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SENATE JUDICIARY COMMITTEE  
U.S. SENATE  
WASHINGTON, D.C.

INTERVIEW OF: IKE THOMAS KAVELADZE

FRIDAY, NOVEMBER 3, 2017  
WASHINGTON, D.C.

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

1 APPEARANCES:  
2 SENATE JUDICIARY COMMITTEE:  
3 Jason Foster, Chief Investigative Counsel,  
4 Chairman Grassley  
5 Patrick Davis, Deputy Chief Investigative Counsel,  
6 Chairman Grassley  
7 Samantha Brennan, Investigative Counsel,  
8 Chairman Grassley  
9 Joshua Flynn-Brown, Investigative Counsel  
10 Chairman Grassley  
11 Daniel P. Parker, Investigative Assistant  
12 Chairman Grassley  
13 Lee Holmes, Chief Counsel,  
14 Senator Graham  
15 DeLisa L. Lay, Senior Investigative Counsel,  
16 Chairman Grassley  
17 Andrew Moats, Law Clerk,  
18 Chairman Grassley  
19 Brian Privor, Senior Counsel,  
20 Senator Feinstein  
21 Heather Sawyer, Counsel,  
22 Senator Feinstein  
23 Molly M. Claflin, Counsel,  
24 Senator Feinstein  
25

1 APPEARANCES:

2 SENATE JUDICIARY COMMITTEE (Cont'd)

3 Lara G. Quint, Chief Counsel,

4 Senator Whitehouse

5 Sarah Griswold, Minority Staff

6 Alexandria Deitz, Minority Staff

7

8 FOR THE WITNESS:

9 Scott S. Balber, Herbert Smith Freehills

10 John O'Donnell, Herbert Smith Freehills

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1                                    P R O C E E D I N G S

2            MR. DAVIS: Good morning. This is the  
3 transcribed interview of Irakly Kaveladze. On  
4 October 18, 2017, Chairman Grassley sent Mr.  
5 Kaveladze a letter stating that the Judiciary  
6 Committee was seeking information related to a  
7 meeting held on June 9, 2016, at Trump Tower, as  
8 well as related matters. The letter requested an  
9 interview and certain categories of documents.

10                    In response, Mr. Kaveladze has through  
11 his counsel produced documents and agreed to this  
12 voluntary interview.

13                    Would the witness please state your name  
14 for the record.

15            MR. KAVELADZE: Ike Kaveladze.

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

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

25            MR. FOSTER: Jason Foster, Chief

1 Investigative Counsel for the majority staff.

2 MS. BRENNAN: Samantha Brennan,

3 Investigative Counsel for the majority staff.

4 MR. HOLMES: Lee Holmes, Chief Counsel to  
5 Senator Lindsey Graham.

6 MR. PRIVOR: Brian Privor. I'm Senior  
7 Counsel, minority staff, Senator Feinstein.

8 MS. CLAFLIN: Molly Claflin, Counsel,  
9 Senator Feinstein.

10 MS. QUINT: Lara Quint, Chief Counsel,  
11 Senator Whitehouse.

12 MR. PARKER: Daniel Parker, Investigative  
13 Assistant, Senator Grassley.

14 MS. LAY: DeLisa Lay, Senior Investigative  
15 Counsel.

16 MR. MOATS: Andrew Moats, Law Clerk for  
17 Senator Grassley.

18 MR. FLYNN-BROWN: Josh Flynn-Brown,  
19 Investigative Counsel for Senator Grassley.

20 MR. DAVIS: The Federal Rules of Civil  
21 Procedure do not apply to any of the Committee's  
22 investigative activities, including transcribed  
23 interviews. There are some guidelines we follow,  
24 and I'll go over those now.

25 Our questioning will proceed in rounds.



1 The majority staff will ask questions first for  
2 one hour. Then the minority staff will have the  
3 opportunity to ask questions for an equal amount  
4 of time. We will go back and forth until there  
5 are no more questions and the interview is over.

6           We typically take a short break at the  
7 end of each hour, but should you need to take a  
8 break at any other time, please just let us know.

9   Depending on how long the interview takes, we can  
10 discuss taking a break for lunch whenever you're  
11 ready to do that.

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

16           MR. KAVELADZE: I do.

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

25           While Senators on the Committee may

1 observe, the Chairman and Ranking Member have  
2 agreed that only staff will ask questions.

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

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

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

12          MR. DAVIS: Thank you.

13           We want you to answer our questions in  
14 the most complete and truthful manner possible, so  
15 we will take our time. If you have any questions  
16 or if you don't understand any of our questions,  
17 please let us know. If you honestly don't know  
18 the answer to a question or don't remember, it's  
19 best not to guess. Just give us your best  
20 recollection. It's okay to tell us if you learned  
21 some information from someone else if you indicate  
22 how you came to know the information. If there  
23 are things that you don't know or can't remember,  
24 we ask that you inform us to the best of your  
25 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

1 false statements could be subject to criminal  
2 prosecution and imprisonment for up to five years.

3 Do you understand this?

4 MR. KAVELADZE: I do.

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

8 MR. KAVELADZE: There is no reason for that.

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

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

18 MR. PRIVOR: Just to note for the record  
19 that one of our colleagues joined the room.  
20 Please identify yourself for the record.

21 MS. DEITZ: Alexandria Deitz.

22 MR. FOSTER: With the minority staff.

23 MR. DAVIS: The time is now 9:39 a.m., and  
24 we will get started with the first hour of  
25 questions.

1 EXAMINATION BY COUNSEL FOR THE MAJORITY

2 BY MR. DAVIS:

3 Q. Please state your full name for the  
4 record.

5 A. Ike Thomas Kaveladze.

6 Q. Where do you currently reside?

7 A. I reside at [REDACTED]  
8 [REDACTED] California [REDACTED].

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

11 A. Yes, I did.

12 Q. Where are you from originally?

13 A. I was born in now Republic of Georgia.

14 Q. When did you move to the United States?

15 A. I moved to the United States in 1991.

16 Q. When did you become an American citizen?

17 A. I became an American citizen in the year  
18 2001.

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

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

23 Q. You are fluent in English, correct?

24 A. Yes.

25 Q. And you're fluent in Russian as well; is

1 that correct?

2 A. Correct.

3 Q. What is your professional background?

4 A. I'm a specialist in accounting and  
5 finance.

6 Q. And do you currently work at the Crocus  
7 Group?

8 A. Yes.

9 Q. When did you begin working at the Crocus  
10 Group?

11 A. My initial employment started in the year  
12 1989. Then it terminated for a few years, and  
13 then it continued in 2003 until current.

14 Q. What is the nature of Crocus Group's  
15 business?

16 A. Numerous activities. Convention center,  
17 and we actually own the convention center and run  
18 trade shows. Numerous retail shopping projects,  
19 different formats, DIY formats, something like  
20 Home Depot style. And middle-class shopping mall,  
21 upper-middle-class shopping mall chains.

22 Q. What is your current title at the Crocus  
23 Group?

24 A. I'm a senior vice president.

25 Q. And as senior vice president, what are

1 your job responsibilities?

2           A. I was handling international projects,  
3 anything with an international component in it,  
4 such as contracting Chinese construction workers  
5 for some construction project in Russia or  
6 bringing U.S. architect into a construction  
7 project in Russia or buying goods for like  
8 inventory for the stores all over the world, and  
9 construction equipment for construction projects.  
10 Whatever was happening internationally, I was  
11 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  
16 either '89 or '88. Let me be more specific.  
17 Yeah, I think it was '89, 1989.

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

20           A. He's my boss.

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

23           A. I know Mr. Agalarov has participated in  
24 numerous government construction projects, so my  
25 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?



1           A. Initial contract negotiation and signing  
2 the contract.

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

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

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

15          A. Yes.

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

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

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

24          A. It did not materialize into a project.

25          Q. Do you remember why it did not

1 materialize into a project?

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

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

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

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

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

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

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

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

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

25           Q. What is your understanding of Ms.

1 Veselnitskaya's relationship with Prevezon  
2 Holdings?

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

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

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

10          Q. What about the Agalarovs?

11          A. Both Agalarovs work for Crocus Group.

12          Q. I'm sorry --

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

18          MR. DAVIS: Both.

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

22 BY MR. DAVIS:

23          Q. Do you know when that representation  
24 began?

25          A. No.

1 Q. Do you know if she has represented the  
2 Agalarovs as an attorney?

3 A. No, I have no knowledge of that.

4 Q. What is the nature of your relationship  
5 with Ms. Veselnitskaya?

6 A. I don't have much of a relationship.  
7 It's a working relationship related to that  
8 situation, June 9 meeting situation.

9 Q. Who first contacted you about a meeting  
10 between Ms. Veselnitskaya and Donald Trump, Jr.?

11 A. I was contacted by Mr. Aras Agalarov.

12 Q. When did he contact you?

13 A. June 6, 2016.

14 Q. What did Aras Agalarov tell you the  
15 purpose of the meeting was?

16 A. First call, he didn't specify the purpose  
17 of the meeting. He just told me to be in New York  
18 City. Second call, he asked me if I knew anything  
19 about Magnitsky Act, and I said I did, and so he  
20 said the meeting is going to be about Magnitsky  
21 Act.

22 Q. And how did Mr. Aras Agalarov communicate  
23 with you about this meeting? Was it email, text,  
24 phone?

25 A. Mostly phone.

1 Q. To the best of your knowledge, does  
2 Crocus Group have a business relationship with  
3 Prevezon Holdings?

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

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

9 A. As far as I know, no.

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

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

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

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

21 BY MR. FOSTER:

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

1 familiar with the Magnitsky Act?

2 A. Well, I read newspapers, and I'm actual  
3 supporter of Magnitsky Act.

4 Q. So long before this meeting, you were  
5 aware --

6 A. Oh, yeah. Oh, yeah.

7 Q. And just from reading the news.

8 A. Yeah.

9 Q. You didn't have any official business-  
10 related reason to be --

11 A. No.

12 Q. -- to be up on the act or to be aware of  
13 it?

14 A. No. No.

15 BY MR. DAVIS:

16 Q. Do you know whether Aras Agalarov was  
17 asked by someone else to get involved in setting  
18 up this meeting?

19 A. I do not know.

20 Q. How would you describe Aras Agalarov's  
21 relationship with Mr. Putin, if any?

22 A. I know they know each other, but as far  
23 as the nature of the relationship, I don't know.

24 Q. Were you involved in contacting Rob  
25 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

1 aside of the fact that he worked as an agent for  
2 Emin Agalarov, and since I was handling the Crocus  
3 business, sometimes, you know, we'll make a  
4 payment for his agency fees or whatever on behalf  
5 of Crocus.

6 Q. Other than those occasional payments, to  
7 the best of your knowledge is Mr. Goldstone an  
8 employee of the Crocus Group?

9 A. He never was an employee of Crocus Group.  
10 He was outside service provider.

11 Q. What is your understanding of Mr.  
12 Goldstone's ties with the Russian Government, if  
13 any?

14 A. I don't think Mr. Goldstone has ties with  
15 Russian Government.

16 Q. I'd like you to take a look at this email  
17 chain, which I'll label Exhibit 1. This document  
18 is Bates-stamped DJTJR-00893  
19 [Kaveladze Exhibit 1 was marked for  
20 identification.]

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

23 BY MR. DAVIS:

24 Q. This is an email chain between Mr.  
25 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:

1 Q. This email chain references people named  
2 Emin and Aras. As far as you can tell, these are  
3 references to the Agalarovs; is that correct?

4 A. That is correct.

5 Q. Okay. The first email in this chain  
6 chronologically states -- it was sent from Mr.  
7 Goldstone to Donald Trump, Jr., at 10:36 a.m. on  
8 June 3, 2016. It states that the Crown Prosecutor  
9 of Russia met with Aras and offered to provide the  
10 Trump campaign with some official documents and  
11 information that would incriminate Hillary and her  
12 dealings with Russia and would be very useful to  
13 Mr. Trump.

14 Did you provide Mr. Goldstone this  
15 account of the prosecutor's meeting with Aras and  
16 the purported offer to help the Trump campaign?

17 A. Can you say it again? Can you rephrase  
18 that question?

19 Q. Sure. Did you tell Mr. Goldstone this  
20 account of the Crown Prosecutor meeting with Aras?

21 A. No.

22 Q. Do you know who did?

23 A. From that letter, I do not.

24 Q. And from the letter who do you --

25 MR. BALBER: You mean by reading the email,

1 it's --

2 MR. KAVELADZE: By reading this email, yeah.

3 BY MR. DAVIS:

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

7 A. Emin Agalarov.

8 Q. Mr. Goldstone's email states in part:  
9 "This is obviously very high level and sensitive  
10 information, but it's part of Russia and its  
11 government's support for Mr. Trump, helped along  
12 by Aras and Emin."

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

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

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

20 A. No.

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

23 A. A lot of people. I told [REDACTED]  
[family members], I told my  
25 neighbor.

1 Q. So would it be accurate to say you were  
2 not keeping the meeting a secret?

3 A. No, I was not keeping it secret.

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

10 MR. DAVIS: Right.

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

16 MR. DAVIS: That's fine.

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

22 BY MR. FOSTER:

23 Q. Please, please.

24 A. Okay. And right after I received an  
25 email from Mr. Goldstone about three individuals

1 we were going to be meeting with, I got a little  
2 bit puzzled because at that point of time, all I  
3 knew about the meeting, that it's going to be  
4 Magnitsky Act, and I was unclear why exactly these  
5 people are meeting with us. I was in two  
6 conversations prior to that with Mr. Agalarov.  
7 You know, my suggestion was to meet with attorneys  
8 of Mr. Trump because she's an attorney, Ms.  
9 Veselnitskaya, and probably the proper level of  
10 communication with her. And so I called Roman  
11 because I knew he worked with Rob, and I asked  
12 him, "Do you know anything about that meeting?"  
13 And, "Do you know anything about the fact that  
14 we're going to be meeting with three top political  
15 electoral campaign representatives to discuss  
16 Magnitsky Act?" And at that point of time, Roman  
17 told me that, as far as he heard, attorney had  
18 some negative information on Hillary Clinton.

19 Q. So what is the nature of Roman's job?

20 A. Musical business. They -- actually, Rob  
21 Goldstone is a musical agent of Emin. Roman did  
22 logistics of their musical tours, let's say  
23 booking of the venues, you know, dealing with  
24 promoters, selling tickets, and stuff like that.

25 MR. DAVIS: I'd like to show you a document,

1 Bates-numbered SJC-KAV-00045.

2 [Kaveladze Exhibit 3 was marked for  
3 identification.]

4 MR. KAVELADZE: Yeah, that's the email I'm  
5 referring to.

6 BY MR. DAVIS:

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

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

13 Q. Thank you. I'd also like you to take a  
14 look at the email chain Bates-numbered SJC-KAV-  
15 00111 through 112, which will be Exhibit 4.

16 [Kaveladze Exhibit 4 was marked for  
17 identification.]

18 BY MR. DAVIS:

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

21 A. Uh-huh.

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

1 other document which we looked at is that image.

2 Does that match your recollection?

3 A. Yes, it does match my recollection.

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

6 [Pause.]

7 MR. KAVELADZE: Yes.

8 BY MR. DAVIS:

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

17 A. It's myself and Natalia Veselnitskaya.

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

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



1 A. That is correct.

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

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

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

8 A. Yeah, it's -- yeah.

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

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

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

13 MR. KAVELADZE: Okay.

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

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

18 BY MR. DAVIS:

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

24 Mr. Goldstone replied, "Okay. See you in  
25 front of Trump Tower on Fifth Ave. at 3:30 p.m.

1 Rob."

2           When did you arrive in New York for this  
3 trip?

4           A. I arrived on June 9, around 7:00 a.m. in  
5 the morning; 7:10, I believe.

6           Q. And where were you traveling from?

7           A. I was traveling from Los Angeles,  
8 California.

9           Q. What was your itinerary while in New York  
10 during this trip?

11          A. I stayed for one day, and I returned back  
12 home on June 10. My itinerary included only one  
13 item as a meeting -- actually, two items. There  
14 was lunch with Natalia Veselnitskaya prior to the  
15 meeting and then meeting itself.

