The interview in this matter was held at the U.S. Capitol Building, [redacted], commencing at 9:34 a.m.
APPEARANCES:

SENATE JUDICIARY COMMITTEE:

Jason Foster, Chief Investigative Counsel,
Chairman Grassley

Patrick Davis, Deputy Chief Investigative Counsel,
Chairman Grassley

Samantha Brennan, Investigative Counsel,
Chairman Grassley

Joshua Flynn-Brown, Investigative Counsel
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Daniel P. Parker, Investigative Assistant
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Andrew Moats, Law Clerk,
Chairman Grassley

Brian Privor, Senior Counsel,
Senator Feinstein

Heather Sawyer, Counsel,
Senator Feinstein

Molly M. Claflin, Counsel,
Senator Feinstein
APPEARANCES:

SENATE JUDICIARY COMMITTEE (Cont'd)

Lara G. Quint, Chief Counsel,
Senator Whitehouse
Sarah Griswold, Minority Staff
Alexandria Deitz, Minority Staff

FOR THE WITNESS:
Scott S. Balber, Herbert Smith Freehills
John O'Donnell, Herbert Smith Freehills
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MR. DAVIS: Good morning. This is the transcribed interview of Irakly Kaveladze. On October 18, 2017, Chairman Grassley sent Mr. Kaveladze a letter stating that the Judiciary Committee was seeking information related to a meeting held on June 9, 2016, at Trump Tower, as well as related matters. The letter requested an interview and certain categories of documents. In response, Mr. Kaveladze has through his counsel produced documents and agreed to this voluntary interview.

Would the witness please state your name for the record.

MR. KAVELADZE: Ike Kaveladze.

MR. DAVIS: On behalf of the Chairman, I want to thank Mr. Kaveladze for appearing here today. My name is Patrick Davis, and I'm the Deputy Chief Investigative Counsel with the Committee's majority staff.

I'll ask everyone else from the Committee who is here at the table to introduce themselves as well, and we'll get to your counsel in just a few moments.

MR. FOSTER: Jason Foster, Chief
Investigative Counsel for the majority staff.

MS. BRENnan: Samantha Brennan,

Investigative Counsel for the majority staff.

MR. HOLMES: Lee Holmes, Chief Counsel to

Senator Lindsey Graham.

MR. PRIVOR: Brian Privor. I'm Senior

Counsel, minority staff, Senator Feinstein.

MS. CLAFLIN: Molly Claflin, Counsel,

Senator Feinstein.

MS. QUINT: Lara Quint, Chief Counsel,

Senator Whitehouse.

MR. PARKER: Daniel Parker, Investigative

Assistant, Senator Grassley.

MS. LAY: DeLisa Lay, Senior Investigative

Counsel.

MR. MOATS: Andrew Moats, Law Clerk for

Senator Grassley.

MR. FLYNN-BROWN: Josh Flynn-Brown,

Investigative Counsel for Senator Grassley.

MR. DAVIS: The Federal Rules of Civil

Procedure do not apply to any of the Committee's

investigative activities, including transcribed

interviews. There are some guidelines we follow,

and I'll go over those now.

Our questioning will proceed in rounds.
The majority staff will ask questions first for one hour. Then the minority staff will have the opportunity to ask questions for an equal amount of time. We will go back and forth until there are no more questions and the interview is over.

We typically take a short break at the end of each hour, but should you need to take a break at any other time, please just let us know. Depending on how long the interview takes, we can discuss taking a break for lunch whenever you're ready to do that.

We have an official reporter taking down everything we say to make a written record, so we ask that you give verbal responses to all questions. Do you understand?

MR. KAVELADZE: I do.

MR. DAVIS: So that the court reporter can take down a clear record, we'll do our best to limit the number of people directing questions to you during any given hour to those whose turn it is. It's also important that we don't talk over one another or interrupt each other if we can help it, and that goes for everybody present at today's interview.

While Senators on the Committee may
observe, the Chairman and Ranking Member have agreed that only staff will ask questions.

We encourage witnesses who appear before the Committee to consult freely with counsel if they so choose. You are appearing here today with counsel. Counsel, please state your name for the record.

MR. BALBER: Scott Balber, from Herbert Smith Freehills, on behalf of the witness.

MR. O'DONNELL: John O'Donnell, from Herbert Smith Freehills, also on behalf of the witness.

MR. DAVIS: Thank you.

We want you to answer our questions in the most complete and truthful manner possible, so we will take our time. If you have any questions or if you don't understand any of our questions, please let us know. If you honestly don't know the answer to a question or don't remember, it's best not to guess. Just give us your best recollection. It's okay to tell us if you learned some information from someone else if you indicate how you came to know the information. If there are things that you don't know or can't remember, we ask that you inform us to the best of your knowledge who might be able to provide a more
1 complete answer to the question.
2 It is this Committee's practice to honor
3 valid common law privilege claims as an
4 accommodation to a witness or party when those
5 claims are made in good faith and accompanied by
6 sufficient explanation so that the Committee can
7 evaluate the claim. When deciding whether to
8 honor a privilege, the Committee weighs its need
9 for the information against any legitimate basis
10 for withholding it. The Committee typically does
11 not honor contractual confidentiality agreements.
12 You should understand that although the
13 interview is not under oath, by law you are
14 required to answer questions from Congress
15 truthfully. Do you understand that?
16     MR. KAVELADZE: I do.
17     MR. DAVIS: Specifically, 18 U.S.C. Section
18 1001 makes it a crime to make any materially
19 false, fictitious, or fraudulent statement or
20 representation in the course of a congressional
21 investigation. That statute applies to your
22 statements in this interview. Do you understand
23 that?
24     MR. KAVELADZE: I do.
25     MR. DAVIS: Witnesses who knowingly provide
false statements could be subject to criminal prosecution and imprisonment for up to five years. Do you understand this?

MR. KAVELODZE: I do.

MR. DAVIS: Is there any reason you're unable to provide truthful answers to today's questions?

MR. KAVELODZE: There is no reason for that.

MR. DAVIS: Finally, we ask that you not speak about what we discuss in this interview with anyone else outside of who's here in the room today in order to preserve the integrity of our investigation. We also ask that you not remove any exhibits or other Committee documents from the interview.

Is there anything else that my colleagues from the minority want to add?

MR. PRIVOR: Just to note for the record that one of our colleagues joined the room.

Please identify yourself for the record.

MS. DEITZ: Alexandria Deitz.

MR. FOSTER: With the minority staff.

MR. DAVIS: The time is now 9:39 a.m., and we will get started with the first hour of questions.
EXAMINATION BY COUNSEL FOR THE MAJORITY

BY MR. DAVIS:

Q. Please state your full name for the record.

A. Ike Thomas Kaveladze.

Q. Where do you currently reside?

A. I reside at California.

Q. Did you reside there in June of 2016 as well?

A. Yes, I did.

Q. Where are you from originally?

A. I was born in now Republic of Georgia.

Q. When did you move to the United States?


Q. When did you become an American citizen?


Q. Are you a dual citizen of Georgia or any other country?

A. I'm a dual citizen of the United States and Russian Federation.

Q. You are fluent in English, correct?

A. Yes.

Q. And you're fluent in Russian as well; is
Q. What is your professional background?
A. I'm a specialist in accounting and finance.

Q. And do you currently work at the Crocus Group?
A. Yes.

Q. When did you begin working at the Crocus Group?
A. My initial employment started in the year 1989. Then it terminated for a few years, and then it continued in 2003 until current.

Q. What is the nature of Crocus Group's business?
A. Numerous activities. Convention center, and we actually own the convention center and run trade shows. Numerous retail shopping projects, different formats, DIY formats, something like Home Depot style. And middle-class shopping mall, upper-middle-class shopping mall chains.

Q. What is your current title at the Crocus Group?
A. I'm a senior vice president.

Q. And as senior vice president, what are
1 your job responsibilities?

2 A. I was handling international projects, anything with an international component in it, such as contracting Chinese construction workers for some construction project in Russia or bringing U.S. architect into a construction project in Russia or buying goods for like inventory for the stores all over the world, and construction equipment for construction projects. Whatever was happening internationally, I was handling it.

12 Q. Do you know Aras Agalarov?

13 A. Yes, I do.

14 Q. When did you first meet him?

15 A. We first met in nineteen eighty -- it was either '89 or '88. Let me be more specific. Yeah, I think it was '89, 1989.

18 Q. And what is the nature of your relationship with him?

19 A. He's my boss.

20 Q. What is your understanding of Aras' ties to the Russian Government, if any?

23 A. I know Mr. Agalarov has participated in numerous government construction projects, so my understanding -- that's my understanding of ties.
1 Q. Are you aware of any instances in which
2 Aras Agalarov sought to arrange meetings between
3 Mr. Trump or his associates and Russian Government
4 officials?
5 A. No, I'm not aware.
6 Q. Do you know Emin Agalarov?
7 A. Yes, I do.
8 Q. When did you first meet him?
9 A. My best recollection would be year 1990.
10 Q. And what is the nature of your
11 relationship with him?
12 A. He is my coworker. He works for Crocus.
13 Q. What is your understanding of Emin
14 Agalarov's ties to the Russian Government, if any?
15 A. I don't think they exist.
16 Q. Are you aware of any instances in which
17 Emin Agalarov sought to arrange meetings between
18 Mr. Trump or his associates and Russian Government
19 officials?
20 A. No, I'm not aware.
21 Q. Were you involved in the Crocus Group's
22 efforts related to the 2013 Miss Universe Pageant?
23 A. Yes.
24 Q. What were your responsibilities in that
25 context?
A. Initial contract negotiation and signing the contract.

Q. What interactions did you have with personnel in the Trump Organization in that context?

A. I mostly interacted with attorneys representing the Miss Universe organization. I did not interact -- my only interaction with actual Trump Organization representatives was on June 15, 2013, when the documents were signed in Las Vegas during the Miss USA contest.

Q. Have you been involved in any efforts between Crocus Group and the Trump Organization to pursue real estate projects?

A. Yes.

Q. Can you please describe the projects and what your involvement was in them?

A. I was involved in negotiations, initial negotiations, which led to the signing of letter of intent, MOU, memorandum of understanding, which is letter of intent.

Q. And what was the result of that letter of intent?

A. It did not materialize into a project.

Q. Do you remember why it did not
materialize into a project?

A. Mr. Trump's side at some point of time kind of walked out of this project and just stopped responding to our emails.

Q. Mr. Kaveladze, when did you first interact with Natalia Veselnitskaya?

A. My first interaction with Natalia Veselnitskaya was on June 6, 2016.

Q. To the best of your knowledge, is Ms. Veselnitskaya an attorney for the Russian Government?

A. To the best of my knowledge, Ms. Veselnitskaya is not an attorney for Russian Government.

Q. Do you know if she ever has been an attorney for the Russian Government previously?

A. No, I have no knowledge of her being an attorney for Russian Government.

Q. When you first interacted with Ms. Veselnitskaya, what did you understand her business to be?

A. I understood that her business was legal business, legal profession, and she's a Russian attorney, private Russian attorney.

Q. What is your understanding of Ms.
Veselnitskaya's relationship with Prevezon Holdings?

A. Everything I learned about Prevezon Holdings I learned from the media 5 months ago.
So I could just -- you know, it's mostly going to be in articles in the media.

Q. That's fine. As far as you know, does Ms. Veselnitskaya work for the Crocus Group?

A. No, she does not work for Crocus Group.

Q. What about the Agalarovs?

A. Both Agalarovs work for Crocus Group.

Q. I'm sorry --

MR. BALBER: And just to clarify your question, when you say "work for," do you mean as an employee? Or would you also encompass in your question her providing legal representation as outside counsel?

MR. DAVIS: Both.

MR. KAVELADZE: As I know currently, Ms. Veselnitskaya represents Crocus as an outside counsel in a real estate deal.

BY MR. DAVIS:

Q. Do you know when that representation began?

A. No.
Q. Do you know if she has represented the Agalarovs as an attorney?
A. No, I have no knowledge of that.
Q. What is the nature of your relationship with Ms. Veselnitskaya?
A. I don't have much of a relationship. It's a working relationship related to that situation, June 9 meeting situation.
Q. Who first contacted you about a meeting between Ms. Veselnitskaya and Donald Trump, Jr.?
A. I was contacted by Mr. Aras Agalarov.
Q. When did he contact you?
A. June 6, 2016.
Q. What did Aras Agalarov tell you the purpose of the meeting was?
A. First call, he didn't specify the purpose of the meeting. He just told me to be in New York City. Second call, he asked me if I knew anything about Magnitsky Act, and I said I did, and so he said the meeting is going to be about Magnitsky Act.
Q. And how did Mr. Aras Agalarov communicate with you about this meeting? Was it email, text, phone?
A. Mostly phone.
Q. To the best of your knowledge, does Crocus Group have a business relationship with Prevezon Holdings?

A. To the best of my knowledge, no business relationship with Prevezon Holdings.

Q. As far as you know, are either Aras or Emin Agalarov involved with the Human Rights Accountability Global Initiative?

A. As far as I know, no.

Q. To the best of your knowledge, have either of the Agalarovs been subject to Magnitsky Act sanctions?

A. To the best of my knowledge, no. In fact, I know for a fact no.

Q. So as far as you know, what is the basis of Aras Agalarov's interest in the Magnitsky Act and the Prevezon litigation, if any?

A. I can only guess here, and, again, I'm reading some accounts in the media, some words of people, just...

21 BY MR. FOSTER:

Q. I'm sorry. You said earlier, I think in response to an earlier question, that you were asked if you were familiar with the Magnitsky Act, and you said you were. How did you become
familiar with the Magnitsky Act?

A. Well, I read newspapers, and I'm actual

supporter of Magnitsky Act.

Q. So long before this meeting, you were

aware --

A. Oh, yeah. Oh, yeah.

Q. And just from reading the news.

A. Yeah.

Q. You didn't have any official business-

related reason to be --

A. No.

Q. -- to be up on the act or to be aware of

it?

A. No. No.

BY MR. DAVIS:

Q. Do you know whether Aras Agalarov was

asked by someone else to get involved in setting

up this meeting?

A. I do not know.

Q. How would you describe Aras Agalarov's

relationship with Mr. Putin, if any?

A. I know they know each other, but as far

as the nature of the relationship, I don't know.

Q. Were you involved in contacting Rob

Goldstone to ask him to contact Donald Trump, Jr.,
1 in order to seek a meeting with Ms. Veselnitskaya?
2 A. No.
3 Q. Do you know who did contact -- I'm sorry.
4 Go ahead.
5 A. Correction. There was two attempts to do
6 a meeting. The second one was November. In
7 November, yes, I was involved. But initial
8 meeting I was not.
9 Q. Thank you. Do you know who did contact
10 Mr. Goldstone regarding the June 9th meeting?
11 A. As far as I know, Mr. Goldstone was
12 contacted by Emin Agalarov.
13 Q. Did Mr. Goldstone ever tell you how Emin
14 Agalarov had portrayed the purpose of the meeting?
15 A. No. We never had a discussion about this
16 with Mr. Goldstone.
17 Q. Did Mr. Goldstone tell you who the
18 intended participants were for this meeting before
19 it happened?
20 A. Yes. I have received an email on June 7
21 describing the -- providing me with a list of
22 participants.
23 Q. What is your relationship with Mr.
24 Goldstone?
25 A. I have no relationship with Mr. Goldstone
aside of the fact that he worked as an agent for
Emin Agalarov, and since I was handling the Crocus
business, sometimes, you know, we'll make a
payment for his agency fees or whatever on behalf
of Crocus.

Q. Other than those occasional payments, to
the best of your knowledge is Mr. Goldstone an
employee of the Crocus Group?
A. He never was an employee of Crocus Group.

He was outside service provider.

Q. What is your understanding of Mr.
Goldstone's ties with the Russian Government, if
any?
A. I don't think Mr. Goldstone has ties with
Russian Government.

Q. I'd like you to take a look at this email
chain, which I'll label Exhibit 1. This document
is Bates-stamped DJTJR-00893

[Kaveladze Exhibit 1 was marked for
identification.]

MR. BALBER: Do you have one for me? Thank
you.

BY MR. DAVIS:

Q. This is an email chain between Mr.
Goldstone and Rhona Graff, Donald Trump, Sr.'s
1 assistant, from July of 2015. You are not listed
2 as a recipient. The first email chronologically
3 is from Mr. Goldstone to Ms. Graff on July 22,
4 2015, and states in part: "Emin has an email
5 invite for Mr. Trump to attend his father's 60th
6 birthday in Moscow on November 8th."
7 Ms. Graff responded back on July 24,
8 2015, stating in part: "I will certainly make Mr.
9 Trump aware of this invitation, and I know he will
10 be honored that Emin thought of him. However,
11 given his Presidential campaign, it's highly
12 unlikely that he would have time on his calendar
13 to go to Moscow in November."
14 Mr. Goldstone replies on that same day,
15 stating in part: "I totally understand re:
16 Moscow, unless maybe he would welcome a meeting
17 with President Putin, which Emin would set up."
18 Were you involved in Mr. Goldstone's
19 offer to arrange via Emin a meeting between Mr.
20 Putin and Mr. Trump?
21 A. No, I was not.
22 Q. Were you aware of the offer at the time?
23 A. No, I was not.
24 Q. Other than this email chain and the
25 circumstances leading up to the June 9, 2016,
1 meeting, are you aware of any other instances in
2 which Mr. Goldstone sought to arrange meetings
3 between Russian Government officials and
4 associates of the Trump campaign?
5     A. No, I'm not aware.
6     Q. As you likely know, Donald Trump, Jr.,
7 publicly released the email chain between him and
8 Mr. Goldstone in which the June 9th meeting was
9 arranged. I'd like to turn to a version of that
10 email chain beginning on June 3, 2016, between
11 Trump, Jr., and Mr. Goldstone. I will label this
12 Exhibit 2. The Bates numbers are DJTFP-00011895
13 through 897.
14 [Kaveladze Exhibit 2 was marked for
15 identification.]
16 BY MR. DAVIS:
17     Q. On page 897 --
18     MR. BALBER: I would just suggest you read
19 from the back and read the whole thing before you
20 answer anything, okay?
21     MR. DAVIS: Sure. Take your time.
22     MR. BALBER: Thank you.
23     [Pause.]
24     MR. KAVELADZE: Okay.
25 BY MR. DAVIS:
Q. This email chain references people named Emin and Aras. As far as you can tell, these are references to the Agalarovs; is that correct?
A. That is correct.
Q. Okay. The first email in this chain chronologically states -- it was sent from Mr. Goldstone to Donald Trump, Jr., at 10:36 a.m. on June 3, 2016. It states that the Crown Prosecutor of Russia met with Aras and offered to provide the Trump campaign with some official documents and information that would incriminate Hillary and her dealings with Russia and would be very useful to Mr. Trump.
Did you provide Mr. Goldstone this account of the prosecutor's meeting with Aras and the purported offer to help the Trump campaign?
A. Can you say it again? Can you rephrase that question?
Q. Sure. Did you tell Mr. Goldstone this account of the Crown Prosecutor meeting with Aras?
A. No.
Q. Do you know who did?
A. From that letter, I do not.
Q. And from the letter who do you --
MR. BALBER: You mean by reading the email,
MR. KAVELADZE: By reading this email, yeah.

BY MR. DAVIS:

Q. And just to clarify, in that email Mr. Goldstone says, "Emin just called," and then provides --

A. Emin Agalarov.

Q. Mr. Goldstone's email states in part:

"This is obviously very high level and sensitive information, but it's part of Russia and its government's support for Mr. Trump, helped along by Aras and Emin."

Did you and Mr. Goldstone ever discuss an effort by the Russian Government assisted by Aras and Emin Agalarov to support the Trump campaign?

A. I have never discussed that with Mr. Goldstone.

Q. Were you otherwise aware of any such efforts at the time?

A. No.

Q. Prior to the meeting on June 9, 2016, who did you tell about the meeting?

A. A lot of people. I told [family members], I told my neighbor.
Q. So would it be accurate to say you were not keeping the meeting a secret?

A. No, I was not keeping it secret.

MR. BALBER: And just so the record's clear, when you say "told about the meeting," I want to make sure that the witness understands he means -- I assume you're including people who may have already known about the meeting that he was going to speak to.

MR. DAVIS: Right.

MR. BALBER: So I guess I want to make sure you're including -- maybe just to clarify the question, identify everybody you spoke to about the meeting before the meeting happened. Is that okay?

MR. DAVIS: That's fine.

MR. KAVELADZE: So whoever I just mentioned, obviously all participants of the meeting, and a gentleman named Roman Beniaminov. He worked with Rob Goldstone. I called him on June 7 to -- should I continue or wait for a question?

BY MR. FOSTER:

Q. Please, please.

A. Okay. And right after I received an email from Mr. Goldstone about three individuals
we were going to be meeting with, I got a little bit puzzled because at that point of time, all I knew about the meeting, that it's going to be Magnitsky Act, and I was unclear why exactly these people are meeting with us. I was in two conversations prior to that with Mr. Agalarov. You know, my suggestion was to meet with attorneys of Mr. Trump because she's an attorney, Ms. Veselnitskaya, and probably the proper level of communication with her. And so I called Roman because I knew he worked with Rob, and I asked him, "Do you know anything about that meeting?" And, "Do you know anything about the fact that we're going to be meeting with three top political electoral campaign representatives to discuss Magnitsky Act?" And at that point of time, Roman told me that, as far as he heard, attorney had some negative information on Hillary Clinton.

Q. So what is the nature of Roman's job?
A. Musical business. They -- actually, Rob Goldstone is a musical agent of Emin. Roman did logistics of their musical tours, let's say booking of the venues, you know, dealing with promoters, selling tickets, and stuff like that.

MR. DAVIS: I'd like to show you a document,
MR. KAELADZE: Yeah, that's the email I'm referring to.

BY MR. DAVIS:

Q. Okay. Thank you for clarifying. And approximately how long after you received this email was it before you called Roman?

A. Approximately 1 to 2 hours. I can go back to my phone records to be a little bit more specific, but I think it's 1 to 2 hours.

Q. Thank you. I'd also like you to take a look at the email chain Bates-numbered SJC-KAV-00111 through 112, which will be Exhibit 4.

BY MR. DAVIS:

Q. This is an email chain between you and Rob Goldstone on June 7th and 8th of 2016.

A. Uh-huh.

Q. As you can see, about halfway down the first page Bates-numbered 111, there's mention of an image which is not rendered in this version. I believe, if I'm correct, that's the version -- the
other document which we looked at is that image.

Does that match your recollection?

A. Yes, it does match my recollection.

Q. I'll give you a moment to read over the chain.

[Pause.]

MR. KAVELADZE: Yes.

BY MR. DAVIS:

Q. In the first email chronologically, which was sent at 2:27 p.m. on June 7th, according to the document, June 7, 2016, Mr. Goldstone writes to you that he has "confirmed a meeting for you both at 3:00 p.m. on Thursday with Donald Trump, Jr., at his office at Trump Tower." When he references "you both," who did you understand him to be referencing?

A. It's myself and Natalia Veselnitskaya.

Q. On June 8th at 3:40, according to this email chain, you emailed Mr. Goldstone saying, "Just spoke with that lady from Russia. She asked if it would be possible to move meeting to 4:00. She represents client in court that morning and is afraid of being late."

That's also a reference to Ms. Veselnitskaya; is that correct?
A. That is correct.

Q. And how did you speak with her -- by phone, text, or mail -- for this interaction?

A. It was phone conversation. What time is that? Is that 3:40 p.m.?

Q. I believe it's a.m., but I could be mistaken.

A. Yeah, it's -- yeah.

MR. BALBER: Well, the earlier one is 3:25 p.m., so --

MR. KAVELADZE: Yeah, that's on June 7th.

MR. BALBER: Oh, that's right. Sorry.

MR. KAVELADZE: Okay.

MR. DAVIS: And the one after that is 8:31 a.m.

MR. KAVELADZE: Well, that's June 8th, the day before -- well, it's phone.

BY MR. DAVIS:

Q. At 8:31 a.m. on June 8, 2016, according to this email chain, Mr. Goldstone proposes that you and he meet before this scheduled meeting at Trump Tower, that you meet him at 3:30 p.m., which you agree to, writing, "Sure, let's meet at 3:30."

Mr. Goldstone replied, "Okay. See you in front of Trump Tower on Fifth Ave. at 3:30 p.m."
When did you arrive in New York for this trip?
A. I arrived on June 9, around 7:00 a.m. in the morning; 7:10, I believe.
Q. And where were you traveling from?
A. I was traveling from Los Angeles, California.
Q. What was your itinerary while in New York during this trip?
A. I stayed for one day, and I returned back home on June 10. My itinerary included only one item as a meeting -- actually, two items. There was lunch with Natalia Veselnitskaya prior to the meeting and then meeting itself.
Q. When was that lunch with Ms. Veselnitskaya?
A. To the best of my knowledge, it was 2 hours prior to the meeting, although she was 45 minutes late.
Q. And who else attended that lunch, if anyone?
A. That lunch was attended by Natalia Veselnitskaya, myself, and then Anatoli Samochornov, who is the translator for Ms.
1 Veselnitskaya.

