. And so suffice to say he was not your team**

6 **leader at that time, right?**

7 A. He was my team leader.

8 **Q. He was not your team leader at The Mission**

9 **Continues anymore when he was directing you to share this**

10 **donor list with his campaign staff, right?**

11 A. No.

12 **Q. And in particular, he was not your team leader**

13 **when he directed you on April 22, 2015 to share the list**

14 **with Meredith Gibbons, right?**

15 A. No.

16 **Q. No, he was not your team leader, correct?**

17 A. Yes.

18 **Q. Again, Eric Greitens is the one who authorized**

19 **and instructed you to do that with respect to Meredith**

20 **Gibbons, right?**

21 A. Correct.

22 **Q. That is best recollection of that, right?**

23 A. Yes.

24 **Q. And specifically we're referring back to**

25 **Exhibit 19, the April 22, 2015 e-mail that's sent when the**

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1 **essentially be some kind of video public service**

2 **announcement featuring Eric Greitens; is that right?**

3 A. Yes.

4 **Q. Is that right?**

5 A. That's correct.

6 **Q. Let's try to not speak at the same time. I'm**

7 **the worst offender. So I apologize.**

8 **So the idea is that this is a video that would**

9 **be made by The Mission Continues in 2013; is that right?**

10 A. So, no. The video was completely separate

11 from The Mission Continues. It was something that Eric was

12 doing outside of his scope as CEO of The Mission Continues.

13 **Q. Did it fall under the Greitens Group at all or**

14 **was it a personal thing?**

15 A. I mean it was more of a personal thing. But

16 any personal things generally fell under the Greitens

17 Group. If he was -- if he just wanted to do something, you

18 know, the Greitens Group team would handle it.

19 **Q. So the idea -- did he in fact make this video,**

20 **do you know?**

21 A. Yes, he did.

22 **Q. So he made a video that was supporting the**

23 **Dreamer's Act or did you call it the American Dream Act?**

24 A. I can't recall the name of it. But basically

25 if you were brought here --

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1 **campaign is already in existence, correct?**

2 A. Correct.

3 MR. SAUER: Could we have five?

4 MR. HAMMER: Five minutes?

5 MR. SAUER: Yeah.

6 (Whereupon there was a short break.)

7 (Whereupon Exhibit 22 was marked for

8 identification.)

9 **Q. (By Mr. Sauer) Ms. Proctor, I'm handing you a**

10 **document that's been marked Exhibit 22. Do you see this?**

11 A. Yes.

12 **Q. Do you recognize this e-mail chain?**

13 A. Yes, now that I've reviewed it.

14 **Q. You say you recognize it. Generally speaking,**

15 **what is this e-mail all about?**

16 A. Eric was -- was going to be in a video for --

17 working with [REDACTED] that was promoting -- I don't

18 know if it's called the American Dream Act or something --

19 some sort of like legislation.

20 **Q. Who is [REDACTED]?**

21 A. [REDACTED]?

22 **Q. [REDACTED] Sorry.**

23 A. He is, I think, like the documentary or movie

24 producer or something along those lines.

25 **Q. So there's a script in this e-mail that would**

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1 MR. HAMMER: Is it DACA?

2 A. -- if you're brought into the United States of

3 America illegally by your parents and you were a young

4 child or something, that you are offered citizenship,

5 something along those lines.