16          Q. When was that lunch with Ms.  
17 Veselnitskaya?

18          A. To the best of my knowledge, it was 2  
19 hours prior to the meeting, although she was 45  
20 minutes late.

21          Q. And who else attended that lunch, if  
22 anyone?

23          A. That lunch was attended by Natalia  
24 Veselnitskaya, myself, and then Anatoli  
25 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  
6 lunch?

7 A. No, I have not.

8 Q. What did you discuss at that lunch?

9 A. Because of the fact that she was late,  
10 and during that lunch I was supposed to read the  
11 synopsis for the meeting, and synopsis was 10- to  
12 11-page document, I spent most of the time reading  
13 that synopsis. I don't think we had much of a  
14 discussion with her because eventually -- maybe a  
15 little discussion, and then eventually we started  
16 walking towards the Trump Tower. So it was mostly  
17 reading synopsis.

18 Q. Was that synopsis written in English or  
19 Russian?

20 A. It was written in Russian.

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

23 A. I met Mr. Akhmetshin 15 minutes prior to  
24 the meeting. He met us in front of the Trump  
25 Tower.

1 Q. Did you interact with anyone else on the  
2 legal team representing Prevezon Holdings or who  
3 was involved in the Human Rights Global  
4 Accountability Initiative?

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

10 Q. Do you recall when that was?

11 A. No, I don't know names.

12 MR. FOSTER: No; when.

13 MR. KAVELADZE: Oh, when.

14 MR. FOSTER: Do you recall when that was?

15 MR. KAVELADZE: When it was. Very vague  
16 recollection would be around October, November  
17 2016.

18 BY MR. DAVIS:

19 Q. Do you recall where --

20 A. Oh, yeah.

21 Q. -- the birthday party --

22 A. It's a restaurant named Nello. It's  
23 Madison Avenue in New York City between 62nd and  
24 63rd Street.

25 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 Samochnov?

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

1 she was working for the Russian Government in her  
2 introduction; is that correct?

3 A. No, she did not.

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

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

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

15 A. To the best of my knowledge, no.

16 Q. How was Rinat Akhmetshin introduced?

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

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

22 A. No.

23 MR. FOSTER: Did he introduce himself?

24 MR. KAVELADZE: I would say so. I mean, and  
25 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 themselves.

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

1 initiator of that act, in ruining relationship  
2 between U.S. and Russia. And she also claimed  
3 that Mr. Browder is considered to be a criminal in  
4 Russia for tax dodging and other purposes. And  
5 she also suggested that the repeal of that act  
6 could significantly improve the relationship  
7 between Russia and U.S. I would call it a short  
8 synopsis of her speech.

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

12 MR. KAVELADZE: Yes. Then it would be --  
13 then Mr. Akhmetshin would step in, but I guess  
14 that's the next question, right?

15 BY MR. DAVIS:

16 Q. Go right ahead.

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

25 MR. FOSTER: Did he say "we" when he

1 referred to Russia?

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

5 BY MR. DAVIS:

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

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

19 Eventually, Mr. Trump asked a question --  
20 I have to correct myself. There's one thing also  
21 happened prior to this whole thing. They also  
22 told story about Ziff Brothers, who were the  
23 owners of Bill Browder's company in Russia.

24 BY MR. FOSTER:

25 Q. By "they," you mean Veselnitskaya and

1 Akhmetshin?

2           A. Yeah, Veselnitskaya and Akhmetshin. And  
3 they said it's also, you know, correlates with  
4 whatever -- with the synopsis, and basically told  
5 a story that because that money is considered to  
6 be a criminal money because it's tax dodging and  
7 then it goes to the shareholders here in New York,  
8 to Ziff Brothers, and Ziff Brothers are heavy  
9 sponsors of Democratic Party, then, you know,  
10 basically this whole chain was kind of like  
11 portrayed as a negative for Democratic Party. And  
12 then one of them, I think Mr. Akhmetshin,  
13 suggested that the same thing could have been done  
14 with Hillary Clinton's campaign. And after those  
15 words, Mr. Trump asked both Ms. Veselnitskaya and  
16 -- Trump, Jr., Ms. Veselnitskaya and Akhmetshin,  
17 asked if they got anything on Hillary, and to  
18 which Mr. Akhmetshin responded, "Why don't you do  
19 your own research on her? We gave you the idea,"  
20 and continued talking about the Magnitsky Act.

21           But, eventually, Mr. Trump suggested that  
22 although it might be an interesting and important  
23 story, he said, "We're in the middle of electoral  
24 campaign," and he said, "We're extremely busy  
25 right now." And he said, "If we win, then we

1 might get back to you and continue that discussion  
2 about Magnitsky Act," and politely ended the  
3 conversation, ended the meeting.

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

11 BY MR. DAVIS:

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

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

24           Q. Did anyone mention the Justice  
25 Department's lawsuit against Prevezon Holdings?

1 A. No.

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

5 A. No.

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

10 A. No.

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

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

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

18 A. He was silent.

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

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

25 MR. KAVELADZE: Yes, I did.

1 MR. BALBER: Why don't you tell what you  
2 said.

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

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

15 MR. KAVELADZE: Yes, yes.

16 MR. BALBER: Okay.

17 BY MR. DAVIS:

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

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

25 MR. FOSTER: You don't recall any mention of



1 the RNC?

2 MR. KAVELADZE: I don't. RNC?

3 MR. FOSTER: Republican National Committee.

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

6 BY MR. DAVIS:

7 Q. Turning to this email chain --

8 MR. O'DONNELL: There's one other thing.  
9 What, if anything, did Donald Trump, Jr., say  
10 about the Ziff Brothers and their campaign  
11 contributions?

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

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

19 MR. KAVELADZE: Let me think.

20 The thing that surprised me was how Mr.  
21 Akhmetshin was dressed for the meeting. He was  
22 dressed in pink -- pink jeans with like holes on  
23 the knees, and a pink T-shirt. So I thought it  
24 was highly inappropriate, but, yeah, I was  
25 certainly shocked to see him dressed like that.

1 MR. BALBER: I was going to wear the same  
2 thing today, but I changed my mind at the last  
3 minute.

4 [Laughter.]

5 BY MR. DAVIS:

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

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

17 BY MR. FOSTER:

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

20 A. I met with him once in Moscow.

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

23 MR. KAVELADZE: Subsequent, yeah, yeah.

24 MR. O'DONNELL: You had never met him before  
25 the June meeting?

1 MR. KAVELADZE: Oh, no, no, no. Sorry, no.

2 BY MR. FOSTER:

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

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

17 Q. Why were you in Moscow at this time?

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

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

24 A. At the lobby of Lotte Plaza Hotel.

25 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.

1 A. Yeah.

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

3 [Pause.]

4 BY MR. DAVIS:

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

21 To the best of your recollection, did Mr.  
22 Goldstone discuss this VK proposal during the June  
23 9, 2016, meeting?

24 A. No, unless he stayed after the meeting.

25 Q. Did you not leave the building with him?

1 Did he remain behind?

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

5 Q. To the best --

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

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

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

15 MR. DAVIS: Thank you for that  
16 clarification.

17 BY MR. DAVIS:

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

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

24 Q. And to the best of your recollection,  
25 during the meeting did Mr. Kushner take any notes?

1 A. To the best of my recollection, no.

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

6 A. I do not believe so.

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

8 MR. DAVIS: Yes.

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

10 MR. KAVELADZE: Yeah, I do not believe.

11 BY MR. DAVIS:

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

14 A. Here's where my recollection differs with  
15 what I read in the media. I thought that he was -  
16 -

17 MR. BALBER: He just wants your  
18 recollection.

19 MR. KAVELADZE: My recollection, he was  
20 present.

21 BY MR. DAVIS:

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

24 A. Definitely not.

25 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,



1 were there any other comments or questions he made  
2 during the meeting?

3 A. To the best of my knowledge, no.

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

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

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

14 MR. KAVELADZE: It was only in Russian.

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

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

19 BY MR. DAVIS:

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

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

25 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,

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

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

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

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

15 MR. KAVELADZE: Good morning.

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

21 MS. SAWYER: Sure. Heather Sawyer. I'm  
22 Senator Feinstein's General Counsel.

23 MS. GRISWOLD: And Sarah Griswold.

24 MR. PRIVOR: Very good.

25 EXAMINATION BY COUNSEL FOR THE MINORITY

1 BY MR. PRIVOR:

2 Q. Mr. Kaveladze, I apologize in advance.  
3 I'm going to jump around a little bit. I want to  
4 try to fill in some -- where I had questions about  
5 some of Mr. Davis' line of inquiry first, but I'll  
6 try to keep us in order.

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

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

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

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

22 Q. And is that IBC for short?

23 A. Yes.

24 Q. Is IBC still in business?

25 A. It's -- it's inactive for numerous years,

1 but, yeah, company still exists.

2 Q. When did it go inactive?

3 A. I mean, I don't file inactive tax  
4 returns. It still has an account. But as far as  
5 doing business, it hasn't been doing business for  
6 last 5 years.

7 Q. Okay. So approximately since 2012?

8 A. Yeah. Actually doing business, IBC was  
9 not doing business.

10 Q. Other than the Crocus work and related  
11 matters that you just described, do you do any  
12 other work for the Agalarov family?

13 A. Sometimes I would handle personal  
14 matters. Let's say he wants to buy a house. He  
15 will get in touch with me and ask, you know, to  
16 look for properties or find a real estate broker  
17 or secure a mortgage for the house. That would be  
18 me.

19 Q. With regard to IBC or any business  
20 related to IBC, did you set up corporations for  
21 the Agalarovs?

22 A. No, not for Agalarovs.

23 Q. How about for the Crocus Group?

24 A. No.

25 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 [REDACTED].

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.

1 Q. What's the connection to New Jersey? Why  
2 do you have business there?

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

9 Q. You said it's mostly Crocus business.  
10 What else does it do?

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

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

18 A. Same place.

19 Q. In New Jersey?

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

24 Q. Did you ever register a business for the  
25 Agalarovs at the same New Jersey location?

1           A. I believe there was a company registered  
2 in the '90s, like mid-'90s, called Crocus  
3 International or something like that, Crocus --  
4 but it was -- didn't do any business, didn't have  
5 account, didn't do anything.

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

8           A. Saffron Property, yeah, I have.

9           Q. What is that company?

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

13          Q. Is it just the one property?

14          A. I believe it's two properties.

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

17          A. No, both on Fisher Island.

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

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

24          Q. Do you have any responsibility for  
25 Saffron Property Management?



1 A. No, I do not.

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

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

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

10 A. Yes, he did ask me this question.

11 Q. And your answer --

12 A. The answer is no.

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

15 A. No, I have not.

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

18 A. Yes.

19 Q. -- even before the June 9th meeting.  
20 Have you ever done any work related to the  
21 Magnitsky Act before the June 9th meeting?

22 A. No, I have not.

23 Q. How about since the June 9th meeting?

24 A. No, I have not.

25 Q. Have you ever been asked to do any kind

1 of work by any Russian Government officials?

2 A. No.

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

7 A. Correct.

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

10 A. Uh-huh.

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

13 A. No.

14 Q. You didn't meet --

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

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

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

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

23 A. Senior, yeah.

24 Q. Okay. And although you don't know the  
25 names, do you know the positions of the people

1 that were there representing the Trump  
2 Organization?

3 A. No, unfortunately not.

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

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

12 Q. Both women?

13 A. Both women, yes.

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

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

21 Q. Were you successful?

22 A. Not very successful. I secured one  
23 sponsorship.

24 Q. Which sponsorship was that?

25 A. Sberbank.

1 Q. And Sberbank is a Russian bank?

2 A. Yes.

3 Q. How did you make that connection to  
4 secure them as a sponsor?

5 A. Well, you know, all Crocus accounts are  
6 in Sberbank, and Sberbank is a main creditor of  
7 Crocus. So it was easy. I approached them, and  
8 they probably couldn't say no.

9 Q. Other than securing their sponsorship and  
10 the letter of intent, did you have any other work  
11 related to the Miss Universe Pageant?

12 A. No.

13 Q. Did you attend the pageant?

14 A. Yes, I did.

15 Q. In Moscow?

16 A. Yes.

17 Q. Did you attend any of the after-parties  
18 related to the Miss Universe Pageant?

19 A. I attended after-party right after the  
20 pageant. There was this after-party in the same  
21 building, Crocus City Hall, reception hall.

22 Q. Did you meet any of the members of the  
23 Trump family at that after-party?

24 A. No, I didn't meet anybody.

25 Q. How about before the pageant? Were there

1 any related events like a lunch or a dinner,  
2 anything like that to kick off the Miss Universe?

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

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

8 A. Uh-huh.

9 Q. Is that right?

10 A. Yes.

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

12 A. Yeah.

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

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

22 Q. Was there anyone there from the Trump  
23 Organization?

24 A. Well, if you consider people from Miss  
25 Universe a part of Trump Organization, which they

1 probably were at that time, yes. Paula Shugart,  
2 the president of Miss Universe, was there, and a  
3 couple of employees I think I saw.

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

7 A. No, not at that reception.

8 Q. Okay. And --

9 A. It was kind of quick, this thing.

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

16 A. No.

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

20 A. I've heard about it.

21 Q. You didn't attend it?

22 A. I did not attend.

23 A. You had mentioned that you had engaged in  
24 negotiations toward a letter of intent or a  
25 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?

1           A. It's hard for me to say, but I was  
2 brought into this communication by Emin Agalarov,  
3 so I'm not sure who approached whom. So --

4           Q. And that was a communication between Emin  
5 and?

6           A. And Donald Trump, Jr.

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

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

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

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

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

25          A. Sure.



1 Q. Was anyone else involved from Crocus  
2 other than Emin and you?

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

6 Q. Who was that?

7 A. Yuri Grossman.

8 Q. Oh, Yuri is your employee.

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

15 Q. What was his role?

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

20 Q. Do you recall how long the negotiations  
21 took?

22 A. Well, as I said, actually the -- I'm not  
23 sure when we signed LOI, but to the best of my  
24 knowledge, best of my recollection, maybe 2 to 3  
25 months, then we sign LOI; then architects kicked

1 in.

2 Q. Were those negotiations between largely  
3 you and Emin on the one hand and Donald Trump,  
4 Jr., on the other?

5 A. Correct.

6 Q. Was there anyone else on the Trump side  
7 of that equation?

8 A. I'm sure there were people cc'd. I just  
9 don't remember. I mean, since he was the one who  
10 responded, I didn't pay attention who was cc'd on  
11 their side.

12 Q. Did you communicate with Donald Trump,  
13 Jr., by telephone, by email, combination?

14 A. Combination. Well, phone was conference  
15 calls, and as far as emails, yes, there were  
16 emails as well.

17 Q. How often did you communicate with him to  
18 negotiate this letter of intent?

19 A. I would say seven to eight emails and  
20 maybe two to three conference calls.

21 Q. Did you ever meet in person?

22 A. No.

23 Q. Regarding this project.

24 A. Regarding -- no, never.

25 Q. In between the time when you were

1 negotiating this project and the June 9th meeting  
2 that we're going to come to in a moment, had you  
3 ever met Donald Trump, Jr., in that period of  
4 time?

5 A. No, I have not.

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

8 A. No, I have not.

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

11 A. That is correct.

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

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

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

23 A. Yeah.

24 Q. Did you have communications with Donald  
25 Trump, Jr., during that period of time?

1           A. I think I did. I think at some point of  
2 time, I sent an email kind of asking why are they  
3 silent. Yeah, and I think there was some kind of  
4 response they were "too busy, we got some stuff,  
5 projects going on overseas, and we'll get back to  
6 you" type of thing. And I think it was an effort  
7 undertaken like Mr. Caul, I believe the  
8 architect's name was, so Mr. Caul was trying to  
9 communicate with Bill McGee, and then Bill wrote  
10 to me again saying that he disappeared again.