2 MR. FOSTER: No one else?

3 MR. KAVELADZE: No one else at that point.

4 BY MR. DAVIS:

5 Q. Had you met Mr. Samochornov prior to that lunch?

6 A. No, I have not.

7 Q. What did you discuss at that lunch?

8 A. Because of the fact that she was late, and during that lunch I was supposed to read the synopsis for the meeting, and synopsis was 10- to 11-page document, I spent most of the time reading that synopsis. I don't think we had much of a discussion with her because eventually -- maybe a little discussion, and then eventually we started walking towards the Trump Tower. So it was mostly reading synopsis.

9 Q. Was that synopsis written in English or Russian?

10 A. It was written in Russian.

11 Q. And when did you meet up with Mr. Akhmetshin?

12 A. I met Mr. Akhmetshin 15 minutes prior to the meeting. He met us in front of the Trump Tower.
Q. Did you interact with anyone else on the legal team representing Prevezon Holdings or who was involved in the Human Rights Global Accountability Initiative?

A. We had one episode, which has -- which was, I believe, Natalia's birthday party where there were some people from her legal team. I didn't interact with them, but I sat at the same table.

Q. Do you recall when that was?

A. No, I don't know names.

MR. FOSTER: No; when.

MR. KAVELADZE: Oh, when.

MR. FOSTER: Do you recall when that was?

MR. KAVELADZE: When it was. Very vague recollection would be around October, November 2016.

BY MR. DAVIS:

Q. Do you recall where --

A. Oh, yeah.

Q. -- the birthday party --

A. It's a restaurant named Nello. It's Madison Avenue in New York City between 62nd and 63rd Street.

MR. BALBER: And that's the same place you
1 had lunch with her, right?
2 MR. KAVELADZE: Yeah.
3 BY MR. DAVIS:
4 Q. And do you recall the names of any of the
5 individuals you met at that birthday party?
6 A. No. I know there were two daughters of
7 Natalia, and either one or two gentlemen who she
8 kind of introduced as attorneys, Russian-speaking
9 individuals.
10 Q. Did you attend the court proceedings
11 related to Prevezon Holdings on June 9, 2016?
12 A. No, I did not.
13 Q. Did you, in fact, meet Mr. Goldstone
14 around 3:30 p.m. on June 9th before the meeting as
15 you planned?
16 A. My belief is that we were 15 minutes
17 late.
18 Q. Well, when you did meet with Mr.
19 Goldstone, what did you discuss?
20 A. Nothing. He welcomed us and escorted us
21 to the conference room at the higher floor. I
22 don't recall what floor was that.
23 Q. Prior to the meeting itself, who did you
24 expect to attend? Did you expect Rinat Akhmetshin
25 to attend or Anatoli Samochornov?
1 A. No, I did not. My expectation was that I
2 will accompany Ms. Veselnitskaya and I will be
3 translating.
4 Q. All right. I'd like to turn now to the
5 meeting itself on June 9, 2016.
6 A. Okay.
7 Q. Did anyone at the meeting offer to
8 release hacked emails to aid the Trump
9 campaign?
10 A. No.
11 Q. Did anyone offer to manufacture and
12 distribute fake news to aid the Trump campaign?
13 A. No.
14 Q. Did anyone offer to hack State voter
15 registration systems to obtain voter data to aid
16 the Trump campaign?
17 A. No.
18 Q. To the best of your recollection, was
19 there any discussion of anything that might
20 reasonably be considered collusion between the
21 Trump campaign and the Russian Government?
22 A. No.
23 Q. Mr. Goldstone's prior email to you said
24 he'd be bringing you and Ms. Veselnitskaya to the
25 meeting but would not sit in. Did Mr. Goldstone
1 stay for the entire meeting?
2   A. Yes, he did.
3 Q. Who else attended the June 9th meeting in
4 New York City at Trump Tower? Can you please list
5 everyone who was present for any portion of the
6 meeting, however brief, even if they did not
7 attend the entire meeting?
8   A. Natalia Veselnitskaya, Anatoli
9 Samochornov, myself, Rob Goldstone, obviously
10 Donald Trump, Jr., Jared Kushner, Paul Manafort.
11 Did I miss some -- Rinat Akhmetshin. Rinat
12 Akhmetshin.
13 Q. Was that everyone?
14   A. Yeah.
15 Q. Were all of the attendees introduced?
16   A. Yes.
17 Q. How was Ms. Veselnitskaya introduced?
18   A. Well, actually, U.S. attendees were not
19 introduced. Ms. Veselnitskaya introduced herself
20 as a private attorney.
21   MR. FOSTER: Through her translator?
22   MR. KAVELADZE: Through her translator,
23 yeah.
24 BY MR. DAVIS:
25   Q. So Ms. Veselnitskaya did not claim that
she was working for the Russian Government in her introduction; is that correct?

A. No, she did not.

Q. Okay. Mr. Goldstone's email to Donald Trump, Jr., indicated that he would be bringing a Russian Government attorney. Did anyone from the Trump side ask about this discrepancy when she introduced herself as a private attorney?

A. No, I don't believe so.

Q. As best as you could tell, did it appear that anyone else in the meeting from the Trump campaign had ever previously interacted with Ms. Veselnitskaya? Did anyone seem like they already knew her?

A. To the best of my knowledge, no.

Q. How was Rinat Akhmetshin introduced?

A. As a lobbyist and proponent of the anti-Magnitsky Act actions. Actions could mean -- I'm not sure, but yeah.

Q. Did he or any other attendee claim that he was working for the Russian Government?

A. No.

MR. FOSTER: Did he introduce himself?

MR. KAVELADZE: I would say so. I mean, and as far as like introducing, let's say I don't
1 believe I have introduced myself or somebody else
2 introduced me. It's mostly like the key figures
3 were introduced, yeah. Rob Goldstone was not
4 introduced. I was not introduced. But, like,
5 Russian side kind of introduced themself.

6 BY MR. DAVIS:
7 Q. And other than meeting up with Mr.
8 Akhmetshin shortly before the meeting, had you
9 ever communicated with him previously?
10 A. No previous communications.
11 Q. Did it appear to you that anyone else in
12 the meeting from the Trump campaign had ever
13 previously interacted with him?
14 A. Yes, it did. At some point of time,
15 right before the meeting started, Mr. Akhmetshin
16 approached Mr. Manafort and suggested that they've
17 met previously at some kind of meeting in
18 Washington, D.C., like a conference or seminar or
19 whatever, some kind of meeting in D.C. So from
20 that I assumed they were introduced, although --
21 MR. FOSTER: What was the response?
22 MR. KAVELADZE: There was no response from
23 Mr. Manafort. He was texting and he continued
24 texting, or whatever, sending emails or something.
25 I don't think he even lifted his eyes off his
1 BlackBerry or iPhone.
2 BY MR. DAVIS:
3    Q. So you've already stated that you were
4 not introduced and that Mr. Goldstone was not
5 introduced.
6    A. Yeah.
7    Q. Was Mr. Samochornov introduced?
8    A. No; as a translator. As a translator.
9    Q. He was introduced as a translator?
10   A. Yeah.
11   Q. Did he or any other attendee claim that
12 he was working for the Russian Government?
13   A. No.
14   Q. And did it appear that anyone else in the
15 meeting from the Trump campaign had ever
16 previously interacted with him?
17   A. With Anatoli?
18   Q. Right.
19   A. No, it didn't appear so.
20   Q. Moving beyond the introductions, can you
21 recount for us in as much detail as you remember
22 what happened at the meeting?
23   A. Meeting started with a short speech by
24 Natalia Veselnitskaya about Magnitsky Act and
25 about destructive role played by Bill Browder, the
initiator of that act, in ruining relationship between U.S. and Russia. And she also claimed that Mr. Browder is considered to be a criminal in Russia for tax dodging and other purposes. And she also suggested that the repeal of that act could significantly improve the relationship between Russia and U.S. I would call it a short synopsis of her speech.

MR. FOSTER: So her opening speech, was that consistent with the 10-page synopsis that you had read prior to the meeting?

MR. KAVELADZE: Yes. Then it would be --

then Mr. Akhmetshin would step in, but I guess that's the next question, right?

BY MR. DAVIS:

Q. Go right ahead.

A. Continue, okay. At some point of time, Mr. Akhmetshin continued that -- gave a little bit more details, and this is when he mentioned a ban for U.S. citizens to adopt kids in Russia and basically said you realize if U.S. going to repeal the Magnitsky Act, we're going to lift that ban, Russia will lift the ban, and United States citizens could adopt Russian kids again.

MR. FOSTER: Did he say "we" when he
1 referred to Russia?

2 MR. KAVELADZE: I'm not sure about "we." He said Russia would lift the ban, yeah, something like that.

3 BY MR. DAVIS:

4 Q. Did anyone -- actually, I should let you continue. What happened after that?

5 A. At some point of time, Mr. Kushner was sitting right next to me, to my left, and I noticed Mr. Kushner was very frustrated that he was in this meeting, and -- as opposed to Mr. Manafort, who didn't pay any attention to the meeting and was continuing writing something on his iPhone. And at some point of time, Mr. Kushner asked a question. I can't give you word by word, but I think the idea was: Why are we here and why are we listening to that Magnitsky Act story?

6 Eventually, Mr. Trump asked a question --

7 I have to correct myself. There's one thing also happened prior to this whole thing. They also told story about Ziff Brothers, who were the owners of Bill Browder's company in Russia.

8 BY MR. FOSTER:

9 Q. By "they," you mean Veselnitskaya and
Akhmetshin?

A. Yeah, Veselnitskaya and Akhmetshin. And they said it's also, you know, correlates with whatever -- with the synopsis, and basically told a story that because that money is considered to be a criminal money because it's tax dodging and then it goes to the shareholders here in New York, to Ziff Brothers, and Ziff Brothers are heavy sponsors of Democratic Party, then, you know, basically this whole chain was kind of like portrayed as a negative for Democratic Party. And then one of them, I think Mr. Akhmetshin, suggested that the same thing could have been done with Hillary Clinton's campaign. And after those words, Mr. Trump asked both Ms. Veselnitskaya and -- Trump, Jr., Ms. Veselnitskaya and Akhmetshin, asked if they got anything on Hillary, and to which Mr. Akhmetshin responded, "Why don't you do your own research on her? We gave you the idea," and continued talking about the Magnitsky Act. But, eventually, Mr. Trump suggested that although it might be an interesting and important story, he said, "We're in the middle of electoral campaign," and he said, "We're extremely busy right now." And he said, "If we win, then we
might get back to you and continue that discussion about Magnitsky Act," and politely ended the conversation, ended the meeting.

We started exiting the room. While exiting the room, I saw Mr. Goldstone approaching Donald Trump, Jr., and apologizing for -- I mean, I don't remember the wording, but for stupid meeting, or something like that, he has set up. And Mr. Trump said, "It's okay." And so we exited the room.

BY MR. DAVIS:

Q. So you mentioned that Ms. Veselnitskaya had said that if the Magnitsky Act were repealed, there would be a general improvement in relations with Russia, and that Mr. Akhmetshin had mentioned that if the act were repealed, the ban on adoptions would go away. Did anyone ask that Donald Trump, Sr., take any action specifically regarding the Magnitsky Act or the Global Magnitsky Act if elected?

A. I don't believe anybody asked on actions. It was more like informative meeting. They were filling them in on the story.

Q. Did anyone mention the Justice Department's lawsuit against Prevezon Holdings?
A. No.

Q. Did anyone ask that Donald Trump, Sr., take any action regarding Preet Bharara, the U.S. Attorney in New York at the time?

A. No.

Q. And other than generally improved relations and reinstatement of adoption, did Ms. Veselnitskaya or Mr. Akhmetshin offer the Trump campaign anything?

A. No.

Q. And to clarify, when you referenced Ms. Veselnitskaya speaking, was that always through her translator, mostly through her translator?

A. Always through her translator. I don't think she speaks any English.

Q. What was Mr. Goldstone's role, if any, during the meeting?

A. He was silent.

Q. I'd like you to take a look at an email chain Bates-numbered DJTJR-00454 to 56.

MR. BALBER: And, I'm sorry, before we leave the meeting, if you don't mind, is there anything you said at the meeting? I just want to make sure the record's clear.

MR. KAVELADZE: Yes, I did.
MR. BALBER: Why don't you tell what you said.

MR. KAVELADZE: Okay. What I said during the meeting was, I believe, one sentence or maybe two, and what I said was before becoming a fugitive, Mr. Bill Browder was a darling of Kremlin and darling of Putin, which is my understanding of the situation. He would speak on every investor in Russia, do business in Russia conference. He was like a big, welcome business card of Russia.

MR. BALBER: And with that addition, have we now covered everything you remember being said at the meeting?

MR. KAVELADZE: Yes, yes.

MR. BALBER: Okay.

BY MR. DAVIS:

Q. And before we move on to that document, did anyone mention support of the DNC, the Democratic National Committee, or the RNC, the Republican National Committee? And if so, what was the context?

A. No. I don't think we mentioned the committees.

MR. FOSTER: You don't recall any mention of
MR. KAVELADZE: I don't. RNC?

MR. FOSTER: Republican National Committee.

MR. KAVELADZE: To the best of my knowledge,
I don't remember anything about it.

BY MR. DAVIS:

Q. Turning to this email chain --

MR. O'DONNELL: There's one other thing.

What, if anything, did Donald Trump, Jr., say about the Ziff Brothers and their campaign contributions?

MR. KAVELADZE: Yes, he said Ziff Brothers support everybody -- Democrats, Republicans. They contribute to everybody. It cannot be counted as negative in any way, shape, or form.

MR. FOSTER: So other than everything else we've talked about, is there anything else you can recall specifically from the meeting?

MR. KAVELADZE: Let me think.

The thing that surprised me was how Mr. Akhmetshin was dressed for the meeting. He was dressed in pink -- pink jeans with like holes on the knees, and a pink T-shirt. So I thought it was highly inappropriate, but, yeah, I was certainly shocked to see him dressed like that.
MR. BALBER: I was going to wear the same thing today, but I changed my mind at the last minute.

[Laughter.]

BY MR. DAVIS:

Q. And what was your understanding of how Mr. Akhmetshin came to join the meeting? Did Ms. Veselnitskaya explain his presence?

A. Yeah, well, my understanding was that he was in town for something else, they were doing lunch, and so it was like very unexpected type of -- you know, unplanned meeting -- I mean not meeting but participation of Mr. Akhmetshin in that meeting. But then I read an article, and apparently it was clear in the -- okay, that's the article, yeah.

BY MR. FOSTER:

Q. So had you ever been in any other meetings with Mr. Akhmetshin?

A. I met with him once in Moscow.

MR. BALBER: This is subsequent to the meeting then?

MR. KAVELADZE: Subsequent, yeah, yeah.

MR. O'DONNELL: You had never met him before the June meeting?
MR. KAVELADZE: Oh, no, no, no. Sorry, no.

Q. So can you go ahead and tell us about the meeting with him in Moscow?

A. Yes. It was either June or July this year. He contacted me and asked for a quick meeting, and he basically -- during that meeting he told me about the article in CNN -- on CNN's site suggesting that he had ties with military intelligence. He told me that is complete lie and the only connection with military intelligence he ever had was the fact that he -- when he was drafted into Soviet Army in the age of 18, he had some connection with military intelligence there, and he had no further connections. And so I took into consideration.

Q. Why were you in Moscow at this time?

A. I travel to Moscow every -- every 2 months to meet with Mr. Agalarov to go over the main topics, main projects, discuss issues, discuss financing.

Q. And where did you meet with Mr. Akhmetshin?

A. At the lobby of Lotte Plaza Hotel.

Q. And he contacted you to ask you to meet
1 him?
2 A. Yes.
3 BY MR. DAVIS:
4 Q. Do you know how he had your contact
5 information?
6 A. Oh, we exchanged phones after that
7 meeting. I have his contact information as well.
8 MR. DAVIS: We'll turn to the document now.
9 I'll give you a moment to read over it. This
10 will be Exhibit 5.
11 [Kaveladze Exhibit 5 was marked for
12 identification.]
13 BY MR. DAVIS:
14 Q. This is an email from Mr. Goldstone to
15 Dan Scavino, copying Donald Trump, Jr., Rhona
16 Graff, and Konstantin Sidorkov. You are not on
17 this email chain.
18 MR. BALBER: Do you have one for me, if you
19 don't mind?
20 MS. BRENNAN: I'm sorry.
21 MR. HOLMES: Oh, I'm sorry. Thank you.
22 Appreciate it.
23 MR. KAVELADZE: I'm not on that email.
24 BY MR. DAVIS:
25 Q. You're not on this email chain.
BY MR. DAVIS:

Q. So, again, this email was sent by Mr. Goldstone on June 29, 2016. It states in part, "Dan, I am following up an email awhile back of something I had mentioned to Don and Paul Manafort during a meeting recently. There are believed to be around 2 million Russian American voters living in the USA and more than 1.6 million of these use the Russian Facebook site VKontakte, VK, as their preferred social media outlet. As I mentioned to you guys through Emin and my contact at VK, they want to create a Vote Trump 2016 promotion aired directly at these users, people who will be voting in November. At the time Paul had said he would welcome it, and so I had the VK folks mock up a basic sample page, which I am resending for your approval now."

To the best of your recollection, did Mr. Goldstone discuss this VK proposal during the June 9, 2016, meeting?

A. No, unless he stayed after the meeting.

Q. Did you not leave the building with him?
Did he remain behind?

A. No, I left the building with Natalia Veselnitskaya, Anatoli Akhmetshin -- Anatoli Samochornov and Rinat Akhmetshin.

Q. To the best --

A. Correction, correction. We didn't leave the building. We walked into a Trump bar which was located inside of the building, and after a round of drinks, I left the building myself. They stayed in the bar.

MR. BALBER: And that was in the lobby, right?

MR. KAVELADZE: Lobby, yeah. We didn't leave the building technically.

MR. DAVIS: Thank you for that clarification.

BY MR. DAVIS:

Q. Do you have any knowledge of whether Mr. Goldstone or Emin ever pursued further this VK proposal with the Trump campaign?

A. I have no knowledge of that initiative or if they have ever pursued. I never belonged to that social network either.

Q. And to the best of your recollection, during the meeting did Mr. Kushner take any notes?
A. To the best of my recollection, no.

Q. And other than the question you previously mentioned where he asked what they were doing there, something to that effect, did he ask any other questions or make any other comments?

A. I do not believe so.

MR. BALBER: I'm sorry. You said Kushner?

MR. DAVIS: Yes.

MR. BALBER: Okay. I'm sorry. Thank you.

MR. KAVELADZE: Yeah, I do not believe.

BY MR. DAVIS:

Q. Was Mr. Kushner present for the entire meeting?

A. Here's where my recollection differs with what I read in the media. I thought that he was -

MR. BALBER: He just wants your recollection.

MR. KAVELADZE: My recollection, he was present.

BY MR. DAVIS:

Q. As best as you could tell, did Mr. Manafort take any notes during the meeting?

A. Definitely not.

Q. You said he was using his phone the
1 entire time; is that correct?
2 A. Uh-huh.
3 Q. Did Mr. Manafort ask any questions or
4 make any comments, to the best of your
5 recollection?
6 A. On the other hand, he could have been
7 taking notes on the phone.
8 MR. O'DONNELL: You don't know what he was
9 doing --
10 MR. KAVELADZE: I don't know, yeah. So ask
11 the question again, please?
12 BY MR. DAVIS:
13 Q. Did Mr. Manafort ask any questions or
14 make any comments during the meeting?
15 A. No. No, he was silent.
16 Q. Was he present for the entire meeting?
17 A. I believe so.
18 Q. As best as you could tell, did Donald
19 Trump, Jr., take any notes during the meeting?
20 A. I can't tell. I do not remember. Those
21 two individuals were sitting next to me, but
22 Donald Trump, Jr., was across the table, so I
23 don't know.
24 Q. Other than the comments and questions
25 you've already described Mr. Trump, Jr., making,
were there any other comments or questions he made during the meeting?

A. To the best of my knowledge, no.

Q. You mentioned the Russian language synopsis that Ms. Veselnitskaya had. Did she bring that with her to the meeting?

A. Yes, she did. She offered -- she offered -- well, I think she offered that synopsis, you know, to keep for the Trump party, but I'm not sure if they accepted it or not, because I already exited the room.

MR. FOSTER: The version that she brought to the meeting was also in Russian, though?

MR. KAVELADZE: It was only in Russian.

MR. FOSTER: It was only in Russian? So she didn't have an English translation of it?

MR. KAVELADZE: I don't believe so, no. At least I didn't see it.

BY MR. DAVIS:

Q. Other than that document, did she or any of the other attendees bring any other documents to the meeting?

A. I don't recall anybody bringing any documents.

Q. To the best of your knowledge, what time
1 did the meeting begin and when did it end?

2 A. I would say it began maybe 4:03, 4:05.

3 And to the best of my recollection, it was over in

4 35 minutes. And that is considering the

5 translation.

6 Q. Did any of the attendees request

7 additional meetings or communications with the

8 Trump campaign at the June 9th meeting?

9 A. There was no request, but as I said, it

10 was a suggestion that if Trump campaign wins, they

11 might get back to the Magnitsky Act topic in the

12 future.

13 Q. Did you report back to Aras Agalarov

14 about the meeting?

15 A. Yes, I did.

16 Q. How did you describe it to him?

17 A. That it was complete loss of time and it

18 was useless meeting. But --

19 MR. BALBER: Was there a prior conversation,

20 though?

21 MR. KAVELADZE: Yeah.

22 MR. BALBER: Why don't you run through both

23 the conversations.

24 MR. KAVELADZE: Okay. Well, when we walked

25 out of the meeting room and went down to the bar,
he called me, and Natalia was present there, and I said, oh, well, everything is fine, we had a great meeting and stuff, because I didn't want to upset her. But then I believe 2 hours later we had another conversation where I gave details of the meeting, and at that conversation I explained that it was loss of time.

MR. DAVIS: All right. Thank you very much. I think my hour is up now, so we will go off the record. We'll take a short break.

[Recess at 10:41 a.m. to 10:46 a.m.]

MR. PRIVOR: We are back on the record. It is 10:46 a.m. Good morning, Mr. Kaveladze. Thank you for coming in today.

MR. KAVELADZE: Good morning.

MR. PRIVOR: We appreciate you traveling to meet with us. Just so we can note for the record, we had two more colleagues join us on the minority staff. Do you want to identify yourselves for the record?


MS. GRISWOLD: And Sarah Griswold.

MR. PRIVOR: Very good.

EXAMINATION BY COUNSEL FOR THE MINORITY
BY MR. PRIVOR:

Q. Mr. Kaveladze, I apologize in advance.

I'm going to jump around a little bit. I want to try to fill in some -- where I had questions about some of Mr. Davis' line of inquiry first, but I'll try to keep us in order.

You started out discussing your background for the Crocus Group. You said you left it for a few years. You started in 1989, left for a few years, and came back in 2003, I think. What did you do during the gap?

A. I ran my business in U.S. Among other clients, Crocus was my client. We've handled -- for Crocus I handled purchasing just the same way I was doing as an employee. But I also -- we were also running incorporation business for Eastern European clientele, secretarial services.

Q. That creation business, is that International Business Creations?

A. International Business Creations, yes, that is correct.

Q. And is that IBC for short?

A. Yes.

Q. Is IBC still in business?

A. It's -- it's inactive for numerous years,
but, yeah, company still exists.

Q. When did it go inactive?
A. I mean, I don't file inactive tax returns. It still has an account. But as far as doing business, it hasn't been doing business for last 5 years.
Q. Okay. So approximately since 2012?
A. Yeah. Actually doing business, IBC was not doing business.
Q. Other than the Crocus work and related matters that you just described, do you do any other work for the Agalarov family?
A. Sometimes I would handle personal matters. Let's say he wants to buy a house. He will get in touch with me and ask, you know, to look for properties or find a real estate broker or secure a mortgage for the house. That would be me.
Q. With regard to IBC or any business related to IBC, did you set up corporations for the Agalarovs?
A. No, not for Agalarovs.
Q. How about for the Crocus Group?
A. No.
Q. I understand that you live in California.
1 Do you have any other addresses in the U.S. or
2 have you lived elsewhere in the U.S.?
3 A. I have lived elsewhere in U.S.
4 Q. Where else have you lived?
5 A. I lived in Riverdale, New York; New York,
6 New York; Irvington, New York; Santa Monica,
7 California; Palos Verdes Estates, California; and
8 now in ____________.
9 Q. Okay. Going back just to -- let's go to,
10 say, 2015. Have you lived in California that
11 whole time?
12 A. Yes.
13 Q. From 2015 to the present?
14 A. Yes.
15 Q. And during that time period, did you have
16 any other addresses?
17 A. Individual personal addresses?
18 Q. Yes.
19 A. No.
20 Q. Okay. Do you have businesses in New
21 Jersey?
22 A. Yes.
23 Q. Do you have a residence in New Jersey
24 that you stay at?
25 A. No.
Q. What's the connection to New Jersey? Why do you have business there?

