

# **Attachment 2**

# Grand Jury Information

UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)

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 In re: :  
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 GRAND JURY :  
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Grand Jury No. 18-2  
United States District Court for  
the Eastern District of Virginia  
401 Courthouse Square  
Alexandria, Virginia 22314

Tuesday, June 26, 2018

The testimony of MICHAEL FLYNN was taken in the  
presence of a full quorum of Grand Jury 18-2, commencing at  
9:53 a.m., before:

James P. Gillis  
Assistant United States Attorney

Evan N. Turgeon  
Special Assistant United States Attorney

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# Grand Jury Information

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P R O C E E D I N G S

Whereupon,

MICHAEL FLYNN

was called as a witness and, after being first duly sworn by the Foreperson, or Deputy Foreperson, of the Grand Jury, was examined and testified as follows:

EXAMINATION

BY MR. TURGEON

Q Can you please tell us your name?

A Michael Flynn.

Q Are you a retired U.S. military officer?

A Yes.

Q What branch did you serve in?

A Army.

Q At what position did you retire from the Army?

A I was a lieutenant general and director of the Defense Intelligence Agency.

Q What is the Flynn Intel Group?

A It's a consulting advisory group.

Q Was the Flynn Intel Group also known as FIG, spelled F-I-G?

A Yes.

Q Who were the people who played the most active part of the business of FIG?

A Myself, Bijan Kian. There were others but those

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1 were principally the two people that played the most active  
2 role.

3 Q Is Bijan Kian also known or does he also go by  
4 the name Bijan Rafiekian?

5 A Yes.

6 Q What was your role position with FIG?

7 A I was the CEO.

8 Q Was Mr. Rafiekian also an officer of FIG?

9 A He was. He was the vice chairman and held a  
10 couple of other roles.

11 Q Are you aware of a project concerning Turkey that  
12 FIG performed during the summer and fall of 2016?

13 A Yes.

14 Q How did you first become aware of that project?

15 A Bijan came to me and mentioned that he had an  
16 associate that he knew that was interested in using our  
17 company to support a project.

18 Q Who was that associate?

19 A It was a gentleman by the name of Ekim Alptekin.

20 Q Who is Ekim Alptekin?

21 A Ekim is a person I came to know through Bijan.  
22 He is a Turkish member of the Turkish-American Business  
23 Council. And I mean, you know -- I mean, he's got some  
24 other background but that's pretty much my knowledge of  
25 him.

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1 Q What stage was the project at when Mr. Rafiekian  
2 approached you about it?

3 A It was at the, like, stage zero. I mean,  
4 basically it was initial.

5 Q During that conversation with Mr. Rafiekian, did  
6 Mr. Rafiekian tell you he had already spoken to someone  
7 about the project?

8 A Bijan had mentioned that he had spoken with Ekim.

9 Q Before the project what relationship if any did  
10 Mr. Rafiekian have with Mr. Alptekin?

11 A I understood that they had a relationship through  
12 a commission, the Nalruse Commission, that Bijan is part  
13 of. And I believe that they knew each other from other  
14 just previous interaction, but I principally believe that's  
15 where they knew each other.

16 Q Are you aware of Mr. Rafiekian communicating with  
17 Mr. Alptekin about the project?

18 A Yes.

19 Q How do you know those conversations took place?

20 A Bijan related to me that he had been engaged or  
21 speaking with Ekim about this, you know, like I said, the  
22 initial stages and had spoken to him at least a couple of  
23 times about it.

24 Q From the beginning of the project what was your  
25 understanding about on whose behalf the work was going to

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1 be performed?

2 A I think at the -- from the beginning it was  
3 always on behalf of elements within the Turkish government.

4 Q Would it fair to say that the project was going  
5 to be principally for the benefit of the government of  
6 Turkey or high-ranking Turkish officials?

7 A Yes, yeah.

8 Q Where did you get that understanding?

9 A From conversations I had with Bijan and just  
10 various email engagements that we had had early on about  
11 whether or not we were going to do this thing.

12 Q Were Turkish officials involved with the project?

13 A They were. They definitely were aware of it and  
14 they had acknowledged, or we were told that they had  
15 acknowledged that we were involved. So I guess, I mean you  
16 could in terms of rephrasing the question or whatever, but  
17 I -- they were definitely aware of the project. I mean,  
18 you know, you asked that they were directly involved but --

19 Q So do you know who the Turkish government  
20 officials were who were involved in the project?

21 A I met two eventually and I saw names on various  
22 emails that Bijan or Ekim had sent.

23 Q Who were the two that you met?

24 A I met the Minister of Foreign Affairs and I met  
25 -- and I don't know exactly what his ministry was, but he

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1 was the son in law of Erdogan, the president.

2 Q Did he hold a ministry-level position in the  
3 Turkish government?

4 A I believe he did. Yeah, I believe he did. I  
5 believe he did.

6 Q Do you know whether Mr. Alptekin had any  
7 relationship with those Turkish officials?

8 A I believe that he did, just based on information  
9 that Bijan had provided me as well as just emails that I  
10 had seen about his engagement with senior government  
11 officials in Turkey.