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

14           A. No.

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

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

19           Q. How about --

20           A. Outside of this development. In  
21 connection -- sometimes they were also asking  
22 about -- we also had a Marriott project on the  
23 property, and there was also negotiations where we  
24 should place tower in relationship to that  
25 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  
4 you communicated with him, say, before the June  
5 9th meeting?

6 A. No.

7 Q. Had you ever met him, I think, other --

8 A. June 9. June 9 would be the first time -  
9 -

10 Q. I am talking about Senior.

11 MR. BALBER: Slow down.

12 BY MR. PRIVOR:

13 Q. Senior.

14 A. Yeah, I'm sorry. Senior, I met him on  
15 June 15, 2013, in Las Vegas.

16 Q. At the Miss -- I'm sorry, at the Vegas  
17 signing for this --

18 A. Correct.

19 Q. -- project that didn't come to fruition.

20 A. Correct.

21 Q. Okay. Other than that meeting with  
22 Donald Trump, Sr., had you ever met him at any  
23 other time in person?

24 A. I saw him during the Miss Universe.

25 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.

1 Q. What did you mean by "working  
2 relationship"?

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

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

13 A. Yeah.

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

15 A. No, I had no knowledge of her until June  
16 9. You know, that's where I saw her first time.  
17 Obviously, I communicated on June 6 with her.

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

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

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

23 A. No.

24 Q. Before the meeting, did you know what her  
25 -- 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.



1 Q. Did you do any sort of investigation or  
2 due diligence on him before the meeting?

3 A. No.

4 Q. Did you even know that he was going to  
5 appear at this meeting before you met him?

6 A. Thirty minutes prior to the meeting, I  
7 realized he's going to appear. No, I didn't know  
8 him.

9 Q. And in that interim 30 minutes before the  
10 meeting until the meeting, did you take Rob  
11 Goldstone aside, for instance, and ask him who is  
12 Mr. Akhmetshin?

13 A. We didn't have that opportunity. We were  
14 greeted by -- we walked into the building. Mr.  
15 Goldstone was standing at reception. He greeted  
16 us and walked us through. We didn't have no time  
17 to discuss anything with Mr. Goldstone.

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

23 A. Yes.

24 Q. -- of what to expect?

25 A. Yes.

1 Q. What were those conversations? And just  
2 to back up so we don't have to cause you to repeat  
3 yourself, I know you mentioned two brief calls.

4 A. Two phone calls.

5 Q. Anything other than those two calls?

6 A. There was also that synopsis sent to me,  
7 shorter version, four-page version of synopsis by  
8 Mr. Agalarov.

9 Q. Okay. When did he send that to you?

10 A. I believe it was either June 6 or June 7.

11 Q. What was in that synopsis?

12 A. That's the document you --

13 Q. Oh, that's the one we were looking at  
14 this morning.

15 A. Yeah.

16 MR. BALBER: Which one?

17 MR. KAVELADZE: The shorter version.

18 MR. BALBER: I think you're confused, so  
19 slow down, be thoughtful, because I don't think  
20 you've seen that.

21 MR. PRIVOR: We have not seen that yet.

22 MR. BALBER: We've had all of your  
23 colleagues shown this thing.

24 MR. KAVELADZE: Sorry. It's from previous  
25 testimony.

1 MR. BALBER: Yeah, so just slow down.

2 MR. PRIVOR: Fair enough.

3 BY MR. PRIVOR:

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

7 A. June 6.

8 Q. Okay.

9 A. First communication about Ms.  
10 Veselnitskaya.

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

13 A. Synopsis?

14 Q. Yes.

15 A. Yes, it was email.

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

22 I have no doubt you saw it, but --

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

25 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?

1           A. Yeah, it just had a little bit more  
2 details, yes.

3           Q. Ms. Veselnitskaya's had more details?

4           A. More details, obviously.

5           Q. Were there any topics discussed in the  
6 shorter version that were not contained in the  
7 longer Russian version?

8           A. I don't believe so.

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

11          MR. PRIVOR: Oh, I'm sorry.

12          MR. KAVELADZE: Both of them were, yes.

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

14 BY MR. PRIVOR:

15          Q. Do you recall -- I know you're not  
16 certain, but you seem to think it might have come  
17 to you by email. Do you recall whether anyone  
18 else received the same communication at the same  
19 time?

20          A. No.

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

1 other than you about the upcoming meeting?

2 A. No. No.

3 Q. In any of --

4 A. Not at the Crocus Group.

5 Q. Okay.

6 A. Emin was communicating with Rob

7 Goldstone, but --

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

11 A. Uh-huh.

12 Q. Was anyone else on those telephone calls?

13 A. No. Just him.

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

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

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

23 A. Yeah.

24 Q. Okay. The 30-minute window of time when  
25 you were in front of Trump Tower before walking --

1           A. Yeah, that's what I mentioned. Yeah, I  
2 mentioned 30 minutes, yeah.

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

7           A. No.

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

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

12          Q. Who told you to do that?

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

15          Q. How did he communicate that to you?

16          A. Verbally over the phone call.

17          Q. Was that in your first call with him?

18          A. I believe so.

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

22          A. First call, he didn't even mention  
23 Magnitsky Act. It was the second call in which he  
24 mentioned, not the first call. He just said I  
25 need to be in New York, and I was kind of hesitant

1 to leave on June 6 because June 7 was [family  
2 event] , and I didn't want to miss it. It was  
3 kind of negotiated, later date, my arrival.

4 Q. And you were leaving from California?

5 A. Yes.

6 [descriptions of family members]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

19 A. No.

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

23 A. I have not.

24 Q. So June 6th then was the very first time  
25 you had heard about any meeting?



1 MR. BALBER: You have to answer out loud.

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

8 BY MR. PRIVOR:

9 Q. And that would be conference calls --

10 A. During that Trump Tower negotiation  
11 period.

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

14 A. Yes.

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

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

22 [Kaveladze Exhibit 6 was marked for  
23 identification.]

24 MR. PRIVOR: I'm going to show you our next  
25 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 [REDACTED] dated May  
21 19, 2016. Do you know who [REDACTED] is?

22 A. Yes. She is -- her name is [REDACTED]  
[REDACTED]

24 Q. Who is she?

25 A. She's family member 1 "FM1" [REDACTED]

1 Q. Looking at the subject, "Trump-Agalarov,"  
2 and the article, which you can see attached,  
3 you'll note on the first page of the article  
4 there's a photograph of Donald Trump, President  
5 Trump. And are those the Agalarovs, father and  
6 son?

7 A. Uh-huh.

8 MR. BALBER: Say "yes."

9 MR. KAVELADZE: Yes.

10 MR. PRIVOR: Thank you.

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

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

15 MR. BALBER: It's okay.

16 BY MR. PRIVOR:

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

20 A. I thought I sent it to --

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

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

1 her, and I send her article.

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

7 A. No.

8 Q. So just entirely coincidence?

9 A. Yeah.

10 Q. And your [REDACTED] FM 1 [REDACTED] was she your  
11 [REDACTED] FM 1 [REDACTED] at that time?

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

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

19 A. No.

20 Q. You mentioned family members. Is your  
21 [REDACTED] FM 1 [REDACTED] one of the people that you spoke  
22 to in advance of the meeting?

23 A. I don't believe so.

24 Q. Okay.

25 A. I don't believe I discussed June 9

1 meeting with her.

2 Q. Of your family members, do you recall who  
3 they were, which ones you spoke to in advance of  
4 the meeting?

5 [REDACTED]

[REDACTED]

[REDACTED] description of discussions with family

members 2 and 3, and a possible discussion

with family member 4 "FM 2" "FM 3" "FM 4"

[REDACTED]

[REDACTED]

[REDACTED]

13 Q. And you mentioned your family members

5 & 6 ?

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

16 Q. Who's your neighbor?

17 A. His name is [REDACTED].

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

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

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

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

25 A. First, I discussed the meeting going to

1 be about Magnitsky Act. Then after I received --  
2 not while I received -- when I placed the call to  
3 Roman and received that information that that  
4 lawyer might have negative information on Ms.  
5 Clinton, I discussed that with him as well.

6 Q. You discussed that with [REDACTED] FM 2 ?

7 A. Yeah, and with [REDACTED] FM 3 .

8 Q. And I'm sorry if you had stated earlier,  
9 when was the call with Roman?

10 A. June 7.

11 Q. So you spoke to [REDACTED] FM 2 about the meeting  
12 both before -- so in between June 6th and June  
13 7th, and then you spoke to him again after the  
14 call with Roman on June 7th?

15 A. Yes.

16 Q. Okay. So in your first conversation with  
17 [REDACTED] FM 2 , you mentioned the Magnitsky Act. What was  
18 the basis for your understanding that it would be  
19 about the Magnitsky Act?

20 A. Well, I received a communication from Mr.  
21 Agalarov that it's going to be about Magnitsky  
22 Act.

23 Q. Anything else that gave you the  
24 impression it would be about the Magnitsky Act?

25 A. Aside of what I received from Mr.

1 Agalarov, no.

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

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

14 Q. You mentioned teenage family member. Did  
15 you mean [REDACTED]? Were you referring to  
16 FM 2?

17 A. FM 3. No. [REDACTED]  
[REDACTED]

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

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

23 Q. And FM 2 is older than FM 3?

24 A. Yeah.

25 Q. Okay. What do you recall telling FM 2

1 about the negative information about Hillary  
2 Clinton? I just want to be clear. I understood  
3 what you've said. I just wasn't sure who you told  
4 it to.

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

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

17           A. From Roman Beniaminov.

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

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

23           Q. Did you ask him any further details about  
24 his conversation -- or, I'm sorry, what he  
25 overheard from Rob Goldstone?



1           A. No, I didn't ask for details.

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

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

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

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

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

23          A. I don't believe I asked her, but I read  
24 this synopsis, and I realized -- and I asked her,  
25 "Is there anything else you want to discuss during

1 the meeting?" And she said, "No. I'm strictly  
2 going to stick to that synopsis."

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

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

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

11 A. Yeah.

12 Q. -- Russian statement?

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

15 Q. You stated when you were describing this  
16 information to FM 2 that you had some concern  
17 about it. What did you mean by "concern"?

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

25 Q. Why not?

1           A. Because I don't want to be a part of a --  
2 first of all, I voted for Hillary and my family  
3 voted for Hillary, and so I didn't want a part of  
4 this.

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

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

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

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

20          Q. After the lunch with Ms. Veselnitskaya?

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

24          Q. Had you explored what was meant by  
25 "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 [FM 2]. 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 [FM 2], or conversations?

14 A. There was no conversation with [FM 2]. I  
15 just mentioned about this negative information.  
16 There was no response, much of a response from  
17 [FM 2]. He just took it into consideration. The  
18 same goes with [FM 3], 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 --

1 Q. -- have said that?

2 A. I'm speculating right now.

3 Q. Okay. That's all you can remember from  
4 the mention to [REDACTED] FM 2 ?

5 A. Yeah.

6 Q. Okay. You also spoke to [REDACTED] FM 3 . Was it  
7 at the same time as [REDACTED] FM 2 or separately?

8 A. I believe so, same time.

9 Q. Both conversations?

10 A. [REDACTED] FM 2 and [REDACTED] FM 3 , I believe they were  
11 both in the room when I discussed it. And I think  
12 [REDACTED] FM 6 was also in the room.

13 Q. Did you have any other conversations with  
14 [REDACTED] FM 3 other than the ones where [REDACTED] FM 2 was  
15 present?

16 A. She asked me a few days later, she asked  
17 me how was meeting, and I responded.

18 Q. Do you recall what you said?

19 A. I said the meeting was boring and there  
20 was no negative information about -- and they got  
21 nothing on Hillary.

22 Q. You mentioned [REDACTED] FM 6 . Did you have  
23 any conversations with her about the June 9th  
24 meeting other than you thought she was present  
25 when you spoke to [REDACTED] FM 2 and [REDACTED] FM 3 ?

1 A. No, I do not have a -- independent from  
2 that conversation.

3 Q. Okay. How about [REDACTED] FM 5 [REDACTED]? Did you  
4 speak with her as well?

5 A. I did discuss -- yes, I did discuss it  
6 with [REDACTED] FM 5 [REDACTED].

7 Q. What did you tell [REDACTED] FM 5 [REDACTED]?

8 A. I told her everything, pretty much what I  
9 told [REDACTED] FM 2 [REDACTED] and [REDACTED] FM 3 [REDACTED]. [REDACTED] FM 5 [REDACTED] 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 [REDACTED]  
[REDACTED] FM 5 [REDACTED].

17 MR. KAVELADZE: Yeah. I'm sorry.

18 MR. O'DONNELL: That's typically privileged.

19 BY MR. PRIVOR:

20 Q. Do you have a sense of why she didn't  
21 want you to go?

22 A. I don't know. She has strong feelings  
23 about Magnitsky Act.

24 Q. Strong feelings?

25 A. Support.

1 Q. Support for it? You mentioned your  
2 neighbor, [REDACTED]. What did you discuss with  
3 him?

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

7 Q. Also two conversations?

8 A. Yeah.

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

12 A. Well, yes, I did.

13 Q. Did he have any response?

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

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

19 A. No.

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

22 A. At that point the information about  
23 negative information was -- as far as I was  
24 concerned was gossip, was something someone  
25 communicated who overheard it from someone. So I

1 was not trusting to that information too much. I  
2 just was concerned about possibility that that  
3 might be true. But at that point of time, I  
4 qualified that as a gossip, that aspect, that part  
5 of it.

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

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

20 A. No. I never heard that term before.

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

24 A. No, I haven't.

25 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?

1           A. They have not.

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

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

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

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

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

16          A. "Em-een."

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

22          A. No, I have not.

23          Q. You will note in this email Mr. Goldstone  
24 suggests that Donald Trump, Jr., speak to Emin.  
25 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.

1 Q. A hundred percent?

2 A. A hundred percent logistics.

3 Q. Okay. And then just to follow up on your  
4 meeting with Mr. Goldstone just before the June  
5 9th meeting, you said you met him approximately  
6 3:45 before the meeting?

7 A. There was no meeting with Rob Goldstone.  
8 We approached as a group. Rob Goldstone said  
9 hello, and he walked us to the meeting. There was  
10 no meeting with Rob Goldstone.

11 Q. You described it earlier as just a  
12 welcome and walking up.

13 A. Welcome, hello, handshakes, let's go.

14 Q. There was no conversation with him?

15 A. No.

16 Q. Did the topic of negative information  
17 about Hillary Clinton come up during that walk-up  
18 to the meeting?

19 A. No. There was no words exchanged.

20 Q. In advance of your meeting, you've talked  
21 about the people you spoke to, the lunch with Ms.  
22 Veselnitskaya, and now walking up to the meeting.  
23 Did you do anything else in advance of the  
24 meeting to prepare other than reading the synopsis  
25 that you've described before?

1 A. No.

2 Q. Did you strategize with anyone?

3 A. No.

4 Q. Did you consult anyone?

5 A. I mean, bear in mind my initial  
6 understanding is that I am going to be translating  
7 in the meeting. I don't need to strategize,  
8 consult. I just need -- I was supposed to  
9 translate.

10 Q. And without disclosing any substance, did  
11 you consult a lawyer before you went to this  
12 meeting?

13 A. No.

14 Q. And other than the synopsis, did you see  
15 any other documents in advance of this meeting?  
16 And to be clear, I understand you ultimately saw  
17 two synopses.

18 A. Yes, that's all I saw.

19 Q. Did you have any communications with the  
20 U.S. persons that were at the meeting before the  
21 meeting? So did you speak in advance with --

22 A. Yeah, I told Rob I would be there, and  
23 we're always coordinating meeting time and people.

24 Q. And from the Trump side, had you spoken  
25 to Donald Trump, Jr., in advance?

1 A. No, I didn't have no direct access to --

2 Q. How about Mr. Kushner?

3 A. No.

4 Q. Did you know him before the meeting?

5 A. No.

6 Q. Had you ever communicated with him  
7 before?

8 A. No.

9 Q. How about Mr. Manafort?

10 A. No.

11 Q. Had you ever communicated with him before  
12 the meeting?

13 A. No.

14 Q. You had described the introductions to  
15 the meeting, and you said that Ms. Veselnitskaya  
16 introduced herself as a private attorney. Did she  
17 make a point of describing herself as a "private"  
18 attorney? Did she use that word?