A. My office initially, before I moved to California, was located in New Jersey, and this office mostly handles Crocus matters right now, and it's being paid by Crocus. So that's why we decided to keep that office there because there are some employees there.

Q. You said it's mostly Crocus business.

What else does it do?

A. I would say it's 95 percent Crocus business, but we did do some pharmaceutical projects, purchasing ingredients for pharmaceutical products. Also, well, musical business is Crocus related.

Q. IBC Group, do you know where its office is or was?

A. Same place.

Q. In New Jersey?

A. Yeah. We also -- at some point of time, I believe I registered doing business in California for IBC Group, but it never materialized, never did business in California.

Q. Did you ever register a business for the Agalarovs at the same New Jersey location?
A. I believe there was a company registered in the '90s, like mid-'90s, called Crocus International or something like that, Crocus -- but it was -- didn't do any business, didn't have account, didn't do anything.

Q. Have you ever heard of a company called Saffron Property Management?

A. Saffron Property, yeah, I have.

Q. What is that company?

A. I believe it manages the personal properties of Mr. Agalarov, which is the Fisher Island properties.

Q. Is it just the one property?

A. I believe it's two properties.

Q. Do you know what the other one is other than Fisher Island?

A. No, both on Fisher Island.

Q. Oh, I'm sorry. Two properties on Fisher Island?

A. I believe so, to the best of my knowledge, unless -- Agalarov got divorced this year, in February. So, honestly, I'm not sure if there was any division of properties.

Q. Do you have any responsibility for Saffron Property Management?
A. No, I do not.

Q. Is there anyone in the United States who works on behalf of Saffron Property Management?

A. To the best of my knowledge, Mr. Agalarov himself is a director, and I believe they got an accountant.

Q. Mr. Davis had asked you whether -- I think he asked whether you had worked for the Russian Government.

A. Yes, he did ask me this question.

Q. And your answer --

A. The answer is no.

Q. Have you ever done any lobbying work related to the Russian Government?

A. No, I have not.

Q. You stated that you had some familiarity with the Magnitsky Act --

A. Yes.

Q. -- even before the June 9th meeting.

Have you ever done any work related to the Magnitsky Act before the June 9th meeting?

A. No, I have not.

Q. How about since the June 9th meeting?

A. No, I have not.

Q. Have you ever been asked to do any kind
of work by any Russian Government officials?

A. No.

Q. Mr. Davis had asked you about your contacts with the Trumps. You described meeting some people related to the Trump Organization in June of 2013 related to the Miss Universe Pageant.

A. Correct.

Q. And you had a meeting signing papers in Las Vegas; is that right?

A. Uh-huh.

Q. Did you meet any of the Trump family members at that meeting?

A. No.

Q. You didn't meet --

A. I don't think they were present there.

Q. Who was present on behalf of the Trump Organization?

A. Mr. Trump himself, numerous other employees which I have no knowledge of names or positions or anything.

Q. When you say "Mr. Trump himself," is that Donald Trump, the current President?

A. Senior, yeah.

Q. Okay. And although you don't know the names, do you know the positions of the people
that were there representing the Trump Organization?

A. No, unfortunately not.

Q. Were any of them lawyers for the Trump Organization?

A. They were lawyers for Miss Universe Pageant. That I know. They were lawyers because I was negotiating with them the set of documents for Miss Universe, and they were present during that meeting. So yeah, two ladies: Andrea -- and I forgot the other name.

Q. Both women?

A. Both women, yes.

Q. With regard to the Miss Universe Pageant, other than signing the -- or procuring the signatures on the letter of intent, did you have any other work to do with the Miss Universe Pageant in 2013?

A. Yes. My other work was trying to secure sponsorship for this pageant.

Q. Were you successful?

A. Not very successful. I secured one sponsorship.

Q. Which sponsorship was that?

A. Sberbank.
Q. And Sberbank is a Russian bank?
A. Yes.

Q. How did you make that connection to secure them as a sponsor?
A. Well, you know, all Crocus accounts are in Sberbank, and Sberbank is a main creditor of Crocus. So it was easy. I approached them, and they probably couldn't say no.

Q. Other than securing their sponsorship and the letter of intent, did you have any other work related to the Miss Universe Pageant?
A. No.

Q. Did you attend the pageant?
A. Yes, I did.
Q. In Moscow?
A. Yes.

Q. Did you attend any of the after-parties related to the Miss Universe Pageant?
A. I attended after-party right after the pageant. There was this after-party in the same building, Crocus City Hall, reception hall.

Q. Did you meet any of the members of the Trump family at that after-party?
A. No, I didn't meet anybody.

Q. How about before the pageant? Were there
any related events like a lunch or a dinner, anything like that to kick off the Miss Universe?

A. I heard about the luncheons, but I didn't attend any luncheon.

Q. Okay. So your only connection to the Miss Universe Pageant then is you attended the actual event.

A. Uh-huh.

Q. Is that right?

A. Yes.

Q. And then you went to an after-party?

A. Yeah.

Q. And other than that, you don't have any other connections to the actual event taking place in Moscow?

A. Two days prior to that, there was also one Miss Universe party where the participants showed up, and it was like a little reception. But there was no Mr. Trump. It was just Miss Universe -- it was before he actually visited Moscow.

Q. Was there anyone there from the Trump Organization?

A. Well, if you consider people from Miss Universe a part of Trump Organization, which they
probably were at that time, yes. Paula Shugart, the president of Miss Universe, was there, and a couple of employees I think I saw.

Q. Anyone else that you would associate with the Trump Organization itself as opposed to the Miss Universe Pageant company?

A. No, not at that reception.

Q. Okay. And --

A. It was kind of quick, this thing.

Q. Okay. So other than attending the event itself, one after-party, and then this event 2 days before where you met some of the participants or they were at this same event, were there any other events related to the Miss Universe Pageant that you attended?

A. No.

Q. There was a dinner at the restaurant Nobu around that time with Aras Agalarov. Were you aware of that dinner?

A. I've heard about it.

Q. You didn't attend it?

A. I did not attend.

A. You had mentioned that you had engaged in negotiations toward a letter of intent or a memorandum of understanding related to another
1 property, and you testified earlier that it didn't
2 materialize because Mr. Trump stopped
3 communicating with the Crocus Group. Is that
4 right?
5 A. Yes.
6 Q. What project was that that you had worked
7 on?
8 A. Trump Tower, Moscow.
9 Q. And what was the time frame of that?
10 A. I believe the first communication I
11 received in regards to the project happened in
12 December of 2013. And I believe my last
13 communication in regards to the project was some
14 time in October, November 2014. And then all I
15 got was calls from my architects complaining that
16 Trump people don't respond. Calls and emails.
17 Q. Do you know what the origin of that
18 particular project was? How did it come to a
19 letter of intent? What was your involvement?
20 A. Well, I was negotiating the conditions of
21 that project.
22 Q. With whom?
23 A. With Donald Trump, Jr.
24 Q. And how did you first -- who approached
25 who first to lead to that project?
A. It's hard for me to say, but I was brought into this communication by Emin Agalarov, so I'm not sure who approached whom. So --

Q. And that was a communication between Emin and?

A. And Donald Trump, Jr.

Q. So the two of them were discussing a project, and then Emin brought you into the project?

A. Yeah, basically as a person who was going to be doing this negotiating points and stuff.

Q. And did you take over the negotiations at that point, or was Emin still involved?

A. Still involved. I was consulting with him, like every now and then I'm, like, "What's our final acceptable for as conditions?" And we'll set conditions, and I'll try to negotiate it and get as close as possible to those conditions, things like that. So, yeah, I was coordinating with him, obviously. I don't have rights to set my conditions or something, so I need to get okay from Agalarovs.

Q. And this, I presume, was a project on behalf of the Crocus Group?

A. Sure.
Q. Was anyone else involved from Crocus other than Emin and you?

A. Well, his attorney, Sergey Sharov, was involved. Mr. Yuri Grossman, my associate and my employee, was involved in negotiations.

Q. Who was that?

A. Yuri Grossman.

Q. Oh, Yuri is your employee.

A. Yeah, my employee. Yeah, I work with him in Moscow. Our architect, Bill McGee, was involved. He's a U.S. architect, but he was representing us in this transaction. And I think later Jason Tropea, a U.S. individual and friend of Emin, also was involved in this transaction.

Q. What was his role?

A. Also negotiating, discussing logistics of a project. I can't be too specific about what he did, but I know he was copied, and I know, I think he participated in one or two conference calls.

Q. Do you recall how long the negotiations took?

A. Well, as I said, actually the -- I'm not sure when we signed LOI, but to the best of my knowledge, best of my recollection, maybe 2 to 3 months, then we sign LOI; then architects kicked
Q. Were those negotiations between largely you and Emin on the one hand and Donald Trump, Jr., on the other?
A. Correct.
Q. Was there anyone else on the Trump side of that equation?
A. I'm sure there were people cc'd. I just don't remember. I mean, since he was the one who responded, I didn't pay attention who was cc'd on their side.
Q. Did you communicate with Donald Trump, Jr., by telephone, by email, combination?
A. Combination. Well, phone was conference calls, and as far as emails, yes, there were emails as well.
Q. How often did you communicate with him to negotiate this letter of intent?
A. I would say seven to eight emails and maybe two to three conference calls.
Q. Did you ever meet in person?
A. No.
Q. Regarding this project.
A. Regarding -- no, never.
Q. In between the time when you were
negotiating this project and the June 9th meeting that we're going to come to in a moment, had you ever met Donald Trump, Jr., in that period of time?

A. No, I have not.

Q. And before this negotiation, had you ever met him before?

A. No, I have not.

Q. So the first time that you met Donald Trump, Jr., in person was at the June 9th meeting?

A. That is correct.

Q. Other than meeting him in person, had you communicated with him during that interim period between the June 9th meeting and the negotiations of this letter of intent for the Moscow tower?

A. No, nothing outside of that Moscow tower negotiations.

Q. Okay. And you said that the project went until, you guessed, October or November of 2014. I take it a significant period of that time was after the letter of intent had already been signed?

A. Yeah.

Q. Did you have communications with Donald Trump, Jr., during that period of time?
A. I think I did. I think at some point of time, I sent an email kind of asking why are they silent. Yeah, and I think there was some kind of response they were "too busy, we got some stuff, projects going on overseas, and we'll get back to you" type of thing. And I think it was an effort undertaken like Mr. Caul, I believe the architect's name was, so Mr. Caul was trying to communicate with Bill McGee, and then Bill wrote to me again saying that he disappeared again.

Q. So other than that last email communication that you described, were there any other communications with Donald Trump, Jr.?

A. No.

Q. And about any topic, not even just this particular development?

A. No, I have not discussed any topic with him.

Q. How about --

A. Outside of this development. In connection -- sometimes they were also asking about -- we also had a Marriott project on the property, and there was also negotiations where we should place tower in relationship to that Marriott project. So sometimes we would send him
1 Marriott project drawings so he would understand
2 the positioning. So yeah.
3 Q. How about with Donald Trump, Sr.? Have you communicated with him, say, before the June
4 9th meeting?
5 A. No.
6 Q. Had you ever met him, I think, other --
7 A. June 9. June 9 would be the first time -
8 -
9 Q. I am talking about Senior.
10 MR. BALBER: Slow down.
11 BY MR. PRIVOR:
12 Q. Senior.
13 A. Yeah, I'm sorry. Senior, I met him on
14 June 15, 2013, in Las Vegas.
15 Q. At the Miss -- I'm sorry, at the Vegas
16 signing for this --
17 A. Correct.
18 Q. -- project that didn't come to fruition.
19 A. Correct.
20 Q. Okay. Other than that meeting with
21 Donald Trump, Sr., had you ever met him at any
22 other time in person?
23 A. I saw him during the Miss Universe.
24 Q. Did you speak with him at the Miss
1 Universe Pageant?
2 A. No.
3 Q. And other than that meeting there and
4 signing of the LOI, had you ever met him in person
5 at any other time?
6 A. No.
7 Q. Have you spoken to him on the telephone
8 at any other time?
9 A. No. I don't believe I ever spoken with
10 him on the telephone.
11 Q. Have you exchanged any emails with him at
12 any time?
13 A. No.
14 Q. And have you ever communicated with him
15 through his secretary, for instance, Rhona Graff?
16 A. No.
17 Q. You haven't passed any messages to him
18 through Rhona?
19 A. I don't know Rhona.
20 Q. Okay. Let's move forward to the June 9th
21 meeting, which we've spent some considerable time
22 on. When you were describing Ms. Veselnitskaya,
23 you used the phrase "working relationship" that
24 you had with her?
25 A. Uh-huh.
Q. What did you mean by "working relationship"?

A. Because we got back to the topic in November, so she wanted to go over this thing again, try to arrange the meeting. So we tried to arrange the meeting. Then she was looking for attorney in New York to discuss this Magnitsky matter. I introduced her to my attorney, and so that's what I call "working relationship."

Q. And your working relationship with her is something that developed after the June 9th meeting?

A. Yeah.

Q. You didn't have any prior relationship --

A. No, I had no knowledge of her until June 9. You know, that's where I saw her first time.

Q. Right. And before June 6, you had no communications with her?

A. No. I have no knowledge who she is.

Q. You anticipated my next question. You didn't know her at all?

A. No.

Q. Before the meeting, did you know what her -- you learned her name on June 6th; is that
1 right?
2 A. That's correct.
3 Q. Okay. Did you do anything to investigate
4 her, do some due diligence to find out who she is
5 before you showed up to the meeting on June 9th?
6 A. No, I did not.
7 Q. Did you --
8 A. I know she was Mr. Agalarov's friend or
9 person from Mr. Agalarov, so I didn't do any
10 investigation.
11 Q. Did you have any conversation with Mr.
12 Agalarov before the June 9th meeting and after --
13 in the time period -- I'm sorry. The time period
14 between June 6th when you learned her name and the
15 June 9th meeting, did you have any conversation
16 with Mr. Agalarov, Aras, about Ms. Veselnitskaya?
17 A. No.
18 Q. How about with Emin?
19 A. No. I had no conversation with Emin.
20 Q. And how about Rob Goldstone? Did you
21 speak with him about Ms. Veselnitskaya?
22 A. No.
23 Q. Rinat Akhmetshin, had you known anything
24 about him before the June 9th meeting?
25 A. No.
Q. Did you do any sort of investigation or due diligence on him before the meeting?
A. No.

Q. Did you even know that he was going to appear at this meeting before you met him?
A. Thirty minutes prior to the meeting, I realized he's going to appear. No, I didn't know him.

Q. And in that interim 30 minutes before the meeting until the meeting, did you take Rob Goldstone aside, for instance, and ask him who is Mr. Akhmetshin?
A. We didn't have that opportunity. We were greeted by -- we walked into the building. Mr. Goldstone was standing at reception. He greeted us and walked us through. We didn't have no time to discuss anything with Mr. Goldstone.

Q. In the period of time between June 6th when you first learned of the meeting and when the meeting occurred on June 9th, did you have any conversations with the Agalarovs in connection with this meeting --
A. Yes.

Q. -- of what to expect?
A. Yes.
Q. What were those conversations? And just
to back up so we don't have to cause you to repeat
yourself, I know you mentioned two brief calls.
A. Two phone calls.
Q. Anything other than those two calls?
A. There was also that synopsis sent to me,
shorter version, four-page version of synopsis by
Mr. Agalarov.
Q. Okay. When did he send that to you?
A. I believe it was either June 6 or June 7.
Q. What was in that synopsis?
A. That's the document you --
Q. Oh, that's the one we were looking at
this morning.
A. Yeah.
MR. BALBER: Which one?
MR. KAVELADZE: The shorter version.
MR. BALBER: I think you're confused, so
slow down, be thoughtful, because I don't think
you've seen that.
MR. PRIVOR: We have not seen that yet.
MR. BALBER: We've had all of your
colleagues shown this thing.
MR. KAVELADZE: Sorry. It's from previous
testimony.
MR. BALBER: Yeah, so just slow down.

MR. PRIVOR: Fair enough.

BY MR. PRIVOR:

Q. So why don't we back up. Tell us about that communication. First of all, when -- do you recall when it was when you first received this?

A. June 6.

Q. Okay.

A. First communication about Ms. Veselnitskaya.

Q. Did it come to you via email or some other method?

A. Synopsis?

Q. Yes.

A. Yes, it was email.

MR. BALBER: Are you sure? I'll state for the record that we've looked for this email with this attachment in connection with the request by the Committee, and we have not identified it. So I'd just ask the witness to be cautious about being sure the means by which it was sent to you.

I have no doubt you saw it, but --

MR. PRIVOR: Fair enough. Thank you for the clarification.

MR. KAVELADZE: Maybe it was an e-fax,
1 maybe, but I saw synopsis.
2 BY MR. PRIVOR:
3 Q. Okay. And it was, you said,
4 approximately four pages?
5 A. Four or five pages.
6 Q. Was it in English or in Russian?
7 A. Russian.
8 Q. Do you know who the author of that
9 document was?
10 A. No, I have no idea.
11 Q. Do you recall what it said? Could you
12 give us a general description of it?
13 A. It's about deteriorating relationship
14 between Russia and U.S. after Magnitsky Act was
15 adopted, and then it was this whole story of Bill
16 Browder and being a criminal and tax dodger, and
17 then basically the story of Ziff Brothers of being
18 -- being a shareholder of Mr. Browder's company in
19 Moscow and receiving the proceeds of these
20 activities in Russia, and then funding the
21 Democratic Party with that money. And, yeah, it
22 was mostly about Browder.
23 Q. Was the content of this four-page
24 synopsis similar to the longer Russian document
25 that you had seen from Ms. Veselnitskaya?
A. Yeah, it just had a little bit more
details, yes.

Q. Ms. Veselnitskaya's had more details?
A. More details, obviously.

Q. Were there any topics discussed in the
shorter version that were not contained in the
longer Russian version?
A. I don't believe so.

MR. BALBER: And I think he said both
versions were in Russian.

MR. PRIVOR: Oh, I'm sorry.

MR. KAVELADZE: Both of them were, yes.

MR. PRIVOR: Okay. Very good. Thank you.

BY MR. PRIVOR:

Q. Do you recall -- I know you're not
certain, but you seem to think it might have come
to you by email. Do you recall whether anyone
else received the same communication at the same
time?
A. No.

Q. Do you know whether in the lead-up to
this June 9th meeting, say from June 6th when you
first learned of it until the date, do you know
whether the Agalarovs, either father or son, were
communicating with anyone at the Crocus Group
other than you about the upcoming meeting?

A. No. No.

Q. In any of --

A. Not at the Crocus Group.

Q. Okay.

A. Emin was communicating with Rob Goldstone, but --

Q. Right. I want to focus on your communications, though. You mentioned the couple of phone calls with Aras Agalarov.

A. Uh-huh.

Q. Was anyone else on those telephone calls?

A. No. Just him.

Q. Just the two of you? And did you have any in-person meetings with anyone related to the meeting other than the short 30 minutes before showing up on June 9th?

A. No, no. It was probably a little bit more than 30 minutes with Veselnitskaya and Samochornov. Yeah, it was probably an hour and a half, I would say.

Q. Oh, you're referring to the lunch.

A. Yeah.

Q. Okay. The 30-minute window of time when you were in front of Trump Tower before walking --
A. Yeah, that's what I mentioned. Yeah, I mentioned 30 minutes, yeah.

Q. Okay. Very good. Did the Agalarovs, either Aras or Emin, ask you to speak with anyone else in advance of the meeting, even if not associated with the Crocus Group?

A. No.

Q. And is there anyone else you can think of that you did speak to --

A. I was told to coordinate this effort with Mr. Goldstone.

Q. Who told you to do that?

A. Mr. Agalarov, that Mr. Goldstone holds the details for the meeting.

Q. How did he communicate that to you?

A. Verbally over the phone call.

Q. Was that in your first call with him?

A. I believe so.

Q. Do you recall what, if anything else, he said in that first phone call other than, "We want you to attend this meeting"?

A. First call, he didn't even mention Magnitsky Act. It was the second call in which he mentioned, not the first call. He just said I need to be in New York, and I was kind of hesitant
1 to leave on June 6 because June 7 was [family event], and I didn't want to miss it. It was kind of negotiated, later date, my arrival.

Q. And you were leaving from California?

A. Yes.

Q. Before you learned of this meeting on June 6th, had the Agalarovs ever suggested to you that they wanted to arrange a meeting with the Trumps?

A. No.

Q. Had you ever heard that from anyone else that they were interested in arranging a meeting with anyone from the Trump family?

A. I have not.

Q. So June 6th then was the very first time you had heard about any meeting?
MR. BALBER: You have to answer out loud.

MR. KAVELADZE: Oh. Yes. I'm sorry. Like I said, I'm a little bit confused here because obviously the Agalarovs asked me to discuss this whole Trump Tower thing, and there were conference calls, but I don't think meetings. No, no meetings.

BY MR. PRIVOR:

Q. And that would be conference calls --

A. During that Trump Tower negotiation period.

Q. Okay. So about the real estate development deal.

A. Yes.

Q. Was there ever any mention from the Agalarovs about arranging a meeting with the Trumps or discussions with the Trumps about anything other than real estate development projects?

A. I don't believe so, except, obviously, that last one, June 9th, June 6th.

[Kaveladze Exhibit 6 was marked for identification.]

MR. PRIVOR: I'm going to show you our next exhibit which we have marked as Exhibit No. 6.
1 This is, for the record --

2 MR. BALBER: If you have one for me, I'd

3 appreciate it. Do you have an extra one?

4 MR. PRIVOR: For some reason we only have

5 two of them.

6 MR. BALBER: That's okay.

7 BY MR. PRIVOR:

8 Q. For the record this is Bates marked SJC-

9 KAV-00263, and it has attached to it a three-page

10 Bloomberg Government article titled "Trump's Long

11 Romance with Russia."

12 A. Uh-huh.

13 Q. I'll note for the record that the email

14 produced to us is the single page, 263, and it has

15 a hyper link to an article, and we've taken the

16 liberty of attaching the actual article that that

17 link attaches to.

18 The first question for you, sir, on just

19 the first page of the document. You can see it's

20 an email from you to dated May

21 19, 2016. Do you know who is?

22 A. Yes. She is -- her name is

23 

24 Q. Who is she?

25 A. She's family member 1"FM1"
Q. Looking at the subject, "Trump-Agalarov," and the article, which you can see attached, you'll note on the first page of the article there's a photograph of Donald Trump, President Trump. And are those the Agalarovs, father and son?

A. Uh-huh.

MR. BALBER: Say "yes."

MR. KAVELADZE: Yes.

MR. PRIVOR: Thank you.

MR. BALBER: The court reporter can't transcribe --

MR. KAVELADZE: I know. I'm sorry. I'm very sorry.

MR. BALBER: It's okay.

BY MR. PRIVOR:

Q. Do you know what caused your [FM 1] to send this article to you on May 19, 2016?

A. I thought I sent it to --

Q. I'm sorry. For you to send it to her.

A. She's involved in, like, politics and she reads news and she obviously -- we discussed the fact that Agalarovs are close to -- you know, friendship with Trump family and everything with
her, and I send her article.

Q. I'll note that this email is approximately 3 to 4 weeks before the June 9th meeting that took place. Was this article something that you sent in any relation to the effort to establish a meeting on June 9th?

A. No.

Q. So just entirely coincidence?

A. Yeah.

Q. And your was she your at that time?

A. Yes. We maintain good relationship with her, though.

Q. You had identified a number of people that you had spoken to about the meeting before it took place, the June 9th meeting. I think you stated you weren't trying to hide that the meeting was taking place.

A. No.

Q. You mentioned family members. Is your one of the people that you spoke to in advance of the meeting?

A. I don't believe so.

Q. Okay.

A. I don't believe I discussed June 9
Q. Of your family members, do you recall who they were, which ones you spoke to in advance of the meeting?

I description of discussions with family members 2 and 3, and a possible discussion with family member 4 "FM 2", "FM 3", "FM 4".

Q. And you mentioned your family members 5 & 6?

A. Yes, FM 5 & 6, my neighbor.

Q. Who's your neighbor?

A. His name is ...

Q. Anyone else that you can recall that you spoke to about the meeting before it occurred?

A. To the best of my knowledge, that's it.

Q. Okay. Let's take these one at a time.

We'll start with FM 2. Do you recall what you discussed with him about the meeting before it occurred?

A. First, I discussed the meeting going to
be about Magnitsky Act. Then after I received -- not while I received -- when I placed the call to Roman and received that information that that lawyer might have negative information on Ms. Clinton, I discussed that with him as well.