6 **Q. (By Mr. Sauer) So in 2013, he made a video**

7 **with [REDACTED] in which Eric advocated for the**

8 **passage of a federal law that would allow children who were**

9 **brought here illegally by their parents to become U.S.**

10 **citizens, correct?**

11 A. That is my understanding, correct.

12 **Q. And if you flip to like the -- I guess the**

13 **second to last page of this e-mail, it's the third page of**

14 **the document, about a third of the way down in the last**

15 **sentence in all caps has Eric saying: Let's pass common**

16 **sense immigration reform and give people like Alejandro an**

17 **earned path to citizenship and keep our military the best**

18 **in the world. Right?**

19 A. Correct.

20 **Q. So in other words, this is a video where Eric**

21 **would be saying, hey, look some of these dreamers, as**

22 **they're popularly called, are serving honorably in our**

23 **military and they deserve to be citizens, right?**

24 A. Correct.

25 **Q. Okay. And then on the first page at the top**

1 of there, this e-mail is originally sent to you at your
 2 Mission Continues e-mail address April 16 of 2013, right?
 3 A. Yes.
 4 Q. And it's sent to you by [REDACTED] els, right?
 5 A. Yes.
 6 Q. Who is [REDACTED] ?
 7 A. I honestly don't remember. I think she was
 8 probably working with [REDACTED] like a producer in
 9 charge of writing the script or something.
 10 Q. Okay. So you believe that she was probably
 11 somebody affiliated with Mr. [REDACTED] ?
 12 A. Yes.
 13 Q. And I see she sent it to your Mission
 14 Continues e-mail address, correct?
 15 A. Correct.
 16 Q. But it's your recollection this was not a
 17 Mission Continues project I take it?
 18 A. Correct.
 19 Q. Okay. And you don't recall whether it was
 20 just done by Eric personally or done through the LLC, the
 21 Greitens Group, correct?
 22 A. Correct.
 23 Q. Okay. And then on October 20 of 2015, at
 24 10:50 in the evening, you forwarded this e-mail from your
 25 Mission Continues e-mail to your Greitens Group e-mail,

1 correct?
 2 A. Correct.
 3 Q. Do you remember why you did that?
 4 A. I'm assuming that I did that because I was
 5 looking for contact information for someone on this e-mail
 6 chain and I was sending it to my Greitens Group e-mail,
 7 which at the time I was using most consistently.
 8 Q. Now, by October 20 of 2015, you had been gone
 9 from The Mission Continues for a few months, right?
 10 A. Yes. However, we still had access to our
 11 Mission Continues e-mails.
 12 Q. And was that something that The Mission
 13 Continues agreed to or is it just something that was the
 14 way it was?
 15 A. I don't know if they agreed to it. They
 16 certainly were aware. But I don't know what the
 17 arrangement was. I just knew I could go into my Mission
 18 Continues e-mail and get contact information.
 19 Q. Who told you you were allowed to do that? Did
 20 Eric Greitens tell you that you were allowed to continue to
 21 access your Mission Continues e-mails?
 22 A. I don't know who -- I don't know if he told me
 23 that I was allowed to. But given I had access to it, I
 24 sort of assumed that I was allowed to.
 25 Q. How about with respect to this particular

1 e-mail; do you recall Eric telling you go find this e-mail
 2 from 2013 and resend it to the Greitens Group in 2015?
 3 A. I don't recall that. My -- I would assume
 4 that Eric probably asked me to find contact information for
 5 [REDACTED] and we didn't have it. So he might have
 6 mentioned, you know, it's probably in your Mission
 7 Continues e-mail.
 8 Q. Do you recall any discussion of Eric Greitens'
 9 position on immigration reform becoming an issue in a
 10 future political campaign?
 11 A. No, I do not.
 12 Q. I take it you're hesitating. Go ahead.
 13 A. Yes, I recall a discussion regarding that.
 14 Q. What were the nature of those discussions?
 15 A. I don't know that I was heavily involved in
 16 them. But, you know, a part of running for -- when you're
 17 running for office, part of what some of the political
 18 consultants were doing was to ensure that any -- any
 19 political statement he had made in the past on any certain
 20 issues, we were at least aware of and had knowledge of and
 21 was -- we had documentation of.
 22 Q. So is this action of you retrieving this
 23 e-mail from 2013 and sending it to your Greitens Group
 24 account, was that for the purpose of collecting prior
 25 politically statements that Eric had made in preparation

1 for the political campaign?
 2 A. I don't remember. I think that's likely. Or
 3 it could have been that I was looking for contact
 4 information. But, yes. I think it's likely that I was
 5 looking for it.
 6 Q. Did anyone instruct you to go into your
 7 Mission Continues e-mail account to look for things of that
 8 nature?
 9 A. I don't remember, you know, a direct -- I
 10 don't remember a specific conversation. But I would have
 11 been instruct -- yes. Now that I'm looking at it again and
 12 realizing what it is, I would have been instructed to go
 13 and find this e-mail.
 14 Q. Who would have instructed you to do that?
 15 A. I would assume Eric or potentially a campaign
 16 manager, whoever that was at that time probably.
 17 Q. Now, this is occurring in October 20 of 2015.
 18 The campaign had been in place for about six months at that
 19 time, right?
 20 A. Yes.
 21 Q. Do you know who the campaign manager was at
 22 that time?
 23 A. At this time, there was a little bit of a
 24 shift, but I think it probably was Danny Laub.
 25 Q. Do you remember Danny Laub saying anything