19 A. She either said "private attorney" or  
20 "private citizen." But, yeah, she definitely said  
21 something like that.

22 Q. Was your understanding that she was  
23 distinguishing herself from, by contrast, a  
24 government attorney?

25 A. I can't tell right now, but --

1 MR. BALBER: Then that's it.

2 MR. KAVELADZE: Yeah.

3 BY MR. PRIVOR:

4 Q. That's all you can recall?

5 A. Yeah.

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

9 Do I have that right?

10 A. No, there was no discussion.

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

13 A. No.

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

16 A. No.

17 Q. Or that data had been hacked?

18 A. No.

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

22 A. No.

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

25 A. No. Not during the meeting.



1 Q. And with regard to the documents, you  
2 stated that Ms. Veselnitskaya brought with her the  
3 synopsis. That's the 11-page document in Russian?

4 A. I think it's around 11 pages. Could be  
5 10, could be 12. It's in Russian. Yeah, it was  
6 in Russian.

7 Q. You said that you weren't sure if anyone  
8 had accepted her offer of that document. Do you  
9 know if she left anything behind?

10 A. I don't know. I know there was an offer  
11 to leave it, but if she actually left it or not, I  
12 don't -- I don't recall.

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

16 A. Uh-huh.

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

19 A. Akhmetshin and Samochornov.

20 Q. So the four of you.

21 A. Yeah.

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

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

25 Q. You had described Mr. Goldstone having

1 some brief words with Mr. Donald Trump, Jr., some  
2 sort of apology. Was anyone else around sort of  
3 standing nearby that they could hear that  
4 conversation between Mr. Goldstone and Mr. Trump,  
5 Jr.?

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

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

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

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

15 A. Same thing. I don't recall.

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

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

21 Q. Okay. I think --

22 MR. BALBER: One more question before you  
23 leave this topic. Was there anybody you met in  
24 the kind of reception area as you were leaving the  
25 meeting?

1 MR. KAVELADZE: Yeah. We were greeted by  
2 Ivanka Trump.

3 BY MR. PRIVOR:

4 Q. Was she ever present in the meeting?

5 A. No. She was at the reception. She said  
6 hello to us, and we said hello, how are you, and  
7 we had, like, polite conversation for maybe 1  
8 minute. And then she told us to have a good day,  
9 and we left.

10 Q. Did you see her after the meeting?

11 A. That was after the meeting.

12 Q. Oh, I'm sorry. Did you see anybody on  
13 your way into the meeting?

14 A. No.

15 Q. Other than the participants, obviously.

16 A. No.

17 Q. Did you see if anyone else spoke to  
18 Ivanka Trump after the meeting other than your  
19 casual exchange?

20 A. It's hard to say. I think we had this  
21 casual exchange and moved on. So we left her  
22 behind. I'm not sure who she was talking to or  
23 could have been talking to.

24 MR. O'DONNELL: This was upstairs, right?

25 MR. KAVELADZE: Upstairs.

1 MR. O'DONNELL: Before you got on the  
2 elevator to go downstairs.

3 MR. KAVELADZE: Upstairs.

4 BY MR. PRIVOR:

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

9 A. I did not see that.

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

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

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

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

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

19 MR. DAVIS: We'll go back on the record at  
20 11:57.

21 FURTHER EXAMINATION BY COUNSEL FOR THE MAJORITY

22 BY MR. DAVIS:

23 Q. Mr. Kaveladze, you had mentioned having  
24 email and phone interaction with Donald Trump,  
25 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

1 part, but, you know, we had numerous meetings with  
2 business leaders, like overseas international  
3 leaders. We don't usually have a translator.  
4 It's usually me translating.

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

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

14 Q. When did you depart New York?

15 A. I believe next morning.

16 BY MR. FOSTER:

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

20 A. Yeah.

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

23 A. He told me to do that. Basically he -- I  
24 read the short synopsis first, you know, while in  
25 California. And I read a longer synopsis. I

1 didn't see much of a difference. But when I read  
2 the short synopsis, I called him, said this  
3 meeting should be conducted on the level of  
4 attorneys, not with these people. We're going to  
5 be discussing Magnitsky Act. You know, these  
6 people have nothing to do with Magnitsky Act. And  
7 he said, "Great. Thank you." And at that time I  
8 was under assumption that we might be meeting with  
9 attorneys.

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

21           Q. So when you say you were surprised that  
22 these three people showed up, you mean Manafort,  
23 Kushner, and Don, Jr.?

24           A. Manafort, Trump, Jr., yeah -- Kushner and  
25 Trump, Jr.

1 Q. Okay. And so I apologize if you've  
2 answered this before, but I'm just a little  
3 confused. So why were you there? What was your  
4 purpose?

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

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

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

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

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

25 Q. Did you provide any written evaluation of



1 the synopsis or --

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

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

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

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

12          A. No.

13          Q. Send an email?

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

16          Q. And do you recall when those were?

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

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

22          A. As I mentioned before, the first one was  
23 basically me reporting that the meeting went well,  
24 and the reason I said that because Natalia  
25 Veselnitskaya was right next to me. And the next

1 one I said it was complete loss of time.

2 MR. FOSTER: Okay.

3 BY MR. DAVIS:

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

7 A. "Good afternoon, gentlemen. How are you?  
8 Welcome to Trump Tower." I think that's -- I  
9 think she welcomed us. And we said, "Thank you."  
10 And then Akhmetshin said some pleasantries. He  
11 speaks excellent English, and he exchanged some  
12 pleasantries with Ivanka.

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

16 A. No. No.

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

19 MR. KAVELADZE: No, we did not.

20 BY MR. DAVIS:

21 Q. So you discussed with my colleague your  
22 interactions with FM 3, regarding  
23 the meeting. I'd like you to take a look at an  
24 email chain Bates-stamped SJC-KAV-00251. This  
25 will be Exhibit 7.

1 [Kaveladze Exhibit 7 was marked for  
2 identification.]

3 BY MR. DAVIS:

4 Q. This document states that on June 15,  
5 2016, FM 3 asked you, "How was the meeting with  
6 Trump people? What happened?" And your reply  
7 was, "Meeting was boring. The Russians did not  
8 have any bad info on Hillary."

9 A. On Hillary, yeah. His mistake.

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

14 A. Sure.

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

19 [Kaveladze Exhibit 8 was marked for  
20 identification.]

21 MR. O'DONNELL: 260 and 267?

22 MR. DAVIS: 0026 and 0027.

23 MR. KAVELADZE: Thank you.

24 MS. BRENNAN: Is it 0026 and 0027?

25 MR. DAVIS: Right, along with 248.

1 MR. DAVIS: We're having technical  
2 difficulties.

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

5 MR. BALBER: Oh, sure.

6 MR. FOSTER: It's not attached.

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

9 MR. BALBER: Yeah.

10 BY MR. DAVIS:

11 Q. So this is an email chain, Bates numbers  
12 0026 and 27. 0026 is an email from Rob Goldstone  
13 to Emin Agalarov and you. It has an image  
14 attachment, but the text of the message says, "Top  
15 story right now seems eerily weird based on our  
16 Trump meeting last week with the Russian lawyers,  
17 et cetera." And the attached image is a CNN  
18 headline. The headline reads, "Russian hackers  
19 stole Dems' Trump files, firm says." And Bates  
20 number 00248 is an extension of that same email  
21 chain.

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

23 MR. DAVIS: Okay. That'll be Exhibit 9.  
24 248 will be Exhibit 9.

25 [Kaveladze Exhibit 9 was marked for

1 identification.]

2 MR. PRIVOR: And the other two together will  
3 be 8.

4 MR. DAVIS: That's correct.

5 BY MR. DAVIS:

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

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

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

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

23 A. "Very interesting"? It's a polite  
24 response. I mean, I didn't want to call him a  
25 weird person or something like that, because it

1 was weird for him to send something like that to  
2 me.

3 Q. And, again, was any hacking in any  
4 context discussed at the June 9th meeting?

5 A. Nothing was discussed in meeting.

6 Q. Was there a reason you responded just to  
7 Rob Goldstone and not also to Emin?

8 A. It's my inproficiency with -- sometimes I  
9 forget. Instead of "Reply to All," I just do  
10 "Reply," and that's what it is. I had no reason  
11 to hide that response from Emin, "Very  
12 interesting."

13 [Kaveladze Exhibit 10 was marked for  
14 identification.]

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

21 [Pause.]

22 BY MR. DAVIS:

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

1 A. Sure, yes.

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

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

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

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

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

19 A. Oh, yeah.

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

22 A. Correct.

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

25 A. I do not recall. I might have some

1 meetings with my friends, but nothing business-  
2 related.

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

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

12 [Kaveladze Exhibit 11 was marked for  
13 identification.]

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

17 [Pause.]

18 BY MR. DAVIS:

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

24 MR. BALBER: From counsel's perspective,  
25 yes, that's how we prepared it.



1 BY MR. DAVIS:

2 Q. Much of the content is in Russian; is  
3 that correct?

4 A. Yes.

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

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

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

22 A. Correct.

23 Q. Who initiated this request for another  
24 meeting?

25 A. Aras Agalarov. At least as far as I'm

1 concerned. Maybe Natalia initiated to Aras, but  
2 yeah.

3 MR. BALBER: Speak up and just answer based  
4 upon what you know.

5 MR. KAVELADZE: 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

1 that meeting.

2 Q. So your text message to Aras Agalarov  
3 says that Rob talked with the Trump people. Do  
4 you know which Trump people he contacted?

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

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

10 A. No.

11 Q. All right. Returning to the document,  
12 the message we were discussing was sent at 17:45,  
13 according to the document. It looks like 13  
14 minutes later, at 17:58, it says you sent the same  
15 message to a recipient listed here as "unknown."  
16 To whom did you send this message at 17:58?

17 [Pause.]

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

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

21 BY MR. DAVIS:

22 Q. And according to this same document, at  
23 19:00 hours that same day, November 18, 2016, you  
24 sent a message to a contact listed here as  
25 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.

1 Q. And then the next one is at 14:05 -- I'm  
2 sorry, is at 10:56 again is also Natalia?

3 A. Yeah.

4 Q. Could you translate that one as well?

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

9 Q. And then it looks like you responded at  
10 14:05.

11 A. Uh-huh.

12 Q. Could you translate that as well?

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

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

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

25 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."

1 Q. So keep this exhibit handy. We'll be  
2 coming back to it. But right now I'd like to have  
3 you take a look at the email and attachment Bates-  
4 stamped SJC-KAV-00040 through 43, which would be  
5 Exhibit 12.

6 [Kaveladze Exhibit 12 was marked for  
7 identification.]

8 BY MR. DAVIS:

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

13 A. That is correct.

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

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

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

23 A. Russian Federation country.

24 Q. Okay. And what did you understand that  
25 subject line to mean?

1 A. It's a letter from Russia.

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

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

7 Q. Okay. Next I'd like you to take a look  
8 at a document Bates-stamped SJC-KAV-00136-137.

9 This will be Exhibit 13.

10 [Kaveladze Exhibit 13 was marked for  
11 identification.]

12 BY MR. DAVIS:

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

18 A. Yes.

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

20 A. Uh-huh.

21 [Pause.]

22 MR. KAVELADZE: Yes, I remember this email.

23 BY MR. DAVIS:

24 Q. If you could please look at the message  
25 from Mr. Goldstone to you at 8:16 a.m. Mr.



1 Goldstone writes, "Having skimmed it over, isn't  
2 this exactly what she presented at the last  
3 meeting?" You replied, "Yes, pretty close to what  
4 she talked about at first meeting."

5           Is that true? Was the content of this  
6 synopsis similar to the content of the June 9,  
7 2016, meeting?

8           A. Yes, it is true.

9           Q. Were there any material differences?

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

13          Q. Of course.

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

21          MR. DAVIS: That is fair.

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

24 BY MR. DAVIS:

25          Q. Later in the email chain, Goldstone

1 writes, "I have to submit this and then speak to  
2 Don and Rhona, and then wait to see if they want  
3 to have a meeting." Who did you understand Don to  
4 be in this email a reference to?

5 A. My understanding was Don, Jr.

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

8 MR. FOSTER: Exhibit 11.

9 BY MR. DAVIS:

10 Q. Exhibit 11, at Bates page 317.

11 A. Uh-huh.

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

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

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

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

25 Q. And I apologize for jumping around again,

1 but I'd like to have you take a look at an email  
2 and attachment, Bates-numbered DJTJR-00245 through  
3 248.

4 MR. FOSTER: Which will be marked Exhibit  
5 14.

6 [Kaveladze Exhibit 14 was marked for  
7 identification.]

8 BY MR. DAVIS:

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

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

22 A. Hold on one second.

23 [Pause.]

24 MR. KAVELADZE: Yes, it looks like the same  
25 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."

4 BY MR. DAVIS:

5 Q. All right. If we could turn the page to  
6 Bates number 318, a message from you to Natalia at  
7 23:06. Could you translate that one for us as  
8 well, please?

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

11 Q. And it looks like Natalia responded at  
12 23:53. Could you translate that one as well?

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

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

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

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

22 A. "Understood. I have tickets for tomorrow  
23 to Moscow. Can we somehow understand should I  
24 exchange them and request a meeting next week so I  
25 could fly back to U.S.? I need to be in Moscow

1 only for this weekend."

2 Q. Okay. And then you replied at 11:18.

3 Could you translate your response, please?

4 A. "Robert says that logistics of  
5 organizations of meetings with Team Trump now  
6 would be difficult and lengthy. I've landed in  
7 Moscow. I will discuss this situation with boss"  
8 -- "with my boss."

9 Q. Okay. And when you refer to boss, did  
10 you mean Aras Agalarov?

11 A. Mr. Agalarov.

12 Q. And what did you discuss with him?

13 A. This meeting. I'm reporting to him that  
14 it does not look good, and I was -- yeah.

15 Q. Further down the page, on December 1st --  
16 actually, I'm sorry. Let me back up. On November  
17 30th on this document, it looks like Ms.

18 Veselnitskaya emailed you about President-elect  
19 Trump meeting with Preet Bharara. Could you  
20 please translate the messages that begin at 17:20  
21 on November 30th?

22 A. "Maybe that's the reason. Is that a bad  
23 sign?"

24 Q. And then it looks like you responded at  
25 17:22?

1           A. "I don't think it's a bad sign." At that  
2 point I have no idea who Preet Bharara is. "He  
3 left him" --

4           Q. I'm sorry. That's Natalia's response.

5           A. "He left him. How is it possible?"

6 Continue?

7           Q. Yes, please.

8           A. "Or maybe just a game. Maybe he wants to  
9 control him that way, who to crush or who not.  
10 Maybe."

11          Q. Now, to clarify, have you ever discussed  
12 Preet Bharara with Ms. Veselnitskaya?

13          A. No.

14          Q. Okay. Did you understand what she meant  
15 by this?

16          A. No. I mean, I Googled that name, and I  
17 realized she's talking about some prosecutor from  
18 New York.

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

21          MR. KAVELADZE: No, no.

22 BY MR. DAVIS:

23          Q. But after Googling it, did you learn that  
24 he was overseeing the Prevezon Holdings case?

25          A. I did not -- I don't believe at that

1 point I -- later I read it in the media, in the  
2 press.

3 Q. And at that point did you understand Ms.  
4 Veselnitskaya's relationship with Prevezon  
5 Holdings?

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

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

13 A. No connection to Trump team?

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

16 A. There was no second meeting arranged, no.

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

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

25 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."