Q. You discussed that with Miffj?
A. Yeah, and with Mlffi ·
Q. And I'm sorry if you had stated earlier, when was the call with Roman?
A. June 7.
Q. So you spoke to about the meeting both before -- so in between June 6th and June 7th, and then you spoke to him again after the call with Roman on June 7th?
A. Yes.
Q. Okay. So in your first conversation with , you mentioned the Magnitsky Act. What was the basis for your understanding that it would be about the Magnitsky Act?
A. Well, I received a communication from Mr. Agalarov that it's going to be about Magnitsky Act.
Q. Anything else that gave you the impression it would be about the Magnitsky Act?
A. Aside of what I received from Mr.
Agalarov, no.

Q. Okay. And after your call with Roman, you spoke to FM 2 again. What did you discuss in that conversation?

A. I expressed my concern. I was concerned at that time that there would be some negative information about Hillary Clinton during the meeting, and it was -- information was inconsistent with what I heard before, which is what I was preparing for. And I was puzzled, so I guess that's the reason why -- maybe it's stupid to discuss with a teenage family member, but I guess there was my nervousness or something.

Q. You mentioned teenage family member. Did you mean FM 2? Were you referring to FM 2?

A. FM 3. No.

Q. I see. Did you speak to FM 2 about the negative information about Hillary Clinton?

A. I believe I mentioned that to FM 2 as well.

Q. And FM 2 is older than FM 3?

A. Yeah.

Q. Okay. What do you recall telling FM 2?
about the negative information about Hillary Clinton? I just want to be clear. I understood what you've said. I just wasn't sure who you told it to.

A. I did not have -- I did not have much information except that phrase, "negative information on Hillary Clinton." So all I could have told him is that there's a rumor that -- I mean, obviously, this thing was on the level of gossip at that point for me because I didn't have no documentary confirmation that they would be talking about. So all I could have told him is that, yeah, someone told me that there might be negative information.

Q. Where did you get the phrase "negative information on Hillary Clinton"?

A. From Roman Beniaminov.

Q. In your conversation with Roman, did you ask him what he meant by that?

A. I believe I did, and he responded that he does not have details, he does not know the details. He overheard it from Rob Goldstone.

Q. Did you ask him any further details about his conversation -- or, I'm sorry, what he overheard from Rob Goldstone?
A. No, I didn't ask for details.

Q. Did you ever reach out to either of the Agalarovs, for instance, to ask them if they knew anything about this negative information?

A. No. I thought it was -- you know, Agalarov is based in Russia, and I'm pretty sure, you know, his phone is being, you know, monitored. So I decided not to discuss it with -- I decided to wait until that lunch with Veselnitskaya and just to go over the whole situation, ask her questions.

Q. And that's the lunch on the day of the June 9th meeting.

A. Yeah, which I did, and at that lunch I realized that except that one sentence about it could be that Ziff Brothers could be financing Hillary Clinton's campaign, that would be the only negative sentence since this whole 11-page presentation.

Q. I'm sorry. Did you ask Ms. Veselnitskaya what was meant by it, or you were inferring that from her statement?

A. I don't believe I asked her, but I read this synopsis, and I realized -- and I asked her, "Is there anything else you want to discuss during
the meeting?" And she said, "No. I'm strictly
going to stick to that synopsis."

Q. Did you ever ask her specifically if she
was going to discuss negative information about
Hillary Clinton?

A. I didn't, but at that point I assumed
that this whole negative information was about
that one sentence, could have.

Q. So, in other words, you inferred that
from her 11-page or so --

A. Yeah.

Q. -- Russian statement?

A. Yeah, my assumption was there's nothing
else. So I was relieved at that point.

Q. You stated when you were describing this
information to that you had some concern
about it. What did you mean by "concern"?

A. Look, I didn't want to be a part of a
meeting where some negative information on a
Presidential candidate would be discussed. So,
honestly, I was considering if I realized during
the lunch that the meeting would be about negative
information on Ms. Clinton, I'm not going to go to
that meeting.

Q. Why not?
A. Because I don't want to be a part of a -- first of all, I voted for Hillary and my family voted for Hillary, and so I didn't want a part of this.

Q. Was there a particular concern you had about being a part of it? Were you fearing some consequence from being a part of it?

A. At that point I did not understand the aspects of legality, so I was less concerned about that. I was more concerned about aspects of morality and ethics of the situation.

Q. I'm sorry. I want to probe a little bit more on what you meant by "concern." Was your concern some sort of alarm, or was it something short of alarm?

A. No, it wasn't alarm, but it was more -- I wouldn't call it "alarm." No, I would call it "concern," and -- which disappeared after that lunch.

Q. After the lunch with Ms. Veselnitskaya?

A. Yeah. When I was going to the meeting, I was confident it was about Magnitsky Act, and it was about Magnitsky Act.

Q. Had you explored what was meant by "negative information about Hillary Clinton" with
1 anyone else in between the time when Roman told
2 you that and when you had the lunch with Ms.
3 Veselnitskaya?
4 A. No, I have not. I have not.
5 Q. And so you didn't ask anyone else what
6 they knew about that?
7 A. No. I decided to ask the source.
8 Q. Fair enough. We were talking about your
9 conversation with [redacted]. The first conversation
10 was about the Magnitsky Act. The second one you
11 mentioned what Roman had told you. Was there
12 anything else you can recall from the conversation
13 with [redacted], or conversations?
14 A. There was no conversation with [redacted]. I
15 just mentioned about this negative information.
16 There was no response, much of a response from
17 [redacted]. He just took it into consideration. The
18 same goes with [redacted], same thing. It just -- I
19 don't think we had like a discussion about that or
20 something. They could have -- they might have
21 asked of me -- I'm not sure -- what negative
22 information, and I would say, "I don't know."
23 Q. Do you recall that you did say that, or
24 you're just surmising you might --
25 A. No, I don't recall --
Q. -- have said that?
A. I'm speculating right now.
Q. Okay. That's all you can remember from the mention to FM 2?
A. Yeah.
Q. Okay. You also spoke to FM 3. Was it at the same time as FM 2 or separately?
A. I believe so, same time.
Q. Both conversations?
A. FM 2 and FM 3, I believe they were both in the room when I discussed it. And I think FM 6 was also in the room.
Q. Did you have any other conversations with FM 3 other than the ones where FM 2 was present?
A. She asked me a few days later, she asked me how was meeting, and I responded.
Q. Do you recall what you said?
A. I said the meeting was boring and there was no negative information about -- and they got nothing on Hillary.
Q. You mentioned FM 6. Did you have any conversations with her about the June 9th meeting other than you thought she was present when you spoke to FM 2 and FM 3?
1 A. No, I do not have a -- independent from
2 that conversation.
3 Q. Okay. How about FM 5? Did you
4 speak with her as well?
5 A. I did discuss -- yes, I did discuss it
6 with FM 5.
7 Q. What did you tell FM 5?
8 A. I told her everything, pretty much what I
9 told FM 2 and FM 3. FM 5 was against me
10 going there like in general, even for Magnitsky
11 Act. And so she was against -- but I said, "you
12 know, I can't do much. Mr. Agalarov told me to
13 go."
14 MR. O'DONNELL: I don't know that he needs
15 to get too much into his discussions with FM 5.
16 MR. KAVELADZE: Yeah. I'm sorry.
17 MR. O'DONNELL: That's typically privileged.
18 BY MR. PRIVOR:
19 Q. Do you have a sense of why she didn't
20 want you to go?
21 A. I don't know. She has strong feelings
22 about Magnitsky Act.
23 Q. Strong feelings?
24 A. Support.
Q. Support for it? You mentioned your neighbor, [redacted]. What did you discuss with him?

A. Same thing. First, I discussed that I'm going there, and then I discussed that there's some negative information. Same thing.

Q. Also two conversations?

A. Yeah.

Q. And with respect to the negative information, did you express to [redacted] that you had some concern about it?

A. Well, yes, I did.

Q. Did he have any response?

A. I don't recall any response from him. Maybe some kind of response, but I don't recall what he told me.

Q. Do you recall elaborating on your concerns to any of the people that you spoke to?

A. No.

Q. So it was a generalized concern that you expressed?

A. At that point the information about negative information was -- as far as I was concerned was gossip, was something someone communicated who overheard it from someone. So I
I was not trusting to that information too much. I just was concerned about possibility that that might be true. But at that point of time, I qualified that as a gossip, that aspect, that part of it.

Q. I'd like for you to take a look at Exhibit 2, which is still in front of you. This is the email chain from Mr. Goldstone to Donald Trump, Jr., and their exchange back and forth. If you go to the third page of that exhibit, the initial conversation from Mr. Goldstone where he describes the meeting -- and Mr. Davis has gone over some of this. I just had a few follow-up questions.

There's a discussion of the Crown Prosecutor of Russia. Did you ever have any understanding of who that was, who he was referring to? Did you ever hear anyone mention the Crown Prosecutor?

A. No. I never heard that term before.

Q. And I know that you weren't copied on this, and you testified earlier you hadn't seen this email?

A. No, I haven't.

Q. Were you ever consulted on the content of
1 this email?
2 A. No, I was not.
3 Q. Mr. Goldstone never picked up the phone
4 and called you and said, "Hey, I'm going to send
5 an email"?
6 A. No. We don't have that relationship for
7 Mr. Goldstone to call me and say, "Hi, I'm going
8 to send an email."
9 Q. How about the Agalarovs? Did anyone,
10 either Emin or Aras, give you a heads up that this
11 email was going to be going out?
12 A. No.
13 Q. And so the first you learned of it was
14 on?
15 A. Television set.
16 Q. Of the actual email.
17 A. Yeah.
18 Q. Okay. Fair enough. This email, which I
19 understand you haven't seen, refers to "high-level
20 and sensitive information that is part of Russia
21 and its government's support of Mr. Trump." Had
22 you ever heard anyone use that phrase before?
23 A. No. No, I have not.
24 Q. Had the Agalarovs ever referred to Russia
25 and its government's support for Mr. Trump?
A. They have not.

Q. Do you know whether the Agalarovs were making any effort to promote the candidacy of Mr. Trump?

A. I do not know of any efforts to promote the candidacy.

Q. And how about the Russian Government? Do you have a sense of was there any effort from the Russian Government -- other than what you've read in the papers, have you --

A. I have no knowledge other than what I read in the papers.

Q. This email also refers to an effort that was helped along by Aras and Emin. Is it "Em- een," the pronunciation?

A. "Em-een."

Q. Thank you. Mr. Goldstone refers to this part of Russia's support for Mr. Trump as something that is helped along by them. Have you ever heard anybody refer to the Agalarovs helping along any effort related to Mr. Trump?

A. No, I have not.

Q. You will note in this email Mr. Goldstone suggests that Donald Trump, Jr., speak to Emin. You'll see at the end of his email he says, "Would
1 you be able to speak to Emin about it directly?"
2 Do you know whether that conversation ever took
3 place between Emin and Donald Trump, Jr.?
4 A. I do not know.
5 Q. Did Emin ever mention to you that he had
6 a conversation with Donald Trump, Jr.?
7 A. No.
8 Q. And conversation about the June 9th
9 meeting.
10 A. With Emin?
11 Q. Yes. Did --
12 A. Between him and Donald Trump, Jr. --
13 Q. Let me restate it so it's clear for the
14 record. Were you aware of any conversation
15 between Emin and Donald Trump, Jr., concerning the
16 June 9th meeting?
17 A. No, aside of what I read in the papers.
18 Q. And Aras Agalarov, did he ever mention a
19 conversation between Emin and Donald Trump, Jr.?
20 A. No, he has not.
21 Q. How about Rob Goldstone? Did you ever
22 talk to him about any conversations between Emin
23 and Donald Trump, Jr.?
24 A. No, because I've heard about the email
25 only a few months ago, and I didn't realize there
1 was this conversation.
2 MR. BALBER: And you don't know that it
3 happened.
4 MR. KAVELADZE: Yeah.
5 BY MR. PRIVOR:
6 Q. If you take a look at Exhibit 4, which is
7 in front of you, Mr. Davis had asked you this
8 morning about you had spoken by telephone with the
9 lady from Russia, which you identified as Natalia
10 Veselnitskaya. I understand you had the luncheon
11 meeting with her. Do you recall anything from the
12 telephone conversation with her before the
13 luncheon took place?
14 A. It's mostly logistics: When can we meet?
15 Can we meet on 8th? No, I'm busy. I'm in the
16 court. Can we meet morning 9th? No, I'm busy.
17 I'm in the court. We could meet for lunch. And
18 another call, sorry, I can't do lunch at 1:00. We
19 can do -- I mean, I'm not sure if it's 1:00 or
20 2:00, but we have to delay our lunch, so --
21 because I'm still in court, I got stuck in court.
22 So it's like a lot of logistical calls.
23 Q. You used the word "mostly" about
24 logistics. Was there anything else you can --
25 A. A hundred percent.
Q. A hundred percent?
A. A hundred percent logistics.

Q. Okay. And then just to follow up on your meeting with Mr. Goldstone just before the June 9th meeting, you said you met him approximately 3:45 before the meeting?
A. There was no meeting with Rob Goldstone. We approached as a group. Rob Goldstone said hello, and he walked us to the meeting. There was no meeting with Rob Goldstone.

Q. You described it earlier as just a welcome and walking up.
A. Welcome, hello, handshakes, let's go.

Q. There was no conversation with him?
A. No.

Q. Did the topic of negative information about Hillary Clinton come up during that walk-up to the meeting?
A. No. There was no words exchanged.

Q. In advance of your meeting, you've talked about the people you spoke to, the lunch with Ms. Veselnitskaya, and now walking up to the meeting. Did you do anything else in advance of the meeting to prepare other than reading the synopsis that you've described before?
Q. Did you strategize with anyone?
A. No.

Q. Did you consult anyone?
A. I mean, bear in mind my initial understanding is that I am going to be translating in the meeting. I don't need to strategize, consult. I just need -- I was supposed to translate.

Q. And without disclosing any substance, did you consult a lawyer before you went to this meeting?
A. No.

Q. And other than the synopsis, did you see any other documents in advance of this meeting? And to be clear, I understand you ultimately saw two synopses.
A. Yes, that's all I saw.

Q. Did you have any communications with the U.S. persons that were at the meeting before the meeting? So did you speak in advance with --
A. Yeah, I told Rob I would be there, and we're always coordinating meeting time and people.

Q. And from the Trump side, had you spoken to Donald Trump, Jr., in advance?
A. No, I didn't have no direct access to --
Q. How about Mr. Kushner?
A. No.
Q. Did you know him before the meeting?
A. No.
Q. Had you ever communicated with him before?
A. No.
Q. How about Mr. Manafort?
A. No.
Q. Had you ever communicated with him before the meeting?
A. No.
Q. You had described the introductions to the meeting, and you said that Ms. Veselnitskaya introduced herself as a private attorney. Did she make a point of describing herself as a "private" attorney? Did she use that word?
A. She either said "private attorney" or "private citizen." But, yeah, she definitely said something like that.
Q. Was your understanding that she was distinguishing herself from, by contrast, a government attorney?
A. I can't tell right now, but --
MR. BALBER: Then that's it.

MR. KAVELADZE: Yeah.

BY MR. PRIVOR:

Q. That's all you can recall?
A. Yeah.

Q. At the meeting -- Mr. Davis had asked you about hacking information, and you stated there was no discussion of releasing any information.

Do I have that right?

A. No, there was no discussion.

Q. Was there any discussion that preceded --
that related to hacking at all?

A. No.

Q. So not just releasing information. Was there any discussion that emails had been hacked?

A. No.

Q. Or that data had been hacked?

A. No.

Q. Was there ever any discussion about trying to obtain information through presumably unlawful means?

A. No.

Q. There was no discussion of Preet Bharara, none at all?

A. No. Not during the meeting.
Q. And with regard to the documents, you stated that Ms. Veselnitskaya brought with her the synopsis. That's the 11-page document in Russian? A. I think it's around 11 pages. Could be 10, could be 12. It's in Russian. Yeah, it was in Russian.

Q. You said that you weren't sure if anyone had accepted her offer of that document. Do you know if she left anything behind? A. I don't know. I know there was an offer to leave it, but if she actually left it or not, I don't -- I don't recall.

Q. And when you walked out of the meeting, you stated that you left, went down to the bar in the lobby.

A. Uh-huh.

Q. And you were with Ms. Veselnitskaya and Mr. Samochornov?

A. Akhmetshin and Samochornov.

Q. So the four of you.

A. Yeah.

Q. Who was still in the office when you left; do you recall?

A. I don't recall. No, I don't recall.

Q. You had described Mr. Goldstone having
some brief words with Mr. Donald Trump, Jr., some sort of apology. Was anyone else around sort of standing nearby that they could hear that conversation between Mr. Goldstone and Mr. Trump, Jr.?

A. Could be. I don't recall who exactly was, because it was a group of people. But I definitely heard that one.

Q. Do you recall if Mr. Manafort was still in the room?

A. I could only guess. I can't -- I don't recall.

Q. And how about Mr. Kushner? Do you recall if he was still behind?

A. Same thing. I don't recall.

Q. Do you recall when you left the meeting with the other three that went to the bar, was anyone still behind in the meeting or in the office?

A. I don't recall those details. I'm sorry.

Q. Okay. I think --

MR. BALBER: One more question before you leave this topic. Was there anybody you met in the kind of reception area as you were leaving the meeting?
MR. KAVELADZE: Yeah. We were greeted by Ivanka Trump.

BY MR. PRIVOR:

Q. Was she ever present in the meeting?
A. No. She was at the reception. She said hello to us, and we said hello, how are you, and we had, like, polite conversation for maybe 1 minute. And then she told us to have a good day, and we left.

Q. Did you see her after the meeting?
A. That was after the meeting.

Q. Oh, I'm sorry. Did you see anybody on your way into the meeting?
A. No.

Q. Other than the participants, obviously.
A. No.

Q. Did you see if anyone else spoke to Ivanka Trump after the meeting other than your casual exchange?
A. It's hard to say. I think we had this casual exchange and moved on. So we left her behind. I'm not sure who she was talking to or could have been talking to.

MR. O'DONNELL: This was upstairs, right?
MR. KAVELADZE: Upstairs.
MR. O'DONNELL: Before you got on the elevator to go downstairs.

MR. KAVELADZE: Upstairs.

BY MR. PRIVOR:

Q. Did you see if she was near enough to Donald Trump, Jr., and Rob Goldstone to be part of that conversation where he gave some sort of apology?

A. I did not see that.

MR. PRIVOR: Okay. Very well. My time is up.

MR. KAVELADZE: Oh, apology? No, definitely not, because apology happened in the room, and we walked out, and she was outside. She was at the reception area. So it definitely was not there.

MR. PRIVOR: Okay. Very good. Thank you.

MR. DAVIS: We're off the record at 11:47.

[Recess at 11:47 a.m. to 11:57 a.m.]

MR. DAVIS: We'll go back on the record at 11:57.

FURTHER EXAMINATION BY COUNSEL FOR THE MAJORITY

BY MR. DAVIS:

Q. Mr. Kaveladze, you had mentioned having email and phone interaction with Donald Trump, Jr., in years prior to the June 9, 2016, meeting.
1 Did he give any indication he recognized you by
2 name at that meeting?
3 A. There was no indication that he
4 recognized me.
5 Q. And in your discussions with Ms.
6 Veselnitskaya surrounding the meeting, did she
7 give you any indication that she was trying to
8 keep the meeting secret?
9 A. No.
10 Q. Did Mr. Akhmetshin give any similar
11 indication?
12 A. No. As I said, I did not have
13 interaction with Mr. Akhmetshin prior to the
14 meeting.
15 Q. Did you have any understanding from Aras
16 Agalarov as to who was to be in charge of the
17 group that was meeting with the Trump personnel?
18 A. I had an understanding that Rob Goldstone
19 was in charge of logistics.
20 Q. You previously described your job
21 responsibilities with the Crocus Group. This type
22 of project where you understood it to be
23 translation, was that outside of the norm of your
24 usual job responsibilities?
25 A. Actually, it's a part. Not very typical
part, but, you know, we had numerous meetings with business leaders, like overseas international leaders. We don't usually have a translator. It's usually me translating.

Q. Did Mr. Agalarov give any explanation as to why he needed you to fly out from California to New York to translate rather than having a local translator do the job?

A. He didn't specify that it was all about translation. As I said before, he also wanted me to meet with Ms. Veselnitskaya prior to the meeting and read that synopsis she has and tell him what I think about it.

Q. When did you depart New York?

A. I believe next morning.

BY MR. FOSTER:

Q. Sorry. Before you go on, you said he asked you to read the synopsis and tell him what you thought about it.

A. Yeah.

Q. Did you do that, and when did you do that?

A. He told me to do that. Basically he -- I read the short synopsis first, you know, while in California. And I read a longer synopsis. I
didn't see much of a difference. But when I read
the short synopsis, I called him, said this
meeting should be conducted on the level of
attorneys, not with these people. We're going to
be discussing Magnitsky Act. You know, these
people have nothing to do with Magnitsky Act. And
he said, "Great. Thank you." And at that time I
was under assumption that we might be meeting with
attorneys.

Then I mentioned again those attorneys,
you know, my suggestion that the meeting should be
conducted with attorneys representing the Trump
Organization, and that was about it. I remember
being surprised when these three individuals
showed up. Although I had an email saying that
I'm meeting with these people, I thought that
someone would make that correction based on my
suggestions and we were going to be meeting with
attorneys. So I was kind of surprised that at
this point it didn't happen.

Q. So when you say you were surprised that
these three people showed up, you mean Manafort,
Kushner, and Don, Jr.?
A. Manafort, Trump, Jr., yeah -- Kushner and
Trump, Jr.
Q. Okay. And so I apologize if you've answered this before, but I'm just a little confused. So why were you there? What was your purpose?

A. My purpose was to read that longer synopsis, whatever she had over there, and my understanding was that longer synopsis contained something which I could alarm Mr. Agalarov about - you know, I would alarm him, and he would call off the meeting. That synopsis was about same thing, so there was no alarm or nothing.

Q. But to be clear, Ms. Veselnitskaya didn't have any business relationship with the Crocus Group; is that right?

A. At that point I did not know what was the nature of relationship of Ms. Veselnitskaya with Crocus Group or Mr. Agalarov.

Q. But you were going to go read the synopsis and then translate for her, is what you thought?

A. Yes. During the meeting I assumed I'm going to be translating, and prior to the meeting I was supposed to read the synopsis and make evaluation of that synopsis.

Q. Did you provide any written evaluation of
the synopsis or --

A. No. We didn't have no time. Just basically I read it. We had a little conversation, got up and -- I got up and left. I mean, we got up and left for a meeting.

Q. I didn't mean immediately after the meeting. I meant after --

A. I never commented, no, not in -- no.

Q. Okay. So you didn't do any sort of report after the meeting back to your boss, "Here's what I did"? You didn't write a memo?

A. No.

Q. Send an email?

A. No. Just a phone conversation. Two of them, to be specific.

Q. And do you recall when those were?

A. One was within 30 minutes after the meeting ended, and the other one was within 2 to 3 hours after the meeting ended.

Q. Can you describe them to the best of your recollection?

A. As I mentioned before, the first one was basically me reporting that the meeting went well, and the reason I said that because Natalia Veselnitskaya was right next to me. And the next
one I said it was complete loss of time.

MR. FOSTER: Okay.

BY MR. DAVIS:

Q. You mentioned a casual conversation with Ivanka Trump. Do you remember the specifics of that conversation?

A. "Good afternoon, gentlemen. How are you? Welcome to Trump Tower." I think that's -- I think she welcomed us. And we said, "Thank you."

And then Akhmetshin said some pleasantries. He speaks excellent English, and he exchanged some pleasantries with Ivanka.

Q. Did she give any indication that she knew what the purpose of your meeting was with her brother?

A. No. No.

MR. FOSTER: Did you even introduce yourself by name to her?

MR. KAVELADZE: No, we did not.

BY MR. DAVIS:

Q. So you discussed with my colleague your interactions with [REDACTED], regarding the meeting. I'd like you to take a look at an email chain Bates-stamped SJC-KAU-00251. This will be Exhibit 7.
BY MR. DAVIS:

Q. This document states that on June 15, 2016, asked you, "How was the meeting with Trump people? What happened?" And your reply was, "Meeting was boring. The Russians did not have any bad info on Hillary."

A. On Hillary, yeah. His mistake.

Q. I believe you have already discussed this exchange with my colleague, but I did want to enter this document into the record just so we have it.

A. Sure.

Q. Next I'd like you to take a look at an email exchange Bates-numbered SJC-KAV-00248 as well as 0026 and 27, and I'll explain the different numbers.

MR. O'DONNELL: 260 and 267?

MR. DAVIS: 0026 and 0027.

MR. KAVELADZE: Thank you.

MS. BRENNAN: Is it 0026 and 0027?

MR. DAVIS: Right, along with 248.
MR. DAVIS: We're having technical difficulties.

MR. FOSTER: So can you hand me the exhibit back?

MR. BALBER: Oh, sure.

MR. FOSTER: It's not attached.

MR. DAVIS: I'll describe it as we get it set up.

MR. BALBER: Yeah.

