

SPECIAL INVESTIGATIVE
COMMITTEE ON OVERSIGHT

Wednesday, March 14, 2018

Jefferson City Police Department
401 Monroe Street
Jefferson City, Missouri 65101

COMMITTEE MEMBERS:

Representative Jay Barnes, Chair
Representative Donald Phillips, Vice-Chair
Representative Kevin Austin
Representative Shawn Rhoads
Representative Jeanie Lauer
Representative Gina Mitten
Representative Tommie Pierson Jr.

Also present: Bryan Scheiderer, Legal Analyst
Alex Curchin
Alixandra Hallen, Minority Counsel

REPORTED BY: Beverly Jean Bentch, CCR No. 640
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APPEARANCES

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INDEX

MIKE HAFNER

| | Page |
|--|------|
| Questions by Representative Barnes | 5 |
| Questions by Representative Phillips | 45 |
| Questions by Representative Mitten | 52 |
| Questions by Representative Lauer | 78 |
| Questions by Representative Austin | 90 |
| Questions by Representative Rhoads | 100 |
| Questions by Representative Pierson Jr. | 103 |
| Further Questions by Representative Barnes | 112 |
| Further Questions by Representative Phillips | 119 |
| Further Questions by Representative Lauer | 125 |
| Further Questions by Representative Austin | 129 |
| Further Questions by Representative Barnes | 131 |
| Motion to Close Meeting Next Friday | 132 |
| Motion for Subcommittee to do Interview | 133 |
| Motion to Authorize Interview of Mr. Laub | 137 |

(March 14, 2018)

REPRESENTATIVE BARNES: we'll call to order
this meeting of the House Special Investigative
Committee on Oversight. Mr. Secretary, please call the
roll.

SECRETARY CURCHIN: Barnes.

REPRESENTATIVE BARNES: Here.

SECRETARY CURCHIN: Phillips.

REPRESENTATIVE PHILLIPS: Here.

SECRETARY CURCHIN: Mitten.

REPRESENTATIVE MITTEN: Here.

SECRETARY CURCHIN: Lauer.

REPRESENTATIVE LAUER: Here.

SECRETARY CURCHIN: Austin.

REPRESENTATIVE AUSTIN: Here.

SECRETARY CURCHIN: Rhoads.

REPRESENTATIVE RHOADS: Here.

SECRETARY CURCHIN: Pierson.

REPRESENTATIVE PIERSON: Here.

REPRESENTATIVE BARNES: Seven members being
present. Everyone is here.

Good morning. Thank you for being here.
Before we start, let me administer the oath as
prescribed in the resolution creating our committee.
would you raise your right hand?

(Witness sworn.)

MICHAEL HAFNER, being sworn, testified as follows:

QUESTIONS BY REPRESENTATIVE BARNES:

Q. Can you state your name?

A. Mike Hafner.

Q. Can you spell your name for the court reporter?

A. M-i-k-e H-a-f-n-e-r.

Q. Mr. Hafner, have you ever given testimony in a deposition before?

A. I have not.

Q. Okay. So this is not a deposition but it's a lot like a deposition. So there are a few ground rules. The first is that in answering a question, you need to use words, not actions. So shaking your head yes or no will not work. You have to say yes or no.

The second is we want to be sure to have a clear record, and the way we do that is if someone asks you a question and you don't understand it or it's a compound question or asks multiple things, just ask them to stop, repeat the question so that you understand.

The third is that if you need to stop for any reason, feel free to tell us I'd like to stop for a moment. With that, you've got a stack of documents in front of you there that we'll get into in a second.

5

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First, some preliminary questions. When did you --

Counsel, if you'd like to note your presence for the record?

MR. ERNST: Thank you. Edwin C. Ernst, IV of Sowers Ernst for Mike Hafner.

REPRESENTATIVE BARNES: Thank you.

BY REPRESENTATIVE BARNES:

Q. Mr. Hafner, when did you start working for Eric Greitens?

A. I began work in January 2015 as a paid advisor to Eric Greitens.

Q. Did you work for him at any point in time prior to that in a consulting role?

A. I served as an informal advisor as a volunteer basis throughout 2014. That relationship started in December 2013.

Q. Can you describe that first year as an informal advisor what was your job?

A. Essentially to introduce Eric, network, help him network among Republican donors, influencers, activists. He was new to the political scene, to the Republican political scene. So when we first met him, that kind of began the relationship. Like I said, we first met in December 2013. He relied on us to help

6

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introduce him and go through the process of running for office.

Q. At what point did you start getting paid by Mr. Greitens?

A. We finalized a compensation agreement in late December of 2014 in a meeting at his office, and then I began officially working as a paid employee of his in January of 2015.

Q. Now, you said paid employee of his. Who was that? Who was paying the bill?

A. So in January I don't recall exactly. It was either Eric Greitens himself or the Greitens Group. I don't recall where the check came from. I do know that the last two months in February and March of my employment with him was paid by Greitens for Missouri.

Q. How would you describe Eric in that first year that you were working with him?

A. A lot of how I would describe my relationship with first-time candidates, very new to the process. Also, he was coming from a unique background in the sense that he hadn't made very many relationships around the state with Republican elected officials or donors or influencers, and so it was our job to help him do that plus going through the whole process of deciding to run for office and with Eric the options, the offices that

7

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he wanted to run for were -- it was always indicated to us that it was either governor or lieutenant governor and our conversations were geared towards him running for a state-wide office. But my interaction with him it was certainly a lot like how you would approach a first-time candidate. With him it was a little bit of a unique background because he had had a very, a very great resume and profile for what you would want in a candidate.

Q. Okay. Let's go to the documents if you could. Just pull the one off the top, the one that has the green sheet of paper on top labeled January 6, 2015. Do you recognize this document?

A. Yes, that was an invitation for --

Q. Let me back up because I believe is that the document labeled Exhibit 3 in the bottom right corner?

A. Yes.

Q. Page 1 of 24?

A. Yes.

REPRESENTATIVE BARNES: For members of the Committee, they're not labeled with numbers in your books but they are labeled with dates.

BY REPRESENTATIVE BARNES:

Q. Do you recognize this page 1 here of Exhibit 3?

8

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A. I do.

Q. And how do you recognize this?

A. So this was a meeting that was set by Eric and his assistant. I was hired by Eric to help him with fundraising.

Q. Hold on a second. Is this a fair and accurate representation of the meeting notes you received?

A. Yes, it is.

Q. And was this sent, in fact, by Eric Greitens?

A. I do not know if it was sent by Eric. I can tell you it was either sent by Eric or his assistant.

Q. If his assistant sent it, was it sent at his direction?

A. Yes.

Q. Okay. And then the e-mail address at the top, egreitens@missioncontinues.org, was that the e-mail address that Mr. Greitens used to communicate with you?

A. Not so much to communicate with me. All the meeting notices I believe came from The Mission Continues e-mail address. He had a number of other e-mails that he communicated with. I don't recall all of them, but there was at least a couple.

Q. Was this one of the e-mails used by Eric Greitens?

A. For the meeting notices, yes.

Q. Okay. And if Krystal Taylor set a meeting, would she have done so with the input and direction of Eric Greitens?

A. Yes.

Q. And what was Krystal's job title?

A. I believe it was vice president. She -- when I first met Krystal in 2015 -- sorry, in 2014, I believe her job title was his personal assistant. At some point, I don't know exactly when, she was made vice president of the Greitens Group.

Q. Can you explain did she operate -- I'm sorry. Let me back up. Did she operate as an executive assistant -- in sort of an executive assistant role to Mr. Greitens?

A. Yes. Setting the schedule, setting meeting times, phone calls, everything.

Q. Would you describe her as a free agent within the Greitens Group or as someone who worked at the direction of Eric Greitens?

A. At the direction of Eric Greitens.

Q. This meeting notice was sent out Tuesday, January 6 at 1:57 p.m. I want to direct you to page 2 of Exhibit 3. Do you recognize this?

A. I do.

Q. And what is this?

A. So this is one of the first e-mails that I was provided when I became an official paid staffer of Eric's, and I was supplied the four donor lists that they had that they I presume had been using in some capacity.

Q. And who sent this e-mail? what e-mail address was this sent from?

A. Krystal Taylor's.

Q. Was that an e-mail address she regularly used to communicate with you and others?

A. Yes. I believe it is the only one she used to communicate with me and others.

Q. Did Ms. Taylor send this e-mail as a free agent or do you believe she would have sent that at the direction of Mr. Greitens?

A. At the direction of Mr. Greitens.

Q. Okay. And there are four attachments to these e-mails. Can you explain what each of those are?

A. Yes. So the first attachment, the All Donors 1,000 Total and Up as of 5/17/14, that was provided to me and communicated that that was The Mission Continues list which was Mr. Greitens' former charity.

Q. Whose idea was it to use The Mission Continues list?

A. I don't recall exactly whose idea it was. I

just know that -- I didn't know any of these lists existed. However, I was supplied them in one of the first days I was officially employed at Eric's or Mr. Greitens'.

Q. Was it your decision to use them?

A. It wasn't my decision. I know that that was one of the main lists that we used to create a fundraising plan and call list for Mr. Greitens.

Q. Prior to this e-mail, did you have access to any list of donors to The Mission Continues?

A. I did not.

Q. There's a Danny Laub on this e-mail as well. Who's Danny Laub?

A. Danny Laub was a political consultant that Eric had hired at some point in fall of 2014. I had known Danny from years prior. We went to the same college. He was a little bit younger than I was. We had a preexisting relationship before both working for Mr. Greitens, and he essentially was serving as Eric's campaign manager at the time.

In December, I set up -- he set up meetings with me to discuss the campaign and a potential role for me in Eric's campaign.

If I could state something really quick. The e-mail that -- obviously it says The Mission Continues

1 list. I did not at the time know that that was direct
2 property of the charity. Even though it obviously says
3 it, I was unaware that that had -- I have no idea where
4 it originated from. The press reports say it was the
5 charity's e-mail list, but at the time I did not know
6 that that was direct property of The Mission Continues.

7 **Q. Was it your idea to take The Mission Continues**
8 **list?**

9 A. It was not my idea certainly to use it. I
10 didn't know it existed before this e-mail. It was an
11 e-mail list, a contact list that we utilized in the
12 first -- in January.

13 **Q. By "we," who is we?**

14 A. Mr. Greitens and myself.

15 **Q. Was Danny Laub ever an employee of The Mission**
16 **Continues, to your knowledge?**

17 A. To my knowledge, no.

18 **Q. And briefly can you explain what the other**
19 **three attachments are?**

20 A. So I believe the EG Finance Prospects -- so
21 the EG Finance Prospects and the fundraising tracker, I
22 don't recall exactly what was in those documents. I
23 believe one of those was just people Eric had met
24 throughout 2014, potential donors, some national people
25 that he had been referred to. I know one of those

1 documents was that. I don't know exactly which one.

2 **Q. Okay.**

3 A. And I think one of the other fundraising
4 trackers -- to my knowledge, the other fundraising
5 tracker or the Finance Prospects was a list that was
6 created by a gentleman that Eric had been working with,
7 a national fundraiser named Mason Fink.

8 Oh, okay. The EG Finance Prospects, that's
9 the one that was Mason Fink's list. He supplied that to
10 the campaign. The fundraising tracker, yeah, that was
11 the list that had people that -- donors, influencers,
12 that just Eric had come across through different
13 contacts. The Schweich list, I don't know how they
14 acquired that list, but it was Tom Schweich's
15 fundraising list which had to be created internally in
16 the Schweich campaign, but I don't know how they
17 acquired it.

18 **Q. To be clear for the record, these documents,**
19 **you provided these documents to this Committee pursuant**
20 **to a subpoena sent to you; is that correct?**

21 A. Correct.

22 **Q. And so these come from your own records; is**
23 **that correct?**

24 A. Yes.

25 **Q. They are records you used in the process of**

1 **working for and at the direction of Eric Greitens?**

2 A. Yes.

3 **Q. Ask you to turn to the next page which is page**
4 **3, Attachment No. 1 and then pages 4 through 24. If you**
5 **could take a moment to review these. So we're clear,**
6 **you sent this to the Committee in the form of an Excel**
7 **spreadsheet. We turned this on its side so that it**
8 **could all fit on one page.**

9 A. Yes.

10 **Q. Do you recognize this?**

11 A. I do.

12 **Q. And what is this?**

13 A. This is what was described to me as The
14 Mission Continues list.

15 **Q. Is it a fair and accurate representation of**
16 **what you were sent in that e-mail as The Mission**
17 **Continues list?**

18 A. Yes. To clarify, the Attachment No. 2 on page
19 16, that's part of the same list.

20 **Q. That's correct. How many -- Do you recall how**
21 **many tabs there were?**

22 A. There was three. There was one of individual
23 donors which is the first attachment, and then the
24 document listed as Attachment No. 2 is I believe the
25 foundation tab, and the last -- if there's another

1 attachment in here, there was another tab of
2 corporations and companies.

3 **Q. And do you recall anything about the meeting**
4 **on January 7?**

5 A. So there were two meetings that we had,
6 fundraising meetings in January, finance meetings. I
7 don't recall exactly which of those two meetings we went
8 through this list. It might have been both of them.
9 But at least in one of those meetings we went through
10 the list, the attachments from that e-mail except the
11 Schweich list. I don't recall ever going through the
12 Schweich list, but I worked with Mr. Greitens through
13 the list to identify donor prospects for him to contact.

14 **Q. When you say the list, you mean -- restate**
15 **what you just said. You worked with Mr. Greitens**
16 **through The Mission Continues donor list to identify**
17 **people to contact to donate to the political campaign?**

18 A. Yes. And most of these donors -- I've been a
19 political consultant, worked in campaigns for a number
20 of years on the Republican side. Most of The Mission
21 Continues donors I was not familiar with. There was
22 some overlap with your general Republican donors, but a
23 lot of them I encountered for the first time on that
24 list. In those meetings Eric gave me notes on specific
25 donors. And of course, donors were selected based on

1 their ability to give which is denoted in the list of
2 their lifetime giving history to The Mission Continues.
3 So there were specific names obviously that were
4 selected from that specific donor list that I received
5 notes on and further leads and people to reach out to
6 which came directly from Mr. Greitens.

7 **Q. Did you -- Can you explain the note? Who made**
8 **the notes in the far right-hand column? I presume this**
9 **was being sent to you. Do you know who made those**
10 **notes? So for example, on page 6 of 24, there's a note**
11 **that says family of [REDACTED] (phonetic spelling.)**

12 A. Sure, it is -- it's possible --

13 **Q. If you don't know who made that column.**

14 A. I do not know exactly. Some of these I have
15 no recollection of. Now, there's some other notes on
16 here that I possibly could have made at the time of
17 going through this list with Eric, but some of these
18 notes they don't ring any -- I don't have any
19 recollection of making. Most of the notes that I took
20 regarding this list were taken on a notepad and then I
21 transferred them -- I typed them out on a computer.

22 **Q. Okay. If you could bundle those together in**
23 **order. We will set those to the side. Now, I want to**
24 **ask you about -- Are you on what's labeled January 19,**
25 **2015?**

17

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1 A. Yes.

2 **Q. If you could turn to the next page, I believe**
3 **that's labeled Exhibit 4; is that correct?**

4 A. Mine is not labeled. It does have an exhibit
5 but it does not say 4.

6 **Q. Let's label that one Exhibit 4 if you have a**
7 **pen.**

8 A. (The witness complied.)

9 **Q. Okay. Do you recognize this?**

10 A. I do.

11 **Q. And what is this?**

12 A. This was an invitation for another fundraising
13 finance meeting with Mr. Greitens.

14 **Q. Was Mr. Greitens present in both this**
15 **fundraising meeting and the fundraising meeting**
16 **mentioned in Exhibit 3?**

17 A. Yes.

18 **Q. Okay. And did that meeting, in fact, occur on**
19 **January 19, 2015?**

20 A. To my knowledge, yes.

21 **Q. I'd like you to turn to page 2. Do you**
22 **recognize this and what is this?**

23 A. I do. This is an e-mail that I sent to myself
24 on January 19. Just personally the way I organize
25 things it's all done through my e-mail. So on specific

18

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1 notes and action items from things I send them to my
2 inbox so I can organize them better. It's just
3 something that helps me. So they're notes that I took.
4 They're action items that I took from our meeting with
5 Mr. Greitens.

6 **Q. And can you explain to the Committee the**
7 **second line what that is in regards to?**

8 A. The second line, there was an individual.

9 **Q. Let's state what the line says for the record.**
10 **Line says meeting with Lindsey Hodges and Krystal Taylor**
11 **regarding TMC Contribution List. Meet with sometime**
12 **this week. What was that about?**

13 A. So after going through The Mission Continues
14 donor list, at some point during the process Mr.
15 Greitens didn't recall a number of names from the list
16 and I was directed -- he directed me to set up a meeting
17 with Lindsey Hodges who it was indicated that she was
18 either a current employee or a former employee of The
19 Mission Continues. And Eric indicated that she would
20 have more extensive information on many of the donors
21 from the list and that I needed to reach out to her to
22 go over the list with her.

23 I never met with Lindsey. I don't recall ever
24 reaching out to her, but it's possible I could have.
25 But to my knowledge, I don't think she ever came into

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1 the office, and I certainly never met with her
2 personally to go over the list.

3 **Q. Do you know why at this point in time?**

4 A. I don't -- I don't -- I don't know why, why
5 that meeting was never set.

6 **Q. Can you explain to the Committee the layout of**
7 **the office in which you were working with -- Did Krystal**
8 **Taylor work in the same office space?**

9 A. She did.

10 **Q. Did Danny Laub work in the same office space?**

11 A. Yes.

12 **Q. Did Eric Greitens work in the same office**
13 **space?**

14 A. Yes.

15 **Q. Was there anyone else who worked in that**
16 **office space?**

17 A. There was --

18 **Q. On a regular -- Let me back up. Was there**
19 **anyone else who worked in that office space on a regular**
20 **basis?**

21 A. There were two individuals that worked in
22 there on a regular basis. One who was solely doing
23 Greitens Group tasks, a gentleman by the name of Chris
24 Bobak. Then there was his father who also worked out of
25 the same space regularly, not everyday but multiple days

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every week.