1 Q. Okay. When you said, "We'll send a  
2 request," were you referring to a request to have  
3 Mr. Agalarov meet with Mr. Trump? Is that what --

4 A. Yeah.

5 Q. Okay. I understand now.

6 A. The request was never sent.

7 Q. All right. So in the message following  
8 that on December 1, 2016, at 12:07, Natalia  
9 responds to you. Can you translate that one as  
10 well?

11 A. "Can I meet with your boss? We could  
12 meet at the same place we met with him."

13 Q. Okay. So in that message, she asks --  
14 Ms. Veselnitskaya asks for a meeting with your  
15 boss. I'd like to have you take a look at the  
16 email and attachments Bates-numbered SJC-KAV-00255  
17 to 258. This will be Exhibit 15.

18 [Kaveladze Exhibit 15 was marked for  
19 identification.]

20 MR. BALBER: Thank you.

21 BY MR. DAVIS:

22 Q. This is an email sent from you to Aras  
23 Agalarov on December 2, 2016, which attached the  
24 text message exchange between you and Natalia in  
25 which she asked to meet your boss. Is that

1 correct?

2 A. Among other messages.

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

6 A. I believe he did.

7 Q. Do you know what they discussed?

8 A. No.

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

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

23 Can I take a pause, please?

24 MR. DAVIS: Of course.

25 [Witness confers with counsel.]

1           MR. BALBER: Let me suggest, if I can, that  
2 you ask the witness about why he sent Exhibit 15  
3 and maybe a little more granularity on what the  
4 texts that are a screenshot actually say. I think  
5 that might add some --

6           MR. KAVELADZE: That would be connected to -  
7 -

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

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

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

16          MR. FOSTER: You mean attached to Exhibit  
17 15.

18          MR. BALBER: 15.

19          MR. KAVELADZE: "Unfortunately, there's no  
20 communication. Boss was planning to meet with  
21 him. We'll make a request and hopefully we'll  
22 have communication. Can we meet with your boss  
23 the same place we met? He's traveling. He will  
24 be tomorrow. I'll relate that to him. Okay. Or  
25 maybe it's just a game. Maybe that way he wants

1 to control him, who to destroy and who not.  
2 Maybe. Is there any understanding of what's" --  
3 "Is there any" -- okay -- "any feedback from their  
4 side to understand what's happening there?" And  
5 then he sends me that Donald Trump --

6 MR. BALBER: She sends you.

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

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

21 BY MR. DAVIS:

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

24 A. He told me that he had conversation with  
25 Natalia and she's not going to bother me anymore.

1 Q. Turning back to Exhibit 11 on Bates pages  
2 320 and 321, I won't ask you to translate all of  
3 these again, but it appears that you exchanged  
4 some messages with Ms. Veselnitskaya about her  
5 traveling to New York. Is that correct? It's  
6 towards the bottom of 320.

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

8 Q. That's right. I believe so.

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

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

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

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

22 A. Scott Balber.

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

25 A. She would be meeting with him?

1 MR. BALBER: Why were you arranging to have  
2 her meet with me?

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

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

9 MR. DAVIS: Best of intentions, perhaps.

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

14 BY MR. DAVIS:

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

17 A. I believe so.

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

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

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

25 A. Yeah.

1 Q. -- trying to have a meeting with the  
2 Trump team.

3 A. Yeah, she was obsessed with this meeting.  
4 And I say, "I don't think so. Let's discuss on  
5 Friday."

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

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

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

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

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

21 MR. FOSTER: 12:48.

22 MR. DAVIS: 12:48.

23 [Recess at 12:48 p.m. to 1:26 p.m.]

24



1 AFTERNOON SESSION

2 [1:26 p.m.]

3 MR. PRIVOR: We will go back on the record.

4 It is 1:26.

5 FURTHER EXAMINATION BY COUNSEL FOR THE MINORITY

6 BY MR. PRIVOR:

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

11 A. Sure.

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

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

19 A. Yeah, uh-huh.

20 Q. Do I have that right?

21 A. I think Samochornov left slightly  
22 earlier, like -- but I'm not sure about  
23 Samochornov because -- or maybe he stayed, but,  
24 yeah, those -- we walked all together and then  
25 some of them -- and I left in 15 minutes.

1 Q. And you had a round of drinks with them,  
2 we saw. Do you recall what conversation you had  
3 during that round of drinks?

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

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

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

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

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

21 Q. What did you discuss with Mr. Agalarov?

22 A. In general, the meeting went well. Oh,  
23 good. Then Natalia asked for the phone, and I  
24 passed the phone to her, and she kind of thanked  
25 him for helping to organize that meeting.

1 Q. Did you say anything to Mr. Agalarov  
2 about the matter that had given you some concern  
3 earlier, the potential information about Hillary  
4 Clinton?

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

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

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

20 Q. What theater play was it?

21 A. Okay. I could tell -- okay. The play is  
22 called "Stories" by Vasily Shukshin. It's a  
23 theatrical troupe on the tour. "Stories" by  
24 Vasily Shukshin. And leading role was played by  
25 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  
2 else.

3 Q. Did you all leave simultaneously?

4 A. No. I left first.

5 Q. So the other three -- Rinat, Ms.  
6 Veselnitskaya, and Mr. Samochornov -- stayed  
7 behind?

8 A. Yeah. I'm a little bit unsure about  
9 Samochornov, but the key players were there.

10 Q. Did anyone else join your group while you  
11 were there?

12 A. No.

13 Q. Was there anyone that you recognized who  
14 was nearby, near enough that they might have heard  
15 your conversation?

16 A. No. Mostly people over 60, Trump  
17 supporters, mostly males.

18 MR. BALBER: You had a conversation with  
19 them about who they supported politically? Okay.  
20 So then let's try to pay attention to what we're  
21 saying and what you saw.

22 MR. KAVELADZE: All right.

23 MR. BALBER: Thank you.

24 BY MR. PRIVOR:

25 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.

1           A. Yeah, 35 to 40 minutes, yeah. By the  
2 time we got there, it probably was like 4:45.

3           Q. Okay. After you left this group, where  
4 did you go next?

5           A. I don't remember. I don't recall.

6           Q. And then you went back to your hotel that  
7 evening?

8           A. Yeah.

9           Q. You said you turned in a little early?

10          A. Yeah.

11          Q. And when you woke up, where did you go  
12 after that?

13          A. I know it was not business-related. I  
14 maybe ate something and went to the airport.

15          Q. Did you leave that evening?

16          A. I left -- that evening meaning June 9?

17          Q. Yes.

18          A. No. I slept at the hotel.

19          Q. You slept overnight.

20          A. Yeah.

21          Q. And so you left the next day on June  
22 10th?

23          A. Yeah, June 10.

24          Q. Where did you fly to?

25          A. Los Angeles.

1 Q. So on June 10th you flew to Los Angeles,  
2 and did you stay in Los Angeles?

3 A. Yeah.

4 Q. And do you recall how long you were in  
5 Los Angeles after that?

6 A. No, I don't.

7 Q. Do you recall if you had traveled back to  
8 New York, say, at any other time in June?

9 A. I don't believe I traveled to New York.

10 Q. Do you recall whether you had any other  
11 travel for the rest of June?

12 A. No, I don't. I would need to see my  
13 records.

14 Q. What would you look to to figure out  
15 where you were? Do you keep a calendar?

16 A. No. I would look for some kind of  
17 airline reservations.

18 Q. If I can have you take a look at Exhibit  
19 7, which you have in front of you. You'll recall  
20 this is the exchange you had with FM 3  
21 where you had responded to our query about the  
22 meeting and saying that it was boring, Russians  
23 didn't have any bad information on Hillary.

24 If you go to the beginning of that email  
25 chain, the first-in-time email, which is on Bates



1 page 252, you were describing there how you had  
2 left your iPad on the plane to New York and you  
3 must have left your suit in the hotel. This is on  
4 June 14th that you're writing to her. Do you  
5 recall where you were in between June 10th and  
6 June 14th?

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

8 Q. And you'll see that you're corresponding  
9 with her. The most-recent-in-time conversation is  
10 the one at the top of the page, on Bates page 251,  
11 where you describe the meeting as boring. You're  
12 still communicating with [REDACTED] FM 3 [REDACTED] via email,  
13 which suggests you're not in the same place. Do  
14 you recall if you were, in fact, back in Los  
15 Angeles communicating with [REDACTED] FM 3 [REDACTED] ?

16 A. [REDACTED] She lives separately from  
17 me.

18 Q. I see.

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

21 Q. Does seeing this exchange with [REDACTED]  
[REDACTED] FM 3 [REDACTED] does that refresh your recollection in  
23 terms of where you were physically at the time?

24 A. It's probably about that my stage is 4  
25 days later. You know, I'm communicating to her

1 about that trip. I mean, it's probably -- I'd  
2 want to see my travel records to be sure. But I  
3 sure don't remember returning back to New York on  
4 14th. I think I'm referring to that trip on June  
5 10 that I forgot my suit and I forgot my iPad on  
6 the plane.

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

9 A. I think so, yeah.

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

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

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

18 [Kaveladze Exhibit 16 was marked for  
19 identification.]

20 BY MR. PRIVOR:

21 Q. So, for the record, while you look that  
22 over, this is Exhibit 16. It's Bates page SKC-  
23 KAV-00270 and it should go through 291, and this  
24 appears to be a telephone bill from [REDACTED]  
25 addressed to you, Mr. Kaveladze. Do you recognize

1 the document?

2 A. 291?

3 Q. Just the whole document. It starts on  
4 page 270.

5 A. Yeah, I do. It's [REDACTED] bill.

6 Q. Is that your telephone bill?

7 A. I believe so.

8 Q. Let's turn to the third page, which has  
9 272 at the bottom. Do you see the Bates number in  
10 the bottom right-hand corner, 272?

11 A. Oh, yeah.

12 Q. Okay. You'll see this lists five  
13 different phone numbers that appear to be part of  
14 this account. The one at the top, the 9-1-7  
15 telephone number, whose number is that?

16 A. That's mine.

17 Q. That's your personal line?

18 A. Yes.

19 Q. And the next one down, I'll just refer to  
20 them by the last two digits for sake of privacy.

21 The [REDACTED] number?

22 A. [REDACTED] is my [REDACTED] FM 1 [REDACTED].

23 Q. Okay. And how about the next one down,  
24 the [REDACTED] number?

25 A. [REDACTED] FM 3 [REDACTED].

1 Q. That's [REDACTED] FM 3 [REDACTED] ?

2 A. Uh-huh.

3 Q. And the [REDACTED]

4 A. [REDACTED] is [REDACTED] FM 2 [REDACTED] .

5 Q. And how about the last one, the [REDACTED] ?

6 A. [REDACTED] FM 4 [REDACTED] .

7 Q. That's also [REDACTED] FM 4 [REDACTED] ?

8 A. [REDACTED] , yes.

9 Q. So let's take a look now at Bates page  
10 282, and you'll see that this is showing call  
11 details for your telephone number. Do you see  
12 that?

13 A. Yes.

14 Q. At the top of the page, it indicates it's  
15 your telephone number. So I want to point you to  
16 June 10th, and you can see the first call on June  
17 10th is at 10:34 in the morning.

18 A. Uh-huh. Yes.

19 Q. 10:34. Two numbers down below that,  
20 12:36 and 12:48, do you recognize either of those  
21 telephone numbers?

22 A. No, I do not.

23 Q. You can see that the destination for the  
24 first one, the one that ends in [REDACTED] , says "Russia  
25 MOB." Do you know what that means?

1 A. Mobile number.

2 Q. Mobile. And the number immediately below  
3 it, the [REDACTED] number, do you recognize that number?

4 A. I do not.

5 Q. So this is on June 10th, the day after  
6 the June 9th meeting. Do you recall calling  
7 anybody on a Russian mobile phone on June the  
8 10th?

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

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

15 MR. KAVELADZE: No.

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

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

19 BY MR. PRIVOR:

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

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

24 MR. PRIVOR: We'll just make that as a  
25 request.

1 MR. BALBER: Sure.

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

5 MR. KAVELADZE: Sure.

6 BY MR. PRIVOR:

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

14 A. No.

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

19 A. Okay.

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

22 A. That's incoming call.

23 Q. Yes.

24 A. I have no idea.

25 Q. Do you know if that's Rob Goldstone?

1 Would you recognize his number?

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

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

7 MR. KAVELADZE: Yeah, well --

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

11 MR. KAVELADZE: No.

12 MR. BALBER: Okay.

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

15 MR. BALBER: Or it could be anybody else.

16 MR. KAVELADZE: Yeah.

17 BY MR. PRIVOR:

18 Q. Let's take a look at the call that's at  
19 3:36 p.m. You see that's the same number as the  
20 call at 6:51?

21 A. Yes.

22 Q. 3:36 is around the time -- you said you  
23 were going to meet Rob Goldstone at 3:30 before  
24 that June 9th meeting, and he was a little bit  
25 late.

1 A. We were a little bit late.

2 Q. You were a little bit late.

3 A. Yeah. He was there.

4 Q. Do you recall whether you called Mr.  
5 Goldstone to let him know you were running late?

6 A. I probably would, yeah.

7 Q. Do you think that that number then is Mr.  
8 Goldstone's or --

9 A. Probably. Probably it is.

10 Q. Okay. Do you recall whether you did  
11 speak to Mr. Goldstone after the June 9th meeting  
12 by telephone?

13 A. I don't have a recollection, but --

14 MR. BALBER: If you don't have a  
15 recollection --

16 MR. KAVELADZE: I don't have a recollection  
17 of that phone call.

18 BY MR. PRIVOR:

19 Q. Looking at the same list, we were looking  
20 at the June 10th that has the two Russian mobile  
21 numbers. The next entry after June 10th is not  
22 until June 20th, so there's a gap of 10 days in  
23 your phone usage on this line. Do you know why  
24 that is? Do you recall not using your phone for  
25 10 days?



1 A. No.

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

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

4 MR. PRIVOR: Oh, I'm sorry. We're still on  
5 282.

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

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

12 MR. KAVELADZE: I have no idea.

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

15 MR. KAVELADZE: I have no idea --

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

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

18 BY MR. PRIVOR:

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

22 A. No. He called me.

23 Q. He called you? Okay. I'm sorry. He  
24 called you. How did he know -- do you know how he  
25 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.

1 Q. Okay. Very good. And you said that you  
2 thought you were back in Los Angeles after this  
3 meeting -- is that right -- starting on June 10th?

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

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

11 A. Yeah, so I was in Russia.

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

14 A. Uh-huh.

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

17 A. I guess so, yes.

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

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

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

1 MR. BALBER: Sure.

2 MR. KAVELADZE: I produced the travel  
3 records.

4 BY MR. PRIVOR:

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

9 A. Well, yes.

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

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

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

17 A. No.

18 Q. You don't recall or --

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

24 Q. Okay. Let's have you take a look at  
25 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 A. Uh-huh.

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 A. Yeah, I'm sorry.

15 Q. There you go.

16 A. Okay.

17 Q. So you see the paragraph that starts,  
18 "The U.S. Department of Justice was informed of  
19 this"? And it refers to the Office of Prosecutor  
20 General of the Russian Federation and by the RF  
21 Ministry of Interior under U.S.-Russian MLAT.

22 A. Yeah.

23 Q. Do you see that? Do you think -- looking  
24 back again at the first page of this exhibit where  
25 it mentions "From RF", do you think that's a

1 reference to what's referred to in this paragraph,  
2 the RF Ministry?

3           A. No, I do not. Anything related to  
4 Russia, you know, any organization what starts  
5 with RF, Russian Federation Ministry of Foreign  
6 Relations, Russian Federation -- meanwhile, the  
7 name of the country is RF, Russian Federation.  
8 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  
11 exhibit, Exhibit 12, other than this one, do you  
12 have other people with whom you correspond that  
13 use that same style of putting in a subject line,  
14 "From Russia," "From RF"? Have you seen that --

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

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

23           A. Yes.

24           Q. Why do you think she has the subject line  
25 in English?

1           A. Because the document is in English.

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

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

7           Q. So this is simply a response to --

8           A. Yeah.

9           Q. To the prior ask?

10          A. Correct.

11          Q. We saw this document went to Rob  
12 Goldstone, who ultimately forwarded it on, it  
13 looks like, to someone at the Trump Organization.  
14 Do you know whether -- or do you recall whether  
15 this document has been shared with anyone else  
16 other than Rob Goldstone? In other words, did you  
17 forward this message to anyone else?