BY MR. DAVIS:

Q. So this is an email chain, Bates numbers 0026 and 27. 0026 is an email from Rob Goldstone to Emin Agalarov and you. It has an image attachment, but the text of the message says, "Top story right now seems eerily weird based on our Trump meeting last week with the Russian lawyers, et cetera." And the attached image is a CNN headline. The headline reads, "Russian hackers stole Dems' Trump files, firm says." And Bates number 00248 is an extension of that same email chain.

MR. FOSTER: It'll be marked Exhibit 9.

MR. DAVIS: Okay. That'll be Exhibit 9.

248 will be Exhibit 9.

[Kaveladze Exhibit 9 was marked for]
MR. PRIVOR: And the other two together will be 8.

MR. DAVIS: That's correct.

BY MR. DAVIS:

Q. This is a response email from you to Rob Goldstone. Emin does not appear to be on this response. And your reply, according to this email, is, "Very interesting."

What about the CNN hacking story seemed weird in light of the June 9th meeting?

A. I don't know what was weird about that story. I didn't think that story was weird. It had no relationship with June 9 meeting, I know that. It was weird that he actually sent that link. And that was not very -- I didn't understand the meaning of the word "eerily." You know, I later asked my attorney what it means. But I think it was weird that he sent something like that to me.

Q. What did you mean by your response, "Very interesting"?

A. "Very interesting"? It's a polite response. I mean, I didn't want to call him a weird person or something like that, because it
1 was weird for him to send something like that to me.

Q. And, again, was any hacking in any context discussed at the June 9th meeting?
A. Nothing was discussed in meeting.

Q. Was there a reason you responded just to Rob Goldstone and not also to Emin?
A. It's my inproficiency with -- sometimes I forget. Instead of "Reply to All," I just do "Reply," and that's what it is. I had no reason to hide that response from Emin, "Very interesting."

[Kaveladze Exhibit 10 was marked for identification.]

MR. DAVIS: Next I'd like to look at some documents Bates-stamped SJC-KAV-00158 and 159, which will be Exhibit 10. This is an email sent on July 7, 2016, from you to someone named Vadim, attaching Crocus-related expenses. I'll give you a moment to look it over.

[Pause.]

BY MR. DAVIS:

Q. In general, was your participation in the June 9th meeting and your trip surrounding that meeting considered a business expense to Crocus?
A. Sure, yes.

Q. The attached transaction document shows two transactions on June 9, 2016. One just says, "Trump," and it's for $57.21. Do you remember what that transaction was?

A. Yeah. I bought a round of drinks for Rinat, Natalia -- I'm not sure if Veselnitskaya drank -- myself, and -- because I left that bar -- yeah, I bought a round of drinks.

Q. And the other transaction listed here is Staples for $20.68. Do you recall what that transaction --

A. Yeah. I forgot my business cards in California, so I ran to Staples to print urgently business cards.

Q. And did the business cards you printed, did they match the content of your normal business card?

A. Oh, yeah.

Q. So I believe you said you left on the morning of the 10th; is that correct?

A. Correct.

Q. After leaving the Trump Bar, what did you do with the rest of the day?

A. I do not recall. I might have some
meetings with my friends, but nothing business-related.

Q. Did you discuss the Trump Tower meeting with any of those friends, to the best of your recollection?

A. I don't even remember if I had a meeting with friends, so I definitely don't remember discussing it with them. I think I was kind of tired because of a jet lag, because it was a red-eye flight I arrived on, and I went to bed really early.

[Kaveladze Exhibit 11 was marked for identification.]

MR. DAVIS: Okay. I'd like you to take a look at the document Bates-stamped SJC-KAV-00316 through 329.

[Pause.]

BY MR. DAVIS:

Q. This is a document that your attorney produced to us. It appears to show the date, time, and participants of text messages as well as the messages' content. Is that a correct description of the nature of this document?

MR. BALBER: From counsel's perspective, yes, that's how we prepared it.
Q. Much of the content is in Russian; is that correct?
A. Yes.

Q. Could you please take a look at the entry for November 18, 2016, at 17:45. This appears to be a message from you to Aras Agalarov. Mr. Kaveladze, could you please translate the content of that message?

A. "Hello. Rob spoke with Trump people. They asked a short synopsis of what is she going to be discussing. Last time she produced a lot of emotions and less facts. Most of the people who took part in that meeting are moving to Washington, D.C. Some of them already fired. When they receive synopsis, they will decide who to send to that meeting."

Q. To the best of your knowledge, is this a reference to another attempt by Rob Goldstone to arrange a meeting between Natalia Veselnitskaya and the Trump team?
A. Correct.

Q. Who initiated this request for another meeting?
A. Aras Agalarov. At least as far as I'm
1 concerned. Maybe Natalia initiated to Aras, but yeah.

3 MR. BALBER: Speak up and just answer based
4 upon what you know.
5 MR. KAVELODZE: Aras Agalarov.
6 BY MR. DAVIS:
7 Q. And what is the basis for your knowledge
8 that he was the person who initiated this request?
9 A. Because he called me.
10 Q. When he called you, what did you discuss?
11 A. When he called me, he said that Natalia
12 wants to meet with Trump people again to discuss
13 Magnitsky Act.
14 Q. Okay. You had previously mentioned that
15 in the June 9th meeting, Donald Trump, Jr., gave
16 some sort of statement to the effect of perhaps
17 once, if Donald Trump, Sr., is elected, this would
18 be an issue we would return to.
19 A. Yeah.
20 Q. Did you feel that this was an effort to
21 follow up on that?
22 A. Yes.
23 Q. What was your involvement in pursuing
24 this second meeting?
25 A. I contacted Rob Goldstone and requested
Q. So your text message to Aras Agalarov says that Rob talked with the Trump people. Do you know which Trump people he contacted?

A. I have no idea who he spoke with. He usually would not give me details of that.

Q. Okay. Did you have any sense of his method of contacting them, whether it was by phone, email, or text?

A. No.

Q. All right. Returning to the document, the message we were discussing was sent at 17:45, according to the document. It looks like 13 minutes later, at 17:58, it says you sent the same message to a recipient listed here as "unknown."

To whom did you send this message at 17:58?

[Pause.]

MR. BALBER: And if you don't know, you don't know.

MR. KAVELADZE: I don't -- I don't know.

BY MR. DAVIS:

Q. And according to this same document, at 19:00 hours that same day, November 18, 2016, you sent a message to a contact listed here as Natalia, and that message contained what looks to
1 be your email address. Was that Natalia Ms.
2 Veselnitskaya?
3 A. Yes.
4 Q. And am I correct that that is your email
5 address?
6 A. That is correct.
7 Q. The document shows that the next day,
8 November 19th, you and Natalia exchanged a series
9 of texts. I'd like to go through all those texts
10 on that day and ask you to translate each.
11 A. Sure.
12 Q. So starting with the one at 10:56 on
13 November 19th.
14 A. Okay. "Irakly, good morning. I have a
15 question. Do we plan" -- "Is there a meeting in
16 the pipeline on our issue before November 27? The
17 reason I'm asking is for me to understand because
18 I'm not sure if I want to leave now or in one
19 week. My son" -- "On the 27th of November, my son
20 has a sworn-in ceremony. Therefore, my" -- "I
21 could do the following: I could leave U.S." -- "I
22 would depart tomorrow and arrive into Moscow on
23 November 26, and then on November 28 I would
24 return to U.S. and will stay here until I resolve
25 all issues." Yeah.
Q. And then the next one is at 14:05 -- I'm sorry, is at 10:56 again is also Natalia?

A. Yeah.

Q. Could you translate that one as well?

A. I think that one word is incorrect. "I only want to understand, if you're trying to arrange" -- "trying to resolve our issues. Can I expect a meeting with someone next week?"

Q. And then it looks like you responded at 14:05.

A. Uh-huh.

Q. Could you translate that as well?

A. Sure. "Hello, Natalia. Meeting was not" -- "So far meeting was not confirmed. They asked for synopsis. In general, next week will be difficult for any type of meetings because of Thanksgiving Day."

Q. And then it looks like at 14:09 Natalia responded.

A. "Understood. I will send you a synopsis on Monday in English. Maybe considering the Thanksgiving Day I should arrive next Sunday. Hopefully by that time you would be clear what's happening with the meeting."

Q. And that looks like she sent another text
1 at 14:09 to you.
2 A. Right. It says, "That was question."
3 Because she forgot to put question mark.
4 Q. All right. And then your response at
5 14:17, could you translate that for us as well?
6 A. "I think that would be right way to
7 approach."
8 Q. And, again, it looks like she responded
9 at 14:20.
10 A. Yeah.
11 Q. Could you translate that one as well?
12 A. "While you were answering to me, things
13 got much simpler than they were before. The
14 sworn-in ceremony for my son was postponed to
15 December 4, so, therefore, I would leave for
16 Moscow tomorrow and will be back in New York" --
17 "in America as soon as the meeting is confirmed,
18 until December 2nd inclusive. Synopsis will be
19 sent to you most likely on Tuesday."
20 Q. Now, the document also shows that on
21 November 23, 2016, Natalia texted you at what's
22 labeled as 15:54. Could you translate that
23 message for us as well?
24 A. "Irakly, good morning. The letter is in
25 your email."
Q. So keep this exhibit handy. We'll be coming back to it. But right now I'd like to have you take a look at the email and attachment Bates-stamped SJC-KAV-00040 through 43, which would be Exhibit 12.

[Kaveladze Exhibit 12 was marked for identification.]

BY MR. DAVIS:

Q. This email was sent on November 23, 2016, at 7:49 a.m., according to the sent line. Am I correct that this email is Natalia sending you the synopsis as an attachment in English?

A. That is correct.

Q. Could you please translate the body of the email? It look like there's a line or two.

A. "Good day. I'm sending synopsis. Also, in addition, also in English, I'm sending the documents I mentioned, which is declaration and request. I am available. NV." Natalia Veselnitskaya.

Q. The subject of this email is "From RF". What does "RF" stand for?

A. Russian Federation country.

Q. Okay. And what did you understand that subject line to mean?
A. It's a letter from Russia.

Q. Okay. So did you understand that to mean that the letter was from the Russian Government or just from a person within Russia?

A. From a person within Russia. RF is certainly not abbreviation for Russian Government.

Q. Okay. Next I'd like you to take a look at a document Bates-stamped SJC-KAV-00136-137. This will be Exhibit 13.

Kaveladze Exhibit 13 was marked for identification.

BY MR. DAVIS:

Q. This appears to be an email chain also on November 23, 2016, between you and Rob Goldstone in which you forwarded him Ms. Veselnitskaya's synopsis of the topics she wanted to discuss with the Trump people. Is that correct?

A. Yes.

Q. I'll give you a moment to look it over.

A. Uh-huh.

[Pause.]

MR. KAVELADZE: Yes, I remember this email.

BY MR. DAVIS:

Q. If you could please look at the message from Mr. Goldstone to you at 8:16 a.m. Mr.
Goldstone writes, "Having skimmed it over, isn't this exactly what she presented at the last meeting?" You replied, "Yes, pretty close to what she talked about at first meeting."

Is that true? Was the content of this synopsis similar to the content of the June 9, 2016, meeting?

A. Yes, it is true.

Q. Were there any material differences?

A. I don't think she's mentioning Democratic campaign, funding of Democratic campaign in this. I think -- can I look over?

Q. Of course.

MR. BALBER: And, obviously, in fairness, he's looking for anything that really strikes you as being material with the understanding that you haven't read the other ones in a long time and they're, what, a 10-page document. So anything that just strikes you as being significantly different. Is that fair?

MR. DAVIS: That is fair.

MR. KAVELADZE: Yeah, it's very close to what she sent before.

BY MR. DAVIS:

Q. Later in the email chain, Goldstone
writes, "I have to submit this and then speak to Don and Rhona, and then wait to see if they want to have a meeting." Who did you understand Don to be in this email a reference to?

A. My understanding was Don, Jr.

Q. I'd like to look back at the exhibit with the text messages now.

MR. FOSTER: Exhibit 11.

BY MR. DAVIS:

Q. Exhibit 11, at Bates page 317.

A. Uh-huh.

Q. There is an entry for a text message on November 27, 2016, from Natalia to you at 17:27. Could you translate that message for us, please?

A. "Irakly, good day. I hope you had successful holidays. Is there any understanding on the meeting? I'd like to plan 2 days I've got left, Monday and Tuesday."

Q. And could you please translate the response he sent her 2 minutes later at 17:29?

A. "Hello, Natalia. I'm afraid we will have some understanding only tomorrow morning when everybody returns from a long weekend. I will let you know."

Q. And I apologize for jumping around again,
but I'd like to have you take a look at an email and attachment, Bates-numbered DJTJR-00245 through 248.

MR. FOSTER: Which will be marked Exhibit 14.

[Kaveladze Exhibit 14 was marked for identification.]

BY MR. DAVIS:

Q. The first email chronologically in this chain is from Mr. Goldstone to Rhona Graff, who is Donald Trump's assistant, Donald Trump, Sr. Goldstone writes, "Aras Agalarov has asked me to pass on this document in the hope it can be passed on to the appropriate team. If needed, a lawyer representing the case is in New York currently and happy to meet with any member of his transition team."

The document he attached to this email is the same synopsis Ms. Veselnitskaya emailed you and you forwarded to Mr. Goldstone; is that correct?

A. Hold on one second.

[Pause.]

MR. KAVELADZE: Yes, it looks like the same document.
1 BY MR. DAVIS:
2 Q. And I would note the email chain shows
3 Ms. Graff forwarding the email to Steve Bannon,
4 writing in part, "Not sure how to proceed, if at
5 all."
6 A. Uh-huh.
7 Q. Now, returning again to Exhibit 11, the
8 log of text messages, could you translate the
9 series of messages between you and Natalia
10 beginning on November 28th? That's towards the
11 bottom of page 37.
12 A. "Hello, Natalia. Unfortunately, we got
13 no response. Secretary of Trump told that this
14 kind of request now take much longer to process."
15 Okay. Should I go to the next one?
16 Q. Yes, the next one at 21:28, it looks
17 like.
18 A. Okay. Hold on. "Robert is on the phone
19 with reception" -- yeah, "reception. Hopefully
20 we'll hear something until the end of the day."
21 Q. Okay. And --
22 MR. BALBER: It looks like you --
23 MR. KAVELADZE: I corrected myself.
24 MR. BALBER: Right.
25 MR. KAVELADZE: Because the first one, it
1 says like it was a mistake, typographical mistake, 
2 and it says "hear from them." And she said, 
3 "Understood. Waiting."

BY MR. DAVIS:

Q. All right. If we could turn the page to 
Bates number 318, a message from you to Natalia at 
23:06. Could you translate that one for us as 
well, please? 

A. 23:06: "So far they're silent. Rob left 
another message."

Q. And it looks like Natalia responded at 
23:53. Could you translate that one as well? 

A. "Could that mean there's lack of 
interest?"

Q. It looks like you responded at 11:08. 
Could you translate that as well? 

A. "Most likely what it means logistically 
they're not ready yet."

Q. At 11:15 Natalia wrote you back with a 
response. Could I ask you to translate that 
message for us as well? 

A. "Understood. I have tickets for tomorrow 
to Moscow. Can we somehow understand should I 
exchange them and request a meeting next week so I 
could fly back to U.S.? I need to be in Moscow
only for this weekend."
Q. Okay. And then you replied at 11:18.
Could you translate your response, please?
A. "Robert says that logistics of
organizations of meetings with Team Trump now
would be difficult and lengthy. I've landed in
Moscow. I will discuss this situation with boss"
-- "with my boss."
Q. Okay. And when you refer to boss, did
you mean Aras Agalarov?
A. Mr. Agalarov.
Q. And what did you discuss with him?
A. This meeting. I'm reporting to him that
it does not look good, and I was -- yeah.
Q. Further down the page, on December 1st --
actually, I'm sorry. Let me back up. On November
30th on this document, it looks like Ms.
Veselnitskaya emailed you about President-elect
Trump meeting with Preet Bharara. Could you
please translate the messages that begin at 17:20
on November 30th?
A. "Maybe that's the reason. Is that a bad
sign?"
Q. And then it looks like you responded at
17:22?
A. "I don't think it's a bad sign." At that point I have no idea who Preet Bharara is. "He left him" --

Q. I'm sorry. That's Natalia's response.
A. "He left him. How is it possible?"

Continue?

Q. Yes, please.
A. "Or maybe just a game. Maybe he wants to control him that way, who to crush or who not. Maybe."

Q. Now, to clarify, have you ever discussed Preet Bharara with Ms. Veselnitskaya?
A. No.

Q. Okay. Did you understand what she meant by this?
A. No. I mean, I Googled that name, and I realized she's talking about some prosecutor from New York.

MR. BALBER: But you had never heard the name before that.

MR. KAVELADZE: No, no.

BY MR. DAVIS:
Q. But after Googling it, did you learn that he was overseeing the Prevezon Holdings case?
A. I did not -- I don't believe at that
Q. And at that point did you understand Ms. Veselnitskaya's relationship with Prevezon Holdings?

A. Yeah, well, I'm not sure at what point, but I think by the end of 2016 or early 2017 I understood that she'd been representing Prevezon Holdings.

Q. Okay. So as of November 30th, there had been no connection with the Trump team to agree on a second meeting; is that correct?

A. No connection to Trump team?

Q. You hadn't arranged for a second meeting as of November 30th; is that correct?

A. There was no second meeting arranged, no.

Q. Okay. Looking down at the entry for December 1, 2016, at 11:49, you sent a message to Natalia. Could you translate that one for us as well?

A. At 11:49, "Unfortunately, we don't have communication. My boss planned to meet with him. We will send a formal request. Hopefully after the meeting we will keep communication."

Q. When you wrote that your boss planned to
1 meet with him, did you mean that Aras Agalarov

2 intended to meet with Donald Trump, Sr.?

3 A. Correct.

4 Q. Okay. Did such a meeting occur?

5 Q. No.

6 Q. And did you send a formal request for the

7 second meeting?

8 A. For a second meeting? With whom?

9 Q. A request from Aras Agalarov to Donald

10 Trump, Sr. Was there ever a written request from

11 him --

12 MR. BALBER: For a second meeting meaning --

13 what was the first meeting?

14 MR. DAVIS: For a meeting between

15 Veselnitskaya and anyone on the Trump team.

16 MR. BALBER: Okay. I'm sorry. Would you

17 mind starting over?

18 MR. DAVIS: No problem.

19 BY MR. DAVIS:

20 Q. So could you translate the message at

21 11:49 again?

22 A. "Unfortunately, at this point we don't

23 have communication. Boss was planning to meet

24 with him. We will send request. After the

25 meeting hopefully we'll have communication."
Q. Okay. When you said, "We'll send a request," were you referring to a request to have Mr. Agalarov meet with Mr. Trump? Is that what --
A. Yeah.
Q. Okay. I understand now.
A. The request was never sent.
Q. All right. So in the message following that on December 1, 2016, at 12:07, Natalia responds to you. Can you translate that one as well?
A. "Can I meet with your boss? We could meet at the same place we met with him."
Q. Okay. So in that message, she asks --
Ms. Veselnitskaya asks for a meeting with your boss. I'd like to have you take a look at the email and attachments Bates-numbered SJC-KAV-00255 to 258. This will be Exhibit 15.
[Kaveladze Exhibit 15 was marked for identification.]
MR. BALBER: Thank you.
BY MR. DAVIS:
Q. This is an email sent from you to Aras Agalarov on December 2, 2016, which attached the text message exchange between you and Natalia in which she asked to meet your boss. Is that
1 correct?

2 A. Among other messages.

3 Q. Among other messages. Did Aras Agalarov meet with Ms. Veselnitskaya after you sent him this email?

4 A. I believe he did.

5 Q. Do you know what they discussed?

6 A. No.

7 Q. Turning back to Exhibit 11, the text messages on Bates-numbered pages 319 and we'll move on to 320. I won't ask you to translate all these messages between you and Ms. Veselnitskaya, but looking over them, would it be generally correct to say that in December of 2016, as well as January of 2017, you and Ms. Veselnitskaya were discussing American attitudes towards Russia and investigations of Russian interference in the 2016 election? Is that an accurate general summary?

8 A. It would be accurate to suggest that she periodically would send me some links or ask me questions, and sometimes I would answer to those questions.

9 Can I take a pause, please?

10 MR. DAVIS: Of course.

11 [Witness confers with counsel.]
MR. BALBER: Let me suggest, if I can, that you ask the witness about why he sent Exhibit 15 and maybe a little more granularity on what the texts that are a screenshot actually say. I think that might add some --

MR. KAVELADZE: That would be connected to --

MR. BALBER: -- shed some light on the question you just asked.

MR. DAVIS: Okay. Certainly, yeah, if you could go through those attachments and explain --

MR. BALBER: Why don't you translate the text messages that are attached to Exhibit 11, and then maybe you can explain why you sent them to Mr. Agalarov.

MR. FOSTER: You mean attached to Exhibit 15.

MR. BALBER: 15.

MR. KAVELADZE: "Unfortunately, there's no communication. Boss was planning to meet with him. We'll make a request and hopefully we'll have communication. Can we meet with your boss the same place we met? He's traveling. He will be tomorrow. I'll relate that to him. Okay. Or maybe it's just a game. Maybe that way he wants
to control him, who to destroy and who not.

Maybe. Is there any understanding of what's" --

"Is there any" -- okay -- "any feedback from their
side to understand what's happening there?" And
then he sends me that Donald Trump --

MR. BALBER: She sends you.

MR. KAVELADZE: She sends me, yeah. She
sends me. "That's a bad sign." I said, "I don't
know. I don't think it's a bad sign. He left
him. How is it possible?"

The reason I've sent this whole chain of
text messages to Mr. Agalarov, because at that
point I was very frustrated because she was
bombarding me with this thing. I did not
understand the nature of relationship between her
and Mr. Agalarov, and I didn't want to complain to
her, so I kind of complained to him, saying that
this must stop. I mean, I don't like that. And
he told me to give example of what she does, and
I've sent this whole thing to him.

BY MR. DAVIS:

Q. And how did he respond after you sent
this example?

A. He told me that he had conversation with
Natalia and she's not going to bother me anymore.
Q. Turning back to Exhibit 11 on Bates pages 320 and 321, I won't ask you to translate all of these again, but it appears that you exchanged some messages with Ms. Veselnitskaya about her traveling to New York. Is that correct? It's towards the bottom of 320.

A. Okay. One second. Oh, bottom of 320?

Q. That's right. I believe so.

A. Okay. I'm sending the message to Natalia saying, "Are you going to be in New York this week?" And she says, "Irakly, I'm in the air right now, 4 hours left, and I will be in New York."

Q. Okay. Could you please -- on page 321, could you please translate the message -- excuse me, the messages -- the message beginning on January 17, 2017, at 17:26 from you to Natalia?

A. "Hello, welcome. Would you like to meet with attorney 11:00 a.m. on Friday?"

Q. Who is the attorney you were offering to have her meet with at 11:00 a.m.?

A. Scott Balber.

Q. And in what capacity was she to be meeting with him?

A. She would be meeting with him.
MR. BALBER: Why were you arranging to have her meet with me?

MR. KAVELADZE: She did -- it's Magnitsky Act-related. At that point I tried to distance myself out of the situation, and being a good man, I decided to involve Scott in this situation.

MR. BALBER: Or maybe not a good man. Depends how you look at it.

MR. DAVIS: Best of intentions, perhaps.

MR. KAVELADZE: Yeah, but -- yeah. And so I tried -- yeah, she had some issues, you know, let professionals deal with it. I don't want to deal with that.

BY MR. DAVIS:

Q. To the best of your knowledge, did that meeting occur?

A. I believe so.

Q. Could you also translate Natalia's two responses to you, both at 17:33?

A. Okay. She's asking if we could hope for the meeting with someone from a team of number one. I assume she's talking about Trump.

Q. So you understood that to be a reference to --

A. Yeah.
Q. -- trying to have a meeting with the
Trump team.

A. Yeah, she was obsessed with this meeting.

And I say, "I don't think so. Let's discuss on
Friday."

Q. Okay. What did you discuss with her on
that Friday?

A. We -- I didn't discuss -- well, we
discussed this meeting situation. Basically I
told her that it's not happening. It's not
happening. And then I did an introduction to
attorney.

Q. So, Mr. Kaveladze, to the best of your
knowledge, did Ms. Veselnitskaya ever have a
second meeting with anyone on the Trump team?

A. To the best of my knowledge, she did not
have a meeting with anyone from Trump team.

MR. DAVIS: I think we're at a good stopping
point for our side right now. We'll go off the
record at?


[Recess at 12:48 p.m. to 1:26 p.m.]
MR. PRIVOR: We will go back on the record.

It is 1:26.

FURTHER EXAMINATION BY COUNSEL FOR THE MINORITY

BY MR. PRIVOR:

Q. Okay. Mr. Kaveladze, before the break, our colleagues had discussed a number of different topics, so as with the morning, I'm going to probably bounce around a little bit.