Q. Is that Mark Bobak?

A. Yes.

Q. Okay. Can you describe the set-up of this office space?

A. It was the first floor of a converted home in the central west end located on west Pine. They had just moved in there sometime in the fall of 2014. They had access to the upper floors as well as the basement. And when you walked in the office to the right -- when you walked into the first floor from the street, to the right was Krystal's office. To the left was where Danny and I worked in an office along with Mark Bobak. I'm sorry if I said that incorrectly. To the left was where Danny and I worked out of an office and then also to the left was a conference room which is what Mr. Greitens worked out of.

Q. Okay. So this is on the first floor of the home. There's a common hallway between these spaces. Is this the type of space where if you needed something from another lawyer that basically others could hear your conversations in your office?

A. Yes.

Q. So it's a -- would you describe it as a sort of open office setting where everyone could hear

21

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everyone else and everyone is operating basically within the same space?

A. Yes. For private conversations, I know I stepped out a number of times, but generally, yes, we worked in an open space. Most of the time Mr. Greitens' conference room door was closed.

Q. Okay. If I could now direct you to -- if we could put that one away -- to January 28, 2015. And is there a number on that exhibit?

A. There is not.

Q. If we could label that Exhibit 5. Do you recognize this?

A. I do.

Q. What is this?

A. This was an e-mail thread that started because I was working on building some call lists for Mr. Greitens and there was contact information that I needed that I didn't have, numbers and some other, you know, e-mails and maybe some notes that -- but basically just contact information, and Sales Force was the contact management system that Mr. Greitens used for the Greitens Group.

Q. Was this his account eric@greitensgroup.com?

A. To my knowledge, yes.

Q. Okay. And did you input information about The

22

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Mission Continues -- from The Mission Continues fundraising list into this Sales Force database?

A. I do not remember if I did or not. I know I utilized Sales Force to take information from it.

Q. And so on page 4 of this exhibit, this list of persons, do you remember -- do you recall where you came up with this list of persons?

A. To my recollection, this was -- these were names that we identified off those lists that -- off the fundraising lists that Mr. Greitens and I went through and --

Q. Off the fundraising lists. Do you mean the combination of the four lists that were in that first exhibit?

A. I know we never used the Schweich list but certainly those other three lists.

Q. Including The Mission Continues list?

A. Yes. And so to my recollection these were names that there weren't any contact information for and I needed to secure phone numbers and contact info so Eric could solicit them for contributions.

Q. Are the documents contained within what we've labeled here as Exhibit 5 fair and accurate representations of the documents that you were utilizing at the direction and employment of Mr. Greitens?

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A. Can you repeat the question?

Q. Are the documents in Exhibit 5 fair and accurate representations of documents that you created and utilized while you were employed and working under the direction of Mr. Greitens?

A. Yes.

Q. And in case, I'm not sure if I asked the question, for Exhibits 3 and 4, the documents in Exhibit 3 and 4 fair and accurate representations of documents that you both created and received in the course of working for Mr. Greitens and at the direction of Mr. Greitens?

A. Yes.

Q. You have not altered them in any form or fashion?

A. Certainly not the e-mails I've not altered in any form or the meeting invites. So in Exhibit 4, no.

Q. Let me be clear with my question because you received fundraising lists?

A. Uh-huh.

Q. In the course of your employment for Mr. Greitens, your duty was to use those fundraising lists to create another list?

A. Yes.

Q. So you did alter those lists at some point in

24

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1 time, correct? You used them in some fashion to create
2 something else, correct?

3 A. Yes.

4 Q. Okay. But what you sent us in response to our
5 subpoena are the documents as they were sent to you on
6 those particular dates and time?

7 A. Yes.

8 Q. And you did not alter them in any form or
9 fashion before sending them to us as they were received
10 by you on those dates and times?

11 A. I think I'm not sure how to exactly answer
12 that because those lists I would have saved on my own to
13 my computer. So if you can -- so in terms of that, they
14 were altered because they saved them.

15 Q. You saved them. Your alteration -- To the
16 extent that you were testifying that you altered them,
17 it was to the extent you pressed the save button on your
18 computer?

19 A. Yes.

20 Q. You did not input new things into them?

21 A. No.

22 Q. You didn't delete items from them?

23 A. No.

24 Q. Okay. You just hit the save button to your
25 own hard drive, correct?

25

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1 A. Yes. Now, as I said earlier on the specific
2 Mission Continues list, some of those notes it's
3 possible but not likely that some of those notes were
4 mine in the column; but in terms of actually adding to
5 the list or deleting anything, that did not occur.

6 Q. I now direct you to February 2. I think that
7 has six pages. If you could put that to the side. And
8 if you could turn to the first page there. Does that
9 have an exhibit number on it?

10 A. It does.

11 Q. Okay. We're going to renumber. We're on 6.

12 MR. ERNST: If I may. Give me just one second
13 to clarify something that you're asking him. I think it
14 will make it go a little smoother.

15 REPRESENTATIVE BARNES: Okay.

16 BY REPRESENTATIVE BARNES:

17 Q. Is that -- I'm sorry. Are we on 6? Can you
18 mark that as Exhibit 6. Do you recognize this?

19 A. Yes.

20 Q. And what is this?

21 A. This was a finance plan, a fundraising plan
22 for Mr. Greitens' campaign that I developed based on the
23 lists that I received and also input from Mr. Greitens.

24 Q. Okay. I want to ask you about this paragraph.
25 Let me read the paragraph. It says it is more

26

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1 complicated than running a regular --

2 THE COURT REPORTER: I'm sorry. Could you
3 read a little bit slower.

4 REPRESENTATIVE BARNES: Yes, I can.

5 BY REPRESENTATIVE BARNES:

6 Q. Let's scratch where I started. I'll go
7 slower. To whom did you send this e-mail?

8 A. To Danny Laub.

9 Q. And was this processed at the direction and
10 service of Mr. Greitens?

11 A. Yes.

12 Q. Okay. Now, here's what the paragraph says,
13 and I quote: It is more complicated than running a
14 regular fundraising program because the majority of our
15 plan is based on engaging a whole new group of
16 non-traditional R donors that I will only have a limited
17 background research on, hence why I need Eric's guidance
18 one more time on these donors and then we can get
19 rocking. Can you explain what you meant by that long
20 sentence?

21 A. So Mr. Greitens coming from the background of
22 being the CEO of The Mission Continues, as well as not
23 being familiar with many Republican donors in the state
24 or donors that generally would give to Republicans in
25 Missouri, he was engaging in a completely

27

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1 non-traditional group of donors and would rely on a
2 completely different group of donors than other
3 Republicans in his position running for a state-wide
4 office. And so what I meant by this paragraph was that
5 I really needed more background information on some of
6 the donors in order to put together a call list, a
7 solicitation list for Mr. Greitens to work through, and
8 many of these donors were people that he would only --
9 he would have known through the charity and so I needed
10 his first-hand knowledge of his relationship of other
11 pertinent information regarding these donors.

12 Q. Did you sit down with him with information
13 from The Mission Continues to go through these donors
14 and learn more about them?

15 A. Yes.

16 Q. How would you describe Mr. Greitens' political
17 outlook at this time, at this time? By "at this time,"
18 I mean February 2015 and the months prior.

19 A. Sure. Still very new. He was occupied with
20 some other things at the time as well including a book
21 that he had just written that was planned for launch.

22 Q. Let me back you up because I think you heard
23 my question one way and I meant it the other. I'm going
24 to the non-traditional R donor part of your sentence. I
25 think you're thinking of the question prognostication of

28

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election results. My question is directed to his politics at the time as it regards your statement the non-traditional R donors. So the question is what his political outlook at that time not as regards to elections but as regards to these donors, potentially other donors, public statements and the like. Can you describe what that was in February if you'd like, February 2015 if you'd like prior to that?

A. Just so I understand the question. Were you referring to his political philosophy at the time?

Q. I am. I am. Particularly this sentence gets into the non-traditional R donors and your work with him up to that point in time.

A. Sure. Well, he had built relationships with a lot of Democratic donors. Everything that we had heard up until the time I started working with Mr. Greitens was that he was a solid Democrat. And he approached this whole process from a completely different viewpoint than most candidates would when they're running for one of the highest offices in the state in terms of we needed -- we had meetings and messaging sessions where he had to work through Republican policies because he just wasn't familiar with them. The running joke between Danny Laub and I was that Eric didn't have two sentences where he could tell you why he was Republican.

29

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That's a major issue when you're going out to solicit donors when you can't tell them why you're running in the party that you're running in.

Q. What do you believe his motivations were at the time based on your meetings with him and conversations with him?

A. In terms of the office that he wanted to run for or his ambition?

Q. In terms of what moved him to be in this race and to hire you in the first place.

A. It was solely his ambition for the highest office in the state for governor.

Q. How many candidates do you think you've worked with over the last decade?

A. At least ten personally. In a much broader scale, a lot more than that. I wouldn't know the exact number. I worked for a consulting firm that advised different party committees and things like that where I worked with a number of candidates.

Q. In terms of candidates being driven by core ideological beliefs, where would you rank Mr. Greitens on the scale of every candidate you've worked for?

A. Very, very low on a scale, on an ideological scale.

Q. Did you have a belief that he was a blank

30

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slate in January or February of 2015?

A. I was extremely skeptic of his conservative beliefs at the time.

Q. Are we on Exhibit 6?

A. Whether he was a blank slate or not, again, my previous experience with him, what I had heard and knowing some of his background from other individuals about him looking at running for office as a Democrat in years prior, there wasn't a blank slate per se but I believed up until the point he started talking to us and talking about running as a Republican that he was a Democrat.

Q. I'd like to direct you to page 7 of this exhibit. This is also from February 2, 2015. This is also to Mr. Laub, correct?

A. Uh-huh.

Q. It describes a list that's listed as Draft 1, very creative name. We've attached that herein. Are these fair and accurate representations both of the e-mail that you sent to Mr. Laub and of the attachment you sent to him?

A. Yes.

Q. And did you create these?

A. Yes.

Q. In the course and scope of your employment for

31

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Mr. Greitens and at the direction of Mr. Greitens?

A. Yes.

Q. Okay. You state in the e-mail you weren't sure if he had made calls from this list. Do you know if he later made calls using this list?

A. To my knowledge, he did. There are some documents that I believe have been withheld from the Committee that would indicate that he did make calls using the list.

MR. ERNST: Just for the record, there is the potential for attorney/client privileged documents as it pertains to Mr. Greitens or his campaign. Out of an abundance of caution because there are multiple investigations ongoing, including with the Attorney General's Office and circuit attorney in St. Louis who's conducting a criminal investigation, we have attempted to segregate those documents out subject to further review and determination about whether they are privileged. We have no opinion about whether they're privileged. Once that process plays out and if it's determined that they're not privileged and you would like further testimony from Mr. Hafner, he'll be happy to provide it at that time. So he's going to stay away from any topic that would require him to disclose communications that may have involved attorneys

32

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1 associated with the Greitens campaign including Mark
2 Bobak.

3 REPRESENTATIVE BARNES: Okay. Thank you.
4 Thank you for that.

5 BY REPRESENTATIVE BARNES:

6 Q. If I could direct you to page 9 of this
7 exhibit and the notes herein. It's kind of cool to see
8 George W. Bush's name on this list. This notes column,
9 if you look at the second row.

10 A. Uh-huh.

11 Q. It says TMC \$1,000 Donor. And did you fill
12 out that notes column through -- in conjunction with
13 review of The Mission Continues list?

14 A. Yes.

15 Q. Was it also in conjunction with conversations
16 with Mr. Greitens?

17 A. Yes.

18 Q. That would be true of this entire column in
19 this entire document, correct?

20 A. Yes, yes.

21 Q. Now direct you to February 5, 2015. If I
22 could have you label this as Exhibit 7. And can you
23 describe what Exhibit 7 is?

24 A. It appears to be the first call list that I
25 developed for Mr. Greitens.

33

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1 Q. And to whom did you send that call list?

2 A. To Mr. Greitens and Danny Laub.

3 Q. And did that call list which is attached
4 include information about Mission Continues donors and
5 how much they had given?

6 A. Yes.

7 Q. At any point in time, did Mr. Greitens tell
8 you you shouldn't be using The Mission Continues list?

9 A. No.

10 Q. If you had refused to use The Mission
11 Continues list, do you believe -- what do you believe
12 Mr. Greitens would have said or done?

13 A. I don't want to speculate on that. Again, at
14 the time I did not know it belonged to The Mission
15 Continues or how it was acquired. So I didn't really
16 think very much of it. It obviously was described as
17 that to me, but again I didn't.

18 Q. Did you believe Mr. Greitens had permission to
19 use this list?

20 A. Yes.

21 Q. Is this a fair and accurate representation of
22 the e-mail as you sent it with the attachment as you
23 sent it to Mr. Greitens?

24 A. Yes.

25 Q. You've not altered it in any form or fashion?

34

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1 A. No.

2 Q. In response to our subpoena?

3 A. No.

4 Q. I now direct you to February 17, 2015. Is
5 there a sticker on that? Can we label that as Exhibit
6 8, Mr. Hafner?

7 A. (The witness complied.)

8 Q. And can you describe what this is?

9 A. This is a call list.

10 Q. Let me back up. I want to make sure we're
11 correct. This is on February 17. I believe I said
12 February 7. It is February 17. Can you describe what
13 we've labeled as Exhibit 8, what it is?

14 A. Yes. This is another call list that I
15 modified and supplied to Eric to make phone calls off
16 of.

17 Q. When you say "modified," do you mean before
18 sending it on February 17 or do you mean subsequent to
19 sending it -- right before sending it to us?

20 A. No. While sending it on -- prior to sending
21 it on February 17.

22 Q. Okay. And is this e-mail and the attachment
23 thereto a fair and accurate representation of the e-mail
24 you sent to Mr. Greitens and Ms. Taylor and the
25 attachment thereto?

35

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1 A. Yes.

2 Q. To your knowledge, did Mr. Greitens use this
3 attachment call list?

4 A. To my knowledge, yes.

5 Q. And did it identify Mission Continues donors
6 and the precise amounts of their donations?

7 A. Yes.

8 Q. Did Mr. Greitens use that information in the
9 course of making phone calls to raise money for his
10 campaign?

11 A. To my knowledge, yes.

12 Q. I now direct you to March 20, 2015. And if
13 you could label that as Exhibit 9.

14 A. (The witness complied.)

15 Q. Can you describe for the Committee what this
16 e-mail is?

17 A. Yes, it is a donor prospect list that I
18 created that included all the notes that Mr. Greitens
19 provided to me on specific donors and donor prospects
20 that could contribute to his campaign.

21 Q. So if we could turn to page 6 of 25, [REDACTED] and
22 [REDACTED].

23 A. Uh-huh.

24 Q. They're labeled as a \$10,500 donor to The
25 Mission Continues?

36

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1 A. Uh-huh.
 2 Q. And that is data you pulled from The Mission
 3 Continues list; is that correct?
 4 A. Yes.
 5 Q. And at the request and working with Mr.
 6 Greitens?
 7 A. Yes.
 8 Q. And the same would be true of everywhere else
 9 in this database where it is listed as TMC and an
 10 amount?
 11 A. Yes.
 12 Q. Do you know approximately how much money was
 13 raised by the Greitens campaign from Mission Continues
 14 donors?
 15 A. I do not know the approximate amount. I know
 16 it was substantial.
 17 Q. Do you believe it to be over a million
 18 dollars?
 19 A. Yes.
 20 Q. Do you believe it to be around \$2 million?
 21 A. I don't want to speculate. I know that's what
 22 one of the press accounts said on it. I do not know.
 23 Q. Of course the documents will speak for
 24 themselves. We have public records reports to do this.
 25 I'm going to hand you another exhibit. If you could

37

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1 label that Exhibit 10. This is not your document. So
 2 this is an amended report from the Missouri Ethics
 3 Commission. If I could turn you to I believe the second
 4 to last page. Let me approach again and get another
 5 exhibit in the record. Mr. Curchin is going to hand you
 6 what's been labeled as Exhibit 11. If you could turn to
 7 paragraph 10 of Exhibit 11. In your experience with
 8 campaigns, does a list which results in the raising of
 9 over a million dollars have a value -- would it have a
 10 value of \$600?
 11 A. Yes.
 12 Q. Yes, it would have a value of \$600?
 13 A. I'm sorry. It would have a value of much
 14 greater than \$600.
 15 MR. ERNST: I believe you said over 600.
 16 REPRESENTATIVE BARNES: Let's back up and I'll
 17 ask the question.
 18 BY REPRESENTATIVE BARNES:
 19 Q. Do you believe it is accurate to say that the
 20 value of The Mission Continues list which was used to
 21 raise over a million dollars was \$600?
 22 A. No.
 23 Q. Okay. And do you believe the value to be
 24 higher than \$600?
 25 A. I believe it would be a lot higher than \$600,

38

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1 and that is based on my knowledge of the fundraising of
 2 The Mission Continues charity which raised in excess of
 3 \$10 million a year.
 4 Q. And based on your first-hand experience, did
 5 the campaign receive the list from Daniel Laub?
 6 A. No.
 7 Q. In fact, your e-mail shows it was received
 8 from Krystal Taylor at the direction of Eric Greitens,
 9 correct?
 10 A. Yes.
 11 Q. Do you know why Mr. Laub would agree to state
 12 that he had given that contribution?
 13 A. I can only speculate on that. I do not know
 14 the exact reason why.
 15 Q. Have you spoken to Mr. Laub about it?
 16 A. I have not spoken to Mr. Laub since March
 17 2015.
 18 Q. Do you know what Mr. Laub -- how long he
 19 lasted with the campaign?
 20 A. I don't know the exact time of his separation
 21 with the campaign. It was in the fall of 2015.
 22 Q. Do you have any idea where he worked after
 23 leaving the campaign?
 24 A. I just know where he works now. I don't know
 25 what he did in between. I had heard that he had worked

39

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1 on a congressional race or something in Michigan, but I
 2 don't have any direct knowledge.
 3 Q. You never talked to Mr. Laub after leaving the
 4 campaign; is that correct?
 5 A. No. Last time I spoke to him was the day of
 6 our separation in March of 2015.
 7 Q. And after leaving the Greitens campaign, did
 8 you work for any other campaigns in 2016?
 9 A. Yes. I worked for John Brunner starting in
 10 August of 2015, and then I worked for Kurt Schaefer in
 11 2016. I believe those were the only two campaigns I had
 12 a role on the rest of that cycle.
 13 Q. Did you work for Mr. Brunner through the
 14 primary in 2016?
 15 A. I did.
 16 Q. And for Mr. Schaefer through the primary in
 17 2016?
 18 A. Yes.
 19 Q. In those months between January and March, did
 20 you have any discussions with Mr. Greitens about how the
 21 campaign may conceal the source of donations?
 22 A. Not directly to that topic, but he directed me
 23 to have conversations with donors who intended to raise
 24 significant amounts of money and conceal the donors,
 25 conceal the identity of those donors.