18          A. No.

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

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

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

24          A. No. No. Since it was old news for me,  
25 the document was the same document I read on June

1 9th, almost the same.

2 Q. Let's go to the next exhibit. That's  
3 Exhibit 13. You have that in front of you still.  
4 This is the email exchange with Mr. Goldstone.

5 You'll see at the top of the page Mr.  
6 Goldstone is writing to you saying that he  
7 understands, "I first have to submit this to Don  
8 and Rhona." We've discussed that part of the  
9 email already. And he notes at the bottom, "Also,  
10 FYI, not sure if Emin mentioned that I will be  
11 leaving as of January 1st, so can't help in the  
12 Trump world after December."

13 Do you know what he meant by he's leaving  
14 after December 1st?

15 A. He's quitting on December 1st.

16 Q. What was he quitting?

17 A. Working as Emin's agent, musical agent.

18 Q. And so as of January 1st, presuming he  
19 means January 1, 2017, he's no longer Emin's  
20 agent?

21 A. Correct.

22 Q. Does he do any work, to your knowledge,  
23 for the Agalarov family?

24 A. I have no knowledge of that.

25 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

1 know who that was. This is a statement you had  
2 translated for us before that talks about Rob  
3 having talked to the Trump people.

4 A. Correct.

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

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

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

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

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

21 MR. BALBER: He can't help you.

22 BY MR. PRIVOR:

23 Q. I can only tell you what the document  
24 shows. It's your document. It appears to be a  
25 message from you going out to an unknown person.

1           A. Recipient, got it. My guess in regards  
2 to that is that I sent this thing also to Natalia.  
3 Why is it showing as an unknown, I have no idea,  
4 because I've...

5           Q. And so if we're reading this, since the  
6 same text message is duplicated, it looks like  
7 17:45 you sent it to Aras Agalarov, and then at  
8 17:58 the unknown sender, or you're speculating  
9 it's Ms. Veselnitskaya --

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

11          Q. Is there anyone else --

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

14          MR. KAVELADZE: Unknown recipient.

15          MR. BALBER: Yeah.

16 BY MR. PRIVOR:

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

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

24          Q. Please.

25          A. I think we discussed at some point of

1 time with Rob Goldstone the possibility of setting  
2 the meeting between Aras Agalarov and President-  
3 elect. And I think he told me it's not a good  
4 time, and I relayed it to Mr. Agalarov that it's  
5 not a good time. So I just want this to be on the  
6 record.

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

9 A. Uh-huh.

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

16 A. That's correct.

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

20 A. Yes.

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

25 A. Well, it's -- first of all, she sent me

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

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

14 A. Yeah.

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

16 A. Without reading --

17 Q. -- quickly read the article?

18 A. Yes.

19 Q. And gave her your sort of cursory  
20 opinion?

21 A. Uneducated opinion.

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

24 A. Uh-huh.

25 Q. And Ms. Veselnitskaya has written to you.

1 Would you mind translating for us the last -- the  
2 second line of that after her question.

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

4 Q. Is that the literal translation?

5 A. It's a slang.

6 Q. What's the literal wording of that?

7 A. "Wet and not to wet."

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

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

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

15 A. It should not be taken literally, yes.

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

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

24 Q. And what do you understand -- what is  
25 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

1 articles that precede it?

2 A. I guess so.

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

6 A. Yeah, yeah.

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

9 A. Maybe, yeah. Maybe investigation  
10 started, yeah.

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

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

18 Q. A reference to the investigation --

19 A. Investigation.

20 Q. -- referenced in that article?

21 A. Uh-huh.

22 Q. How about the next line down, December  
23 9th at 17:50? How does that translate?

24 A. "Report should be presented to Congress  
25 by January 20th."



1 Q. Do you know what report that was that you  
2 were referencing?

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

5 Q. But you don't recall --

6 A. No.

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

18 Do you recall receiving that message?

19 A. Yes.

20 Q. What do you remember about it?

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

24 MR. O'DONNELL: Look at the text message.  
25 Just focus on whether that helps you remember.

1 MR. KAVELADZE: Is that a message, or this  
2 thing?

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

5 MR. PRIVOR: Yes, sure.

6 MR. BALBER: I think he completely lost  
7 track.

8 BY MR. PRIVOR:

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

11 A. "When you get a minute" --

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

14 A. Yes.

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

17 A. I think I did.

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

22 A. Uh-huh.

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

25 A. Correct.

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

4 A. Yes.

5 Q. What do you remember about that telephone  
6 call?

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

9 MR. BALBER: Then don't speculate.

10 BY MR. PRIVOR:

11 Q. Give me your best recollection.

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

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

19 A. I don't.

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

22 A. I don't recall.

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

25 A. No. Nobody was on the phone. Just me.

1 Q. Just the two of you?

2 A. Correct.

3 Q. And certainly it appears it would have  
4 been about the subject of the text, but you can't  
5 recall any further details about it?

6 A. Let me see. Well, it's -- like I said,  
7 it's one or two, because it's either attorney's  
8 call or journalist calls.

9 Q. Do you recall how Mr. Goldstone sounded  
10 on the phone? Did he sound worried? Did he sound  
11 happy? Did he sound alarmed? Do you recall at  
12 all?

13 A. I think he sounded worried.

14 Q. And do you have any sense of why he  
15 sounded worried?

16 A. I don't know. But he always sounds --  
17 he's like that. He's hyper person. He's always  
18 worried about something.

19 Q. All right. Let me go ahead and show you  
20 our next exhibit, which we'll mark as Exhibit 17.

21 [Kaveladze Exhibit 17 was marked for  
22 identification.]

23 BY MR. PRIVOR:

24 Q. This is a multi-page document, three-page  
25 document, SJC-KAV-00090 through 92. This appears

1 to be an email from [REDACTED] to you on  
2 June 20, 2017, so just this past June. Take a  
3 moment to look that over.

4 [Pause.]

5 BY MR. PRIVOR:

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

8 A. Yes.

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

13 A. Okay.

14 [Pause.]

15 BY MR. PRIVOR:

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

24 A. Uh-huh.

25 Q. And then you forwarded it on to Roman.

1 Do you recall why you forwarded this to Roman?

2 A. Because Roman was concerned about this  
3 situation, journalist going to the house.

4 Q. Had that been a problem before?

5 A. No. It was a recent development.

6 Q. Was it an issue that Roman had dealt with  
7 before you forwarded this message?

8 A. Yeah, well, he's close to the family, so  
9 maybe Mrs. Agalarov called him and said, "We got a  
10 problem."

11 Q. Now, let's turn to the first page of that  
12 exhibit. You'll see on June 20th -- I'm sorry.  
13 Leading up to it -- let's actually flip to the  
14 page before, sorry, page 91. After you forwarded  
15 the message, Roman responded to you, "Thank you,  
16 Ike. Well noted. In that case I won't return the  
17 call, I guess." Presumably a call to the  
18 reporter. You said, "No need. I am at New York  
19 City tomorrow" -- "NYC" -- "in case you want to  
20 discuss things face to face."

21 Do you recall whether you actually met  
22 with Mr. Benjaminov?

23 A. I did meet with Mr. Benjaminov and Mr.  
24 Jason Tropea, and later we were joined by Mr.  
25 Goldstone.

1 Q. Who's Jason Tropea?

2 A. That's another childhood friend of Emin  
3 Agalarov, works with him.

4 Q. And what did you discuss in that meeting?

5 A. I'm sure we discussed that journalist's  
6 interest or an article. We also discussed  
7 financial matters. Crocus was slow on the  
8 payment, and Jason was concerned. Then eventually  
9 Rob joined us and, again, we discussed that  
10 journalist's interest. And I don't recall  
11 anything else, any other details of that meeting.

12 Q. Looking at the first page of that  
13 exhibit, Bates page 90, about a third of the way  
14 from the bottom, when you're discussing setting up  
15 this meeting with Roman, you suggested on June  
16 20th at 11:31, "I guess coffee. I will have lunch  
17 with lawyers." What lawyers were those? Do you  
18 remember? Is that Mr. Balber?

19 A. Scott Balber, yeah. Maybe one of his  
20 associates, yeah.

21 MR. FOSTER: Can you speak up?

22 MR. KAVELADZE: Yeah, I had lunch with Scott  
23 Balber that day.

24 BY MR. PRIVOR:

25 Q. With anyone else, or just Mr. Balber?

1           A. I think it was just Mr. Balber.

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

8           A. Uh-huh.

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

12          A. Yes.

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

15          [Pause.]

16 BY MR. PRIVOR:

17          Q. Do you recall receiving that message from  
18 Emin?

19          A. I do.

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

23          A. Yeah.

24          Q. And you can see on the very next page,  
25 Bates page 323, same time stamp, 20:03, he says,



1 "Got this from Rob now." And that Rob is Rob  
2 Goldstone?

3 A. Correct.

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

9 A. Yes.

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

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

17 A. There was no meeting in October.

18 Q. You're certain there was no meeting?

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

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

23 A. Yeah. He was -- yeah, he set up the  
24 meeting in June and then attempted to set up  
25 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.

1 Q. The subject matter is the meeting, but he  
2 says "today" -- meaning the date that he sent this  
3 message -- he had been interviewed by attorneys  
4 for the second time. Do you know what he's  
5 referring to when he says he was interviewed by  
6 attorneys?

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

9 Q. Do you know who that is?

10 A. Alan Futerfas.

11 Q. Do you know Mr. Futerfas?

12 A. I spoke with him on the phone.

13 Q. Is he your lawyer?

14 A. No.

15 Q. Was he ever your lawyer?

16 A. No.

17 Q. When did you speak to him?

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

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

24 A. Sure.

25 Q. Toward the bottom of that message, the

1 very end of the message, Mr. Goldstone writes,  
2 "I'm really not happy being put in this situation  
3 with federal attorneys investigating, et cetera."  
4 Do you know what that's a reference to, "federal  
5 attorneys investigating"?

6 A. I never -- no. I never realized, you  
7 know, federal attorneys. That is the first time  
8 I'm paying attention to that phrase. But what is  
9 federal attorneys? I mean --

10 Q. Well, I'm asking what your understanding  
11 is.

12 MR. O'DONNELL: If you don't know --

13 MR. KAVELADZE: I have no idea what he's  
14 talking to.

15 Q. Did Mr. Goldstone ever talk to you about  
16 being interviewed or asked questions by the FBI,  
17 Federal Bureau of Investigation?

18 A. No. No, never did.

19 Q. Did anyone speak to you about -- ever  
20 mention being interviewed by the FBI?

21 A. Was I ever interviewed by FBI?

22 Q. Well, my first question is: Did anyone  
23 else talk to you about being interviewed by the  
24 FBI?

25 MR. BALBER: I'm sorry. I just want to --

1 look, I know what you're getting at. Anything  
2 that you and I may have discussed or other counsel  
3 discussed with you, representing you, that's not  
4 to be disclosed. If you have some other means of  
5 knowing that somebody else may have been  
6 interviewed by the FBI, then, of course, you  
7 should answer the question.

8 MR. PRIVOR: Thank you.

9 MR. BALBER: Sure.

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

11 BY MR. PRIVOR:

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

14 A. No.

15 Q. -- the June 9th meeting?

16 A. No.

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

18 A. No.

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

21 A. I've been contacted by FBI, but what  
22 happened is that I was traveling, and they showed  
23 up at my house in [REDACTED] and left -- one  
24 of the agents left her card, and I called her, and  
25 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

1 text, Mr. Goldstone writes, "I don't even know for  
2 sure who these Russian people were, but hopefully  
3 Ike can answer for them." My question is: Do you  
4 know what he meant by that?

5 A. Hopefully Ike knows who these people are.

6 Q. Who these Russian people are?

7 A. Yeah.

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

10 A. Natalia Veselnitskaya, Rinat Akhmetshin,  
11 and translator.

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

14 A. Correct.

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

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

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

21 FURTHER EXAMINATION BY

22 COUNSEL FOR THE MINORITY (Cont'd)

23 BY MR. PRIVOR:

24 Q. Mr. Kaveladze, so we were discussing this  
25 text message that had been pasted in by Emin to



1 you from -- it's Rob Goldstone's communication,  
2 and Rob had described the meeting as a terrible  
3 meeting. And you seemed to second that view, that  
4 it was a terrible meeting. Is that right?

5 A. To my understanding, it was useless  
6 meeting.

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

9 A. I thought that having the meeting with  
10 these three individuals was a bad idea. I always  
11 pushed for the meeting with attorneys and not with  
12 anybody else.

13 Q. What was the basis for your believing  
14 that it was a bad idea?

15 A. Because nobody in the electoral campaign  
16 was interested in Magnitsky Act. It had nothing  
17 to do with this electoral campaign.

18 Q. And so you were drawing that belief what  
19 the meeting would be about, the Magnitsky Act?

20 A. Correct.

21 Q. Was that based on the synopsis from Ms.  
22 Veselnitskaya?

23 A. And numerous calls from Mr. Agalarov.

24 Q. Before the June 9th meeting?

25 A. Yes.

1 Q. So those are the calls that took place  
2 between June 6th, when you first learned of the  
3 meeting, and June 9th, when the meeting occurred?

4 A. Correct

5 Q. And Mr. Agalarov in those calls described  
6 the meeting as related to the Magnitsky Act?

7 A. Yes.

8 Q. Did he also send you any documents?

9 A. He did send me a synopsis.

10 Q. And that's the shorter version of --

11 A. Yeah.

12 Q. Which roughly corresponds to the 11-page  
13 version from Ms. Veselnitskaya?

14 A. Correct.

15 Q. Is that the document that you haven't  
16 been able to find?

17 A. Yes. That's the document.

18 Q. Did you ever express your opinion that  
19 having a meeting might be a bad idea to Mr.  
20 Agalarov?

21 A. I didn't say it was bad idea, but I kept  
22 saying the attorneys.

23 Q. And did he --

24 A. The meeting should be with attorneys.

25 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.

1 MR. KAVELADZE: 10:23 --

2 BY MR. PRIVOR:

3 Q. Oh, no. I'm sorry. It's actually in the  
4 image itself. Maybe it doesn't come through on  
5 your copy of it.

6 A. Okay. 10:29 --

7 MR. BALBER: 10:33?

8 MR. PRIVOR: No, it's actually in the image  
9 itself. I'm not sure --

10 MR. BALBER: I'm not seeing it.

11 MR. PRIVOR: It's so faint in mine. We'll  
12 go ahead.

13 BY MR. PRIVOR:

14 Q. "We may need to speed this up," is that  
15 the --

16 A. Speed up. "We already in Edinburgh and  
17 the person from PM is flying there as well."

18 Q. Do you know what this is talking about?

19 A. I have no idea what he's talking about.

20 Q. Do you know what the reference to -- I  
21 think you said Edinburgh?

22 A. Edinburgh. I have no idea. We never  
23 dealt with Edinburgh.

24 Q. And how about "person from" -- he said  
25 "PM"? Is that the initials, PM?

1 A. PM, yeah.

2 Q. Do you have any idea what that refers to?

3 A. I have no idea who Mr. PM is.

4 Let me see. Is this -- I thought it was  
5 some kind of a joke because they have pictures of  
6 Trump and Putin. Is that a part of that message?