A. Sure.

Q. So my apologies in advance, but we'll try to keep the chronology roughly in order.

So after the June 9th meeting, you talked about how you went downstairs to the bar on the lobby level of the Trump Tower, and you were there with three other people -- Ms. Veselnitskaya, Rinat Akhmetshin, and Mr. Samochornov.

A. Yeah, uh-huh.

Q. Do I have that right?

A. I think Samochornov left slightly earlier, like -- but I'm not sure about Samochornov because -- or maybe he stayed, but, yeah, those -- we walked all together and then some of them -- and I left in 15 minutes.
Q. And you had a round of drinks with them, we saw. Do you recall what conversation you had during that round of drinks?

A. Mostly about meeting, and out of that 15 minutes, probably 5 minutes I spoke with Mr. Agalarov, and for 10 minutes it was -- I think they were satisfied with the fact that Mr. Junior has suggested that it might be a second meeting if they win. And so they were talking about that, you know, to prepare for that second meeting.

Q. You're saying that the other people who were present with you were satisfied with that. Do I understand you correctly?

A. Yeah, people -- yeah. They were pretty happy, actually.

Q. Did you also convey that to Mr. Agalarov on the telephone that there was an offer of a potential -- another meeting?

A. No, I didn't discuss it with Mr. Agalarov.

Q. What did you discuss with Mr. Agalarov?

A. In general, the meeting went well. Oh, good. Then Natalia asked for the phone, and I passed the phone to her, and she kind of thanked him for helping to organize that meeting.
Q. Did you say anything to Mr. Agalarov about the matter that had given you some concern earlier, the potential information about Hillary Clinton?

A. No, I didn't discuss it over the phone.

Q. In your conversations with the people who were present, did they have any reaction to the meeting that has just occurred, the June 9th meeting, other than you expressed they seemed happy about a potential second opportunity?

A. They were happy. Look, they went to the bar, and Rinat started this conversation about the theater play they were attending that night. And so we mostly spoke about the theater and -- because I saw that play a few months ago, and I liked it very much, and I said it's amazing. The author is amazing. There are -- you know, the people are amazing, and it's just you can enjoy.

And so we mostly talked about theater.

Q. What theater play was it?

A. Okay. I could tell -- okay. The play is called "Stories" by Vasily Shukshin. It's a theatrical troupe on the tour. "Stories" by Vasily Shukshin. And leading role was played by pretty famous Russian actress. Her name is
1 Chulpan Khamatova. And they were all excited to
2 see her.
3 Q. So other than the excitement for the
4 upcoming play, some happiness about a potential
5 second opportunity --
6 A. Not much -- yeah --
7 MR. BALBER: Let him finish the question.
8 BY MR. PRIVOR:
9 Q. Was there any other reaction to the --
10 following the June 9th meeting?
11 A. Not really.
12 Q. It sounds like the other participants
13 were expressing that they were happy. Was there
14 any expression of regret or dissatisfaction?
15 A. No.
16 Q. Did anybody say anything about, for
17 instance, you know, "We expected to be able to
18 cover some other topic, but we didn't have that
19 opportunity"?
20 A. No, they did not.
21 Q. Is there anything else you can remember
22 from the conversation other than the two topics
23 that you noted -- the theater coming up as well as
24 some happiness about a potential second --
25 A. I stayed there for, like I said, 15
1 minutes. No, I don't think we discussed anything else.

3 Q. Did you all leave simultaneously?
4 A. No. I left first.
5 Q. So the other three -- Rinat, Ms. Veselnitskaya, and Mr. Samochornov -- stayed behind?
6 A. Yeah. I'm a little bit unsure about Samochornov, but the key players were there.
7 Q. Did anyone else join your group while you were there?
8 A. No.
9 Q. Was there anyone that you recognized who was nearby, near enough that they might have heard your conversation?
10 A. No. Mostly people over 60, Trump supporters, mostly males.
11 MR. BALBER: You had a conversation with them about who they supported politically? Okay. So then let's try to pay attention to what we're saying and what you saw.
12 MR. KAVELADZE: All right.
13 MR. BALBER: Thank you.
14 BY MR. PRIVOR:
15 Q. What gave you the impression that these
1 were Trump supporters?
2    A. Well, we're in Trump Tower. I made
3 assumption.
4    MR. BALBER: That was not a good assumption
5 to make then and not a good thing to testify about
6 now, so let's refocus. Okay?
7    MR. KAVELADZE: Yeah.
8 BY MR. PRIVOR:
9    Q. Was there any activity on their part that
10 gave you that impression?
11    A. Nothing.
12    Q. So it was just people in the Trump Tower?
13    A. Yeah. Trump Bar of Trump Tower.
14    Q. Were you seated when you were with the
15 other three participants?
16    A. We were seated, yeah.
17    Q. Were you at a table or --
18    A. Table.
19    Q. Was it a private table? Was anyone
20 nearby?
21    A. There were people near. It's a bar, so
22 yeah, there's people nearby.
23    Q. What time did the meeting break up? You
24 said earlier, you testified that it was about 35
25 minutes.
A. Yeah, 35 to 40 minutes, yeah. By the
time we got there, it probably was like 4:45.

Q. Okay. After you left this group, where
did you go next?
A. I don't remember. I don't recall.

Q. And then you went back to your hotel that
evening?
A. Yeah.

Q. You said you turned in a little early?
A. Yeah.

Q. And when you woke up, where did you go
after that?
A. I know it was not business-related. I
maybe ate something and went to the airport.

Q. Did you leave that evening?
A. I left -- that evening meaning June 9?

Q. Yes.
A. No. I slept at the hotel.

Q. You slept overnight.
A. Yeah.

Q. And so you left the next day on June
10th?
A. Yeah, June 10.

Q. Where did you fly to?
A. Los Angeles.
Q. So on June 10th you flew to Los Angeles, and did you stay in Los Angeles?
A. Yeah.
Q. And do you recall how long you were in Los Angeles after that?
A. No, I don't.
Q. Do you recall if you had traveled back to New York, say, at any other time in June?
A. I don't believe I traveled to New York.
Q. Do you recall whether you had any other travel for the rest of June?
A. No, I don't. I would need to see my records.
Q. What would you look to to figure out where you were? Do you keep a calendar?
A. No. I would look for some kind of airline reservations.
Q. If I can have you take a look at Exhibit 7, which you have in front of you. You'll recall this is the exchange you had with [FM 3] where you had responded to our query about the meeting and saying that it was boring, Russians didn't have any bad information on Hillary.
If you go to the beginning of that email chain, the first-in-time email, which is on Bates
you were describing there how you had left your iPad on the plane to New York and you must have left your suit in the hotel. This is on June 14th that you're writing to her. Do you recall where you were in between June 10th and June 14th?

A. No, I don't. I don't recall that.

Q. And you'll see that you're corresponding with her. The most-recent-in-time conversation is the one at the top of the page, on Bates page 251, where you describe the meeting as boring. You're still communicating with via email, which suggests you're not in the same place. Do you recall if you were, in fact, back in Los Angeles communicating with?

A. She lives separately from me.

Q. I see.

A. So we communicate via email sometimes when I'm not with her.

Q. Does seeing this exchange with does that refresh your recollection in terms of where you were physically at the time?

A. It's probably about that my stage is 4 days later. You know, I'm communicating to her
about that trip. I mean, it's probably -- I'd want to see my travel records to be sure. But I sure don't remember returning back to New York on 14th. I think I'm referring to that trip on June 10 that I forgot my suit and I forgot my iPad on the plane.

Q. Okay. So you think that's referencing the return from New York to Los Angeles?

A. I think so, yeah.

Q. And setting aside whether you might have traveled to New York, do you recall traveling anywhere else after June 10th in the month of June?

A. I don't recall anything. I could have, though.

MR. PRIVOR: We're going to mark our next exhibit, which I think we're on 16.

[Khveladze Exhibit 16 was marked for identification.]

BY MR. PRIVOR:

Q. So, for the record, while you look that over, this is Exhibit 16. It's Bates page SKC-KAV-00270 and it should go through 291, and this appears to be a telephone bill from addressed to you, Mr. Khveladze. Do you recognize
the document?
A. 291?
Q. Just the whole document. It starts on page 270.
A. Yeah, I do. It's bill.
Q. Is that your telephone bill?
A. I believe so.
Q. Let's turn to the third page, which has 272 at the bottom. Do you see the Bates number in the bottom right-hand corner, 272?
A. Oh, yeah.
Q. Okay. You'll see this lists five different phone numbers that appear to be part of this account. The one at the top, the 9-1-7 telephone number, whose number is that?
A. That's mine.
Q. That's your personal line?
A. Yes.
Q. And the next one down, I'll just refer to them by the last two digits for sake of privacy. The number?
A. is my FM 1.
Q. Okay. And how about the next one down, the number?
A. FM 3
1 Q. That's FM 3?
   A. Uh-huh.

3 Q. And the
   A. is FM 2.

5 Q. And how about the last one, the FM?
   A. FM 4.

7 Q. That's also FM 4?
   A. Yes.

9 Q. So let's take a look now at Bates page 282, and you'll see that this is showing call

details for your telephone number. Do you see that?

11 A. Yes.

13 Q. At the top of the page, it indicates it's your telephone number. So I want to point you to
June 10th, and you can see the first call on June 10th is at 10:34 in the morning.

18 A. Uh-huh. Yes.

19 Q. 10:34. Two numbers down below that, 12:36 and 12:48, do you recognize either of those
telephone numbers?

22 A. No, I do not.

23 Q. You can see that the destination for the first one, the one that ends in 11, says "Russia
MOB." Do you know what that means?
A. Mobile number.

Q. Mobile. And the number immediately below it, the number, do you recognize that number?

A. I do not.

Q. So this is on June 10th, the day after the June 9th meeting. Do you recall calling anybody on a Russian mobile phone on June the 10th?

A. I call Russia a lot, so I don't recall specifically those two calls. And the problem is, you know, when you look at your phone, you see names, you don't see numbers. So if --

MR. BALBER: Okay. The only question is: Do you know the numbers?

MR. KAVELADZE: No.

MR. BALBER: Okay. Then that's it.

MR. KAVELADZE: I don't recognize the numbers.

BY MR. PRIVOR:

Q. Would you be able to match the numbers to names in your phone book or your electronic directory?

A. I could try. It's in my phone book.

MR. PRIVOR: We'll just make that as a request.
MR. BALBER: Sure.

MR. PRIVOR: That we'll try to identify numbers that we're interested in, if we can match them up.

MR. KAVELADZE: Sure.

BY MR. PRIVOR:

Q. Considering that this is on June 10th, so this is just the day after the June 9th meeting, and that's the only -- those two are the only numbers that were called that are Russian numbers following the June 9th meeting the next day, does that help refresh your recollection as to who you might have spoken to on that day?

A. No.

Q. Let's look at the day before, which is on June 9th. You can see it carries over from the previous page. That's June 9th, and there is a call at 6:51 p.m. to a number that ends in ___.

A. Okay.

Q. Do you see that? Do you know whose number that is?

A. That's incoming call.

Q. Yes.

A. I have no idea.

Q. Do you know if that's Rob Goldstone?
Would you recognize his number?

A. I know his number starts from 9-1-7, so there's a probability that it might be Rob Goldstone. I don't know.

MR. BALBER: Okay. Well, my number also starts with 9-1-7.

MR. KAVELADZE: Yeah, well --

MR. BALBER: And Mr. O'Donnell's number starts with 9-1-7. So you don't know whose number it is, right?

MR. KAVELADZE: No.

MR. BALBER: Okay.

MR. KAVELADZE: No. Could be Rob Goldstone. I don't know.

MR. BALBER: Or it could be anybody else.

MR. KAVELADZE: Yeah.

BY MR. PRIVOR:

Q. Let's take a look at the call that's at 3:36 p.m. You see that's the same number as the call at 6:51?

A. Yes.

Q. 3:36 is around the time -- you said you were going to meet Rob Goldstone at 3:30 before that June 9th meeting, and he was a little bit late.
A. We were a little bit late.
Q. You were a little bit late.
A. Yeah. He was there.
Q. Do you recall whether you called Mr. Goldstone to let him know you were running late?
A. I probably would, yeah.
Q. Do you think that that number then is Mr. Goldstone's or --
A. Probably. Probably it is.
Q. Okay. Do you recall whether you did speak to Mr. Goldstone after the June 9th meeting by telephone?
A. I don't have a recollection, but --
MR. BALBER: If you don't have a recollection --
MR. KAVELADZE: I don't have a recollection of that phone call.
BY MR. PRIVOR:
Q. Looking at the same list, we were looking at the June 10th that has the two Russian mobile numbers. The next entry after June 10th is not until June 20th, so there's a gap of 10 days in your phone usage on this line. Do you know why that is? Do you recall not using your phone for 10 days?
A. No.

Q. Do you have any idea why there's a gap?

MR. FOSTER: Brian, what page are you on?

MR. PRIVOR: Oh, I'm sorry. We're still on 282.

MR. KAVELADZE: Was there a date -- I mean, I have no idea why there's a gap. My only guess is maybe I was traveling. I don't know. I need to check my travel records.

MR. BALBER: I'm going to say it one more time on the record. They don't want you to guess.

MR. KAVELADZE: I have no idea.

MR. BALBER: If you don't know, you don't know.

MR. KAVELADZE: I have no idea --

MR. BALBER: Okay. Then that's the answer.

MR. KAVELADZE: -- why there's a gap.

BY MR. PRIVOR:

Q. You stated that when you went to the bar after the June 9th meeting and you were downstairs, that you called Mr. Agalarov.

A. No. He called me.

Q. He called you? Okay. I'm sorry. He called you. How did he know -- do you know how he knew to call you after the meeting? How would he
1 have known the meeting ended?
2    A. He gave it a try.
3 Q. Had he -- I'm sorry.
4 A. I don't know. The time, 5:14, I don't
5 know. I don't know whether he's -- I mean, I
6 can't evaluate his judgment why he called me at
7 5:14.
8 Q. Do you know when Mr. Agalarov calls you,
9 do you know -- would you recognize his phone
10 number?
11 A. Yes.
12 Q. And is it a Russian phone number?
13 A. Yes.
14 Q. Like a Russian -- is it a mobile number?
15 A. Yes.
16 Q. I see on this bill for June 9th, if you
17 look at the whole list of calls on June 9th,
18 there's no call here on June 9th that appears to
19 be from Russia. Do you have any idea why that
20 would be?
21 A. No, there is a call from Russia.
22 Q. On June 9th?
23 A. Yeah, 5:14 p.m
24 Q. Oh, the incoming, the area code 903?
25 A. Yeah, that's Mr. Agalarov's phone number.
Q. Okay. Very good. And you said that you thought you were back in Los Angeles after this meeting -- is that right -- starting on June 10th?

A. Yeah. But I need to check my travel records, I said.

Q. Understood. Let's take a look at Bates page 290. We're still on the same exhibit. You can see on sort of the midpoint of the page it has call details for your telephone number, and it says, "Roaming." Do you see --

A. Yeah, so I was in Russia.

Q. Okay. So on June 15th and June 16th, it shows that your telephone is roaming in Russia?

A. Uh-huh.

Q. Does that refresh your recollection that you were in Russia at that time?

A. I guess so, yes.

Q. So do you think that you went back to Los Angeles first and then traveled to Russia, or do you think --

A. My phone -- my travel records will tell you exactly.

MR. PRIVOR: Okay. Fair enough. We would ask the same request, Scott, if we could look into that.
MR. BALBER: Sure.

MR. KAVELADZE: I produced the travel records.

BY MR. PRIVOR:

Q. Do you recall that you were in Russia -- setting aside whether you remember the precise dates, but do you recall that you did go to Russia sometime around this time?

A. Well, yes.

Q. Do you know what the purpose of your trip to Russia was at that time?

A. I travel to Russia every 2 months for business. There's no other purpose.

Q. Do you recall whether this particular trip to Russia on or about June 15th or 16th had anything to do with the June 9th meeting?

A. No.

Q. You don't recall or --

A. June 9th meeting, for me it was over on June 9th, and continuation happened in November. But between June 9 and November, nobody bothered me with anything -- I mean, as far as a meeting is concerned.

Q. Okay. Let's have you take a look at Exhibit No. 12 that we had earlier. Exhibit 12 is
1 an email that has a translated version, an English
2 translation of some sort of synopsis, some version
3 of the synopsis. Mr. Davis had earlier asked you
4 about the subject line where it says "From RF",
5 and you stated that you thought that was just an
6 indication of somebody sending you something from
7 Russia as a general matter.
8
9 Q. I want to just turn your attention to
10 Bates page 42 of this same exhibit, and you'll see
11 it's about a third of the way down, a paragraph
12 that starts, "The U.S. Department of Justice..."
13 I think you're one too far.
14
15 Q. There you go.
16 A. Okay.
17
18 Q. So you see the paragraph that starts,
19 "The U.S. Department of Justice was informed of
20 this"? And it refers to the Office of Prosecutor
21 General of the Russian Federation and by the RF
22 Ministry of Interior under U.S.-Russian MLAT.
23
24 Q. Do you see that? Do you think -- looking
25 back again at the first page of this exhibit where
26 it mentions "From RF", do you think that's a
1 reference to what's referred to in this paragraph, the RF Ministry?

3 A. No, I do not. Anything related to Russia, you know, any organization what starts with RF, Russian Federation Ministry of Foreign Relations, Russian Federation -- meanwhile, the name of the country is RF, Russian Federation. You could say from Russia. You could say from RF.

9 So, no, I do not.

10 Q. And do other people, other than this exhibit, Exhibit 12, other than this one, do you have other people with whom you correspond that use that same style of putting in a subject line, "From Russia," "From RF"? Have you seen that --

15 A. People I correspond from Russia, they speak Russian to me. So they don't send me English language messages. So I have seen RF before; yeah, I have seen people writing it. But as far as correspondence with me from Russia, it's in Russian pretty much exclusively.

21 Q. This particular document -- which is from Natalia Veselnitskaya; is that right?

23 A. Yes.

24 Q. Why do you think she has the subject line in English?
A. Because the document is in English.

Q. When she sent this document to you, had you been expecting that she was going to send it to you?

A. Yeah, I think I requested synopsis, so I was expecting the synopsis.

Q. So this is simply a response to --

A. Yeah.

Q. To the prior ask?

A. Correct.

Q. We saw this document went to Rob Goldstone, who ultimately forwarded it on, it looks like, to someone at the Trump Organization.

Do you know whether -- or do you recall whether this document has been shared with anyone else other than Rob Goldstone? In other words, did you forward this message to anyone else?

A. No.

Q. How about in paper form? Had you printed this out and given it to anyone?

A. No, I didn't print it out.

Q. Did you discuss this document with anyone other than forwarding on to Mr. Goldstone?

A. No. No. Since it was old news for me, the document was the same document I read on June
Q. Let's go to the next exhibit. That's Exhibit 13. You have that in front of you still.
This is the email exchange with Mr. Goldstone. You'll see at the top of the page Mr. Goldstone is writing to you saying that he understands, "I first have to submit this to Don and Rhona." We've discussed that part of the email already. And he notes at the bottom, "Also, FYI, not sure if Emin mentioned that I will be leaving as of January 1st, so can't help in the Trump world after December."
Do you know what he meant by he's leaving after December 1st?
A. He's quitting on December 1st.
Q. What was he quitting?
A. Working as Emin's agent, musical agent.
Q. And so as of January 1st, presuming he means January 1, 2017, he's no longer Emin's agent?
A. Correct.
Q. Does he do any work, to your knowledge, for the Agalarov family?
A. I have no knowledge of that.
Q. And how about for the Crocus Group more
1 generally?
2   A. I haven't heard anything he's done for
3 Crocus Group since that time.
4 Q. And when he says, "So can't help in the
5 Trump world after December," do you know what he
6 was referencing in terms of helping in the Trump
7 world?
8   A. Organizing meetings.
9 Q. Organizing meetings like the one that you
10 were speaking about just before lunch, the efforts
11 to set up a meeting with Ms. Veselnitskaya and the
12 Trump people?
13   A. Correct.
14 Q. Were there any other meetings that you're
15 aware of that he was trying to arrange with the
16 Trumps?
17   A. No, I was not aware.
18 Q. All right. Now let's turn to Exhibit 11.
19 This is the long series of texts. If you can
20 take a look at that one again, I just have a few
21 follow-up questions on that document as well.
22 So if you look at the first page, which
23 is Bates page 316, Mr. Davis had asked you about a
24 conversation on November 18th at 17:58 from
25 yourself to unknown, and you stated you didn't
know who that was. This is a statement you had translated for us before that talks about Rob having talked to the Trump people.

A. Correct.

Q. And said that some people are moving to Washington, some have been dismissed or fired from their jobs. Can you recall -- thinking about the subject matter of that text message, can you recall who you were talking to about that subject other than Ms. Veselnitskaya around that time?

MR. BALBER: I'm sorry. "That subject" meaning?

MR. PRIVOR: The subject of the text message. I'm happy to have you translate it again.

MR. BALBER: I understand the question now. Thank you.

MR. KAVELADZE: Let me ask you a question. This text message, is it incoming or outgoing? I sent it, right?

MR. BALBER: He can't help you.

BY MR. PRIVOR:

Q. I can only tell you what the document shows. It's your document. It appears to be a message from you going out to an unknown person.
A. Recipient, got it. My guess in regards to that is that I sent this thing also to Natalia. Why is it showing as an unknown, I have no idea, because I've...

Q. And so if we're reading this, since the same text message is duplicated, it looks like 17:45 you sent it to Aras Agalarov, and then at 17:58 the unknown sender, or you're speculating it's Ms. Veselnitskaya --

A. I'm speculating it's Ms. Veselnitskaya.

Q. Is there anyone else --

MR. O'DONNELL: Unknown sender or unknown recipient.

MR. KAVELADZE: Unknown recipient.

MR. BALBER: Yeah.

BY MR. PRIVOR:

Q. Is there anyone else you can think of during this time period and recognizing the subject of this text message, anyone else you can think of that you would have been communicating with about that?

A. No, no. Can I correct myself about one thing?

Q. Please.

A. I think we discussed at some point of
time with Rob Goldstone the possibility of setting
the meeting between Aras Agalarov and President-
elect. And I think he told me it's not a good
time, and I relayed it to Mr. Agalarov that it's
not a good time. So I just want this to be on the
record.

Q. Okay. Very good. Let's go to page 318
of that same exhibit.

A. Uh-huh.

Q. Roughly the middle of the page, on
November 30th at 17:19, Ms. Veselnitskaya sent you
a message about Preet Bharara. And you stated,
you testified earlier, if I understood you
correctly, that you didn't know him, didn't know
who he was at the time; is that right?

A. That's correct.

Q. And Ms. Veselnitskaya at 17:20 had asked,
"Is this a bad sign?" Is that the correct
translation?

A. Yes.

Q. And you respond, "I don't think it's a
bad sign." Given that you stated that you didn't
know who he was, how were you able to evaluate
whether or not it was a bad sign?

A. Well, it's -- first of all, she sent me
an article, and I read an article, and I Googled the guy. So by that time I already know what I'm talking about. Obviously, I don't possess an analytical mind, and I'm not real into politics, so that is more show-off on my side than an actual evaluation of that situation, because I had no idea if it's a bad sign or good sign. And I said, "I don't think it's a bad sign." And if she asked me, "Is that a good sign?" I would probably say, "I don't think it's a good sign."

Q. So she sent you the article at 17:20 and you responded 2 minutes later that you didn't think it was a bad sign.

A. Yeah.

Q. So in that 2-minute period, you --

A. Without reading --

Q. -- quickly read the article?

A. Yes.

Q. And gave her your sort of cursory opinion?

A. Uneducated opinion.

Q. Okay. Let's go down to December 1st where the time stamp is, it looks like, 22.

A. Uh-huh.

Q. And Ms. Veselnitskaya has written to you.
Would you mind translating for us the last -- the second line of that after her question.

A. "Who to crush and who not to crush."

Q. Is that the literal translation?

A. It's a slang.

Q. What's the literal wording of that?

A. "Wet and not to wet."

Q. And your understanding of the slang is it means to crush somebody?

A. To crush, to where, you know, create some damage for someone. You know, it's such a universal term, but some kind of a -- yeah.

Q. But you view it as a slang term, it shouldn't be taken literally?

A. It should not be taken literally, yes.

Q. Let's go down to the communication from Ms. Veselnitskaya at 11:45. That's two more lines down. The last four words of that exchange, could you translate that for us again?

A. "What stays behind it." And the word "sha" (phonetic) is not really "sha," but the word "za" (phonetic). It's misspelled. [Russian phrase] is "What stays behind it."

Q. And what do you understand -- what is your take on the meaning of that, "what stays
1 behind it"? How do you interpret that?

2 A. What stays behind his decision to keep
3 that gentleman.

4 Q. And the last word, that doesn't translate
5 as "worth"?

6 A. "Sty-eet" (phonetic)?

7 Q. Yeah.

8 A. If it's "stoy-it" (phonetic), it's
9 "worth." If it's "sty-eet," it's "stays." So
10 that's two different meanings. But it's not
11 "worth."