40

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Q. Do you recall who those donors were?

A. There was one in particular, an individual by the name of Monu Joseph. He was in California. To my recollection, I had two phone conversations with him. There was some e-mail traffic as well which has been withheld due to privilege from Mr. Greitens' end. He contributed early to the campaign in the form of some LLCs that he had in California, and I discussed with Monu -- he wanted to discuss with me how the campaign was going to bundle contributions and conceal the identity of donors.

Q. Who is Monu Joseph? What's the nature of his business? I assume he owns a business?

A. I believe he does.

Q. Do you know what the nature of that business is?

A. No, but I was led to believe it was something in real estate, and there were two contributions early on to Mr. Greitens campaign that came from Monu. One had an odd name like Gray Income LLC or Gray Income Property or something like that, but there were two early conversations -- there were two early contributions from him that didn't have his name on it. They came from LLCs, but I don't know the nature of those businesses.

41

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Q. Where were those LLCs located?

A. I believe they were located in California.

Q. Were they created for the purpose of making a contribution?

A. I do not know.

Q. If you were provided with a campaign finance disclosure statement from the Greitens campaign for the first six months of 2015, do you believe you'd be able to identify the LLCs attached to --

A. Yes.

Q. -- Mr. Joseph?

A. Yes.

Q. Okay. We may follow up.

A. Well, I think they might even be in this exhibit if this is from that time period.

Q. That is an amended period. So we'll take a break at some point if you want to review those rather than have you look down as the Committee is staring at you. Were there any other individuals with whom you had contact who were discussing ways to conceal donations?

A. Yes. Again, I think the information on that would be withheld.

Q. Were there any other individuals with whom you had conversations who were not lawyers and there were not lawyers present in the room when you were having

42

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discussions about concealing the identity of donors?

A. No.

Q. So you had conversations with Mr. Greitens, correct?

A. Uh-huh.

Q. You've got to use yes or no.

A. Yes.

Q. And that was about -- one of those conversations was about concealing the identity of a donor?

A. It was about reaching out to specific donors who were intending to raise a lot of money and wanting to know how to do it.

Q. Okay. Mr. Joseph. Do you have any other names of donors who intended to do so through a route of concealment?

A. There was one other individual named Alex Rogers. He was a gentleman I never had any direct conversations with him, but I was led to believe that he lived overseas. He was intending to raise a lot of money and wanted to know how to do it.

Q. From whom was he going to raise money?

A. I don't -- We didn't get that far in conversations or anything. I never spoke to him directly. There was e-mail traffic that indicates all

43

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of that, but that would be withheld.

Q. Were there any conversations about receiving donations from foreign nationals?

A. Yes.

Q. Were those conversations surrounding Mr. Rogers?

A. Yes, I was led to believe that he was one of the people. There was another conversation with Monu that I had where Monu said that he had -- that he had a bunch of friends from Oxford. I believe that was Monu's connection to Eric, that they had met while at Oxford, and Monu indicated that there was a number of people that would contribute to Mr. Greitens' campaign.

Q. Were these British donors or do you know what nationality?

A. No, I do not know.

Q. Where is Mr. Rogers' neighborhood? I'm sorry. I couldn't resist. I'm sorry.

Do you know what country Mr. Rogers is a resident of?

A. I believe him to be British.

Q. Okay.

A. I don't know -- I do not know where he lived at the time. I know he lived overseas, but I don't recall where he was from.

44

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1 **Q. Based on your work in that campaign, do you**
 2 **believe that, in fact, there was a strategy employed to**
 3 **conceal donors?**

4 A. I believe that was an intention of the
 5 campaign's early on.

6 **Q. Do you believe it was carried out?**

7 A. Yes.

8 REPRESENTATIVE BARNES: I believe I'll hand it
 9 over to my vice-chair. Do you want to take a short
 10 break to prepare?

11 REPRESENTATIVE PHILLIPS: Not to prepare.

12 REPRESENTATIVE BARNES: Let's take a short
 13 break. We'll come back in approximately ten minutes.

14 (A recess was taken.)

15 REPRESENTATIVE BARNES: Back from break.
 16 Representative Phillips.

17 REPRESENTATIVE PHILLIPS: Thank you.

18 QUESTIONS BY REPRESENTATIVE PHILLIPS:

19 **Q. Don Phillips, State Representative District**
 20 **138 which is near Branson, Table Rock Lake.**

21 **Why did you leave the Eric Greitens campaign?**
 22 **Did I miss that? I didn't hear that discussed at all.**
 23 **I'm just curious why you left.**

24 A. So a number of consultants that I have
 25 professional relationships with had indicated to Eric,

45

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1 Mr. Greitens, that if he ran for governor that they
 2 would not be -- they would not have a role on his
 3 campaign for governor. And because of my professional
 4 relationship with those consultants, in the days that
 5 they had that conversation with Mr. Greitens, Danny Laub
 6 asked me to come into his office when I got in in the
 7 morning and he said that they were severing -- they had
 8 made the decision to sever all ties with those
 9 consultants and that Eric was 100 percent focused on
 10 running for governor and he had ruled out any other
 11 potential office to run for and because of, as I said,
 12 because of my relationship with those consultants, they
 13 wanted to take a, quote, strategic pause on my
 14 relationship with Mr. Greitens and his campaign.

15 It was never indicated that a separation was
 16 permanent at the time. Danny Laub, Mr. Greitens'
 17 attorney and Mr. Greitens himself all told me that at
 18 some point if things changed, if the dynamics of the
 19 primary had changed, they would love to bring me back
 20 on. Mr. Greitens himself told me that I would make a
 21 great employee in the governor's office some day. It
 22 was as amicable separation as it could have been.

23 **Q. Okay. So in your mind was there a political**
 24 **conflict of interest on your part? Is that the way they**
 25 **saw it maybe?**

46

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1 A. They saw a conflict of interest because the
 2 relationships I had with other consultants. As it was
 3 said earlier, I did end up going to work for John
 4 Brunner. That wasn't until months later in August of
 5 that year. In their mind, because I had a relationship
 6 with other consultants that had known John and had
 7 worked with John, that there was a conflict in their
 8 mind but at the time I never had a conversation with
 9 John Brunner that I recall. I had no professional
 10 relationship with him or anything else.

11 **Q. So you left on a good basis?**

12 A. As good as it could have been, yeah.

13 **Q. Now, when you worked for Brunner and**
 14 **Schaefer's campaign, did you experience the same**
 15 **procedures with them when it came to fundraising as far**
 16 **as hiding donors? Is that just typical in politics**
 17 **behind closed doors to typical try to hide donors? Did**
 18 **you experience that in the other two campaigns? Can you**
 19 **comment on that?**

20 A. I did not experience that in either of the
 21 campaigns I had a role on. The candidates I've worked
 22 for I've not experienced that either.

23 **Q. Okay. So this was unique to Greitens campaign**
 24 **as far as your knowledge goes?**

25 A. Yes and no. In my experience with candidates

47

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1 and my personal experience, it was unique. There are
 2 other candidates that operate in that fashion.

3 **Q. Okay. I was just curious about your part.**
 4 **Now, what's the purpose -- Educate me a little on the**
 5 **purpose of concealing donors. I mean why would a person**
 6 **want to do that running for a high profile job?**

7 A. Sure. There's a number of reasons for it. I
 8 think from a candidate's perspective it's they don't
 9 want to be seen as being purchased by a particular donor
 10 if they're giving mass amounts of money. I know it's
 11 legal -- or it was legal at the time in Missouri. There
 12 weren't any contribution limits to give a million
 13 dollars to a specific candidate, but I think the
 14 exposure certainly is one both from the candidate side
 15 and from the donor side. They don't want to be seen as
 16 influencing a certain candidate. They might have
 17 business before the state. There might be a legitimate
 18 conflict. And I think there's a number of reasons for
 19 why you'd want to from a candidate perspective and from
 20 a donor's perspective. I'm not going to argue on the
 21 legitimacy or why, you know, people should or should not
 22 operate in that manner.

23 **Q. Do you have an opinion about why Eric Greitens**
 24 **particularly wanted to hide the donors?**

25 A. Again, I don't really want to speculate on

48

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1 something like that. I don't know what his motivation
2 specifically was.

3 **Q. All right. There's been a term tossed around**
4 **called dark money when it comes to the Greitens**
5 **campaign. Are you comfortable describing what you think**
6 **dark money is?**

7 A. Yes.

8 **Q. Okay. Would you describe that to me because I**
9 **don't know that I totally understand what it is. I've**
10 **got an idea.**

11 A. Sure. I believe it to be a way that donors
12 exert influence in campaigns without having to conceal
13 their identity -- without having to disclose their
14 identities. It happens for a number of reasons. But
15 yeah, I believe it's an effort to not be transparent
16 with who's funding particular issues or candidates.

17 **Q. So it's fair to say it's people that have a**
18 **considerable amount of money and therefore they have**
19 **some influence as well probably due to the amount of**
20 **money that they're putting into the fundraising efforts?**

21 A. Generally, yes. However, everyone has the
22 ability to give to some of these ghost corporations and
23 LLCs and other things that in turn can provide money to
24 a state little PAC like in Missouri or operate outside
25 of the normal campaign finance structure, but yeah, you

1 could give \$50 or you could give \$500,000 or \$5 million.

2 **Q. Were you ever aware of any conversations that**
3 **specifically mentioned the Ethics Commission and not**
4 **reporting accurately to them, trying to hide money from**
5 **them specifically?**

6 A. I don't recall any conversations to that
7 effect, no.

8 **Q. Would you describe yourself as an honest**
9 **person?**

10 A. Yes.

11 **Q. Would your acquaintances agree with that, as**
12 **far as you know?**

13 A. Yes. As far as I know, yes.

14 **Q. Not just your friends but acquaintances as**
15 **well?**

16 A. I work in politics so everybody has enemies in
17 politics.

18 **Q. Broader definition, isn't it?**

19 A. Yes.

20 **Q. My last question to you is what is your motive**
21 **for providing us with this particular information, the**
22 **e-mails, records of your e-mails, the records of the**
23 **donors? What prompted you or what drives you to share**
24 **that information with us?**

25 A. I think a number of things. In campaigns, I

1 do believe in transparency. On another level, I know
2 what the truth is and I had always assumed that this
3 issue would come back up when I saw the consent form
4 from the MEC. It's not easy for me to be here. I am a
5 Republican campaign consultant, and I think this is a
6 very serious and somber time for our state. But my
7 motivation is -- it's not the money or anything else.
8 I'm paying for my own attorneys. Probably the only --
9 may be the only one that doesn't have a defense fund on
10 this. But my motivation is I believe in good
11 government. That's what drove me to get in politics in
12 the first place. I believe in working for good
13 candidates that align with my political philosophy and
14 the same principles that I have.

15 **Q. So you have no axe to grind with Eric**
16 **Greitens? You're not attempting to get back at him in**
17 **any way or anything like that?**

18 A. No. You know, it hurts me with some of my
19 clients that I'm here if they knew I was testifying. I
20 advise some pro business PACs and I am a registered
21 lobbyist. I lobby for a Senate right group that
22 advocates for labor reform and other premarket reforms,
23 education reform and some other things. Yeah, it
24 probably -- I mean it hurts me professionally if they
25 know that I'm here testifying against the sitting

1 governor of our party.

2 MR. ERNST: And I should also clarify for the
3 record just so it's clear, the documents that are
4 provided and the testimony today were pursuant to a
5 subpoena from this Committee which compelled the
6 production of those documents and his testimony.

7 REPRESENTATIVE PHILLIPS: Right, and I
8 understand that, but I think there had to be some
9 conversations prior to that than just occurred out of
10 the clear blue. I think there had to be some agreement
11 if there were documents available if a subpoena had ever
12 been issued. would that be fair to say?

13 MR. ERNST: I can't speak to that. I don't
14 know how the Committee determined that Mr. Hafner, my
15 client, should be subject to a subpoena. But again, it
16 was in response to and as compelled by that subpoena
17 that he provided the information.

18 REPRESENTATIVE PHILLIPS: All right. Thanks.
19 Thank you, Mr. Chair.

20 REPRESENTATIVE BARNES: Representative Mitten.
21 QUESTIONS BY REPRESENTATIVE MITTEN:

22 **Q. Good morning. I'm Gina Mitten. I'm from St.**
23 **Louis County. My district is the 83rd that represents**
24 **both parts of St. Louis City and St. Louis County.**
25 **Could you briefly describe your campaign experience?**

You said you've been in this business for a number of years. I don't necessarily need the whole candidates but, you know, how many years and in what roles?

A. Sure. I'll give you a quick 30-second rundown.

Q. The pitch.

A. I got my start with Governor Matt Blunt's campaign in 2004. In college took a semester off, worked for US Senator Jim Talent, worked for Sarah Steelman and the state party in 2008, state Republican party as coalitions director. I worked for a business civic group in St. Louis called the Regional Business Council for a year and ten months, and then I worked on a number of campaigns starting with then Lieutenant Governor Peter Kinder in 2011-2012 and a number of other campaigns until 2015 when I worked for -- when I began work for Mr. Greitens.

Q. And in your role working for these prior candidates or campaigns, what would -- well, had you done fundraising for those prior campaigns?

A. Yes.

Q. How many years sort of fundraising? I'm going to get this question out one way or the other. How many years did you work as a fundraiser or perform that function for political campaigns prior to January 2015?

53

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A. My first experience in fundraising for a candidate was in 2008.

Q. Okay.

A. Since then, yeah, it's always been a role that I've had. Not the direct role that I've had but I've managed and directed every department of the campaign whether it's grassroots, fundraising, communications.

Q. Is it fair to say that starting in 2008 fundraising was at least one if not a primary component of your work as a --

A. Yes.

Q. -- political advisor throughout from 2008 to 2015 or '14?

A. Yes.

Q. Okay. Thank you. Then in your work when performing the fundraising aspects -- let me ask this first.

When you were hired by Mr. Greitens, was fundraising your primary role or what was your title and what duties were encompassed in that title?

A. I was led to believe that I was brought on to coordinate fundraising for his campaign. In my experience, I was an advisor on numerous other issues, including policy development, some communications work, just general political stuff.

54

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Q. Right. Isn't it fair to say that even if your primary duty is fundraising, folks in that position would generally be involved in some of these other more policy?

A. Yes.

Q. Right?

A. Yes.

Q. Because part of fundraising is being able to provide a message to the potential donor?

A. Absolutely.

Q. In your fundraising experience outside of your work for Governor Greitens, was it traditional to pull from a charitable list?

A. No, that's not my experience with any candidates I've ever worked for.

Q. Is it fair to say the time from January to March of 2015 while you worked for Eric Greitens, that's the only time in your political employment history in which you pulled from a list owned or maintained by a charitable organization?

A. Yes.

Q. Can you just sort of give a little bit of understanding about how does this work in that not necessarily for Mr. Greitens but, okay, I'm going to come and I'm going to do fundraising for you. The first

55

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thing we're going to do is pull some lists. What is sort of the traditional method by which you would pull lists or what expectations would you have from the candidate or campaign to support in that endeavor?

A. Sure. Well, for me personally you build a fundraising plan and you have a goal that's set based on how much money you need to win your campaign. From that you develop a plan. You select prospects for the candidate to solicit and build numbers around that. And selecting prospects is generally based on their ability to give. How you determine that is a lot from their previous donor history. You all know donors that have given to previous campaigns or active in politics are the ones that are likely to give in future elections and future candidates.

So it's a process of selecting those prospects, building the fundraising plan and then your direct outreach.

Q. Then making the calls?

A. Yes.

Q. Where do these lists come from? In other words, obviously the candidate or, you know, the candidate or the stakeholders to the campaign, they're going to start with their own Rolodexes and all that kind of stuff?

56

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A. Friends and family.

Q. Right, friends and family, all of that. Outside of that individual's personal network, where else do lists come from that you reference? You reference -- there are lists referenced in the e-mail. There is, what is it, the TMC 100, I can't remember, 2,000?

A. Yeah, 1,000 plus.

Q. So where do those lists come from just generally speaking? Where else do you go to get this information?

A. Certainly consultants will share a list among their clients.

Q. Right.

A. They'll take a list from a certain state-wide campaign and use it for another state-wide campaign. They'll have one from 2012 that they use for 2016 cycle.

Q. Is it fair to say that that's part of your value?

A. Sure, yeah. I don't consider myself a full-time fundraiser which is something that I know how to do that I've done for other candidates. Certainly the fundraisers in our state, they have built up lists and cultivated those lists and donors over a period of election cycles.