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1 specific to you about going into your Mission Continues
 2 e-mail account to retrieve any prior political statements
 3 by Eric?
 4 A. I do not.
 5 Q. How about Austin Chambers; do you remember
 6 Austin Chambers ever telling you, hey, go into your Mission
 7 Continues e-mail account and retrieve prior political
 8 statements Eric had made?
 9 A. It is possible, but I do not remember.
 10 Q. So I take it you don't really recall who
 11 specifically would have told you to go and send this
 12 particular e-mail?
 13 A. No.
 14 Q. But you believe now that the most likely
 15 reason you did this was to collect these prior political
 16 statements of the candidate, right?
 17 A. Yes.
 18 Q. Do you remember any other instances where you
 19 went back and got Mission Continues material of any kind
 20 for that purpose, the purpose of collecting prior political
 21 statements that may become an issue in the campaign?
 22 A. It's very possible. I just don't -- I don't
 23 remember. I just don't.
 24 Q. And by this time, October 20 of 2015, Eric has
 25 formally declared that he's running for governor, right?

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1 A. Yes.
 2 Q. So there's a specific office that he's
 3 campaigning for at this time, right?
 4 A. Yes.
 5 Q. And I think you testified earlier as to
 6 Exhibits 4 and 5 that he had, quote, settled on running for
 7 governor as early as March 21, 2014, correct? If you want
 8 to look at Exhibit 4, the e-mail with Missouri Read-Ahead
 9 attached.
 10 A. Yes.
 11 Q. So going back to your prior testimony, it was
 12 your understanding that as early as March 21, 2014, Eric
 13 Greitens had settled on or decided to run for governor of
 14 Missouri specifically, correct?
 15 A. Yes.
 16 Q. And let me ask you this: In that time frame
 17 when you were both still employed at The Mission Continues,
 18 did he ever ask you to get any Mission Continues material
 19 that might be used defensively in his future campaign for
 20 governor?
 21 A. I mean I can't -- there could be other
 22 instances. I don't remember.
 23 Q. You don't remember one way or the other; is
 24 that fair to say?
 25 A. Yes.

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1 Q. But to be clear, the basis of your
 2 understanding that he had decided to run for governor of
 3 Missouri as early as March 2014 were conversations with
 4 Eric Greitens himself, correct?
 5 A. Yes.
 6 MR. SAUER: How about one more five-minute
 7 break?
 8 (Whereupon there was a short break.)
 9 MR. SAUER: We don't have any more questions
 10 for the witness.
 11 MR. HAMMER: I have no questions for the
 12 witness. We can close the deposition.
 13 THE COURT REPORTER: Signature?
 14 (Whereupon there was an off the record
 15 discussion.)
 16 THE WITNESS: I'm going to waive.
 17 (Whereupon signature was waived.)
 18 (Off the record at 5:25 p.m.)
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1 CERTIFICATE OF REPORTER
 2 I, Sheryl A. Pautler, Certified Court Reporter
 3 (MO), Certified Shorthand Reporter (IL), do hereby certify
 4 that the witness whose testimony appears in the foregoing
 5 deposition was duly sworn by me; the testimony of said
 6 witness was taken by me to the best of my ability and
 7 thereafter reduced to typewriting under my direction; that
 8 I am neither counsel for, related to, nor employed by any
 9 of the parties to the action in which this deposition was
 10 taken, and further that I am not a relative or employee of
 11 any attorney or counsel employed by the parties thereto,
 12 nor financially or otherwise interested in the outcome of
 13 the action.
 14
 15
 16 _____
 17 Certified Court Reporter (MO)
 18 Certified Shorthand Reporter (IL)
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