7 MR. BALBER: And I think you characterized  
8 it as the "message." I think that's like a  
9 screenshot that's been imposed on there, so --

10 MR. PRIVOR: So the whole thing is a  
11 screenshot?

12 MR. KAVELADZE: I have no idea what this is  
13 about.

14 MR. BALBER: That's my recollection, having  
15 seen a different format, but go ahead. I'm not  
16 stating that for purposes --

17 MR. PRIVOR: I couldn't make heads or tails  
18 of it.

19 MR. BALBER: That's what I think it is,  
20 but...

21 BY MR. PRIVOR:

22 Q. Okay. So let's go to the next page,  
23 which is Bates page 323, Emin to you at -- I'm  
24 sorry, 324. Emin to you on June 30th, he asks,  
25 "Is this Don Jr.'s lawyer?" And you respond, same

1 time, 2100 hours, "I'm on the phone with him ow."

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?

1 A. He reached out to me.

2 Q. Okay. And do you know why he reached out  
3 to you?

4 A. He wanted to interview me in regards to  
5 the June 9 meeting and understand what was my  
6 recollection of that meeting.

7 MR. PRIVOR: I'm going to show you our next  
8 exhibit, which is 18.

9 [Kaveladze Exhibit 18 was marked for  
10 identification.]

11 BY MR. PRIVOR:

12 Q. This is a single page, Bates number SJC-  
13 KAV-00047. It's a June 30th email from Emin to  
14 you. Subject is "Forwarding introduction." Does  
15 this refresh your recollection as to the timing of  
16 -- I'm sorry. This is Emin's call.

17 A. He reached out earlier than that. That's  
18 Emin's --

19 Q. Okay.

20 MR. BALBER: To you.

21 MR. KAVELADZE: To me.

22 BY MR. PRIVOR:

23 Q. Okay. So he had a call with Emin on June  
24 30th. He had a call with you sometime before  
25 that.

1 A. Sometime in June.

2 Q. Was it, do you recall, a matter of days?

3 Was it a week or two?

4 A. I'm not very good with dates, so, no,

5 I...

6 Q. Okay. It sounds like based on the text  
7 messages we were just looking at that Emin said he  
8 was on the phone with Mr. Futerfas. What did he  
9 tell you -- did he tell you anything about that  
10 conversation he had with Mr. Futerfas?

11 A. Yes, he did.

12 Q. What did he tell you?

13 A. He asked me -- he told me that Mr.  
14 Futerfas was asking questions about that meeting,  
15 and he told him things he knew. That's it.

16 Q. Did he specify what it was he knew?

17 A. No, he didn't.

18 Q. And you had a telephone call -- was it by  
19 telephone, your conversation with Mr. Futerfas?

20 A. Correct.

21 Q. Okay. And your call with Mr. Futerfas,  
22 tell us what you remember from that call. Did he  
23 call you or did you call him?

24 A. I mean, he called me first. Maybe I call  
25 him back at some point because he was not able to



1 reach me and left a message. That call was about  
2 my recollection of what happened during the  
3 meeting, and I filled him in. I told him what I  
4 remembered.

5 Q. And do you recall specifically what you  
6 had told him?

7 A. A shorter version, much shorter version  
8 of whatever I told to you: basically that the  
9 meeting was about Magnitsky Act, yes, they did  
10 mention adoptions, and they also were discussing  
11 the electoral campaign -- not electoral campaign  
12 but that funding thing, Democratic Party thing.

13 Q. You'll recall from this morning both Mr.  
14 Davis and I had asked you a number of questions  
15 about other things. We asked did they also talk  
16 about a list of other things. I asked you, for  
17 instance, did they talk about hacking? Was there  
18 any discussions about emails?

19 A. No, no, no.

20 Q. Did you tell Mr. Futerfas anything about  
21 the meeting that is different from what you have  
22 described to us already?

23 A. No.

24 Q. So you didn't tell Mr. Futerfas about any  
25 conversations about hacking?

1           A. Why would I? I knew nothing about  
2 hacking.

3           Q. Was there any discussion about accessing  
4 emails?

5           A. No.

6           Q. Or voter records?

7           A. No.

8           Q. Or targeting voters?

9           A. No.

10          Q. How about the use of Russian Facebook,  
11 VK?

12          A. No.

13          Q. If you look back at the text messages  
14 that are still in front of you, Exhibit 11 at page  
15 324, you can see on June 30th, 21:04, you are  
16 replying to Emin, and you say, "I have spoken with  
17 him 3 days ago," seeming to refer to Don, Jr.'s  
18 lawyer.

19          A. Uh-huh.

20          Q. Does that refresh your recollection as to  
21 the timing of when you spoke to Mr. Futerfas?

22          A. My last conversation with Mr. Futerfas,  
23 yeah.

24          Q. Was 3 days ago, meaning --

25          A. Well --

1 Q. -- June 27th. Had you had a conversation  
2 with Mr. Futerfas before then?

3 A. Yeah, I had two conversations. One was  
4 my recollection. The second one, he called me and  
5 he read to me what he wrote based on my  
6 recollection, and I kind of confirmed.

7 Q. Do you recall when that second  
8 conversation took place?

9 A. I don't, but judging from that email, it  
10 happened 3 days prior to 6/30, so 6/27.

11 Q. Sometime in early July?

12 A. No.

13 MR. BALBER: I think you've got it  
14 backwards.

15 MR. PRIVOR: I'm sorry.

16 MR. KAVELADZE: End of June.

17 BY MR. PRIVOR:

18 Q. Sometime in the end of June you spoke to  
19 him about his statement?

20 A. Well, the conversation took place about 3  
21 days ago at 6/30, so if it was 3 days ago, that's  
22 6/27.

23 Q. Okay. So --

24 A. June 27.

25 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  
6 27th?

7 A. Yes.

8 Q. And I'm sorry for my confusion. Tell me  
9 the first conversation. So that's sometime before  
10 June 27th by a few days.

11 A. Yeah. Yes, first conversation was my  
12 recollection of the event.

13 Q. Okay.

14 A. Second conversation, he read to me what  
15 he wrote down based on my recollection, and I had  
16 to kind of approve it, if that's what I -- if his  
17 understanding of my recollection was correct, and  
18 I okayed it.

19 Q. And that was a description of the June  
20 9th meeting?

21 A. That is correct.

22 Q. Did he ever send you a document with that  
23 statement, or did he only read it to you over the  
24 telephone?

25 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

1 suggested him to call my attorney and not call me.

2 I said, "I'm in the air and I can't talk. Please  
3 contact my attorney."

4 [Kaveladze Exhibit 19 was marked for  
5 identification.]

6 BY MR. PRIVOR:

7 Q. I'm going to hand you Exhibit No. 19.

8 This is SJC-KAV-0093.

9 A. Yeah, what -- yes, that's, "Can you give  
10 me a call?" Yeah.

11 Q. This is an email from Alan Futerfas to  
12 you dated July 7, 2017, re: "Can you give me a  
13 call?" with a telephone number. And it appears  
14 that he asked to speak with you and you replied --

15 A. "Just saw your message. Tried to call."

16 Q. Yeah, and he said, "I will call you back  
17 shortly." So do you recall a conversation taking  
18 place on July 7th?

19 A. I do not. That's the problem. I do not.

20 Q. Okay. So do you think that the two  
21 conversations that you've already described, is it  
22 pretty firm in your mind that those two  
23 conversations with Mr. Futerfas took place June  
24 27th and earlier?

25 A. Yes.

1 Q. And so this July 7th call that's  
2 referenced here is something else?

3 A. Yeah.

4 MR. BALBER: Or it didn't happen. Is that  
5 possible as well?

6 MR. KAVELADZE: I was not too excited to  
7 talk to him, and at some point I just referred him  
8 to you. Did it happen? I don't remember.

9 BY MR. PRIVOR:

10 Q. Did Mr. Futerfas ever discuss with you  
11 the possibility that the fact of the June 9th  
12 meeting would be reported publicly, like in the  
13 media?

14 A. Yes, he did.

15 Q. What did he say about that?

16 A. He said, "We're not releasing it, but  
17 there might be leaks."

18 Q. And did he refer to any particular media,  
19 any newspaper, any television?

20 A. I don't recall it. I don't remember.

21 Q. You stated that in your conversation with  
22 him June 27th that he read a statement to you. Do  
23 you know what the purpose of that statement was?

24 A. I have no idea.

25 Q. Did you ever ask him?

1           A. Well, I didn't because he kind of was  
2 sent to me by Rob Goldstone, and Rob Goldstone  
3 went through the same procedure, and so I thought  
4 it was a procedure.

5           Q. A procedure for what?

6           A. Trump Jr.'s attorneys trying to get my  
7 recollection of events of the meeting -- event of  
8 the meeting, and so --

9           Q. But did you have any understanding of  
10 what he was going to do with this statement? Was  
11 he going to disseminate it in some way?

12          A. Well, he claimed he wouldn't disseminate  
13 it. He claimed it for internal use.

14          Q. Was it set up as like a declaration of  
15 some sort?

16          A. Yeah, quick -- it was very --

17          Q. I use "declaration" as a technical term.  
18 Was it like a witness statement? Did he ever ask  
19 you to sign something, like, "Yes, these are my  
20 words"?

21          A. I don't think I ever signed anything, no.  
22 Just said okay over the phone.

23 [Kaveladze Exhibit 20 was marked for  
24   identification.]

25 BY MR. PRIVOR:



1 Q. I'm going to show you our next exhibit,  
2 No. 20. This is SJC-KAV-00157. It's a one-page  
3 document. It's an email from Rob Goldstone to  
4 [REDACTED] and Ike. Subject is "Washington Post".  
5 Do you recognize this document?

6 A. Was I copied on this document? Oh, yeah,  
7 I did.

8 [Pause.]

9 MR. KAVELADZE: I remember that email.

10 BY MR. PRIVOR:

11 Q. Okay. So I want to take you through some  
12 of the things that Mr. Goldstone notes in his  
13 email. He's talking about a Washington Post  
14 report. He said the Washington Post and the New  
15 York Times. "Washington Post was the most pushy  
16 and keen to hang this on you, Emin."

17 A. Emin?

18 Q. Do you see that?

19 A. Yes, "are keen to hang on you, Emin."

20 Okay.

21 Q. Do you know what was meant by that?

22 A. No.

23 Q. Do you take that to mean that the  
24 reporter was making a story to blame Emin in some  
25 way for the June 9th meeting?

1           A. I'd like to see that article to make that  
2 statement.

3           MR. O'DONNELL: Just give your  
4 interpretation based on the email you received.

5           MR. BALBER: Do you know what Rob Goldstone  
6 meant when he said it?

7           MR. KAVELADZE: No.

8           MR. BALBER: Okay. At the time I didn't  
9 read the article.

10 BY MR. PRIVOR:

11           Q. Mr. Goldstone then says, "I tried to  
12 assure her" -- presumably that's the reporter --  
13 "that I had been the one requesting Don meet with  
14 her and would not comment on who originated the  
15 request in Moscow." So it sounds like Mr.  
16 Goldstone told the reporter that he was the one  
17 who originated the meeting. Is that your  
18 understanding of how the meeting originated?

19           A. No.

20           Q. What is your understanding of how it  
21 originated?

22           A. Mr. Aras Agalarov originated the meeting.

23           Q. And he said he would not comment on who  
24 originated the request in Moscow, so it sounds  
25 like Mr. Goldstone didn't want to reveal that

1 there was a Russian source behind it?

2 A. Yeah, I guess so.

3 Q. Do you know why? Was there an effort to  
4 hide the fact that somebody from Russia had  
5 originated the request?

6 A. Certainly not my effort, so I don't know  
7 what he meant. I was not hiding it.

8 Q. Did the Agalarovs make any effort, to  
9 your knowledge, to hide their connection to the  
10 June 9th meeting?

11 A. Actually, it was opposite. They told me  
12 that they're not hiding the fact that they  
13 organized the meeting.

14 Q. He says, "Should we prepare a statement?"  
15 Do you know if a statement was ever prepared?

16 A. I don't believe we prepared any joint  
17 statement, or any statement to that matter.

18 Q. The next paragraph, "Trump lawyers are  
19 also in a statement apparently saying the reason  
20 for the meeting was 'misrepresented' by us and  
21 that her agenda was Magnitsky Act and adoption."

22 Do you agree with that statement, that  
23 the Trump lawyers apparently saying the reason was  
24 misrepresented?

25 A. I'm not one of the Trump lawyers, so I

1 cannot make assessments like that.

2 Q. Do you believe that the Trump lawyers had  
3 misrepresented the meeting in any way?

4 A. No, I don't know. I don't know how to  
5 answer this question. It's just -- I can only  
6 share my beliefs and my vision, so --

7 MR. BALBER: Just answer the questions. No  
8 sharing beliefs or visions.

9 MR. KAVELADZE: No.

10 BY MR. PRIVOR:

11 Q. Had you seen any statements by the Trump  
12 lawyers about the meeting?

13 A. I haven't seen but I heard my statement,  
14 and statement was about the meeting.

15 Q. Okay.

16 A. It was very accurately describing what  
17 happened during the meeting.

18 Q. Mr. Futerfas, you said, on or about June  
19 27th had read a statement to you over the  
20 telephone. Do you believe that that statement was  
21 accurate?

22 A. Yes.

23 Q. Was there anything about it that was  
24 inaccurate other than you asked for a correction  
25 of the name, your name?

1           A. It was maybe not as detailed as the full  
2 statement because it was like two paragraphs as  
3 opposed to four pages. So --

4           Q. Do you feel that -- I'm sorry.

5           A. So some information was missing, but  
6 whatever was there was accurate.

7           Q. What did you feel was missing from that  
8 original statement?

9           A. History of Bill Browder, financial  
10 machinations of Bill Browder, the story about Ziff  
11 Brothers funding Democratic Party. A lot of  
12 things were missing from that thing. It was a  
13 two-paragraph thing.

14          Q. Were there any topics that were not  
15 covered in the statement that --

16          A. We --

17          MR. BALBER: Let him finish.

18          Q. -- took place at the meeting that we  
19 haven't discussed already?

20          MR. BALBER: Sorry. Were there any topics  
21 in the thing that was read to him by Futerfas that  
22 was not discussed in the meeting?

23 BY MR. PRIVOR:

24          Q. Were there any topics excluded from  
25 Futerfas' statement that are topics that we have

1 already discussed as having been excluded? So,  
2 for example, email hacking?

3 A. No.

4 Q. Tampering with voter rolls and the like?

5 A. No, nothing like that.

6 Q. Nothing like that?

7 A. No.

8 Q. The last line of Mr. Goldstone's email on  
9 Exhibit 20 says, "The FBI may be investigating  
10 this meeting further. Thoughts?" At this time,  
11 July 9th, had you been contacted by the FBI?

12 A. No, I was not.

13 Q. Did you ask him about the FBI? Did you  
14 ask Mr. Goldstone about the FBI investigating?

15 A. No.

16 Q. Had Mr. Futerfas mentioned to you  
17 anything about the FBI possibly investigating?

18 A. No.

19 Q. At any time in any conversation with Mr.  
20 Futerfas, had you discussed with him the  
21 possibility of the FBI investigating the June 9th  
22 meeting?

23 A. I don't believe so.

24 [Kaveladze Exhibit 21 marked for identification.]

25 Q. I'll show you our next exhibit, 21. This

1 is a single-page document, SJC-KAV-00127, Rob  
2 Goldstone to Emin, cc'd to Ike, subject, "Re:  
3 statement." And this document appears to be a  
4 response to the one we were just looking at,  
5 Exhibit 20.

6           You can see in the first paragraph Rob  
7 Goldstone asks, "What about this as a statement?  
8 Suggesting it should come from either Aras, you,  
9 or me, or maybe from the Crocus Group as a whole."  
10 Do you recall him sending that statement to you?

11           A. Yes.

12           Q. And did you ever comment on that  
13 statement?

14           A. I don't believe so.

15           Q. When you saw this, did you believe it to  
16 be an accurate statement with respect to the June  
17 9th meeting?

18           A. Yeah. It was accurate statement.

19           Q. So he states here that, "This was a  
20 personal request by us." Do you know who the "us"  
21 was that he was referring to?

22           A. Aras, Emin.

23           Q. And he says, "It's in no way connected  
24 with the Russian Government or any of its  
25 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 [REDACTED] 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



1 accurate.