12 Q. But it's not "worth."

13 A. In that connotation, it's "sty-eet."

14 Q. Okay. Let's go to the next page, Bates
15 page 319. In roughly the middle of the page,
16 December 9th at 17:49, the second 17:49, it looks
17 like you writing to Ms. Veselnitskaya. What is
18 the translation for that?

19 A. "It started."

20 Q. What did you mean by that?

21 A. I want to know what she wrote to me, and
22 from there I guess I will figure out what I meant
23 by, "It started." Some process, I mean, like
24 something started.

25 Q. Do you think it's a reference to the
articles that precede it?

A. I guess so.

Q. And those articles, it looks like, just reading from the URLs, it looks like, "Lindsey Graham calls for investigation."

A. Yeah, yeah.

Q. So do you think the "It has started" is a reference to investigations?

A. Maybe, yeah. Maybe investigation started, yeah.

Q. Do you recall? I mean, is that your memory of what you had in mind here? Or are you just speculating about that? I'm trying to understand your best recollection of what you intended when you wrote that.

A. Yeah, that's -- that's what I meant, it started, yeah.

Q. A reference to the investigation --

A. Investigation.

Q. -- referenced in that article?

A. Uh-huh.

Q. How about the next line down, December 9th at 17:50? How does that translate?

A. "Report should be presented to Congress by January 20th."
Q. Do you know what report that was that you were referencing?

A. I don't know. Maybe related to the investigations.

Q. But you don't recall --

A. No.

Q. -- that's just your best guess? All right. Let's jump ahead then to Bates page 322, and you'll see there's a series of text messages on June the 2nd. It looks like the first four are from Rob Goldstone, and you'll see one at 22:08 from Rob Goldstone to you, and he states -- well, actually, preceding that, at 22:07, 1 minute earlier, he says, "When you get a minute, can you please call me?" And then his next text is, "I just had an interesting call re: that meeting we attended at Trump Tower last year."

Do you recall receiving that message?

A. Yes.

Q. What do you remember about it?

A. That he got a call from -- in regards to the meeting. So, yeah, I called him, or he called me. I don't remember. And --

MR. O'DONNELL: Look at the text message.

Just focus on whether that helps you remember.
MR. KAVELADZE: Is that a message, or this thing?

MR. BALBER: Would you mind redirecting the question again?

MR. PRIVOR: Yes, sure.

MR. BALBER: I think he completely lost track.

BY MR. PRIVOR:

Q. So it's two text messages in succession, June 2nd, the first one at 22:07. Actually --

A. "When you get a minute" --

Q. Yeah, "When you get a minute, can you please call me?"

A. Yes.

Q. Do you recall whether or not you called Mr. Goldstone in response to that text message?

A. I think I did.

Q. And you can see his very next text message a minute later, at 22:08, said, "I just had an interesting call re: that meeting we attended at Trump Tower last year."

A. Uh-huh.

Q. Your understanding is the meeting at Trump Tower last year is the June 9th meeting?

A. Correct.
Q. And you recall that you did have a telephone conversation with Mr. Goldstone in response to this text?

A. Yes.

Q. What do you remember about that telephone call?

A. It either could be -- it could be two things. I have to speculate.

MR. BALBER: Then don't speculate.

BY MR. PRIVOR:

Q. Give me your best recollection.

A. My best recollection, it would be in regards to the call he received from either journalist about that meeting or Donald Trump, Jr.'s attorney. One of those two.

Q. And bearing in mind the date of June 2nd, do you recall when the press first reported about the June 9th meeting?

A. I don't.

Q. Okay. Do you recall how long your conversation with Mr. Goldstone lasted?

A. I don't recall.

Q. Do you recall was there anyone else on the telephone with you at the time?

A. No. Nobody was on the phone. Just me.
Q. Just the two of you?
A. Correct.

Q. And certainly it appears it would have been about the subject of the text, but you can't recall any further details about it?
A. Let me see. Well, it's -- like I said, it's one or two, because it's either attorney's call or journalist calls.

Q. Do you recall how Mr. Goldstone sounded on the phone? Did he sound worried? Did he sound happy? Did he sound alarmed? Do you recall at all?
A. I think he sounded worried.

Q. And do you have any sense of why he sounded worried?
A. I don't know. But he always sounds -- he's like that. He's hyper person. He's always worried about something.

Q. All right. Let me go ahead and show you our next exhibit, which we'll mark as Exhibit 17. [Kaveladze Exhibit 17 was marked for identification.]

BY MR. PRIVOR:

Q. This is a multi-page document, three-page document, SJC-KAV-00090 through 92. This appears
to be an email from [REDACTED] to you on June 20, 2017, so just this past June. Take a moment to look that over.

[Pause.]

BY MR. PRIVOR:

Q. Do you recognize that exchange with Roman -- it appears to be Roman Beniaminov.

A. Yes.

Q. What do you recall about this exchange with him? Do you recall anything independent of what the document says? Do you remember this exchange with him?

A. Okay.

[Pause.]

BY MR. PRIVOR:

Q. Let me try to focus you on part of the document. So if you turn to Bates page 91, the second page of the exhibit, you'll see there's a message that you're forwarding from Mr. Balber, your counsel, and you're forwarding it on to Roman. It looks like you've had an exchange with Mr. Balber about a reporter who has gone to a home that is evidently owned by Mr. Agalarov.

A. Uh-huh.

Q. And then you forwarded it on to Roman.
1 Do you recall why you forwarded this to Roman?
A. Because Roman was concerned about this situation, journalist going to the house.
Q. Had that been a problem before?
A. No. It was a recent development.
Q. Was it an issue that Roman had dealt with before you forwarded this message?
A. Yeah, well, he's close to the family, so maybe Mrs. Agalarov called him and said, "We got a problem."
Q. Now, let's turn to the first page of that exhibit. You'll see on June 20th -- I'm sorry. Leading up to it -- let's actually flip to the page before, sorry, page 91. After you forwarded the message, Roman responded to you, "Thank you, Ike. Well noted. In that case I won't return the call, I guess." Presumably a call to the reporter. You said, "No need. I am at New York City tomorrow" -- "NYC" -- "in case you want to discuss things face to face."
Do you recall whether you actually met with Mr. Beniaminov?
A. I did meet with Mr. Beniaminov and Mr. Jason Tropea, and later we were joined by Mr. Goldstone.
Q. Who's Jason Tropea?
A. That's another childhood friend of Emin Agalarov, works with him.
Q. And what did you discuss in that meeting?
A. I'm sure we discussed that journalist's interest or an article. We also discussed financial matters. Crocus was slow on the payment, and Jason was concerned. Then eventually Rob joined us and, again, we discussed that journalist's interest. And I don't recall anything else, any other details of that meeting.
Q. Looking at the first page of that exhibit, Bates page 90, about a third of the way from the bottom, when you're discussing setting up this meeting with Roman, you suggested on June 20th at 11:31, "I guess coffee. I will have lunch with lawyers." What lawyers were those? Do you remember? Is that Mr. Balber?
A. Scott Balber, yeah. Maybe one of his associates, yeah.
MR. FOSTER: Can you speak up?
MR. KAVELADZE: Yeah, I had lunch with Scott Balber that day.
BY MR. PRIVOR:
Q. With anyone else, or just Mr. Balber?
A. I think it was just Mr. Balber.

Q. Let's go back to Exhibit 11 again. This is the set of texts. We were discussing texts on June the 2nd, page 322, Bates page 322. You will see -- so we just discussed a few minutes ago the Rob Goldstone text to you about an interesting call he had received.

A. Uh-huh.

Q. Then on June 27th, which is the last text on this page, you'll see there's a text from Emin to you at 20:03. Do you see that?

A. Yes.

Q. And he attaches an image, and take a moment to look that over.

[Pause.]

BY MR. PRIVOR:

Q. Do you recall receiving that message from Emin?

A. I do.

Q. You do? Okay. So this appears to be Emin forwarding to you his exchange with Rob Goldstone; is that right?

A. Yeah.

Q. And you can see on the very next page, Bates page 323, same time stamp, 20:03, he says,
"Got this from Rob now." And that Rob is Rob Goldstone?

A. Correct.

Q. Okay. So he's pasting in this image of his conversation with Rob Goldstone. Do you understand this to be Rob Goldstone that is speaking in this message that has been pasted here?

A. Yes.

Q. And Mr. Goldstone refers to "that meeting I set up in October with Trump campaign for your father, for that Russian attorney and her colleagues." And he says, "It's causing massive problems."

First of all, he refers to a meeting in October. Do you know what he has in mind there?

A. There was no meeting in October.

Q. You're certain there was no meeting?

A. I'm certain there was no meeting in October.

Q. So do you understand that to be just a mistake?

A. Yeah. He was -- yeah, he set up the meeting in June and then attempted to set up meeting in November. There was no meeting in


1 October. Rob does it all the time. His messages
2 are sometimes a little bit clueless.
3 Q. He refers to --
4 MR. O' DONNELL: No need for editorials.
5 MR. KAVELADZE: Okay.
6 BY MR. PRIVOR:
7 Q. He refers to "causing massive problems."
8 Do you know what he's referring to?
9 A. I have no idea what massive problems he's
10 referring to.
11 Q. Further on down in the message, about the
12 middle of his message, Mr. Goldstone writes, "I
13 did say at the time that this was an awful idea
14 and a terrible meeting." Do you know what he was
15 referring to by "an awful idea"?
16 A. I guess the meeting itself, he thought it
17 was awful idea.
18 Q. Do you know why?
19 A. No.
20 Q. Did you ever have any conversations with
21 Mr. Goldstone where he expressed that he thought
22 it was an awful idea?
23 A. We had -- I think we had a call same day
24 of the meeting where he kind of expressed his
25 frustration over these people and the fact that he
1 organized that meeting for a topic which was no
2 interest to -- no interest for anybody.
3 Q. And he describes it as "terrible." Is
4 that something that you had discussed with him,
5 his describing it as "terrible"?
6 A. No. I don't recall discussing it.
7 Q. Had you heard from anyone else other than
8 Mr. Goldstone that they thought setting up this
9 meeting was an awful idea?
10 A. No. Just him.
11 Q. Did anyone else express that they thought
12 the meeting was terrible that you're aware of?
13 A. It would be myself.
14 Q. You thought it was terrible?
15 A. I thought it was bad idea.
16 Q. Earlier in the message, Mr. Goldstone
17 wrote, "I have today been interviewed by attorneys
18 for the second time about it." Do you know what
19 he's referring to?
20 A. That meeting.
21 Q. Having been interviewed for the second
22 time?
23 A. I don't know what he means, but he's
24 referring -- I mean, from what I understood, he's
25 referring to the meeting.
Q. The subject matter is the meeting, but he says "today" -- meaning the date that he sent this message -- he had been interviewed by attorneys for the second time. Do you know what he's referring to when he says he was interviewed by attorneys?

A. I think he told me that he had a conversation with Donald Trump, Jr.'s attorney.

Q. Do you know who that is?

A. Alan Futerfas.

Q. Do you know Mr. Futerfas?

A. I spoke with him on the phone.

Q. Is he your lawyer?

A. No.

Q. Was he ever your lawyer?

A. No.

Q. When did you speak to him?

A. Around the same time. Rob gave him my number, and he called me and asked me to -- what was my recollection of meeting.

Q. We're going to come back to that, that conversation, but I want to finish with this text message because our time is nearing up.

A. Sure.

Q. Toward the bottom of that message, the
very end of the message, Mr. Goldstone writes,
"I'm really not happy being put in this situation
with federal attorneys investigating, et cetera."
Do you know what that's a reference to, "federal
attorneys investigating"?
A. I never -- no. I never realized, you
know, federal attorneys. That is the first time
I'm paying attention to that phrase. But what is
federal attorneys? I mean --
Q. Well, I'm asking what your understanding
is.
MR. O'DONNELL: If you don't know --
MR. KAVELADZE: I have no idea what he's
talking to.
Q. Did Mr. Goldstone ever talk to you about
being interviewed or asked questions by the FBI,
Federal Bureau of Investigation?
A. No. No, never did.
Q. Did anyone speak to you about -- ever
mention being interviewed by the FBI?
A. Was I ever interviewed by FBI?
Q. Well, my first question is: Did anyone
else talk to you about being interviewed by the
FBI?
MR. BALBER: I'm sorry. I just want to --
look, I know what you're getting at. Anything that you and I may have discussed or other counsel discussed with you, representing you, that's not to be disclosed. If you have some other means of knowing that somebody else may have been interviewed by the FBI, then, of course, you should answer the question.

MR. PRIVOR: Thank you.

MR. BALBER: Sure.

MR. KAVELADZE: No. Then it's no.

BY MR. PRIVOR:

Q. Had you ever been interviewed by the FBI in connection with --

A. No.

Q. -- the June 9th meeting?

A. No.

Q. Anytime, say, from 2016 to the present?

A. No.

Q. Have you been contacted by the FBI and asked to meet with them?

A. I've been contacted by FBI, but what happened is that I was traveling, and they showed up at my house in [redacted] and left -- one of the agents left her card, and I called her, and she said they wanted to speak with me about that
1 meeting. And I suggested that I'd like to involve
2 my attorney and gave my attorney's details. And
3 that was the last time I, you know, had any
4 interaction with these people.
5 Q. And when you say you gave your attorney's
6 details, you're talking about Mr. Balber --
7 A. Scott.
8 Q. -- or Mr. O'Donnell?
9 A. Yeah, I gave Mr. Balber's details.
10 Q. Just before that, toward the end of the
11 text message, Rob Goldstone writes, "I don't even
12 know for sure who these Russian people were, but
13 hopefully Ike can answer for them." Do you know
14 what he's referring to there?
15 A. Well, he refers to the fact that whatever
16 he thought these people were, they were not. They
17 were not representing Russian Government, and so
18 he's --
19 MR. BALBER: I'm sorry. I must be looking
20 at the wrong text. I'm sorry. Can you ask the
21 question again?
22 MR. PRIVOR: Sure. I'll try to replicate
23 it.
24 BY MR. PRIVOR:
25 Q. So you can see toward the bottom of the
text, Mr. Goldstone writes, "I don't even know for sure who these Russian people were, but hopefully Ike can answer for them." My question is: Do you know what he meant by that?

A. Hopefully Ike knows who these people are.

Q. Who these Russian people are?

A. Yeah.

Q. And do you know what Russian people he was referring to?

A. Natalia Veselnitskaya, Rinat Akhmetshin, and translator.

Q. So the participants in the June 9th meeting?

A. Correct.

MR. PRIVOR: Okay. Our time is just about up, so I think we'll use this as a stopping point, and we'll go off the record at 2:25.

[Recess at 2:24 p.m. to 2:36 p.m.]

MR. PRIVOR: Okay. We're back on the record. It's 2:35 -- 2:36, sorry.

FURTHER EXAMINATION BY COUNSEL FOR THE MINORITY (Cont'd)

BY MR. PRIVOR:

Q. Mr. Kaveladze, so we were discussing this text message that had been pasted in by Emin to
you from -- it's Rob Goldstone's communication, and Rob had described the meeting as a terrible meeting. And you seemed to second that view, that it was a terrible meeting. Is that right?

A. To my understanding, it was useless meeting.

Q. And you also thought that having the meeting was a bad idea?

A. I thought that having the meeting with these three individuals was a bad idea. I always pushed for the meeting with attorneys and not with anybody else.

Q. What was the basis for your believing that it was a bad idea?

A. Because nobody in the electoral campaign was interested in Magnitsky Act. It had nothing to do with this electoral campaign.

Q. And so you were drawing that belief what the meeting would be about, the Magnitsky Act?

A. Correct.

Q. Was that based on the synopsis from Ms. Veselnitskaya?

A. And numerous calls from Mr. Agalarov.

Q. Before the June 9th meeting?

A. Yes.
Q. So those are the calls that took place between June 6th, when you first learned of the meeting, and June 9th, when the meeting occurred?
A. Correct
Q. And Mr. Agalarov in those calls described the meeting as related to the Magnitsky Act?
A. Yes.
Q. Did he also send you any documents?
A. He did send me a synopsis.
Q. And that's the shorter version of --
A. Yeah.
Q. Which roughly corresponds to the 11-page version from Ms. Veselnitskaya?
A. Correct.
Q. Is that the document that you haven't been able to find?
A. Yes. That's the document.
Q. Did you ever express your opinion that having a meeting might be a bad idea to Mr. Agalarov?
A. I didn't say it was bad idea, but I kept saying the attorneys.
Q. And did he --
A. The meeting should be with attorneys.
Q. Did he have any response to that other
1 than -- I think this morning you testified --
2   A. He said, "Thank you."
3   Q. "Thank you"?
4   A. Yeah, he said, "Thank you," and, no,
5 there was no other response.
6   Q. Okay. We're still on Exhibit 11 with the
7 text messages. Bates page 323 is the next page in
8 the exhibit. You can see on June 30th at 2100
9 hours, Emin sends you -- it looks like an image of
10 President Trump and Vladimir Putin. And then
11 underneath it, there's some Russian. Can you
12 translate that for us? It looks like it refers to
13 a missed call.
14   A. This is, I mean -- "uvazhayemyy" is
15 "respected." "Until now we wait" -- "we're
16 waiting for draft from your" -- and then it's a
17 bracket. "We need to speed up."
18   Q. "We need to speed up," is that the
19 message that very faintly looks like it says 10:23
20 next to it?
21   A. What? Is that related to that?
22   Q. No, I'm just trying to tell which part
23 you just translated.
24   MR. BALBER: I'm sorry. I don't see the
25 10:23 either.
MR. KAVELADZE: 10:23 --

BY MR. PRIVOR:

Q. Oh, no. I'm sorry. It's actually in the image itself. Maybe it doesn't come through on your copy of it.

A. Okay. 10:29 --

MR. BALBER: 10:33?

MR. PRIVOR: No, it's actually in the image itself. I'm not sure --

MR. BALBER: I'm not seeing it.

MR. PRIVOR: It's so faint in mine. We'll go ahead.

BY MR. PRIVOR:

Q. "We may need to speed this up," is that the --

A. Speed up. "We already in Edinburgh and the person from PM is flying there as well."

Q. Do you know what this is talking about?

A. I have no idea what he's talking about.

Q. Do you know what the reference to -- I think you said Edinburgh?

A. Edinburgh. I have no idea. We never dealt with Edinburgh.

Q. And how about "person from" -- he said "PM"? Is that the initials, PM?
A. PM, yeah.

Q. Do you have any idea what that refers to?

A. I have no idea who Mr. PM is.

Let me see. Is this -- I thought it was some kind of a joke because they have pictures of Trump and Putin. Is that a part of that message?

MR. BALBER: And I think you characterized it as the "message." I think that's like a screenshot that's been imposed on there, so --

MR. PRIVOR: So the whole thing is a screenshot?

MR. KAVELADZE: I have no idea what this is about.

MR. BALBER: That's my recollection, having seen a different format, but go ahead. I'm not stating that for purposes --

MR. PRIVOR: I couldn't make heads or tails of it.

MR. BALBER: That's what I think it is, but...

BY MR. PRIVOR:

Q. Okay. So let's go to the next page, which is Bates page 323, Emin to you at -- I'm sorry, 324. Emin to you on June 30th, he asks, "Is this Don Jr.'s lawyer?" And you respond, same
1 time, 2100 hours, "I'm on the phone with him now."
2 And then you correct yourself. The next message
3 is, "With him now."
4 A. Okay.
5 Q. Do you recall what this is about?
6 A. Well, it's not me saying I'm on the
7 phone.
8 Q. Oh, I'm sorry. It's Emin to you.
9 A. Yeah. Yeah, because Alan Futerfas called
10 me, and then he called Emin to discuss that
11 meeting.
12 Q. Alan Futerfas called Emin. Did he call
13 Emin first or you first?
14 A. I believe he called me first.
15 Q. Okay. So let's start with your
16 conversation. Do you recall when he called you?
17 A. No, I cannot give you a date. I would
18 say sometime in June.
19 Q. And do you recall what prompted his call
20 to you?
21 A. I have no idea what prompted his call to
22 me. You mean the reason for his call? Is that
23 what you're asking?
24 Q. Why did -- did he reach out to you, or
25 did you reach out to him first?
A. He reached out to me.

Q. Okay. And do you know why he reached out to you?

A. He wanted to interview me in regards to the June 9 meeting and understand what was my recollection of that meeting.

MR. PRIVOR: I'm going to show you our next exhibit, which is 18.

[Kaveladze Exhibit 18 was marked for identification.]

BY MR. PRIVOR:

Q. This is a single page, Bates number SJC-KAV-00047. It's a June 30th email from Emin to you. Subject is "Forwarding introduction." Does this refresh your recollection as to the timing of -- I'm sorry. This is Emin's call.

A. He reached out earlier than that. That's Emin's --

Q. Okay.

MR. BALBER: To you.

MR. KAVELADZE: To me.

BY MR. PRIVOR:

Q. Okay. So he had a call with Emin on June 30th. He had a call with you sometime before that.
Sometime in June.

Q. Was it, do you recall, a matter of days? Was it a week or two?

A. I'm not very good with dates, so, no, I...

Q. Okay. It sounds like based on the text messages we were just looking at that Emin said he was on the phone with Mr. Futerfas. What did he tell you -- did he tell you anything about that conversation he had with Mr. Futerfas?

A. Yes, he did.

Q. What did he tell you?

A. He asked me -- he told me that Mr. Futerfas was asking questions about that meeting, and he told him things he knew. That's it.

Q. Did he specify what it was he knew?

A. No, he didn't.

Q. And you had a telephone call -- was it by telephone, your conversation with Mr. Futerfas?

A. Correct.

Q. Okay. And your call with Mr. Futerfas, tell us what you remember from that call. Did he call you or did you call him?

A. I mean, he called me first. Maybe I call him back at some point because he was not able to
reach me and left a message. That call was about
my recollection of what happened during the
meeting, and I filled him in. I told him what I
remembered.

Q. And do you recall specifically what you
had told him?

A. A shorter version, much shorter version
of whatever I told you: basically that the
meeting was about Magnitsky Act, yes, they did
mention adoptions, and they also were discussing
the electoral campaign -- not electoral campaign
but that funding thing, Democratic Party thing.

Q. You'll recall from this morning both Mr.
Davis and I had asked you a number of questions
about other things. We asked did they also talk
about a list of other things. I asked you, for
instance, did they talk about hacking? Was there
any discussions about emails?

A. No, no, no.

Q. Did you tell Mr. Futerfas anything about
the meeting that is different from what you have
described to us already?

A. No.

Q. So you didn't tell Mr. Futerfas about any
conversations about hacking?
A. Why would I? I knew nothing about hacking.

Q. Was there any discussion about accessing emails?

A. No.

Q. Or voter records?

A. No.

Q. Or targeting voters?

A. No.

Q. How about the use of Russian Facebook, VK?

A. No.

Q. If you look back at the text messages that are still in front of you, Exhibit 11 at page 324, you can see on June 30th, 21:04, you are replying to Emin, and you say, "I have spoken with him 3 days ago," seeming to refer to Don, Jr.'s lawyer.

A. Uh-huh.

Q. Does that refresh your recollection as to the timing of when you spoke to Mr. Futerfas?

A. My last conversation with Mr. Futerfas, yeah.

Q. Was 3 days ago, meaning --

A. Well --
Q. -- June 27th. Had you had a conversation with Mr. Futerfas before then?

A. Yeah, I had two conversations. One was my recollection. The second one, he called me and he read to me what he wrote based on my recollection, and I kind of confirmed.

Q. Do you recall when that second conversation took place?

A. I don't, but judging from that email, it happened 3 days prior to 6/30, so 6/27.

Q. Sometime in early July?

A. No.

MR. BALBER: I think you've got it backwards.

MR. PRIVOR: I'm sorry.

MR. KAVELADZE: End of June.

BY MR. PRIVOR:

Q. Sometime in the end of June you spoke to him about his statement?

A. Well, the conversation took place about 3 days ago at 6/30, so if it was 3 days ago, that's 6/27.

Q. Okay. So --

A. June 27.

Q. Was that the first conversation or the
1 second?

2 A. It was the last conversation.

3 Q. That was the second.

4 A. Yeah.

5 Q. So you had a conversation before June 27th?

6 A. Yes.

7 Q. And I'm sorry for my confusion. Tell me the first conversation. So that's sometime before June 27th by a few days.

8 A. Yeah. Yes, first conversation was my recollection of the event.

9 Q. Okay.

10 A. Second conversation, he read to me what he wrote down based on my recollection, and I had to kind of approve it, if that's what I -- if his understanding of my recollection was correct, and I okayed it.