57

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Q. Right. And it's not just the data, it's also the relationships?

A. Absolutely.

Q. That again is part of the value of hiring an experienced fundraiser is they're going to be able to bring to the campaign that data, those relationships and the general information about what the pitch looks like I guess would be the way to say it?

A. Absolutely. They'll have an understanding of what drives specific donors to give to a candidate or to a cause.

Q. Right. So if a fundraiser or campaign needed to reach beyond those networks, do you purchase lists?

A. I have never purchased a list, but that's certainly possible for some candidates.

Q. Do you know how one would determine the value of a list that was purchased?

A. I do not.

Q. So in your testimony earlier that the value of The Mission Continues list would be in excess of I think it was \$600, what qualifies you to render that opinion I guess?

A. In my personal experience, a list that is developed and maintained over six years potentially, that involves a lot of staff work, a lot of just

58

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maintaining contact information, cell phone numbers, e-mail addresses, as well as providing a list, a lifetime contribution list. Most of the time we'll go through an MEC report and pull off but you still have to find contact information.

Q. Right.

A. Valuing it at over \$600, I don't know what the exact value would be, but in my personal experience a list that raises in excess of millions of dollars a year, \$10 million a year would be pretty valuable to me.

Q. It's something that a lot of folks would want to get their hands on?

A. A lot of candidates, absolutely.

Q. Right. And also that value would be combined from again sort of the manpower of creating it, the manpower of maintaining it and whatnot?

A. Sure, yeah.

Q. Would you say that a list like that is similar in value or operation to any business's list of clients or customers?

A. Can you ask that question again?

Q. Well, for instance, if I'm ABC Widget Company and I sell widgets to a thousand different businesses across the country, XYZ Widget Company might be very interested in knowing who my customers were, what the

59

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details of that relationship, the cost, the amount of sales I make. Is a donor list sort of a similar function, donor list functions to a campaign similar to the way that a customer or client list would function to a business? Is that a fair assessment?

A. Yes. And I can give a good example of that. If a candidate like Jason Kander who had a military background had a list of people that were sympathetic to causes involving veterans and the military, I believe that a candidate like Jason Kander would really like to have a list like that available to him.

Q. Oh, I can imagine. That's certainly fair to say. Representative Phillips sort of touched on this as well, but it's your understanding that bundling is, or I'm calling it secret bundling, is or is not sort of a traditional thing to do or does it really just depend on the candidate?

A. Bundling is something that a lot of candidates do at the national level.

Q. Right.

A. A donor comes in with a pledge to raise 250,000. They have five other donors that are going to give 10,000. It is a general thing. But normally with federal candidates and with state candidates it's done in the open, it's reportable.

60

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Q. Right. So in other words, if I were to say I'm going to raise, I'm trying to think of a candidate, I'm going to raise \$10,000 for Jay Nixon, we'll say somebody that's not in the game, I just tell Jay, okay, I got \$1,000 from Sally and I got \$5,000 from Joe and I got another \$2,500 from Missy and another \$1,500 from Karen and that's my \$10,000 here. But it would be reported to the MEC -- stop that. That's what we mean by bundling so that we're all clear about the definition?

A. Yes.

Q. In turn, those checks would go to the Nixon campaign from Sally and whatever, Karen?

A. Uh-huh.

Q. Is that correct?

A. Yeah.

Q. And then in turn the Nixon campaign would report to the Ethics Commission the \$1,000 from Sally -- I've lost track of the names.

A. Yes.

Q. Each of those individual contributions. So although the Nixon campaign would know that I was responsible for collecting those donations or getting them, it would be completely transparent to the rest of the world by virtue of filing ethics campaign filings,

61

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right?

A. Yes, generally.

REPRESENTATIVE BARNES: For the record, I believe you were a thousand dollars short of your \$10,000 bundle.

REPRESENTATIVE MITTEN: I apologize but math has never been my strong suit. I thought that's why I went to law school.

BY REPRESENTATIVE MITTEN:

Q. When I refer to it as secret bundling though would be me saying to the Nixon campaign -- I probably should say me saying to the Greitens campaign I'm going to raise \$10,000 and I go to Karen and Sally and all of those folks and they write a check to me and then I write one check for \$10,000. Is that a fair way of sort of putting how that works?

A. That's not really how I view that it works. It certainly can work that way.

Q. It's one of doing it --

A. Sure.

Q. -- to bypass? What's your vision?

A. It could be. My view is that it's done when somebody -- In the case before us, I think it was intended to get a group of people that didn't want to disclose who they were.

62

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Q. Okay.

A. But that they individually or through their companies would give directly to a certain entity like a --

Q. Instead of the dollars -- instead of somebody writing a check to Gina Mitten which I in turn, it would be let's create an LLC, let's create Gina Mitten LLC, everybody donates to Gina Mitten LLC and becomes a shareholder or partner or whatever the corporate structure is and then Gina Mitten LLC gives the \$10,000 check; is that how you envision that?

A. Yes. Generally it's not -- yeah, it's a freedom group.

Q. It's another PAC?

A. Sure.

Q. That's not required to disclose -- I guess it would have to be not a state PAC. It would have to be a federal PAC.

A. I'm not an attorney. I don't know how they do it.

Q. I am an attorney and I don't get it honestly.

A. They do it in a way that conceals donors.

Q. Right. And the reason why I'm asking that is because was that your understanding of what was going to happen with Monu?

63

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A. Yes.

Q. And Mr. Rogers, right, obviously?

A. It was my understanding that, yes, that Mr. Greitens campaign was going -- they had indicated that they were going to go down that road very early on in the campaign.

Q. Okay. Now, and I'm sorry to rehash because you may have already been asked this, but did you have specific conversations -- did you personally have conversations or witness conversations with Alex Rogers or Monu?

A. Monu I did, yes.

Q. Okay. Do you remember -- Well, I guess those conversations would have happened sometime between --

A. January and March of 2015.

Q. Right, exactly.

A. Uh-huh.

Q. And then is Monu's name spelled M-o-n-u?

A. Yes.

Q. And his last name is Joseph, J-o-s-e-p-h?

A. Yes.

Q. Okay. And then Alex Rogers on Exhibit 7, page 5 is your entry for Alex Rogers in your what I would call a call list?

A. Uh-huh.

64

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1 Q. You were calling it a call list as well. So
2 that makes it easy. It says that ask for commitment in
3 exploratory phase and Hong Kong schedule. Does that
4 that refresh your recollection as to where Mr. Rogers'
5 neighborhood really was?

6 A. Yes. To my recollection, Eric was going to be
7 in Hong Kong at some point and wanted to meet with Alex,
8 and there are some other e-mails along this line that
9 have been withheld.

10 Q. Right. Then is it Mr. Bobak that's the
11 attorney, Mark Bobak?

12 A. Yes.

13 Q. So were you an employee when you started in
14 January '15 or were you an independent contractor?

15 A. I was always an independent contractor
16 essentially, but I was paid by Eric either through him
17 or the Greitens Group. I don't remember what his name
18 was on the check.

19 Q. Then one of your e-mails, it's Exhibit 4, page
20 2. Let's see if I can get to that.

21 MR. ERNST: Should we put Exhibit 7 away?

22 REPRESENTATIVE MITTEN: Pardon me?

23 MR. ERNST: Are you done with Exhibit 7?

24 REPRESENTATIVE MITTEN: I am, yes. Thank you.
25 I think I am. No guarantees I suppose.

65

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1 BY REPRESENTATIVE MITTEN:

2 Q. Exhibit 4, page 2 has you marked at Barklage.
3 So were you also employed there or what was the -- why
4 is there the Barklage logo and e-mail string even though
5 it says from your Gmail account on this page?

6 A. Right. That was a company that I was
7 affiliated with. I had been employed by that company
8 from 2011 on. At this particular time, I was still
9 affiliated -- I was not being paid by that company. I
10 had my own clients. I was still affiliated -- they
11 covered my health care and maybe my cell phone. I still
12 had an e-mail address. I was not being paid by them at
13 that time, but I was affiliated with them.

14 Q. Fair enough. You described the offices as
15 this sort of renovated home in the central west end in
16 January '15. And in this building, right, it was a
17 whole building; is that correct?

18 A. It was a three-story converted home.

19 Q. Right. There were employees of The Mission
20 Continues which I believe was Ms. Knodell -- no, I'm
21 sorry, Taylor?

22 A. There was -- You're referring to the Greitens
23 Group offices that I worked out of, correct?

24 Q. That's what I'm trying to understand is who
25 was Greitens Group, who was The Mission Continues? Who

66

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1 was what in that building?

2 A. In the building that I worked out of from
3 January to March 2015 was a converted home in the
4 central west end. Out of that office, out of that
5 office building, office, housed the Greitens Group and
6 eventually Greitens for Missouri. Now, I first met Eric
7 in December of 2013 at the Greitens Group office which
8 was then located at The Mission Continues office just
9 south of downtown St. Louis. I don't know the exact
10 address.

11 Q. I think that's probably where my confusion
12 lies. So in 2013 or in December 2013, the Greitens
13 Group officed with TMC, The Mission Continues, but by
14 2015 the Greitens Group had found its own space separate
15 and apart or physically separate from The Mission
16 Continues?

17 A. Yes.

18 Q. And at the time that you started, the only
19 entities operating out of that building in the central
20 west end were the Greitens Group and then ultimately
21 Greitens for Missouri?

22 A. Yes.

23 Q. And you don't remember if you were paid by
24 Eric Greitens, the Greitens Group, or Greitens for
25 Missouri?

1 A. I know the first month I was not paid for -- I
2 was not paid by Greitens for Missouri. I was paid the
3 last two months by Greitens for Missouri. The first
4 month I do not recall if Eric gave me a check personally
5 or if it came from Greitens Group.

6 Q. Okay. Do you know if Greitens for Missouri
7 reported any payments to you made in January of 2015 as
8 campaign expenditures?

9 A. I do not believe they did.

10 Q. Okay.

11 A. And as an additional point to that, there was
12 another employee, Danny Laub, who I was led to believe
13 was also being paid by Greitens Group. He was hired
14 sometime before me. I don't know which month. I was
15 led to believe he had been hired in November or December
16 and I was led to believe that he was paid by either Eric
17 personally or by the Greitens Group. He is a political
18 consultant as well. We were brought on to do political
19 oriented tasks.

20 Q. So speaking for yourself personally, did you
21 ever do any work for the Greitens Group or was all of
22 your work during the month of January 2015 affiliated
23 with the Eric Greitens campaign?

24 A. There's only one task -- there's -- it's a
25 little bit of a tough question to answer. There's a

67

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68

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1 couple tasks that I had to do that would have fallen
2 under the Greitens Group umbrella. One was prepping
3 Eric for a speech that he had at the Manhattan Institute
4 I think it was. It was a brief conversation that I put
5 some research together and gave it to him. I don't know
6 exactly when that date was. There would have been
7 little stuff around the office that would have been
8 under the Greitens -- I had to move I don't know how
9 many boxes of books they had to the basement of his --

10 **Q. Loading the books, right?**

11 A. -- of his office. That wasn't a campaign
12 thing. There's little stuff like that.

13 **Q. Is it also fair though that your assistance**
14 **with Mr. Greitens preparing a speech, even though the**
15 **money was being funneled through the Greitens Group,**
16 **would also sort of fall into your role as a policy**
17 **advisor to the extent that what the governor said at his**
18 **speech impacts your ability to fundraise from a**
19 **Republican donor list?**

20 A. Yes, absolutely. The speech had some major
21 donors that Eric was reaching out to around the same
22 time period and it was a speech based on I believe it
23 was veterans statistics. It would have been in some of
24 the files I turned over. Yeah, it was a little memo
25 that I developed.

69

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1 **Q. Right. But again, to the extent that what**
2 **candidates say in public can impact --**

3 A. Yes.

4 **Q. -- their campaign and their fundraising, that**
5 **role or responsibility as to a speech sort of has a dual**
6 **purpose; is that a fair assessment?**

7 A. Yes.

8 **Q. Okay. Do you know when Greitens for Missouri**
9 **was actually formed?**

10 A. I don't know the exact date. I know it was in
11 late February. I always get it confused. I believe it
12 was February 24 or February 25.

13 **Q. Okay.**

14 A. And I was directly involved in helping get the
15 papers over to Missouri Ethics Commission.

16 **Q. Okay. Now I'm trying to go back to notes that**
17 **I really scribbled because I didn't understand some of**
18 **the answers.**

19 **Is it fair to say that what happened as far as**
20 **the fundraising lists go, okay, so looking at the**
21 **e-mails and the exhibits, you know, that we've already**
22 **marked and testified about, basically you received a**
23 **list from The Mission Continues, those top 15 or top**
24 **1,000 -- can you help me what were those called?**

25 A. It was donors that had contributed.

70

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1 **Q. TMC top 200?**

2 A. The TMC donor list was donors that had given
3 over \$1,000 to supposedly the charity at the time.

4 **Q. Go ahead.**

5 A. To clarify, I did not know -- Again, I did not
6 know this was a direct property of the charity. The
7 first time that it was indicated that it had come from
8 The Mission Continues was when I was contacted by David
9 Lieb from the Associated Press in October of 2016. He
10 had gotten a copy of the donor list and my name was in
11 the donor list as having accessed it. That was the
12 first time -- he had apparently done some research on
13 the list and looked in the metadata of the document,
14 realized that it was created by a Mission Continues
15 employee, and so the first knowledge that I had that it
16 originated from Mission Continues was essentially from
17 the reporter who called me and told me.

18 **Q. Okay. Okay. So you start -- Ms. Taylor,**
19 **right?**

20 A. Yes. She's married. Her name is Krystal
21 Proctor now, yes.

22 **Q. Ms. Taylor sends you an e-mail saying here,**
23 **here's the four lists that we have, right; you take**
24 **those lists, maybe take some of your own data, and the**
25 **goal is to create one sort of master fundraising or**

71

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1 donor list --

2 A. Yeah.

3 **Q. -- for this particular candidate and as we**
4 **discussed earlier, sort of how this process works is**
5 **that that comes from the candidate's own contacts and**
6 **the value that you bring of data and relationships to**
7 **the table and then possibly other lists; is that sort --**
8 **that's how it works, right?**

9 A. Yes, generally.

10 **Q. Then you take all of these different lists and**
11 **combine them into one, combine all of the information,**
12 **all the contact information. There might be tidbits for**
13 **lack of a better term or information about the donor**
14 **that are in different sources. So say you've got John**
15 **Doe is on The Mission Continues list as a \$1,000 donor**
16 **to The Mission Continues and you have some notes that**
17 **he's very interested in veterans issues. John Doe might**
18 **also be listed in the top 200 donor list and he's also**
19 **interested in labor issues. And you take both entries**
20 **for John Doe and you might know John Doe from your own**
21 **personal experience and know that, you know, he likes**
22 **unicorns and puppy dogs. You'll take those data points**
23 **and combine them with one entry for John Doe, he gave to**
24 **The Mission Continues, he's on the top 200 Republican**
25 **list and he loves unicorns and puppy dogs so that then**

72

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1 when the candidate makes the phone call they can say
2 thank you for your help with veterans, I support your
3 labor issues and unicorns and puppy dogs are awesome.
4 Is that a fair assessment of how it works?

5 A. Yes. Maybe not so much the unicorns and puppy
6 dogs. Normally it's a kid's name.

7 Q. Trying to be charitable for lack of a better
8 term.

9 A. Yes.

10 Q. Then in doing that process and coming up with
11 this ultimate list or the ultimate list, let's call it
12 that, or I think you refer to it as your campaign plan
13 or your donor plan, you're constantly in contact with
14 the candidate about hey, we have e-mails reflecting
15 this, I need information, I need to sit down with him so
16 that we can go through just what John Doe -- does John
17 Doe still like unicorns or was my puppy dog information
18 wrong or whatever; is that a fair characterization?

19 A. Yes. It's a continual process where you need
20 to get feedback from the candidate who's having those
21 conversations with the donor.

22 Q. Right. Or I heard from so and so that John
23 Doe can't stand your opponent so we're going to add that
24 data point or that information to the list?

25 A. Yes.

73

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1 Q. Is that fair?

2 A. Yes.

3 Q. Okay. Now, I have a note here and it's
4 probably been -- we're probably so far down the road you
5 might not remember but I have a note here that says that
6 you didn't add or delete anything to the list. Do you
7 mean The Mission Continues list? Do you mean -- I mean
8 that's what I'm trying to understand what did you mean
9 by that?

10 A. So this is a document that I accessed
11 obviously, and I could not recall if some of those notes
12 in the column I took myself or I took from Mr. Greitens
13 and added those. I just don't recall that, but these
14 are the same documents that I -- well, most of them are
15 the same documents I supplied when I was subpoenaed by
16 the MEC.

17 Q. Right.

18 A. None of them have been altered in any way
19 since that point certainly and certainly before that
20 since 2015 when I was employed by Mr. Greitens.

21 Q. Okay. And then going back one last time to
22 the sharing of the Greitens Group and the Greitens for
23 Missouri or at least the campaign, both the campaign and
24 the Greitens Group folks all being in one big house,
25 were folks using office equipment, et cetera, the

74

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1 computers, were those owned by the Greitens Group to the
2 best of your knowledge or do you have any understanding
3 of that?

4 A. Yes. The office equipment, the Internet at
5 the time was certainly owned by Greitens Group. I was
6 part of a furniture purchase --

7 Q. You don't look like furniture to me.

8 A. -- along with Danny Laub where they wanted to
9 get a bunch of furniture to put in the second level,
10 second and third level of the building, and I was
11 involved in that. I believe those expenditures were
12 made through the campaign committee because that was
13 later on. But up until the committee was -- yeah, it
14 was.

15 Q. It was really basically the first month or two
16 months. Assuming that Greitens for Missouri was formed
17 in late February of 2015, then from January 1 we'll say
18 of 2015 until the end of February your day-to-day
19 officing expenses and perhaps your salary were paid for
20 by the Greitens Group?