2 MR. PRIVOR: Fair enough.

3 BY MR. PRIVOR:

4 Q. This statement, does this accurately  
5 reflect your understanding of the June 9th  
6 meeting?

7 A. Pretty close.

8 Q. And in what way does it deviate from your  
9 understanding, when you said "pretty close"?

10 A. They did mention this situation with  
11 funding Democratic campaign, and I don't see it  
12 here. And there was also response from Donald  
13 Trump, Jr., that Ziff Brothers fund everybody,  
14 Democrats and Republicans.

15 Q. So would you characterize this statement  
16 as being a complete description, or is it missing  
17 --

18 A. It's a pretty accurate statement. I  
19 mean, like I said, you cannot fit a 45- or 40-  
20 minute meeting into one paragraph, so that's  
21 obviously missing something. But, overall, that's  
22 accurate statement.

23 MR. BALBER: I just want to caution you.  
24 You obviously don't know what Don was or was not  
25 told about Ms. Veselnitskaya's name, right? You

1 have no way of knowing that.

2 MR. KAVELADZE: No.

3 MR. BALBER: And you also, I think it's fair  
4 to say, have no way of knowing what Trump, Jr.'s  
5 statements Goldstone is referring to such that he  
6 can say they're 100 percent accurate or you can  
7 endorse that one way or the other?

8 MR. KAVELADZE: No.

9 MR. BALBER: Okay.

10 MR. KAVELADZE: I mean, the gentleman asked  
11 about the actual meeting, content of the meeting.

12 MR. BALBER: I just wanted to make sure.

13 MR. KAVELADZE: I would characterize it  
14 pretty accurate.

15 MR. O'DONNELL: And that's the sentence that  
16 begins with, "Ms. Veselnitskaya" --

17 MR. KAVELADZE: "Veselnitskaya mostly talked  
18 about Magnitsky Act," yeah. Yeah, that's it.

19 MR. O'DONNELL: And then with respect to  
20 follow-up, you can only talk about any follow-up  
21 that you would have been involved with.

22 MR. KAVELADZE: Exactly.

23 MR. O'DONNELL: And as far as you're  
24 concerned, there was never any follow-up that you  
25 were involved with other than the November --

1 MR. KAVELADZE: November meeting.

2 MR. O'DONNELL: -- issues we've discussed,  
3 and nothing ever came of it.

4 MR. KAVELADZE: Correct.

5 BY MR. PRIVOR:

6 Q. Can I point you to Exhibit 11 again,  
7 which is the long series of text messages, and  
8 particularly Bates page 325. And you'll see in  
9 English on July 10, 2017, at 15:23, an unknown  
10 sender sent you texts concerning what appears to  
11 be a description of the June 9th meeting. Do you  
12 know who the sender is of that message?

13 A. Let me see the message.

14 [Pause.]

15 MR. KAVELADZE: I can only guess. As far as  
16 knowledge, no.

17 BY MR. PRIVOR:

18 Q. You'll see six lines down, at the meeting  
19 the Russian -- I'm sorry, five lines down, "I  
20 reached out to Donald Trump, Jr., and he agreed to  
21 squeeze us into a very tight meeting schedule."  
22 Do you know if anybody reached out to Donald  
23 Trump, Jr., other than Rob Goldstone?

24 A. No. That's Rob Goldstone's statement.

25 Q. Okay.

1 A. Definitely.

2 Q. "...and he agreed to squeeze us into a  
3 very tight meeting schedule." Do you know where  
4 that comes from?

5 A. I have no idea.

6 Q. Did Rob Goldstone ever suggest there was  
7 an effort to squeeze somebody into a very tight  
8 meeting schedule?

9 A. No.

10 Q. Do you know if there was a time  
11 constraint on the meeting?

12 A. I have no idea.

13 Q. In your conversations with Mr. Futerfas,  
14 did he ever ask you to contact him if you were to  
15 be contacted by the press?

16 A. I don't believe so.

17 Q. Did you ever reach out to him to let him  
18 know that you had been contacted by the press?

19 A. No. I had my own attorney. I think from  
20 the very beginning, my attorney has been handling  
21 all contacts with press.

22 Q. Did you have any response to that  
23 statement that appears to be Mr. Goldstone's  
24 statement sent to you from an unknown sender? Do  
25 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  
5 with anyone other than your lawyers sitting here?

6 A. No.

7 Q. Okay. I think we will go off the record.

8 It's 3:11.

9 [Recess at 3:11 p.m. to 3:12.]

10 MR. FOSTER: Okay. We'll go back on the  
11 record at 3:12. I just have a very few follow-up  
12 questions, just a couple minutes.

13 FURTHER EXAMINATION BY  
14 COUNSEL FOR THE MAJORITY

15 BY MR. FOSTER:

16 Q. First of all, other than your attorneys,  
17 have you spoken with anyone else about your  
18 appearance here today?

19 A. I spoke with FM 5, I mean, that there  
20 is an appearance. FM 2-4 know I'm in D.C. They  
21 don't know where exactly am I. And I think a week  
22 ago I mentioned to Mr. Agalarov I will be  
23 traveling to D.C.

24 Q. And did you have any substantive  
25 conversation with him about what you would be

1 saying to us here today?

2 A. No. He would never ask those questions.

3 Q. So anyone else, did you have any  
4 substantive -- any conversation with anyone else  
5 about the substance of what you would be  
6 testifying to today?

7 A. No. No, substance, no. There was also a  
8 call from Mr. Agalarov, but we had to hang up  
9 because we were walking into a meeting, and so,  
10 no, no substance conversation.

11 Q. Okay. So I believe in response to a  
12 question from Mr. Privor, you said that it was not  
13 your understanding at the time of the meeting that  
14 the purpose was for the benefit of the Russian  
15 Government, or something to that effect.

16 A. No, I didn't have that understanding.

17 Q. Is it currently your understanding that  
18 the purpose of the meeting was for the Russian  
19 Government?

20 A. No.

21 Q. Could you take a look at Exhibit 21? So  
22 the statement that's suggested there, "The meeting  
23 that took place in June 2016 between Ms. XXX and  
24 the representatives of the Trump campaign was the  
25 result of a personal request by us and was in no

1 way connected to the Russian Government or any of  
2 its officials."

3 A. Uh-huh.

4 Q. And that's currently your understanding?  
5 Based on everything you know, you believe that's  
6 a true statement today?

7 A. Yes.

8 Q. Earlier in the interview when I was  
9 questioning you and you were talking about the  
10 meeting in Trump Tower, you described Mr.  
11 Akhmetshin and his statement during that meeting  
12 that the Russian Government would change its  
13 adoption policy if the Magnitsky Act were  
14 repealed. Do you recall that description of --

15 A. Yes.

16 Q. And when you first described that to us,  
17 you said something to the effect of -- you used  
18 the word "we." You said, "We would repeal the  
19 adoption ban." Do you recall that?

20 A. Yeah. "We" was incorrect choice of words  
21 because Mr. Akhmetshin is certainly not a part of  
22 Russian Government.

23 Q. Okay. And I remember following up and I  
24 asked you at the time --

25 A. Yeah, and I corrected myself.



1 Q. -- did he say the word "we," and you said  
2 no.

3 A. No.

4 Q. So why did you use the word "we" at that  
5 point?

6 A. I have no idea. What -- it's basically -  
7 - that adoption ban was brought into the picture  
8 right after the Magnitsky law, and Russian public  
9 believed that it was in response to Magnitsky law.  
10 And there's a belief that if Congress repeals  
11 Magnitsky law, then adoption law would be repealed  
12 -- I mean, the restriction would be repealed, too.

13 As far as "we," it is the wrong choice of  
14 words. I didn't mean me, we, or something. We  
15 Russians, maybe that's what I meant. I mean,  
16 just...

17 Q. Because you're a dual citizen of both  
18 countries?

19 A. Yeah -- well --

20 MR. BALBER: I think what he said was that  
21 Rinat used the word "we" in the first instance,  
22 and he corrected that. I don't think he ever put  
23 himself in the "we" category.

24 MR. KAVELADZE: Yeah.

25 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.

1           MR. FOSTER: Well, I don't have any further  
2 questions, so we can -- do you want some time to  
3 confer?

4           MR. KAVELADZE: Well, just quickly.

5           MR. FOSTER: We'll go off the record.

6           [Recess at 3:18 p.m. to 3:24 p.m.]

7           MR. PRIVOR: We're back on. It's 3:24 p.m.

8                           FURTHER EXAMINATION BY  
9                           COUNSEL FOR THE MINORITY

10 BY MR. PRIVOR:

11           Q. Mr. Kaveladze, thank you for your time  
12 this afternoon. We just have a couple finishing  
13 questions. Just before the break, my colleague  
14 Mr. Foster had asked you if you believed there was  
15 any connection to the Russian Government for this  
16 June 9th meeting, and you said you didn't believe  
17 so?

18           A. I didn't believe so.

19           Q. Do you know whether Ms. Veselnitskaya has  
20 any connection to the Russian Government?

21           A. I think she's private attorney.

22           Q. You've stated that you don't know her  
23 very well.

24           A. Yeah.

25           Q. And you didn't know her before you heard

1 her name --

2 A. Correct.

3 Q. -- on June 6th. And do you now know her  
4 very well to know what her connections are, if  
5 any, to the Russian Government?

6 A. I've read articles in the media. That's  
7 my only source of information.

8 Q. You don't have any personal knowledge  
9 about her connections?

10 A. Well, there were some text messages from  
11 Natalia and, again, after the meeting, where she  
12 would use the abbreviation "GP", which made me  
13 think it's the Prosecutor General's office.

14 Q. Do you know if she has any connections to  
15 Mr. Chaika, the --

16 A. I have no idea.

17 Q. He's the equivalent of the Attorney  
18 General in Russia.

19 A. Yes. I have no idea if she has  
20 connections with Chaika.

21 [Kaveladze Exhibit 23 was marked for  
22 identification.]

23 Q. I wanted to show you one additional  
24 document which has been marked as Exhibit No. 23.  
25 This is a two-page document, SJC-KAV-00032

1 through 33. It's an email from [REDACTED] FM 2  
2 to you, subject "DTJR", dated July 11, 2017. And  
3 it is a one-page email with a one-page attachment.  
4 Have you seen this email before?

5 A. Yes.

6 Q. Do you recognize it?

7 A. Yes. It's an email from [REDACTED] FM 2 .

8 Q. Okay. And he asks, one sentence in the  
9 email, he says, "Why did he release this email  
10 admitting to collusion?" And then the attachment  
11 appears to be an email from Donald -- that Donald  
12 Trump, Jr., exchanged with Rob Goldstone. And  
13 this is the email that we had shown you earlier in  
14 the day, or at least an excerpt from it --

15 A. Yes.

16 Q. -- as an exhibit. Do you know what [REDACTED] FM 2  
17 [REDACTED] had in mind when he said, "Why did he release  
18 this email admitting to collusion?"

19 A. [REDACTED] FM 2 was watching television, and when  
20 the email was released, there were discussions  
21 about collusion. I guess that's what he meant.

22 Q. Had you had any conversations with [REDACTED] FM 2  
23 [REDACTED] about collusion?

24 A. No.

25 Q. Is that a word that you had used?

1 A. I have never used that word.

2 Q. In any context?

3 A. Honestly, no. I mean, I used it now, but  
4 that's not something I'm using.

5 Q. If you look at the second page of this  
6 exhibit, it appears -- hopefully it came through  
7 on your copy. It appears that there's  
8 highlighting on the line a little more than  
9 halfway down. "This is obviously very high level  
10 and sensitive information, but it is part of  
11 Russia and its government's support..." Do you  
12 see that?

13 A. I do.

14 Q. Does the highlighting show through to you  
15 as well?

16 [Witness nodding head.]

17 Q. Do you know who put the highlighting  
18 there?

19 A. I have no idea.

20 Q. Was that FM 2, do you know?

21 A. I have no idea. Honestly, I didn't even  
22 pay attention. I saw it was about that thing. I  
23 didn't pay attention. I didn't read it. I just  
24 saw the email.

25 Q. Did you put the highlighting there?

1 A. No. No, I didn't.

2 Q. Do you know who Michael Cohen is?

3 A. I do not know.

4 Q. Do you know who Felix Sater is?

5 A. From papers.

6 Q. Do you know him personally?

7 A. No.

8 Q. Do you have any business relationship  
9 with him?

10 A. No.

11 Q. Do you know if the Crocus Group has a  
12 business relationship with him?

13 A. I do not believe we have any relationship  
14 with Felix Sater.

15 Q. One last question for you. It's sort of  
16 a general observation about a number of the email  
17 exhibits in particular. We've noticed that the  
18 time stamps on the exhibits seem to shift around  
19 quite a bit, like emails that are responses have  
20 dates or times that are before the message  
21 inquiring. Do you know why that occurred with  
22 this production?

23 A. I have no idea.

24 Q. Do you know, just as a general matter --  
25 I hate to make an accusation, but I have to ask

1 it: Do you know whether the documents were  
2 produced to us as they're kept in their ordinary  
3 course of business with you?

4 MR. BALBER: I can attest to the fact that  
5 they were.

6 BY MR. PRIVOR:

7 Q. And can you confirm that the documents  
8 haven't been altered in any way from their  
9 original state?

10 A. Yes, I can confirm that.

11 MR. PRIVOR: Okay. Very well. We  
12 appreciate your time and counsel's time --

13 MS. SAWYER: One quick question.

14 BY MS. SAWYER:

15 Q. Just on the document that my colleague  
16 was just showing you, did you ever then talk about  
17 that with FM 2 after he sent you that email?

18 A. I did.

19 Q. And what did you discuss with him?

20 A. I told him that at this stage  
21 transparency is important step for that. It's  
22 important to be transparent.

23 Q. And what did you mean by that?

24 A. I kind of like the idea that Mr. Trump,  
25 Jr., has released the email and that it's



1 important for Mr. Trump to be transparent.

2 Q. And had anyone discussed that with you  
3 before it happened, the release of the email?

4 A. No. Before those emails --

5 MR. O'DONNELL: Did you know if the email  
6 was going to be released before it was released?

7 MR. KAVELADZE: No. I never knew about  
8 existence of that email.

9 MR. PRIVOR: Okay. I have no further  
10 questions. Thank you for your time today and  
11 counsel's time.

12 It's 3:30. We'll go off the record.  
13 [Whereupon the proceedings were adjourned at 3:30  
14 p.m.]

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1 ERRATA SHEET  
2 SENATE JUDICIARY COMMITTEE  
3 INTERVIEW OF: IRAKLY "IKE" KAVELADZE  
4

PAGE LINE

- 5 1 CHANGE: "IRAKLY "IKE" KAVELADZE" to "IKE THOMAS KAVELADZE"  
6 REASON: Reflect witnesses legal name  
7  
8 16 5 CHANGE: "No, I am not aware" to "Yes"  
9 REASON: ~~to correct~~ Mr. Kaveladze was recalled a conversation since testifying  
10 28 16 CHANGE: "we" to "I"  
11 REASON: CLARIFY  
12 34 12 CHANGE: "home" to "Russia"  
13 REASON: Per request, Mr. Kaveladze reviewed travel records  
14 51 24 CHANGE: "Palotay Plaza" to "Lotte Plaza"  
15 REASON: Correct Spelling  
16 80 19 CHANGE: change "we" to "I"  
17 REASON: CLARIFY  
18 90 23 CHANGE: [REDACTED]  
19 REASON: Correct Spelling  
20 159 25 CHANGE: "Los Angeles" to "Moscow"  
21 REASON: Per request, Mr. Kaveladze reviewed travel records  
22 160-62, 169 171-72 CHANGE: NOTE THAT Mr. Kaveladze traveled to Russia from June 10, 2016 through approximately July 14, 2016.  
23 REASON: Per request, Mr. Kaveladze checked his travel records.

24 Submitted by: (Signed)  Date: 2/7/2018

25 PRINT NAME: IKE KAVELADZE