11 Q. And that was a description of the June 9th meeting?

12 A. That is correct.

13 Q. Did he ever send you a document with that statement, or did he only read it to you over the telephone?

14 A. He read it over the phone. I mean, I
1 don't remember. Maybe he sent a letter, but I
2 don't think so. If it's not produced, I mean, I
3 don't think so, because -- he read it to me over
4 the phone. I remember this part.
5 Q. Did you make any changes to what he read
6 to you, or did you suggest any changes?
7 A. A name, because I went there by Irakly,
8 and my name since year 2001 is Ike Thomas, so I
9 changed that part.
10 Q. And other than that change, were there
11 any other changes that you had suggested to him?
12 A. I think I suggested that I was American
13 citizen, that I told him.
14 Q. Anything else that you can recall?
15 A. No.
16 Q. Did you have any other conversations with
17 Mr. Futerfas?
18 MR. BALBER: Besides those two.
19 BY MR. PRIVOR:
20 Q. Besides those two.
21 A. I don't recall. I know there were a
22 couple of requests for conversation, and I was --
23 at that point I didn't think it was a good idea to
24 converse with him, and I kind of forwarded that --
25 I know I forwarded one message to -- I mean, I
suggested him to call my attorney and not call me.
1 I said, "I'm in the air and I can't talk. Please
2 contact my attorney."
[Kaveladze Exhibit 19 was marked for
3 identification.]
4 BY MR. PRIVOR:
5 Q. I'm going to hand you Exhibit No. 19.
6 This is SJC-KAV-0093.
7 A. Yeah, what -- yes, that's, "Can you give
8 me a call?" Yeah.
9 Q. This is an email from Alan Futerfas to
10 you dated July 7, 2017, re: "Can you give a
11 call?" with a telephone number. And it appears
12 that he asked to speak with you and you replied --
13 A. "Just saw your message. Tried to call."
14 Q. Yeah, and he said, "I will call you back
15 shortly." So do you recall a conversation taking
16 place on July 7th?
17 A. I do not. That's the problem. I do not.
18 Q. Okay. So do you think that the two
19 conversations that you've already described, is it
20 pretty firm in your mind that those two
21 conversations with Mr. Futerfas took place June
22 27th and earlier?
23 A. Yes.
Q. And so this July 7th call that's referenced here is something else?

A. Yeah.

MR. BALBER: Or it didn't happen. Is that possible as well?

MR. KAVELADZE: I was not too excited to talk to him, and at some point I just referred him to you. Did it happen? I don't remember.

BY MR. PRIVOR:

Q. Did Mr. Futerafs ever discuss with you the possibility that the fact of the June 9th meeting would be reported publicly, like in the media?

A. Yes, he did.

Q. What did he say about that?

A. He said, "We're not releasing it, but there might be leaks."

Q. And did he refer to any particular media, any newspaper, any television?

A. I don't recall it. I don't remember.

Q. You stated that in your conversation with him June 27th that he read a statement to you. Do you know what the purpose of that statement was?

A. I have no idea.

Q. Did you ever ask him?
A. Well, I didn't because he kind of was sent to me by Rob Goldstone, and Rob Goldstone went through the same procedure, and so I thought it was a procedure.

Q. A procedure for what?

A. Trump Jr.'s attorneys trying to get my recollection of events of the meeting -- event of the meeting, and so --

Q. But did you have any understanding of what he was going to do with this statement? Was he going to disseminate it in some way?

A. Well, he claimed he wouldn't disseminate it. He claimed it for internal use.

Q. Was it set up as like a declaration of some sort?

A. Yeah, quick -- it was very --

Q. I use "declaration" as a technical term. Was it like a witness statement? Did he ever ask you to sign something, like, "Yes, these are my words"?

A. I don't think I ever signed anything, no. Just said okay over the phone.

BY MR. PRIVOR:

[Kaveladze Exhibit 20 was marked for identification.]
Q. I'm going to show you our next exhibit, No. 20. This is SJC-KAV-00157. It's a one-page document. It's an email from Rob Goldstone to and Ike. Subject is "Washington Post".

Do you recognize this document?

A. Was I copied on this document? Oh, yeah, I did.

[Pause.]

MR. KAVELADZE: I remember that email.

BY MR. PRIVOR:

Q. Okay. So I want to take you through some of the things that Mr. Goldstone notes in his email. He's talking about a Washington Post report. He said the Washington Post and the New York Times. "Washington Post was the most pushy and keen to hang this on you, Emin."

A. Emin?

Q. Do you see that?

A. Yes, "are keen to hang on you, Emin."

Okay.

Q. Do you know what was meant by that?

A. No.

Q. Do you take that to mean that the reporter was making a story to blame Emin in some way for the June 9th meeting?
A. I'd like to see that article to make that statement.

MR. O'DONNELL: Just give your interpretation based on the email you received.

MR. BALBER: Do you know what Rob Goldstone meant when he said it?

MR. KAVELADZE: No.

MR. BALBER: Okay. At the time I didn't read the article.

BY MR. PRIVOR:

Q. Mr. Goldstone then says, "I tried to assure her" -- presumably that's the reporter -- "that I had been the one requesting Don meet with her and would not comment on who originated the request in Moscow." So it sounds like Mr. Goldstone told the reporter that he was the one who originated the meeting. Is that your understanding of how the meeting originated?

A. No.

Q. What is your understanding of how it originated?

A. Mr. Aras Agalarov originated the meeting.

Q. And he said he would not comment on who originated the request in Moscow, so it sounds like Mr. Goldstone didn't want to reveal that
there was a Russian source behind it?

A. Yeah, I guess so.

Q. Do you know why? Was there an effort to
hide the fact that somebody from Russia had
originated the request?

A. Certainly not my effort, so I don't know
what he meant. I was not hiding it.

Q. Did the Agalarovs make any effort, to
your knowledge, to hide their connection to the
June 9th meeting?

A. Actually, it was opposite. They told me
that they're not hiding the fact that they
organized the meeting.

Q. He says, "Should we prepare a statement?"

Do you know if a statement was ever prepared?

A. I don't believe we prepared any joint
statement, or any statement to that matter.

Q. The next paragraph, "Trump lawyers are
also in a statement apparently saying the reason
for the meeting was 'misrepresented' by us and
that her agenda was Magnitsky Act and adoption."

Do you agree with that statement, that
the Trump lawyers apparently saying the reason was
misrepresented?

A. I'm not one of the Trump lawyers, so I
Q. Do you believe that the Trump lawyers had misrepresented the meeting in any way?
A. No, I don't know. I don't know how to answer this question. It's just -- I can only share my beliefs and my vision, so --

MR. BALBER: Just answer the questions. No sharing beliefs or visions.

MR. KAVELADZE: No.

BY MR. PRIVOR:
Q. Had you seen any statements by the Trump lawyers about the meeting?
A. I haven't seen but I heard my statement, and statement was about the meeting.
Q. Okay.
A. It was very accurately describing what happened during the meeting.
Q. Mr. Futerfas, you said, on or about June 27th had read a statement to you over the telephone. Do you believe that that statement was accurate?
A. Yes.
Q. Was there anything about it that was inaccurate other than you asked for a correction of the name, your name?
A. It was maybe not as detailed as the full statement because it was like two paragraphs as opposed to four pages. So --

Q. Do you feel that -- I'm sorry.

A. So some information was missing, but whatever was there was accurate.

Q. What did you feel was missing from that original statement?

A. History of Bill Browder, financial machinations of Bill Browder, the story about Ziff Brothers funding Democratic Party. A lot of things were missing from that thing. It was a two-paragraph thing.

Q. Were there any topics that were not covered in the statement that --

A. We --

MR. BALBER: Let him finish.

Q. -- took place at the meeting that we haven't discussed already?

MR. BALBER: Sorry. Were there any topics in the thing that was read to him by Futerfas that was not discussed in the meeting?

BY MR. PRIVOR:

Q. Were there any topics excluded from Futerfas' statement that are topics that we have
already discussed as having been excluded? So,
for example, email hacking?

Q. Tampering with voter rolls and the like?
A. No, nothing like that.

Q. Nothing like that?
A. No.

Q. The last line of Mr. Goldstone's email on
Exhibit 20 says, "The FBI may be investigating
this meeting further. Thoughts?" At this time,
July 9th, had you been contacted by the FBI?
A. No, I was not.

Q. Did you ask him about the FBI? Did you
ask Mr. Goldstone about the FBI investigating?
A. No.

Q. Had Mr. Futerfas mentioned to you
anything about the FBI possibly investigating?
A. No.

Q. At any time in any conversation with Mr.
Futerfas, had you discussed with him the
possibility of the FBI investigating the June 9th
meeting?
A. I don't believe so.

[Kaveladze Exhibit 21 marked for identification.]

Q. I'll show you our next exhibit, 21. This
is a single-page document, SJC-KAV-00127, Rob Goldstone to Emin, cc'd to Ike, subject, "Re: statement." And this document appears to be a response to the one we were just looking at, Exhibit 20.

You can see in the first paragraph Rob Goldstone asks, "What about this as a statement? Suggesting it should come from either Aras, you, or me, or maybe from the Crocus Group as a whole."

Do you recall him sending that statement to you?

A. Yes.

Q. And did you ever comment on that statement?

A. I don't believe so.

Q. When you saw this, did you believe it to be an accurate statement with respect to the June 9th meeting?

A. Yeah. It was accurate statement.

Q. So he states here that, "This was a personal request by us." Do you know who the "us" was that he was referring to?

A. Aras, Emin.

Q. And he says, "It's in no way connected with the Russian Government or any of its officials." That was your understanding, that it
1 had no connection to the Russian Government?

2 A. That was my understanding.

3 [Kaveladze Exhibit 22 was marked for

4 identification.]

5 BY MR. PRIVOR:

6 Q. We'll hand you Exhibit No. 22. This is a

7 multi-page document, SJC-KAV-00053 through 54.

8 It's an email from Rob Goldstone to and

9 Ike. Subject here is the "Statement drafted by

10 Trump's lawyers which they've asked me to

11 release". It's dated July 10, 2017, and it has a

12 one-page attachment. Do you recognize that

13 document?

14 A. Yes.

15 Q. And so it looks like Rob Goldstone has

16 appended to this email a screenshot from his

17 phone, which is entitled "Statement", and it looks

18 like Alan Futerfas has asked Rob to consider a

19 statement that he's typed in there. Take a look

20 at that statement. Do you agree with the

21 statement? Is it truthful, in your view?

22 MR. BALBER: I mean, it's a little unfair

23 because I don't know how the witness can know what

24 statements Goldstone supposedly read by Donald

25 Trump, Jr., and whether they're 100 percent
MR. PRIVOR: Fair enough.

BY MR. PRIVOR:

Q. This statement, does this accurately reflect your understanding of the June 9th meeting?

A. Pretty close.

Q. And in what way does it deviate from your understanding, when you said "pretty close"?

A. They did mention this situation with funding Democratic campaign, and I don't see it here. And there was also response from Donald Trump, Jr., that Ziff Brothers fund everybody, Democrats and Republicans.

Q. So would you characterize this statement as being a complete description, or is it missing --

A. It's a pretty accurate statement. I mean, like I said, you cannot fit a 45- or 40-minute meeting into one paragraph, so that's obviously missing something. But, overall, that's accurate statement.

MR. BALBER: I just want to caution you. You obviously don't know what Don was or was not told about Ms. Veselnitskaya's name, right? You
have no way of knowing that.

MR. KAVELADZE: No.

MR. BALBER: And you also, I think it's fair to say, have no way of knowing what Trump, Jr.'s statements Goldstone is referring to such that he can say they're 100 percent accurate or you can endorse that one way or the other?

MR. KAVELADZE: No.

MR. BALBER: Okay.

MR. KAVELADZE: I mean, the gentleman asked about the actual meeting, content of the meeting.

MR. BALBER: I just wanted to make sure.

MR. KAVELADZE: I would characterize it pretty accurate.

MR. O'DONNELL: And that's the sentence that begins with, "Ms. Veselnitskaya" --


MR. O'DONNELL: And then with respect to follow-up, you can only talk about any follow-up that you would have been involved with.

MR. KAVELADZE: Exactly.

MR. O'DONNELL: And as far as you're concerned, there was never any follow-up that you were involved with other than the November --
MR. KAVELADZE: November meeting.

MR. O' DONNELL: -- issues we've discussed, and nothing ever came of it.

MR. KAVELADZE: Correct.

BY MR. PRIVOR:

Q. Can I point you to Exhibit 11 again, which is the long series of text messages, and particularly Bates page 325. And you'll see in English on July 10, 2017, at 15:23, an unknown sender sent you texts concerning what appears to be a description of the June 9th meeting. Do you know who the sender is of that message?

A. Let me see the message.

[Pause.] 

MR. KAVELADZE: I can only guess. As far as knowledge, no.

BY MR. PRIVOR:

Q. You'll see six lines down, at the meeting the Russian -- I'm sorry, five lines down, "I reached out to Donald Trump, Jr., and he agreed to squeeze us into a very tight meeting schedule."

Do you know if anybody reached out to Donald Trump, Jr., other than Rob Goldstone?

A. No. That's Rob Goldstone's statement.

Q. Okay.
A. Definitely.

Q. "...and he agreed to squeeze us into a very tight meeting schedule." Do you know where that comes from?

A. I have no idea.

Q. Did Rob Goldstone ever suggest there was an effort to squeeze somebody into a very tight meeting schedule?

A. No.

Q. Do you know if there was a time constraint on the meeting?

A. I have no idea.

Q. In your conversations with Mr. Futerfas, did he ever ask you to contact him if you were to be contacted by the press?

A. I don't believe so.

Q. Did you ever reach out to him to let him know that you had been contacted by the press?

A. No. I had my own attorney. I think from the very beginning, my attorney has been handling all contacts with press.

Q. Did you have any response to that statement that appears to be Mr. Goldstone's statement sent to you from an unknown sender? Do you recall discussing that statement with anybody
1 else?
2     A. I remember discussing with Goldstone.
3 That's the only one.
4 Q. What do you remember about that
5 conversation?
6     A. I believe he asked me if the statement
7 was accurate, and I thought it was pretty
8 accurate.
9 Q. The next entry at July 11, 2017, at
10 14:32, you sent a message to Emin, and you asked,
11 "Are you okay with this draft Crocus statement?"
12 And you have a statement after that, "In order to
13 address Mr. Trump-related events, we've retained
14 an outside counsel, Mr. Scott Balber," et cetera.
15 Was your message to Emin concerning just what you
16 said in that text message, that the Crocus
17 statement would be in order to address Trump-
18 related events, please contact our attorney?
19     A. Yeah.
20 Q. Or were you forwarding or sharing with
21 Emin Rob Goldstone's statement?
22     A. No. I'm discussing that statement.
23 Q. Do you know whether you ever discussed
24 Rob Goldstone's statement with Emin?
25     A. I don't remember discussing statement
1 with Emin. I was in U.S., and he was in Russia.

2 Q. Okay. And how about with Aras Agalarov?

3 A. No.

4 Q. Do you recall discussing that statement with anyone other than your lawyers sitting here?

5 A. No.

6 Q. Okay. I think we will go off the record.

7 It's 3:11.

8 [Recess at 3:11 p.m. to 3:12.]

9 MR. FOSTER: Okay. We'll go back on the record at 3:12. I just have a very few follow-up questions, just a couple minutes.

10 FURTHER EXAMINATION BY COUNSEL FOR THE MAJORITY

11 BY MR. FOSTER:

12 Q. First of all, other than your attorneys, have you spoken with anyone else about your appearance here today?

13 A. I spoke with [FM 5], I mean, that there is an appearance. [FM 2-4] I know I'm in D.C. They don't know where exactly am I. And I think a week ago I mentioned to Mr. Agalarov I will be traveling to D.C.

14 Q. And did you have any substantive conversation with him about what you would be
saying to us here today?

A. No. He would never ask those questions.

Q. So anyone else, did you have any substantive -- any conversation with anyone else about the substance of what you would be testifying to today?

A. No. No, substance, no. There was also a call from Mr. Agalarov, but we had to hang up because we were walking into a meeting, and so, no, no substance conversation.

Q. Okay. So I believe in response to a question from Mr. Privor, you said that it was not your understanding at the time of the meeting that the purpose was for the benefit of the Russian Government, or something to that effect.

A. No, I didn't have that understanding.

Q. Is it currently your understanding that the purpose of the meeting was for the Russian Government?

A. No.

Q. Could you take a look at Exhibit 21? So the statement that's suggested there, "The meeting that took place in June 2016 between Ms. XXX and the representatives of the Trump campaign was the result of a personal request by us and was in no
way connected to the Russian Government or any of its officials."

A. Uh-huh.

Q. And that's currently your understanding? Based on everything you know, you believe that's a true statement today?

A. Yes.

Q. Earlier in the interview when I was questioning you and you were talking about the meeting in Trump Tower, you described Mr. Akhmetshin and his statement during that meeting that the Russian Government would change its adoption policy if the Magnitsky Act were repealed. Do you recall that description of --

A. Yes.

Q. And when you first described that to us, you said something to the effect of -- you used the word "we." You said, "We would repeal the adoption ban." Do you recall that?

A. Yeah. "We" was incorrect choice of words because Mr. Akhmetshin is certainly not a part of Russian Government.

Q. Okay. And I remember following up and I asked you at the time --

A. Yeah, and I corrected myself.
Q. -- did he say the word "we," and you said no.

A. No.

Q. So why did you use the word "we" at that point?

A. I have no idea. What -- it's basically -- that adoption ban was brought into the picture right after the Magnitsky law, and Russian public believed that it was in response to Magnitsky law. And there's a belief that if Congress repeals Magnitsky law, then adoption law would be repealed -- I mean, the restriction would be repealed, too. As far as "we," it is the wrong choice of words. I didn't mean me, we, or something. We Russians, maybe that's what I meant. I mean, just...

Q. Because you're a dual citizen of both countries?

A. Yeah -- well --

MR. BALBER: I think what he said was that Rinat used the word "we" in the first instance, and he corrected that. I don't think he ever put himself in the "we" category.

MR. KAVELADZE: Yeah.

MR. BALBER: I think he was quoting, now he
1 says incorrectly, what Rinat had said.

2 MR. O'DONNELL: But you never meant to

3 convey that you thought Rinat spoke for the

4 Russian Government --

5 MR. KAVELADZE: No.

6 MR. O'DONNELL: -- in making that statement.

7 MR. KAVELADZE: No, I never --

8 BY MR. FOSTER:

9 Q. And is it true that you didn't mean to

10 include yourself in sharing the interests of the

11 Russian Government in repealing the Magnitsky Act

12 in exchange for removing the adoption ban?

13 A. I certainly did not include myself into

14 that group.

15 MR. FOSTER: I don't have anything else.

16 MR. KAVELADZE: Can I make a statement with

17 regards to dual citizenship?

18 MR. BALBER: No, you cannot.

19 MR. KAVELADZE: It's an informative

20 statement. It doesn't concern me. Just

21 informative statement.

22 MR. O'DONNELL: Why don't you talk to us

23 about it, and then we'll see whether it makes

24 sense for you to -- we'll get a chance at the end

25 of your testimony to clarify the record.
MR. FOSTER: Well, I don't have any further questions, so we can -- do you want some time to confer?

MR. KAVELADZE: Well, just quickly.

MR. FOSTER: We'll go off the record.

[Recess at 3:18 p.m. to 3:24 p.m.]

MR. PRIVOR: We're back on. It's 3:24 p.m.

FURTHER EXAMINATION BY

COUNSEL FOR THE MINORITY

BY MR. PRIVOR:

Q. Mr. Kaveladze, thank you for your time this afternoon. We just have a couple finishing questions. Just before the break, my colleague Mr. Foster had asked you if you believed there was any connection to the Russian Government for this June 9th meeting, and you said you didn't believe so?

A. I didn't believe so.

Q. Do you know whether Ms. Veselnitskaya has any connection to the Russian Government?

A. I think she's private attorney.

Q. You've stated that you don't know her very well.

A. Yeah.

Q. And you didn't know her before you heard
her name --

A. Correct.

Q. -- on June 6th. And do you now know her very well to know what her connections are, if any, to the Russian Government?

A. I've read articles in the media. That's my only source of information.

Q. You don't have any personal knowledge about her connections?

A. Well, there were some text messages from Natalia and, again, after the meeting, where she would use the abbreviation "GP", which made me think it's the Prosecutor General's office.

Q. Do you know if she has any connections to Mr. Chaika, the --

A. I have no idea.

Q. He's the equivalent of the Attorney General in Russia.

A. Yes. I have no idea if she has connections with Chaika.

[Kaveladze Exhibit 23 was marked for identification.]

Q. I wanted to show you one additional document which has been marked as Exhibit No. 23.

This is a two-page document, SJC-KAV-00032
2 through 33. It's an email from [redacted] to you, subject "DTJR", dated July 11, 2017. And it is a one-page email with a one-page attachment.

Have you seen this email before?

A. Yes.

Q. Do you recognize it?

A. Yes. It's an email from [redacted].

Q. Okay. And he asks, one sentence in the email, he says, "Why did he release this email admitting to collusion?" And then the attachment appears to be an email from Donald -- that Donald Trump, Jr., exchanged with Rob Goldstone. And this is the email that we had shown you earlier in the day, or at least an excerpt from it --

A. Yes.

Q. -- as an exhibit. Do you know what [redacted] had in mind when he said, "Why did he release this email admitting to collusion?"

A. [redacted] was watching television, and when the email was released, there were discussions about collusion. I guess that's what he meant.

Q. Had you had any conversations with [redacted] about collusion?

A. No.

Q. Is that a word that you had used?
A. I have never used that word.

Q. In any context?

A. Honestly, no. I mean, I used it now, but that's not something I'm using.

Q. If you look at the second page of this exhibit, it appears -- hopefully it came through on your copy. It appears that there's highlighting on the line a little more than halfway down. "This is obviously very high level and sensitive information, but it is part of Russia and its government's support..." Do you see that?

A. I do.

Q. Does the highlighting show through to you as well?

[A witness nodding head.]

Q. Do you know who put the highlighting there?

A. I have no idea.

Q. Was that, do you know?

A. I have no idea. Honestly, I didn't even pay attention. I saw it was about that thing. I didn't pay attention. I didn't read it. I just saw the email.

Q. Did you put the highlighting there?
A. No. No, I didn't.

Q. Do you know who Michael Cohen is?

A. I do not know.

Q. Do you know who Felix Sater is?

A. From papers.

Q. Do you know him personally?

A. No.

Q. Do you have any business relationship with him?

A. No.

Q. Do you know if the Crocus Group has a business relationship with him?

A. I do not believe we have any relationship with Felix Sater.

Q. One last question for you. It's sort of a general observation about a number of the email exhibits in particular. We've noticed that the time stamps on the exhibits seem to shift around quite a bit, like emails that are responses have dates or times that are before the message inquiring. Do you know why that occurred with this production?

A. I have no idea.

Q. Do you know, just as a general matter -- I hate to make an accusation, but I have to ask
Do you know whether the documents were produced to us as they're kept in their ordinary course of business with you?

MR. BALBER: I can attest to the fact that they were.

BY MR. PRIVOR:

Q. And can you confirm that the documents haven't been altered in any way from their original state?

A. Yes, I can confirm that.

MR. PRIVOR: Okay. Very well. We appreciate your time and counsel's time --

MS. SAWYER: One quick question.

BY MS. SAWYER:

Q. Just on the document that my colleague was just showing you, did you ever then talk about that with after he sent you that email?

A. I did.

Q. And what did you discuss with him?

A. I told him that at this stage transparency is important step for that. It's important to be transparent.

Q. And what did you mean by that?

A. I kind of like the idea that Mr. Trump, Jr., has released the email and that it's
important for Mr. Trump to be transparent.

Q. And had anyone discussed that with you before it happened, the release of the email?

A. No. Before those emails --

MR. O'DONNELL: Did you know if the email was going to be released before it was released?

MR. KAVELADZE: No. I never knew about existence of that email.

MR. PRIVOR: Okay. I have no further questions. Thank you for your time today and counsel's time.

It's 3:30. We'll go off the record.

[Whereupon the proceedings were adjourned at 3:30 p.m.]
ERRATA SHEET

SENATE JUDICIARY COMMITTEE

INTERVIEW OF: IRAKLY "IKE" KAVELADZE

PAGE LINE

1  CHANGE: IRAKLY "IKE" KAVELADZE to IKE THOMAS KAVELADZE

7  REASON: Reflect witnesses legal name

5  CHANGE: No, I am not aware to Yes

8  REASON: Mr. Kaveladze has received a conversation since testifying

16  CHANGE: "we" to "I"

10  REASON: CLARIFY

12  CHANGE: "home" to "Russia"

13  REASON: Per request, Mr. Kaveladze reviewed travel

24  CHANGE: "Palatoy Plaza" to "Lotte Plaza"

14  REASON: Correct Spelling

15  CHANGE: Correct "we" to "I"

16  REASON: CLARIFY

23  CHANGE: BLACKED OUT

18  REASON: Correct Spelling

25  CHANGE: "Los Angeles" to "Moscow"

19  REASON: Per request, Mr. Kaveladze reviewed travel

21  CHANGE: Note that Mr. Kaveladze traveled to Russia

22  REASON: Per request, Mr. Kaveladze checked

his travel records.


Submitted by: (Signed) ________________________ Date: 2/17/2018

PRINT NAME: IKE KAVELADZE

Alderson Court Reporting
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