21 A. Yes. Until --

22 Q. When I say salary, I guess I should probably
23 say compensation just because you were an independent
24 contractor.

25 A. Until the committee was filed, yeah,

75

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1 everything would have been paid for, you know, desks,
2 Internet, everything by the Greitens Group.

3 Q. Photocopier?

4 A. Obviously I departed before the April
5 quarterly MEC report was filed so I had no role in that,
6 and I haven't even looked through it to see if those
7 expense --

8 Q. In kind expenditures were reported?

9 A. Yeah, which they should have been if they were
10 used for the campaign.

11 Q. Right. So Mark Bobak was an attorney that was
12 employed by the Greitens Group. Is that -- or do you
13 know?

14 A. I do not know. My sense was that he was -- he
15 was. He had a Greitens Group e-mail address, but I
16 can't speak to his compensation or anything else.

17 Q. But he was there in the office building in the
18 central west end?

19 A. Regularly. Many times per week. Not everyday
20 but at the minimum two or three days a week.

21 Q. Okay. Did he have his own office or desk?

22 REPRESENTATIVE BARNES: I think we're getting
23 in the realm of -- if we're going to go down the
24 attorney/client realm, I think that's a topic for a
25 different day.

76

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1 REPRESENTATIVE MITTEN: Okay. I'm just trying
2 to determine what his role was.

3 REPRESENTATIVE BARNES: I think we can get
4 there.

5 MR. ERNST: I'm okay with questions that don't
6 intrude on the privilege.

7 REPRESENTATIVE MITTEN: Right, I'm not asking
8 about communications, just who is this guy, why is he
9 there.

10 MR. ERNST: We're not getting there yet. As I
11 said before, we don't have an opinion about whether it's
12 privileged just because he's an attorney. Out of an
13 abundance of caution, we're very clear. I'm comfortable
14 with your question. If I think it's a problem, I'll
15 voice my concern.

16 REPRESENTATIVE MITTEN: Thank you.

17 BY REPRESENTATIVE MITTEN:

18 **Q. So did he have like, you know, a desk, an**
19 **office, his own sort of workstation for lack of a better**
20 **term?**

21 A. He had his own desk. I worked out of the same
22 office as him for the duration of this time.

23 **Q. By office, do you mean the same room, physical**
24 **room?**

25 A. Same room. Our desks were in the same room.

77

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1 And then we moved to the second floor sometime in I
2 think late February or maybe mid February. I don't
3 recall the exact date on that front. But yeah, I was
4 working in the same room as him.

5 **Q. Okay. Did you ever have any understanding**
6 **that he was an attorney for the campaign?**

7 A. I don't want to speculate. He was a personal
8 friend of Eric's too. I didn't know if he was a
9 volunteer advisor or if he was getting paid or exactly
10 what his defined role was, but he certainly was an
11 advisor to myself on political issues.

12 **Q. But not legal issues?**

13 MR. ERNST: I think we're now straying into
14 the gray area.

15 BY REPRESENTATIVE MITTEN:

16 **Q. But he advised you about political issues?**

17 A. And campaign related issues.

18 REPRESENTATIVE MITTEN: Okay. Thank you.

19 Thank you, Mr. Chair.

20 REPRESENTATIVE BARNES: Representative Lauer.

21 REPRESENTATIVE LAUER: Thank you, Mr. Chair.

22 QUESTIONS BY REPRESENTATIVE LAUER:

23 **Q. Thank you for being here and mine is probably**
24 **a list of random questions. So it won't be as**
25 **chronologically listed as the others might have been.**

78

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1 **when you started with Mr. Greitens -- let's back up.**
2 **There are four groups I think we're kind of dealing**
3 **with. We have The Mission Continues. We have the**
4 **Greitens Group. We have Greitens for Missouri. And**
5 **then a little bit later maybe appears New Missouri. So**
6 **what is your understanding of the purpose mission of The**
7 **Mission Continues?**

8 A. Purely a (c)(3) charity, charitable
9 organization that helps veterans around the country.

10 **Q. That's its sole purpose to help the veterans?**

11 A. Essentially, yes. It's an organization that
12 helps returning veterans find ways to continue to serve
13 their communities.

14 **Q. Okay. And the Greitens Group, what was its**
15 **purpose mission?**

16 A. The way that I understand the Greitens Group
17 to be more of a PR, marketing, promotional company for
18 Mr. Greitens to help book speeches and sell his books.

19 **Q. So would that have been more affiliated with**
20 **The Mission Continues then versus his political? This**
21 **might be an A, B, C or D question.**

22 A. It's a hard question to answer because the CEO
23 of both was Mr. Greitens. So certainly there were areas
24 that overlapped within Greitens Group and Mission
25 Continues. For one example they were housed out of the

79

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1 same office. And then during the campaign the Greitens
2 Group and Greitens for Missouri were located in the same
3 offices as well.

4 **Q. Okay. So then let's go to Greitens for**
5 **Missouri. That purpose was what?**

6 A. That was for Mr. Greitens' specific campaign
7 for governor.

8 **Q. And did that overlap with Greitens Group in**
9 **any way like we were just discussing? Did it dovetail?**

10 A. Certainly in terms of sharing resources and,
11 yeah, sharing resources whether that's staff or office
12 equipment.

13 **Q. Okay. And then the New Missouri, I believe**
14 **that may have happened after you left or was there a**
15 **discussion about that when you were there?**

16 A. No, no. There was -- That was well after I
17 had departed.

18 **Q. Okay. So then is it fair to say then that**
19 **there was a bit of overlap in all of these not really**
20 **definitively clear lines of where they would -- one**
21 **starts and one ends; is that fair?**

22 A. Yes. Generally, yes.

23 **Q. Okay. Thank you. Thank you for walking me**
24 **through that. It gets a little confusing sometimes.**
25 **All right. So when you received on one sixteen -- I'm**

80

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1 **sorry, one six fifteen the list and in the exhibit on**
 2 **one sixteen that's given to you, the spreadsheet has no**
 3 **identifier on it, no header or title or anything like**
 4 **that. It's pretty generic from that standpoint?**

5 A. Just so I'm following which?

6 **Q. I'm sorry. It's on page 4 of 24 on --**

7 REPRESENTATIVE BARNES: Representative, so you
 8 understand, Mr. Hafner in response to the subpoena sent
 9 us an Excel file and we printed it sideways. The title
 10 of it would have been the 1K whatever.

11 REPRESENTATIVE LAUER: So there was a typo on
 12 it?

13 REPRESENTATIVE BARNES: In the e-mail itself
 14 it has a name which is Donors Over 1K. I don't have the
 15 e-mail in front of me there.

16 REPRESENTATIVE LAUER: But the title does not
 17 say Mission Continues; is that correct?

18 REPRESENTATIVE BARNES: In that title, the
 19 document title there.

20 REPRESENTATIVE LAUER: Right. It does in the
 21 descriptor.

22 BY REPRESENTATIVE LAUER:

23 **Q. So when you got the spreadsheet and the e-mail**
 24 **saying that it was The Mission Continues, that was your**
 25 **understanding of what that spreadsheet was; is that**

81

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1 **correct?**

2 A. It was my understanding, yes. I did not know
 3 where it originated or how it was acquired.

4 **Q. All right. And when you joined with Mr.**
 5 **Greitens, what was your understanding of the expectation**
 6 **of your role? Was there a written list of your roles**
 7 **and responsibilities or what was your understanding?**

8 A. There was no written list, but I had had more
 9 campaign experience than the person that he had working
 10 for him whose name was Danny Laub and it was my
 11 understanding that I would come on to particularly help
 12 with fundraising but also to assist in a lot of other
 13 areas having to do with campaign issues, political
 14 issues, helping network, introducing Eric around,
 15 setting up political meetings.

16 REPRESENTATIVE BARNES: Let me interrupt one
 17 more time about that particular list. We have the
 18 actual Excel file that was sent to us back in the room
 19 in which we are keeping the documents and so everyone
 20 you can review that in that room. I would anticipate
 21 that this exhibit is not going to be a part of the
 22 report that we release because it is a trade secret. It
 23 appears to be a trade secret of The Mission Continues.
 24 We're not going -- we would have a summary of that
 25 particular exhibit in a report but not the exhibit

82

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1 itself.

2 REPRESENTATIVE LAUER: Okay. Thank you.

3 BY REPRESENTATIVE LAUER:

4 **Q. As part of your job being fundraising, you**
 5 **were given or put together several lists. Was there a**
 6 **strategic order to how you received those lists? Was**
 7 **there like a master list you started with and then added**
 8 **on? How did that work?**

9 A. I was -- so I was supplied four lists one of
 10 the first days I started which is in Exhibit 3 I think
 11 this is. And from those lists I created a couple other
 12 documents based on input from Mr. Greitens and going
 13 through these lists with him.

14 **Q. Okay. And I believe you said there was one**
 15 **that was from Mission Continues, one from larger**
 16 **individual donors and one from corporations; is that**
 17 **right?**

18 A. There were three tabs in The Mission Continues
 19 list, and those were the three tabs, yes.

20 **Q. Okay. You said that Danny Laub was the**
 21 **campaign manager; is that right?**

22 A. I don't know if he had that exact title, but
 23 he certainly was in charge of the campaign.

24 **Q. Was he your go to person?**

25 A. Yes, yes.

83

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1 **Q. Okay. Did Danny have sole decision making**
 2 **authority or do you feel he had to get final approvals**
 3 **from Mr. Greitens?**

4 A. Yes. He had to get final approvals on almost
 5 anything. Maybe -- I'm sure there were some minor
 6 things that he did on his own, but everything was
 7 directed by Mr. Greitens.

8 **Q. Okay. Who was the individual for lack of a**
 9 **better word who was responsible for the accounting**
 10 **function meaning where deposits are made and tracked and**
 11 **expenses?**

12 A. Early on they put me --

13 REPRESENTATIVE BARNES: I'm sorry. Can you
 14 clarify from which entity you're referring?

15 REPRESENTATIVE LAUER: For the entity of which
 16 you were working which I guess would be the Greitens
 17 Group. Thank you, Mr. Chair.

18 THE WITNESS: So for the Greitens Group, just
 19 so I'm clear in your question, for the Greitens Group
 20 you're wanting to know who was in charge of accounting?

21 REPRESENTATIVE LAUER: Right.

22 THE WITNESS: I don't know. I assume Mr.
 23 Greitens himself in terms of the finances for the
 24 company.

25 BY REPRESENTATIVE LAUER:

84

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1 **Q. Okay. In regards to the campaign, who would**
 2 **have been the one responsible for filing the reports to**
 3 **Missouri Ethics Commission?**

4 A. So I don't know the exact date but when Mr.
 5 Greitens brought on an individual named Jeff Stuerman,
 6 Jeff served as the campaign treasurer. Mr. Stuerman was
 7 working out of the office. I don't recall when he was
 8 brought on. I believe it was in February but he was
 9 brought on to put in a system of reporting procedures
 10 and document retention policies and other things. He
 11 was a former Edward Jones executive and was a personal
 12 friend of Eric's and Mr. Greitens had brought him in to
 13 help file the reports and do compliance work for the
 14 campaign.

15 **Q. Okay. Thank you. In your work with as we**
 16 **talked about these other groups, more particularly The**
 17 **Mission Continues and Greitens for Missouri, who was the**
 18 **-- did you have direct contact with a key individual at**
 19 **The Mission Continues?**

20 A. No, I did not. Now, as I stated earlier in
 21 testimony, I was directed to reach out to somebody that
 22 was -- that I was told was either a current employee or
 23 former employee named Lindsey Hodges, but to my
 24 recollection I never reached out to her. I certainly
 25 never met with her.

85

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1 **Q. And was Danny Laub the key contact at Greitens**
 2 **Group or who would have been the key contact?**

3 A. So early on in 2014 when I was serving as
 4 essentially an informal advisor there was a gentleman
 5 named Dave Whitman who was kind of my go-between Eric
 6 and myself with the Greitens Group. Eric and Dave
 7 parted ways in the fall of 2014 and then it was Krystal
 8 Taylor. And moving forward it was Krystal Taylor when I
 9 was working as a paid advisor from January through
 10 March. It was essentially Krystal that was the
 11 go-between between myself and the Greitens Group.

12 **Q. I appreciate you kind of clarifying all this**
 13 **because there's a lot of people, a lot of different**
 14 **moving parts here.**

15 A. Yes.

16 **Q. Then with Greitens for Missouri who was the**
 17 **key contact there?**

18 A. Danny was the manager.

19 **Q. For Greitens for Missouri?**

20 A. At the time, Danny, yeah, Danny certainly was
 21 the lead staffer. Of course the candidate as well
 22 directed -- had the final say on campaign activities.

23 **Q. So any moneys that you generated from donors,**
 24 **your understanding was that it went to which group then?**

25 A. The Greitens for Missouri.

86

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1 **Q. Greitens for Missouri. Okay. When the ethics**
 2 **situation came up, I believe most everybody has talked**
 3 **about the list and it was shown that that may have been**
 4 **an inappropriate use and there was a fine associated**
 5 **with that, was there any discussion ever about any**
 6 **moneys being returned to donors?**

7 A. Not to my recollection.

8 **Q. Okay. You mentioned that Mr. Rogers and**
 9 **Mr. Joseph were overseas individuals?**

10 A. I was led to believe Mr. Rogers was overseas
 11 somewhere, and from the notes it kind of jogs my memory
 12 that he was in Hong Kong.

13 **Q. And had Mr. Greitens been overseas regularly**
 14 **to establish those relationships?**

15 A. So he had built a number of relationships
 16 based from his time at Oxford, and some of those he was
 17 utilizing for campaign purposes. I don't know the exact
 18 people. If I went through all my notes, it would
 19 probably jog my memory. But there was certainly a lot
 20 of people from that. Of course in his military work too
 21 there would have been some officers and things like that
 22 that had contacts overseas of course.

23 **Q. And to your knowledge, were any of those**
 24 **individuals, did they make donations outside of the**
 25 **LLCs, and so forth, that we've talked about --**

87

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1 A. The only one to my knowledge --

2 **Q. -- outside of the United States?**

3 A. The only one to my knowledge that made
 4 contributions directly to Greitens for Missouri was the
 5 gentleman Monu Joseph. Certainly there was much
 6 discussion about Alex and then some other potential
 7 donors to the campaign in conversations I had with Monu.
 8 Monu mentioned that they had a lot of buddies from
 9 Oxford that would probably contribute, and I don't know
 10 what happened after I left with those particular donors.

11 **Q. I want to go back to the overlapping of the**
 12 **Greitens Group and Greitens for Missouri because you**
 13 **indicated that there was some overlap because of the**
 14 **Greitens Group being a PR marketing group which could**
 15 **certainly dovetail into campaign, and so forth. So when**
 16 **the moneys were put into Greitens for Missouri, were**
 17 **those moneys to your knowledge ever used for Greitens,**
 18 **the Greitens Group? The reason I'm asking that is**
 19 **because it was unclear as to where you were paid from.**

20 A. Sure.

21 **Q. So I'm trying to identify that.**

22 A. Can you repeat the question just so I'm clear?

23 **Q. Sure. You indicated that you weren't clear on**
 24 **where you received your paycheck from, thought it might**
 25 **have been from the Greitens Group. If the moneys went**

88

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1 -- the donor moneys went into Greitens for Missouri,
2 then was there a shift of moneys from Greitens for
3 Missouri into Greitens Group to help pay for your
4 expenses and any other campaign expenses?

5 A. I don't believe so.

6 Q. Okay. You also talked about the transparency
7 and that was something that you truly believe in and
8 feel should be part of government. Were there any other
9 issues during the time you were with Mr. Greitens that
10 led you to believe that there were other parts that
11 might not be transparent?

12 A. Yes. I think on a -- maybe not so much in
13 terms of campaign finance but certainly some of his
14 personal background, his history as a member -- or as
15 somebody that wanted to run for office, a member of the
16 opposing party, there's information like that that I
17 believe he wanted to have concealed.

18 REPRESENTATIVE LAUER: I'll leave that to
19 someone else to ask if they want to. Thank you,
20 Mr. Chair.

21 THE WITNESS: I know I was paid by Greitens
22 for Missouri in February and March of 2015. In January
23 I just don't remember what the top of the check said.
24 It was either from Eric personally or the Greitens
25 Group. I can go back through my bank records and find

89

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1 it. I know it wasn't from Greitens for Missouri. I
2 remembered the moment when he handed me the check.

3 BY REPRESENTATIVE LAUER:

4 Q. That was in January?

5 A. Of 2015.

6 REPRESENTATIVE LAUER: Okay. I appreciate
7 your efforts to try and recall all this information.
8 Thank you.

9 REPRESENTATIVE BARNES: Gentleman from Greene.

10 REPRESENTATIVE AUSTIN: Thank you, Mr. Chair.

11 QUESTIONS BY REPRESENTATIVE AUSTIN:

12 Q. My name is Kevin Austin, District 136. It
13 sounds to me like when you were reviewing your history
14 that you spent your entire career in politics either for
15 candidates or for groups or for individual companies; is
16 that correct?

17 A. Correct. And for the last three years now
18 I've been a registered lobbyist too for a number of
19 clients, but I only have one lobbying client right now.

20 Q. It sounds like your career in politics
21 actually started while you were still in college --

22 A. Uh-huh.

23 Q. -- with Matt Blunt; is that right?

24 A. Yes. Started with Matt in 2004.

25 Q. What college did you attend?

90

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1 A. St. Louis University.

2 Q. And Danny Laub was also a student at SLU?

3 A. He was. He was I think a couple years younger
4 than me.

5 Q. Did you graduate from college?

6 A. I did.

7 Q. What was your degree in?

8 A. English and business.

9 Q. And how old are you now?

10 A. I am 32.

11 Q. And Danny is younger than you I assume since
12 he was behind you in class?

13 A. Uh-huh.

14 Q. Is that yes?

15 A. Yes, he is. I don't know how old he is. I
16 want to say he's at least a couple years younger than
17 me.

18 Q. Okay. And you said you started with Eric
19 Greitens as a paid advisor in January 2015?

20 A. January 2015 was the first month I was paid
21 for my work for Mr. Greitens.

22 Q. And I think your testimony was is that Eric
23 Greitens relied -- needed help to introduce him to GOP
24 donors and activists and relied on us. The question is
25 that first did I get you right what you said? I I

91

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1 paraphrased you. If so, who's us? You and Danny?

2 A. Danny certainly and then there were other
3 consultants that I was associated with, Robert Knodell
4 and David Barklage. We all helped introduce Mr.
5 Greitens around to a lot of people that ended up
6 becoming his inner circle too.

7 Q. That may just lead into you testified earlier
8 about some other consultants because of your
9 relationship with them is why Mr. Greitens wanted to put
10 your relationship on pause with you; is that correct?

11 A. That's how it was told to me by Danny, Mr.
12 Greitens and Mr. Bobak.

13 Q. Is because these other consultants, whoever
14 they may have been, were also associating or maybe not
15 working for money but associating with other potential
16 candidates for governor, lieutenant governor?

17 A. Yes. Those individuals were just more direct
18 with Mr. Greitens than -- there was some other
19 consultants as well that were involved with Mr. Greitens
20 helping him do some of the same things that we were,
21 Dave Hageman and Steve Michael in particular. The
22 consultants that I was referring to are ones that I
23 think were just more direct with Mr. Greitens and told
24 him that if he did run for governor that they wouldn't
25 be on board with his campaign.

92

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Q. It's your belief that because of your relationship with those consultants who are more direct with Mr. Greitens, Mr. Greitens then wanted to have less relationship with you?

A. That's how it was communicated to me by those three individuals.

Q. What three individuals was that?

A. Danny Laub, Mark Bobak and Mr. Greitens, and the specific phrase that they used was they wanted to take a strategic pause on our relationship, and I just remember that because I've never heard that phrase before.

Q. And that was in March of 2015?

A. Yes.

Q. And then you started to work for John Brunner in the fall of 2015, correct?

A. Yes. I started working for him as a paid advisor -- not fall. In August I believe I'm almost positive was the first month I was paid by the Brunner campaign.

Q. This may have been asked and I apologize if I'm bouncing around twice, but what did you do between March and August of 2015?

A. What was I involved with? So at that time I was doing a little bit of lobbying. So that would have

been until May. And then there was some other clients that I had been working with, donor groups. There's a pro business PAC called the Lewis and Clark Group that I advised. I advise one of the groups now. At the time there were three of them in St. Louis and Springfield and I was doing a lot of work with those groups of donors. And there's a couple other clients that I -- obviously it was a big hit to my income at the time and I had intended to stay with Eric a little bit longer than March. So I had picked up some extra work with the consultants I mentioned earlier, Robert Knodell and David Barklage, and I can't remember the other clients that I was working on. I know that there was something else, maybe a local government issue in St. Louis County. There were some other things that I was working for them.

Q. And this relationship with Barklage and Knodell you've been asked about it before because it's on one of your e-mails and one of your e-mail addresses in fact on Exhibit 3 has it and later it was a Gmail. This was just referrals back and forth between you and Barklage and Knodell as maybe happens with other consultants?

A. Yes. Again, at the time I wasn't employed directly by Barklage and Knodell but they did cover my

health insurance and my phone for sure. I was certainly affiliated with them for the last, you know, the number of years before that. My relationship with them was kind of unique though. I would normally go and work on other campaigns and still be affiliated with that firm. So 2014 I went to work for Rick Stream who was running for county executive and I worked directly with Rick for that entirety. Our relationship was kind of -- was unique. I was always affiliated with that firm and people still ask. It's politics.

Q. It sounds like you're an independent contractor for a lot of different campaigns and organizations?

A. Yes.

Q. I'm not trying to do a bad comparison here but like somebody who does construction work?

A. Yes.

Q. You did a lot of work on a lot of different houses?

A. Yeah. I had my own LLC.

Q. Yeah. If you would, could you go to Exhibit 3. And page 2, back to these attachments, if I understand it right, the first attachment is page 4 through 15; is that correct?

A. It's actually the full through 24. So

starting on page 16 it says Attachment No. 2 but this is the other tab.

REPRESENTATIVE BARNES: If I could. I can explain. This is a chairman error in copying. What are labeled there as Attachments 1, 2 and 3 are the sub tabs of Attachment 1.

BY REPRESENTATIVE AUSTIN:

Q. So truly what we have on pages -- thank you, Mr. Chair. Truly what we have on pages 4 through 24 is just The Mission Continues list?

A. Yes.

Q. But what also threw me off is it looks like tab number 1 is in alphabetical order because it ends with [REDACTED] or Z on page 15 and then we have a second list looks like it starts in As.

A. So the second list was organized by -- it was foundations. So it was organized not necessarily by individual name. It was organized by the name of the overall foundation.

Q. Okay. Maybe I'll lead you here. A good idea. Looks to me like we have some tab differences in between individuals and corporations and that's why we have individual A to Z and then A to Z for corps?

A. Yes. There were three tabs in the document. One for individuals, one for foundations and one for

corporations.

Q. Back to page 2 of Exhibit 3. So the second attachment, this EG Finance Prospects, that's not in pages 2 through 24, correct?

A. Correct. That was a list provided by Mason Fink. Mason Fink was a fundraiser that Eric had met. He had done some extensive work for Mitt Romney. And he supplied that list that included a lot of national donors, national Republican donors. He supplied that list to the campaign or to Eric or Krystal Taylor.

Q. We go to the fourth list. It says Schweich list and if we look up above it says Schweich list-Steve Michael. Who is Steve Michael?

A. Steve Michael is a consultant that works for Dave Hageman at Victory Enterprises.

Q. Do you know how this Schweich list was obtained?

A. I do not. And I do remember looking at that list. We never -- I never went over that list with Eric, but it appeared to be Schweich's internal fundraising list. I have no idea how it was acquired.

Q. Why was it never used?

A. It was very, very extensive. It looks like the kind of list that one of the professional fundraisers in our state use, one that has Kit Bond, you

know, Kit Bond donations, Matt Blunt donations. It was developed over years. And it was just extremely, extremely long. There was information that just wasn't relevant to Mr. Greitens campaign just because he wasn't a traditional Republican candidate.

Q. And you said, if I understood you right, that you were extremely skeptical of his conservative viewpoints. When did you arrive at that opinion?

A. I'm not sure exactly when I arrived. I would say from the first time we met with him in December of 2013 it was always before that I had assumed he was a Democrat. Later on, you know, later on we learned he was very close with Governor Holden and Mayor Slay and we just -- everyone always assumed in the circles that I ran in that he was a Democrat. So to answer your question at what point, I think from the first meeting we had and certainly when I worked with him in a paid capacity in January there were many conversations that we had and policy discussions and other things that he had to formulate certain positions that were essentially new to him and had to work through them. So I think kind of answer to your question was I always kind of viewed him with skepticism.

Q. If we can go to Exhibit 5, please. If we go to like the fourth paragraph -- well, third paragraph

down it says go to: Salesforce.com. What's salesforce.com?

A. It's a contact management tool that businesses, people use to help manage their contacts and it's a database system for managing your contacts.

Q. Software program of some sort?

A. Yeah, essentially. You can access it online too. You can log onto Sales Force from anywhere and get your contact list.

Q. And if we can go to Exhibit 7, first page and I may have missed this certainly too. It says GFM call list. What does GFM stand for?

A. Greitens for Missouri.

REPRESENTATIVE AUSTIN: Thank you, Mr. Chair.

REPRESENTATIVE PHILLIPS: Representative Rhoads, are you ready to go or do we need to take a break?

REPRESENTATIVE MITTEN: Representative Lauer needs a break I think.

REPRESENTATIVE PHILLIPS: We'll take a break, go off the record for about ten minutes.

(A recess was taken.)

REPRESENTATIVE BARNES: Back from break. Gentleman from Howell.

REPRESENTATIVE RHOADS: Thank you,

Mr. Chairman.

QUESTIONS BY REPRESENTATIVE RHOADS:

Q. Shawn Rhoads from Howell County. One question, were you under -- you say you were a contractor obviously. You do contract with various people. Did you have a written contract with Eric Greitens or the Eric Greitens campaign or anything like that?

A. I don't recall that there was a written contract. We verbally agreed in December of 2014 that I would be paid \$4,000 a month starting in January and I would work out of his office four days a week. But to the best of my recollection, we never had any contract --

Q. I'm sorry to interrupt you. You didn't have any kind of hey, look, this is exactly what your job is other than a verbal agreement; is that right?

A. To the best of my recollection, no, there was no.

Q. Is that common practice for you or do you normally have contracts with people?

A. It is standard practice with a lot of consultants to have contracts with candidates. I certainly have had some with others, but the campaigns I've been involved with I think were just made in good

1 faith agreements with those particular candidates.

2 **Q. So were they -- The other good faith handshake**
3 **verbal agreements, were they with people that you're**
4 **more familiar with?**

5 A. Generally, yeah, yeah.

6 **Q. Okay. And I want to make sure that I'm clear**
7 **on this. Obviously you knew -- I'm assuming, you can**
8 **tell me yes or no, you were aware of what The Mission**
9 **Continues does?**

10 A. Yes.

11 **Q. And you were aware that when you got the list**
12 **where it came from?**

13 A. I was not positive where it originated or
14 where it came from or how it was acquired.

15 **Q. No one explained to you?**

16 A. It was listed in the, I forget which exhibit
17 it was.

18 **Q. The one with the e-mails, correct.**

19 A. It was listed as The Mission Continues list.
20 When I mentioned with Mr. Greitens to discuss it, they
21 all were Mission Continues donors. In the first
22 instance that I knew that it originated or that I was
23 told it originated at The Mission Continues was when
24 David Lieb called me in October of 2016. He said in the
25 metadata of the document it was created by some Mission

101

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1 Continues employee.

2 **Q. So you weren't at any point, based on your**
3 **knowledge and experience in consulting, ever thought we**
4 **shouldn't be using this list?**

5 A. No, it certainly crossed my mind. Again, I
6 did not know how it was acquired.

7 **Q. Gotcha. Did you ever bring that up and say**
8 **hey, based on my training or my experience doing this,**
9 **you know, where did we get this from and we want to be**
10 **right in how we're doing this, did you ever bring that**
11 **up to Mr. Greitens or Danny or whoever?**

12 A. I did -- To my recollection, no, I did not.
13 Certainly there were some directives given to me at like
14 reaching out to the employees of The Mission Continues,
15 which I never did, because I was hesitant to reach out
16 to a charity or former employees of the charity to be
17 used for political campaign, but I never spoke to Eric
18 about using that list. In my mind, one, I did not know
19 how it was acquired and, two, I knew that I would be
20 using that list to make another list to developing a
21 call list and a fundraising plan. So it was more of a
22 reference that I was using it for.

23 **Q. Did they utilize the entire list or just parts**
24 **of it?**

25 A. We went through the whole list and he selected

102

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1 donors and gave me notes on specific donors, and then he
2 wanted me to meet with Lindsey Hodges who I don't know
3 who she was. I don't know if she was an employee there
4 or if she was a former employee. I was led to believe
5 she was development director at Mission Continues for a
6 time when Eric was CEO of Mission Continues. And that
7 directive was given so Lindsey and I could then go
8 through the list more extensively on donors that Mr.
9 Greitens did not recall details of.

10 REPRESENTATIVE RHOADS: I think that's it,
11 Mr. Chairman. Thank you.

12 REPRESENTATIVE BARNES: Gentleman from St.
13 Louis County.

14 QUESTIONS BY REPRESENTATIVE PIERSON JR.:

15 **Q. Good morning. I'm Tommie Pierson Jr., State**
16 **Representative of the 66th District in North St. Louis**
17 **County and City. Just a few questions. My questions**
18 **too may be a little out of sequence, but hopefully**
19 **you'll be able to enlighten me on some of them. Where**
20 **do most donor lists come from?**

21 A. So generally campaigns if you're starting from
22 the beginning they're created from a list of personal
23 contacts first from the candidate, maybe friends and
24 family. You add kind of a prospect list to that of
25 potential donors that you want the candidate to reach

103

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1 out to or you reach out to. In a lot of campaigns and a
2 lot of higher level campaigns lists come from -- there's
3 only a few specific fundraising, professional
4 fundraisers in the state that do this sort of thing. So
5 lists are shared between different campaigns and among
6 candidates. Certainly a lot of state-wide candidates
7 that have cultivated their lists, if they've come from a
8 lower office to a higher office, they've cultivated that
9 list over years over election cycles. To answer your
10 question more directly, they come from a number of
11 different sources.

12 **Q. When you say "shared," does that often include**
13 **compensation? How does that process work?**

14 A. Well, among political candidates, say a
15 fundraising vendor in our state or a fundraiser in our
16 state will have a couple clients each cycle. They will
17 have a master list that they work off of. Maybe they
18 just add another column on the side of it and that's for
19 a specific candidate and they work through that list
20 name by name and they're higher level donors or donors
21 that the candidate needs to solicit because they could
22 give at an increased level. For a fundraiser, they will
23 have cultivated a list like that over years over
24 election cycles and they'll work off of the same list
25 for multiple candidates. So when I say shared, that's

104

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1 kind of what I mean. Normally a candidate would not
2 give his or her own fundraising list to another
3 candidate that they don't know. A lot of that -- sorry.

4 **Q. So if I were to hire you knowing your past**
5 **connections with past candidates, would I hire you**
6 **knowing that you would bring a list with you?**

7 A. Certainly with the connections that I've built
8 with donors and others over time, that's why people hire
9 specific fundraising vendors, specific fundraisers in
10 the state. Yes, they bring along those connections,
11 that network. Along with that would come a contact list
12 normally.

13 To answer your question further, different
14 offices have a different donor base, of course. Many
15 donors that are interested in a state-wide state level
16 race wouldn't be interested in a federal race, vice
17 versa. There's different -- obviously, you know,
18 there's a million different reasons why people
19 contribute.

20 **Q. So in looking at a couple of the specific**
21 **lists, and I believe it's the list from Exhibit 3, page**
22 **2, if I start with the Schweich list, you did not use**
23 **that list; is that correct?**

24 A. I remember opening that file and reviewing it
25 at least one time, but no, I did not work off that list

105

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1 with Mr. Greitens.

2 **Q. And I believe you stated the primary reason**
3 **was just difficult to work with?**

4 A. A little bit. It was a very, very extensive
5 list. It was kind of hard to read because there was I
6 don't know how many -- I mean tens of columns in it. It
7 was just kind of difficult to work off of. And I know
8 it was developed by a professional fundraiser. I don't
9 know who. And usually people have their own system when
10 they're working with lists. I have my own. I know
11 others do too. It just wasn't useful to us. Plus, at
12 the time Tom Schweich was running for governor too, and
13 obviously you don't want to have a candidate reach out
14 to donors of your opponent. It's just not a
15 professional thing to do. So I never utilized that list
16 when I was there.

17 **Q. Do you know if anyone -- do you have any**
18 **knowledge of that Schweich list being used subsequently**
19 **not by you?**

20 A. I do not have any knowledge of that. It could
21 have been, but I do not know.

22 **Q. Okay. Do you know the origin of the Schweich**
23 **list?**

24 A. I do not. I do not.

25 **Q. One of the other lists is referenced as EG**

106

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1 **FNCE Prospects?**

2 A. Uh-huh.

3 **Q. The source of that list was Mason Fink; is**
4 **that correct?**

5 A. At the time that this was sent to me, to my
6 recollection I did not know who Mason Fink was. It was
7 later described that he was a Romney fundraiser from
8 2012, had a lot of national contacts and was helping
9 Eric in some capacity. The e-mail that you see that's
10 designated as Mason Fink's list, I was led to believe
11 that he created it; that I remember when opening it it
12 had a lot of donors that were viewed as national level
13 type donors that contributed to races across the board,
14 and I was led to believe that that was his personal
15 fundraising list. I don't know why -- but I don't know
16 when he gave it to the campaign or anything else. My
17 first contact with it obviously was when Krystal Taylor
18 e-mailed that list to me.

19 **Q. But you would say it was a list of value?**

20 A. Yes, absolutely.

21 **Q. Did you know if there was compensation given**
22 **to Mason Fink for this list?**

23 A. I do not, no.

24 **Q. Or do you know if there was or if it was given**
25 **in an in kind fashion?**

107

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1 A. I do not know that.

2 **Q. Lindsey Hodges, you stated you did not meet**
3 **with her; is that correct?**

4 A. No. I never met with her regarding the list.
5 There was one person that came into the Greitens office
6 one time and I don't recall if it was her or not. I
7 want to say that it might have been, but I certainly
8 never met with her about fundraising or The Mission
9 Continues list which is what I was directed to do.

10 **Q. So even though you were directed to perhaps**
11 **use her as a resource, you chose not to?**

12 A. Yes. And I don't remember -- but I don't
13 remember the reason why I chose not to. I just don't
14 recall.

15 **Q. Do you recall meeting anyone else directly**
16 **related to The Mission Continues?**

17 A. Other than -- yes. There were a number of
18 levels. One, the individual that I was working with
19 through most of 2014, Dave Whitman worked out of The
20 Mission Continues office and the Greitens Group office
21 and they were located at the same place. You could say
22 he was related.

23 Then there was board members, people like Tim
24 Noonan I believe, I was led to believe was a board
25 member at Mission Continues or was very active at

108

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1 Mission Continues. Tim was in the Greitens office a
2 couple of different times and I met him. So yes, I did
3 meet people that were involved with the charity and I
4 was led to believe were still involved with the charity.

5 **Q. I think you stated there was a meeting on**
6 **January 7 where you went through a Mission Continues**
7 **donor list. Who was involved in that meeting?**

8 A. So there were two meetings that we had
9 specifically dealing with fundraising. I know the
10 calendar invites are in the exhibits. Eric and I were
11 involved in both meetings. I don't recall the other
12 people there. I would like to say Danny Laub was in at
13 least one of those meetings too. I just know Eric and
14 -- Mr. Greitens and I were involved in both of those
15 meetings.

16 **Q. In those meetings there were specific Mission**
17 **Continues lists that were reviewed?**

18 A. Yes.

19 **Q. Did you ever get a chance to look through the**
20 **MEC listing?**

21 A. At this time or in the past?

22 **Q. Right. I know we had a little break. I**
23 **didn't know if you had a chance to go back and go**
24 **through it.**

25 A. Not really. I glanced through it a little

109

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1 bit.

2 **Q. Did anything familiar jump out at you?**

3 A. Certainly there's some payments --

4 REPRESENTATIVE BARNES: Representative, you're
5 inquiring about Monu Joseph?

6 REPRESENTATIVE PIERSON: Yes.

7 THE WITNESS: Yes. There is an entry on

8 3/9/2015, two entries, one from Gray Arch Income

9 Property and one from Monu Joseph. Both of those were

10 from him. And there are documents proving that, but
11 they've been withheld.

12 BY REPRESENTATIVE PIERSON JR.:

13 **Q. I know Alex Rogers was another name that we**
14 **talked about. Were you aware of any LLCs that perhaps**
15 **were set up by that individual?**

16 A. I am not aware. I do know again there is some
17 e-mail traffic regarding involvement and how much he
18 would raise, but those have been withheld.

19 **Q. Krystal Taylor, when you first met her who did**
20 **she work for?**

21 A. The Greitens Group.

22 **Q. Do you know who she -- anything about her**
23 **former employment history?**

24 A. Just from -- just from what I know from
25 LinkedIn that she used to work at Mission Continues. I

110

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1 don't have any direct knowledge of her time in Mission
2 Continues, though.

3 **Q. So she's a former employee of The Mission**
4 **Continues?**

5 A. As I understand, yes.

6 **Q. And it's your understanding that after, I**
7 **forget the gentleman's name, I think -- well, let me ask**
8 **who was the person that she replaced at the Greitens**
9 **Group?**

10 A. A gentleman named Dave Whitman.

11 **Q. That was the name. And she came on to the**
12 **Greitens Group around what time frame?**

13 A. I don't know the exact dates. I do know she
14 was present at a number of strategy meetings and other
15 political meetings that we held with Mr. Greitens in
16 2014. I don't know the exact time that I met her, but I
17 know she was present in a couple of those. And she, as
18 I understand, took over Dave Whitman's role whenever
19 they separated -- whenever Dave Whitman and Mr. Greitens
20 separated sometime in the fall of 2014.

21 **Q. And did you know Mr. Greitens outside of the**
22 **office?**

23 A. In terms of?

24 **Q. Just if you had a personal relationship with**
25 **him?**

111

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1 A. Yeah. We'd grab lunch together. We never
2 really hung out or anything, but we'd grab lunch
3 together a number of occasions. Certainly I drove him
4 down here for a series of meetings in January of 2015 to
5 meet with elected officials and some other Republican
6 activists. So yeah, I knew him outside, certainly
7 outside of the Greitens Group office.

8 **Q. What kind of person would you describe him to**
9 **be?**

10 A. Extremely ambitious and driven. A guy that
11 doesn't like to lose at anything. Somebody that gives
12 100 percent and is very calculating and self-aware of
13 how he comes across.

14 REPRESENTATIVE PIERSON: Thank you. Thank
15 you, Mr. Chair.

16 REPRESENTATIVE BARNES: Just a few additional
17 questions.

18 FURTHER QUESTIONS BY REPRESENTATIVE BARNES:

19 **Q. How much were you paid in January of 2015?**

20 A. \$4,000.

21 **Q. Do you recall the name of The Mission**
22 **Continues employee who created the list? You mentioned**
23 **a couple times metadata. Do you recall the name of that**
24 **employee?**

25 A. I do not. The first time I heard the name was

112

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1 with the investigator from the MEC when I testified
2 there and she had asked if I knew this person. I don't
3 recall the name.

4 **Q. You testified earlier you believe the**
5 **computers were owned by the Greitens Group. Do you have**
6 **first-hand knowledge of that of who purchased those**
7 **computers? Were the computers there when you showed up**
8 **at the office?**

9 A. At that time we only used our laptops. There
10 was other office equipment, printers and things like
11 that.

12 **Q. Your own personal laptop?**

13 A. I did.

14 **Q. And Krystal Taylor's computer, when you**
15 **arrived to work there, was her computer already there?**

16 A. Yes.

17 **Q. And you don't know who paid for her particular**
18 **computer, do you?**

19 A. No.

20 **Q. Mr. Greitens, did he have his own computer at**
21 **the time you arrived?**

22 A. Yes, it was a laptop, a Mac.

23 **Q. You don't know who purchased that particular**
24 **computer?**

25 A. No.

1 **Q. The campaign paid for furniture?**

2 A. Yes.

3 **Q. Is that an ordinary campaign expense?**

4 A. Is what?

5 **Q. Is that an ordinary campaign expense?**

6 A. For a state-wide campaign I think you could
7 make the argument that it is.

8 **Q. In your involvement with the campaign, did you**
9 **witness Mr. Greitens publicly promise to run an open and**
10 **transparent campaign?**

11 A. Yes.

12 **Q. Were there particular occasions on which?**

13 A. Yes. A particular one that comes to mind in
14 late fall of 2015, Mr. Greitens was very upset that a
15 web video had been released. I don't recall the topic
16 of the web video. But it was questioning his
17 conservative credentials. As a result of that, he made
18 a series of two phone calls to John Brunner when John
19 was in Kansas City for a campaign event. There was a
20 staffer who was with John Brunner at that time.

21 **Q. Were you working for the Brunner campaign at**
22 **this time?**

23 A. I was at that time.

24 **Q. Okay. Continue.**

25 A. There was a staffer who was in the car with

1 Mr. Brunner by the name of Jill Noble. Jill overheard a
2 lot of the contents of the first phone call between Mr.
3 Greitens and Mr. Brunner. In that phone call, according
4 to an affidavit that Jill had signed, Mr. Greitens was
5 extremely irate with Mr. Brunner, challenged him to come
6 down to his boxing gym and used some curse words. I
7 don't recall the exact language of the affidavit. I can
8 certainly supply it if needed. But because of that
9 first phone call and Jill's experience, the decision was
10 made I assume by her to record the second phone call
11 that Mr. Greitens made to Mr. Brunner.

12 That phone call ended up making its way to the
13 press by somebody in our campaign. And after that phone
14 call made its way to the press, Mr. Greitens went on the
15 Mark Reardon Show on KMOX in St. Louis and said that
16 Mr. Brunner wasn't taking responsibility for his
17 actions, that he lacked the courage to come here and sit
18 down with Mark and face him and address questions about
19 the situation. And what Eric said at that time was that
20 he was going to run a positive campaign; that the
21 campaign he was going to run was going to be transparent
22 that you could see his donors and that essentially he
23 was going to run a clean fully transparent campaign.

24 At that time, of course, I was under an NDA.
25 The first time I spoke about any of this was to Missouri

1 Ethic Commission. Of course at that time when Mr.
2 Greitens had that interview, I knew that that wasn't the
3 case at all because I had had conversations with people
4 associated with him in January and February and March
5 when I was employed and working out of that office that
6 I knew that I was led to believe that they were planning
7 -- that they were planning on concealing donors in some
8 way or having people associated with -- on their
9 campaign having staff associated with on their campaign
10 reach out and coordinate donors who would be operating
11 to the contrary of what Mr. Greitens told Mark Reardon
12 on his show.

13 **Q. And I have one more question and I'll allow**
14 **other members to ask additional questions as well if you**
15 **have some additional ones. You testified earlier that**
16 **Mr. Greitens in the course of meeting with you would**
17 **have to -- this is a quote I wrote down -- formulate**
18 **positions that were new to him. Can you explain that?**

19 A. There was at least one session that we did
20 just a general Q&A about different questions that he
21 would probably get in a Republican primary, things
22 having to do with social positions, say pro-life issues
23 or guns, Second Amendment, or education. And during
24 that Q&A session there was at least one that I remember
25 in particular that he had to work through where he stood

1 on these particular issues, issues that you would get
2 with a lot of Republican primary voters.

3 So it kind of led me -- it kind of reinforced
4 what I already knew that, one, this whole new process as
5 a candidate, of course, was new to him but, two, he
6 wasn't coming from a philosophical benchmark on his
7 political positions. And he had met with some other
8 people that we introduced him to throughout 2014 but
9 there was a person that we coordinated Mr. Greitens and
10 her to meet, name was Jennae Neustadt, ended up working
11 at the governor's office for him. She helped him a lot
12 with policy formulation. There was a lobbyist as well
13 involved in that, Shawn Ferry (phonetic spelling) and
14 John Lamping. Those three helped him formulate his
15 conservative positions during that same time period in
16 January, February, March -- January and February in
17 particular of 2015.

18 **Q. What do you mean formulate?**

19 A. Come up with answers that would be -- come up
20 with answers that would be acceptable to a Republican
21 primary voter.

22 **Q. Whose answers were they when they were
23 formulated?**

24 REPRESENTATIVE LAUER: I'm sorry?
25 BY REPRESENTATIVE BARNES:

117

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1 **Q. Whose answers were they when they were
2 formulated?**

3 A. I was not in the sessions with Jennae, John
4 Lamping and Eric, but I know that when I was working
5 with him in the Q&A sessions that he and I would talk
6 through them together and where the base was on a
7 particular issue, you know, what the general
8 conservative voter would generally hear from a candidate
9 that's running for a high office in the state. So
10 certainly myself, Mr. Greitens and Mr. Bobak as well
11 would have been involved in that particular session that
12 I'm speaking about right now.

13 **Q. In your experience, is that typical for a
14 candidate to have to be explained such positions?**

15 A. Usually when you decide to run for a
16 particular party you already know the platform of that
17 party. Mr. Greitens was not really familiar with those
18 issues. With that said, with candidates you always work
19 through messaging points and help them develop a concise
20 message on particular issues.

21 REPRESENTATIVE BARNES: Is there anyone else
22 who has further questions? I'll try and go in order.

23 REPRESENTATIVE PHILLIPS: I would like to.

24 REPRESENTATIVE BARNES: Yes, sir.
25 Representative Phillips.

118

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1 REPRESENTATIVE PHILLIPS: Thank you.

2 FURTHER QUESTIONS BY REPRESENTATIVE PHILLIPS:

3 **Q. I'm gathering you're a strong Republican?**

4 A. Yes.

5 **Q. I assume you have been all of your young life?**

6 A. I've always been a Republican.

7 **Q. As a contract political advisor, have you ever
8 worked for a Democrat?**

9 A. No, never as a -- never as a paid.

10 **Q. How were you approached by the Greitens people
11 about coming on board with them initially?**

12 A. So I had a mutual friend who had known Eric
13 from a number of years ago. His name was Tyler Holman,
14 somebody I'm still friends with. At the time in 2013,
15 we had started to hear rumors that Mr. Greitens was
16 looking to run for office as a Republican. We weren't
17 entirely sure which office he was planning on running
18 for. It was merely just rumors. Tyler had set a
19 meeting up between myself, David Barklage, Mr. Greitens
20 and Dave Whitman. He actually gave me -- I can't
21 remember how the initial meeting or initial outreach
22 happened. Either I contacted Dave or Dave contacted me.

23 From that initial meeting, from that initial
24 outreach, we met -- we then met at the Greitens Group
25 office which was located where The Mission Continues

119

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1 office was located and that was in December of 2013. So
2 the initial outreach happened because we had a mutual
3 friend, Tyler Holman.

4 And we had been told at the time that Mr.
5 Greitens was receiving advice from Ed Martin who was I
6 believe at that time the current Republican party
7 chairman. And again, we had been told then that Ed was
8 trying to engineer a deal with Mr. Greitens and himself
9 that Ed would provide support, network and help for Eric
10 in exchange for Eric agreeing to Ed that he would run
11 his governor's race in 2016. And we were led to believe
12 that Eric was very uncomfortable with that arrangement,
13 and that was kind of when we were brought into the
14 picture. And our first meeting occurred in December of
15 2013.

16 **Q. Okay. So you were contacted by the Greitens
17 campaign. You didn't contact the Greitens campaign; is
18 that what your testimony is?**

19 A. I don't recall the initial outreach whether it
20 was me to Dave Whitman or Dave Whitman to myself, but I
21 do know that Tyler Holman was the one that put us both
22 in touch.

23 **Q. You being a life long Republican and an
24 interest in seeing the party succeed and having
25 knowledge that Mr. Greitens was a Democrat for an**

120

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1 **apparently good while, why in the world would you go to**
 2 **work for him? I don't understand your desire to even be**
 3 **employed by him.**

4 A. Well, certainly when you come across a
 5 candidate that had a resume that he did it makes for a
 6 powerful narrative. It was a great candidate profile.
 7 Somebody who had served in the military that ran a
 8 respectable organization, and on the surface on paper it
 9 is certainly -- it certainly presents itself as a great
 10 profile for a potential candidate for office.

11 I wanted to believe -- A lot of candidates
 12 have conversions in beliefs, and I certainly wanted to
 13 believe that his was sincere. And at the time I didn't
 14 know what his true intentions were. Later on in 2014 it
 15 was always kind of -- we were always kind of led to
 16 believe that he was looking at either governor or
 17 lieutenant governor. At the time I had done a lot of
 18 work for Lieutenant Governor Peter Kinder. In a very,
 19 very small circle I had known that the lieutenant
 20 governor wasn't going to run for re-election. I had no
 21 idea that he'd end up running for governor. At the time
 22 I knew that he wasn't planning on running for
 23 re-election. I did believe that Eric could have made
 24 great lieutenant governor for the state, and it's a job
 25 that gives him a natural segue into Republican party

121

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1 politics because of his veterans background and the
 2 lieutenant governor is veterans advocate and so he could
 3 use that office to kind of prove that he had these
 4 conservative credentials that he said he did and also
 5 help build the party and network and make sure that he
 6 was building these relationships with people around the
 7 state. Obviously that advice wasn't heeded at all.

8 But I went to work for him because I believed
 9 in him. I believed that the conversion was sincere and
 10 I didn't -- I also didn't know at the time the extent of
 11 how he met with senior Democrat officials in Washington,
 12 D.C. in 2008 or 2010; that he actively tried to get them
 13 to recruit him to run for office at that time.

14 I didn't know about the web domains he took
 15 out in 2008 or 2010, the Greitens for President and the
 16 Greitens for America, the Greitens for Governor. I had
 17 no idea about any of those web domains. A lot of that I
 18 learned later on. Initially I certainly believed in him
 19 and that's why I wanted to help him.

20 **Q. Earlier I think you testified that you were**
 21 **doubtful that, I'm putting that word in the sentence, I**
 22 **don't think that's exactly what you said, I think what**
 23 **you meant was you were doubtful about the odds of him**
 24 **becoming governor; is that right?**

25 A. Yes. Yes, he was a virtual unknown to

122

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1 Republican party donors.

2 **Q. He's a rising star in a resume, but yet you**
 3 **knew that the odds of him becoming governor were slim.**
 4 **And then you knew on day one, if I understood your**
 5 **testimony right, when you first met with Governor**
 6 **Greitens that you were very skeptical then about whether**
 7 **or not he truly was a Republican; is that right?**

8 A. Maybe the right word isn't very skeptical, but
 9 certainly I approached the meeting with some skepticism
 10 because up until this point we didn't --

11 **Q. From the Republican candidates that you had**
 12 **worked with in the past, he was vastly different. I**
 13 **think we all agree on that.**

14 A. Yes.

15 **Q. So I guess the part that I'm wondering about**
 16 **is why again would you stay there? Why wouldn't you bow**
 17 **out early if you sensed this is not going to work out?**
 18 **You don't even have to answer that one.**

19 **But how long of a span was there from the time**
 20 **you departed Greitens campaign and became involved in**
 21 **the John Brunner campaign? How many months was that or**
 22 **weeks?**

23 A. The first time it was August when I first was
 24 paid by John Brunner, the first time I did any sort of
 25 substantial work. There might have been some things --

123

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1 I knew the people that were running his campaign. There
 2 were some guys out of Springfield who had been in charge
 3 of it. There really wasn't much that I would have done
 4 before August, though. August was when I started full
 5 time.

6 **Q. Were you in communication with his campaign at**
 7 **anytime while you were -- his campaign or him or his**
 8 **people while you worked for Eric Greitens?**

9 A. I was not involved. I was not in
 10 communication with John Brunner at all. I had met him
 11 briefly a couple times before that but had never spoke
 12 to him about employment or anything else. Now, the
 13 people that I was associated with, some other
 14 consultants, which is why the separation between
 15 Mr. Greitens and myself happened, they were in
 16 communication with John on some issues but it wasn't me
 17 directly with John Brunner, but I don't know and I'd
 18 have to -- I just don't know and I don't know if they
 19 were -- I don't think they were getting paid at that
 20 time either by Mr. Brunner. I think, as consultants do
 21 a lot, I think they were in communication with a number
 22 of different candidates. The people I mentioned, Robert
 23 Knodel and David Barklage, I know David had a number of
 24 conversations with Catherine Hanaway too. That's just
 25 kind of a, yeah, standard operating procedure for some

124

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1 consultants.

2 REPRESENTATIVE PHILLIPS: Thank you. Thank
3 you, Mr. Chair.

4 REPRESENTATIVE MITTEN: I'm good. Thanks.

5 REPRESENTATIVE BARNES: Representative Lauer.

6 REPRESENTATIVE LAUER: Yes, sir, just a few
7 questions. Thank you, Mr. Chair.

8 FURTHER QUESTIONS BY REPRESENTATIVE LAUER:

9 **Q. When you were talking about his demeanor about**
10 **being controlling and ambitious and self-aware, and so**
11 **forth, what was he like as I'll use the term office**
12 **manager? Working with him in the office, what was that**
13 **like?**

14 A. Very structured. I didn't really meet with
15 him. There were times that I would come into the office
16 to ask him a question or something like that. I didn't
17 meet with him to discuss a particular issue unless there
18 was a scheduled time on the calendar to. So extremely
19 very structured.

20 **Q. You spent four days a week in the office, is**
21 **that right, that was part of the agreement?**

22 A. Yes. And maybe some weeks it was just three
23 days. Generally our agreement was four days and most
24 weeks it was.

25 **Q. During the time you were there, even though**

125

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1 **you may not have had contact with him, was there any**
2 **sort of indication as to how he might be managing that?**

3 A. So at the time he was also -- he also had a
4 book launch that he was preparing for. Mr. Greitens is
5 somebody that's, like I said, is very structured and,
6 you know, he was a motivational speaker, motivational
7 leadership speaker as well. A lot goes into that
8 especially with him. There's a lot of rehearsals and
9 things like that that he goes through. There's a
10 process to everything that he does.

11 So he was focused on other things as well and
12 not just politics at that time is what I'm trying to
13 answer.

14 **Q. So when you were working with him as part of**
15 **the Greitens Group I assume, then were you involved in**
16 **any of the initiatives regarding his book or The Mission**
17 **Continues as far as veterans, the book, the PR things?**
18 **How did that all work?**

19 A. That was very, very limited of what I was
20 involved with. They invited me to the book launch that
21 they had in St. Louis and they wanted me to invite a
22 bunch of political people to it, which I did.

23 **Q. What was the purpose of that?**

24 A. It was the release of his latest book called
25 Resilience, and there was an event at the St. Louis

126

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1 Public Library in March, in early March 2015, and he
2 wanted me to reach out to a number of local political
3 people to invite them. I did.

4 So in terms of overlap between Greitens Group
5 and the promotional stuff, there was little stuff like
6 that that I did.

7 **Q. With you being the fundraiser and him asking**
8 **for political guests to come, one might think there was**
9 **an association there of trying to get donor money?**

10 A. Sure, absolutely.

11 **Q. All right. And then I just want to go back to**
12 **the campaign itself and we were talking about**
13 **transparency earlier. Were there things that you were**
14 **told that were not transparent or to be concealed that**
15 **would have impacted his campaign?**

16 A. So he had me sign an NDA the first day that I
17 was working out of the office. So it was expected that
18 I wouldn't discuss probably confidential information
19 with anybody unless compelled to. But in terms of other
20 things that he wanted to conceal, I think there was a
21 lot that he didn't want information to get out on. And
22 take, for instance, say Op Re files or things like that.

23 **Q. I'm sorry? What?**

24 A. Opposition research files or files where you
25 do an assessment on a candidate running and you assess

127

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1 their vulnerabilities, something like that, or maybe a
2 background information on his -- other background
3 information on his past or -- Certainly, yeah, certainly
4 there's other information that I think he would have
5 wanted to conceal.

6 **Q. What were the terms of the confidentiality**
7 **agreement?**

8 A. I don't have it in front of me. I know it was
9 quite extensive.

10 REPRESENTATIVE BARNES: If I might,
11 Representative, we have -- I believe the agreement was
12 provided to us. It's not in the packet that was put
13 together.

14 REPRESENTATIVE LAUER: Thank you. I'm done.

15 THE WITNESS: Also just to add to my earlier
16 answer, another thing is our Q&A sessions that we had,
17 things where we were helping him with his positioning
18 and the Republican platform and our conversations.
19 There's a lot of things like that that they didn't want
20 to ever share or let out in the public.

21 REPRESENTATIVE LAUER: I really appreciate you
22 being so forthcoming and making sure we're very clear on
23 that. Thank you.

24 REPRESENTATIVE BARNES: Representative Austin.

25 REPRESENTATIVE AUSTIN: Thank you.

128

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1 FURTHER QUESTIONS BY REPRESENTATIVE AUSTIN:

2 **Q. So you had an NDA with Eric Greitens, correct?**

3 A. I did.

4 **Q. Did you have an NDA with John Brunner?**

5 A. No.

6 **Q. Have you ever signed an NDA with any other**
7 **candidate that you worked for?**

8 A. To my knowledge, no.

9 **Q. You testified that Jill Noble signed an**
10 **affidavit. Under what circumstances would she be**
11 **signing an affidavit or asked to sign one?**

12 A. There was a situation. It was -- I believe it
13 was the same interview that Mr. Greitens had with Mark
14 Reardon, and in that interview Mark Reardon said that
15 they, in terms of the Brunner campaign, said that there
16 was an earlier phone call that precipitated the phone
17 call that ended up in the media.

18 Eric, after Mark said that, said that is a lie
19 from them. I don't know the exact quote. He said that
20 is a lie from them, Mark, that is an absolute lie. The
21 reason the phone call was recorded in the first place
22 was because the first phone call was of a pretty
23 threatening nature. I guess the calculation was made in
24 the car at the time that they wanted to have a record of
25 the second phone call. And from that phone call John, I

129

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1 think if I remember correctly, Jill had sent the phone
2 call to John. John then sent it to a group of campaign
3 people and it got out. I was not the one that leaked
4 it. Kevin McDermott from the Post called me when I was
5 in Troy, Missouri and said he had a copy of it and then
6 I had to deal with it. It was not a fun thing because
7 it made both candidates look really bad.

8 Anyways, the affidavit was signed as a
9 response to Mr. Greitens' claim that we were lying about
10 that, and we issued the affidavit plus produced John's
11 phone records showing the phone calls made from Eric to
12 John.

13 **Q. And regarding the documents that are the**
14 **subject of the subpoena you received from this**
15 **Committee, why did you keep those documents?**

16 A. So it's really just a personal thing. I save
17 a lot of stuff. I organize it in my files and up until
18 the subpoenas -- obviously the donor lists and a lot of
19 this information I never gave to the Brunner campaign.
20 I was still under an NDA until the MEC subpoenaed me on
21 a lot of this information. But why I held onto it,
22 obviously it wasn't used politically in the primary for
23 John. I doubt they knew any of this stuff even existed.
24 But I held onto it just because it's something I do. I
25 catalog stuff. I save it. And if there's documents

130

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1 that I create, like I say, a fundraising plan, I'll copy
2 that as a template and use for other candidates.

3 **Q. Can you say the same for other campaigns**
4 **you've worked on, you've kept their documents too; is**
5 **that what you've done?**

6 A. Yes. Obviously I never expected them to be
7 subpoenaed and produced to many different agencies and
8 everything.

9 **Q. Okay.**

10 A. Yes, I generally save and organize a lot of
11 files that I work on for other candidates.

12 **Q. You would have documents from the Brunner**
13 **campaign when you worked on that. You'd have documents**
14 **from -- and I forgot who else you said you worked for.**

15 A. Kurt Schaefer.

16 **Q. Yeah. Kurt Schaefer. You'd have documents**
17 **from their campaigns too?**

18 A. Absolutely. Rick Stream, Peter Kinder, yeah,
19 a lot of local candidates I worked on as well.

20 REPRESENTATIVE AUSTIN: Thank you.

21 REPRESENTATIVE BARNES: Representative Rhoads.

22 REPRESENTATIVE RHOADS: Nothing else.

23 REPRESENTATIVE PIERSON: Nothing, Mr. Chair.

24 FURTHER QUESTIONS BY REPRESENTATIVE BARNES:

25 **Q. One final question. Do you believe it's in**

131

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1 **your financial interest to be here today?**

2 A. No, not at all.

3 **Q. The opposite?**

4 A. Yeah. As I said, my clients don't know that
5 I'm here, and I'm here to produce the documents under
6 subpoena. Yeah, it's not my decision to be here.

7 REPRESENTATIVE BARNES: Thank you. Thank you
8 for your testimony. Can we excuse this witness? Thank
9 you.

10 (Witness excused.)

11 REPRESENTATIVE BARNES: Let's take a short
12 break while they go to the door.

13 We're back. So the first motion I will make
14 is to send notice of a meeting for -- to close a meeting
15 scheduled from Friday, March 23 in this location at
16 10:00 a.m. Mr. Secretary, please call the roll.

17 SECRETARY CURCHIN: Chairman Barnes.

18 REPRESENTATIVE MITTEN: Wait a second. So
19 we're going to do 10:00 a.m. on Friday?

20 REPRESENTATIVE BARNES: Unless you want to be
21 here at 8:00 a.m. on Friday.

22 REPRESENTATIVE MITTEN: I have an 8:30 a.m.
23 appointment. I'll see if I can reschedule that.

24 REPRESENTATIVE BARNES: Let's do noon. Let's
25 do noon. That's easier for everyone. 10:00 a.m. makes

132

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1 you leave at 6:00 a.m. Actually let's do 12:30 so
 2 everyone can eat lunch someplace other than here.
 3 REPRESENTATIVE MITTEN: Thank you, Mr. Chair.
 4 REPRESENTATIVE BARNES: I now move to close
 5 the hearing for 12:30 p.m. next Friday, March 23, at
 6 this same location. Mr. Secretary, please call the
 7 roll.
 8 SECRETARY CURCHIN: Chairman Barnes.
 9 REPRESENTATIVE BARNES: Aye.
 10 SECRETARY CURCHIN: Representative Phillips.
 11 REPRESENTATIVE PHILLIPS: Aye.
 12 SECRETARY CURCHIN: Representative Mitten.
 13 REPRESENTATIVE MITTEN: Aye.
 14 SECRETARY CURCHIN: Representative Lauer.
 15 REPRESENTATIVE LAUER: Aye.
 16 SECRETARY CURCHIN: Representative Austin.
 17 REPRESENTATIVE AUSTIN: Aye.
 18 SECRETARY CURCHIN: Representative Rhoads.
 19 REPRESENTATIVE RHOADS: Aye.
 20 SECRETARY CURCHIN: Representative Pierson.
 21 REPRESENTATIVE PIERSON: Aye.
 22 REPRESENTATIVE BARNES: By your vote seven
 23 aye, zero no to close the meeting next Friday, 12:30
 24 p.m. I now move that the Committee authorize a
 25 subcommittee of myself, Representative Austin and

1 Representative Mitten to interview Mr. David Whitman who
 2 is currently located at the federal penitentiary in
 3 Springfield, Missouri and for whom recording devices are
 4 not allowed into those interviews except with special
 5 permission of the warden which I believe we can get but
 6 I think that's a somewhat lengthy process. At this
 7 point in time I think it would behoove us to go have a
 8 conversation first before deciding whether it makes
 9 sense to have a court reporter there to take it down.
 10 Any discussion on that motion?
 11 REPRESENTATIVE LAUER: So it cannot be
 12 recorded in any fashion?
 13 REPRESENTATIVE BARNES: You are prohibited
 14 from -- Unless you have special dispensation from the
 15 warden, you are prohibited from being recording devices
 16 into the facility.
 17 REPRESENTATIVE LAUER: How would that be
 18 recorded?
 19 REPRESENTATIVE BARNES: We will come back to
 20 the Committee with a summary of what he tells us in that
 21 meeting and potentially if he has relevant information
 22 for our Committee then we will follow up with a recorded
 23 statement of some sort if not --
 24 REPRESENTATIVE MITTEN: A request for special
 25 dispensation.

133

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134

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1 REPRESENTATIVE BARNES: -- if not a signed
 2 declaration on the day that we go down there. Further
 3 discussion on said motion?
 4 REPRESENTATIVE PIERSON: And he will be, of
 5 course, under oath?
 6 REPRESENTATIVE BARNES: When we have him
 7 without the special dispensation, he's not going to be.
 8 REPRESENTATIVE PIERSON: So he's not under
 9 oath without the special dispensation?
 10 REPRESENTATIVE BARNES: This is just an
 11 initial meeting to see if he has information relevant to
 12 the investigation.
 13 REPRESENTATIVE MITTEN: An informal interview.
 14 REPRESENTATIVE BARNES: It is an informal
 15 interview to determine whether we need a formal
 16 interview to go through the process of getting a court
 17 reporter into the federal penitentiary in Springfield.
 18 REPRESENTATIVE MITTEN: But it's also possible
 19 -- Mr. Chairman, if I might just reiterate. I think
 20 think it's also possible that if the subcommittee
 21 believes that there is some information that could be
 22 obtained by way of a sworn affidavit that we could just
 23 get then and there, that's another possibility.
 24 REPRESENTATIVE BARNES: Yes. Our intent is to
 25 report back to the Committee rather than go through this

1 lengthy process where we have to get the warden's
 2 special permission and then -- I don't know if all of us
 3 could even get in there for this purpose. My
 4 understanding from speaking to the public information
 5 officer in the facility is that they've never had
 6 anything like this done which should not be surprising.
 7 There's never been a committee of the Missouri House to
 8 interview a witness at the federal penitentiary in
 9 Springfield, Missouri.
 10 REPRESENTATIVE AUSTIN: They've had lawyers
 11 there depose.
 12 REPRESENTATIVE BARNES: They've had lawyers
 13 there. But the question is there are so many of us.
 14 They're nine people to come in, bring a recording
 15 device. That presents a different sort of thing that
 16 they've never done before.
 17 REPRESENTATIVE MITTEN: Something they're not
 18 logistically prepared for.
 19 REPRESENTATIVE BARNES: They're not
 20 logistically prepared for. So I now move that the
 21 Committee grant permission to Representative Austin,
 22 myself and Representative Mitten and I believe
 23 Mr. Curchin is going to be with us for said interview on
 24 Friday. So I now move.
 25 SECRETARY CURCHIN: Chairman Barnes.

135

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136

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1 REPRESENTATIVE BARNES: Aye.
 2 SECRETARY CURCHIN: Phillips.
 3 REPRESENTATIVE PHILLIPS: Aye.
 4 SECRETARY CURCHIN: Mitten.
 5 REPRESENTATIVE MITTEN: Aye.
 6 SECRETARY CURCHIN: Lauer.
 7 REPRESENTATIVE LAUER: Aye.
 8 SECRETARY CURCHIN: Austin.
 9 REPRESENTATIVE AUSTIN: Aye.
 10 SECRETARY CURCHIN: Rhoads.
 11 REPRESENTATIVE RHOADS: Aye.
 12 SECRETARY CURCHIN: Pierson.
 13 REPRESENTATIVE PIERSON: Aye.
 14 REPRESENTATIVE BARNES: Finally, there is some
 15 question about this Committee's authority to issue a
 16 subpoena to force either a Mr. Dan Laub or anyone
 17 associated with The Mission Continues in Manhattan to
 18 appear before us here in Missouri. One potential
 19 solution to that is to take a deposition. There's a
 20 statute that authorizes the speaker to deputize a member
 21 or even a non member to take a deposition for any
 22 purpose to be used in the House of Representatives. So
 23 I want the Committee to vote on said authorization if
 24 necessary to interview Mr. Laub or someone from The
 25 Mission Continues for that limited purpose.

137

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1 REPRESENTATIVE LAUER: He would not be able to
 2 come here?
 3 REPRESENTATIVE BARNES: We don't know the
 4 answer to that question yet. It's if he would not come
 5 here, refuse to come here, I want to offer up the
 6 possibility that if they deem that to be too costly and
 7 time consuming, then we will say fine, we will come to
 8 you so that there's no great excuse not to speak with
 9 us. Further discussion of the motion? Seeing none I so
 10 move. Mr. Curchin, please call the roll.
 11 SECRETARY CURCHIN: Chairman Barnes.
 12 REPRESENTATIVE BARNES: Aye.
 13 SECRETARY CURCHIN: Phillips.
 14 REPRESENTATIVE PHILLIPS: Aye.
 15 SECRETARY CURCHIN: Mitten.
 16 REPRESENTATIVE MITTEN: I'm sorry. But what
 17 are we voting on here?
 18 REPRESENTATIVE BARNES: Let's back up.
 19 REPRESENTATIVE MITTEN: We're basically saying
 20 that the chair -- that should the New York witness
 21 refuse to come to Missouri that we would -- we're
 22 authorizing the Committee or the chair to either travel
 23 to New York to interview or deputize somebody else --
 24 travel to New York for a deposition or deputize somebody
 25 in New York to take said deposition; is that what we're

138

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1 voting on?
 2 REPRESENTATIVE BARNES: Yes. And my
 3 inclination it would be myself and perhaps another
 4 member of the Committee if someone else would choose to
 5 do so. The same is true for Mr. Laub who I believe is
 6 in Virginia at this point.
 7 REPRESENTATIVE MITTEN: I just want to make
 8 sure I know what I'm voting on. Aye.
 9 REPRESENTATIVE BARNES: That was an aye. Was
 10 that an aye?
 11 REPRESENTATIVE MITTEN: Yeah.
 12 SECRETARY CURCHIN: Lauer.
 13 REPRESENTATIVE LAUER: Yes, indeed.
 14 SECRETARY CURCHIN: Austin.
 15 REPRESENTATIVE AUSTIN: Aye.
 16 SECRETARY CURCHIN: Rhoads.
 17 REPRESENTATIVE RHOADS: Aye.
 18 SECRETARY CURCHIN: Pierson Jr.
 19 REPRESENTATIVE PIERSON: Aye.
 20 REPRESENTATIVE BARNES: By your vote of seven
 21 ayes, zero nos, you have approved the motion. That ends
 22 today's hearing.
 23 (Off the record.)
 24
 25

139

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1 CERTIFICATE OF REPORTER
 2
 3 I, Beverly Jean Bentch, CCR No. 640, within the
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 6 taken by me to the best of my ability and thereafter
 7 reduced to typewriting under my direction; that I am
 8 neither counsel for, related to, nor employed by any of
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 10 taken, and further, that I am not a relative or employee
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 12 thereto, nor financially or otherwise interested in the
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140

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