12 Q In connection with the project did Mr. Alptekin  
13 have any role in interacting with these Turkish government  
14 officials?

15 A Yes, he did.

16 Q How do you know that?

17 A Again from same sort of a -- the various  
18 interactions, his feedback to us. And some of it was  
19 relayed to me via Bijan, others were, you know, emails that  
20 I saw where he had been -- he had just recently spoken to  
21 or met with senior government officials, you know, about  
22 this project.

23 MR. TURGEON: Would you and Mr. Alptekin --

24 BY MR. GILLIS:

25 Q Sorry. And what was it that he would relate in

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1 connection with these discussions with Turkish officials?

2 A Yeah. Their awareness, their acknowledgement  
3 that we were engaged, that we were involved with this, that  
4 we were looking at conducting the project. I would even  
5 say at least at that point they seemed satisfied.

6 BY MR. TURGEON:

7 Q Would you and Mr. Alptekin have regular calls  
8 about the project?

9 A We set up conference calls with our group and Mr.  
10 Alptekin.

11 Q What was the purpose of those calls?

12 A They were basically for us to provide updates to  
13 him, where we were, various aspects of things that we were  
14 doing on behalf of the project, and also he would give us  
15 feedback.

16 Q What sort of feedback did Mr. Alptekin provide?

17 A Based on what he had, you know, what was going  
18 on, his feedback was acknowledging where we were at but  
19 also providing us insight into, you know, the sense of the  
20 senior officials of the Turkish government, how they viewed  
21 it and how things were going.

22 Q So you did mention you did discuss Turkish  
23 government officials --

24 A Yeah. Oh, yeah, on those --

25 Q -- on those calls?

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1           A     Yeah, there was a couple. There was, you know,  
2 three or four calls that we had over a period of probably  
3 two months.

4           Q     Was Mr. Rafiekian always a part of those calls?

5           A     Yeah. He usually set them up.

6           Q     During your initial conversation with Mr.  
7 Rafiekian about the project what did you understand the  
8 principal focus on the project to be?

9           A     The principal focus was really about, you know,  
10 sort of at the high-level it was about the relationship  
11 between the United States and the government of Turkey. It  
12 was about the climate between the two countries, kind of.  
13 We'd always talk about Gulen as sort of a sharp point, I  
14 guess if you will, between that relationship. There was  
15 some discussion about business climate as well.

16          Q     Who is Fethullah Gulen?

17          A     He is a Turkish cleric who currently lives in the  
18 United States.

19          Q     Are you aware of an attempted military coup in  
20 Turkey in the summer of 2016?

21          A     Yes.

22          Q     What history if any does the government of Turkey  
23 have with Mr. Gulen related to that attempted coup?

24          A     Well I think in that respect they, the government  
25 of Turkey, you know, put the blame on Gulen's movement

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1 inciting that coup.

2 Q Who was the president of Turkey at the time of  
3 that attempted coup?

4 A Erdogan.

5 Q Is Mr. Erdogan still the president of Turkey?

6 A He is, yep.

7 Q What was the principle focus of the work product  
8 that FIG did produce on the project?

9 A The eventual work product or products that we had  
10 come up with was really focusing on Gulen.

11 Q Was any work done on researching the state of the  
12 business climate in Turkey?

13 A Not that I'm aware of or none that I recall.

14 Q Were there any meetings held with U.S. businesses  
15 or business associations?

16 A None that I'm aware of.

17 Q Was there any work done regarding business  
18 opportunities and investment in Turkey?

19 A None that I'm aware of.

20 Q During the project did you ever hear of the  
21 country of Israel mentioned in connection with the project?

22 A I don't. I don't recall that in any of the  
23 conversations we had. I mean I, you know, it may have come  
24 up but I don't recall it.

25 BY MR. GILLIS:

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1 Q Well let's, just to be clear, General, we don't  
2 want you to guess or speculate.

3 A Yeah, no, and I really don't recall any  
4 conversations about Israel coming up.

5 BY MR. TURGEON:

6 Q During the project did you ever hear that an  
7 Israeli company would benefit from the project?

8 A I don't.

9 Q Did Mr. Rafiekian provide updates to you about  
10 the project either by email or orally?

11 A He did.

12 Q Did he ever mention to you that the project had  
13 significantly changed in any way?

14 A He did not, no. No, we pretty much stayed on the  
15 same track.

16 Q Did he ever mention to you that the principal  
17 beneficiary of the project had changed?

18 A He did not. He did not, no.

19 BY MR. GILLIS:

20 Q The principal beneficiary --

21 A Well I mean, early on there was a discussion --

22 Q Let me finish --

23 A Sorry.

24 Q Let me finish the question if you would, General.  
25 So would it be fair to say, as you testified earlier, that

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1 the principal beneficiary was the government of Turkey?

2 A Yes.

3 Q Or these high-government officials?

4 A Yeah.

5 Q Did he ever mention to you that that principal  
6 beneficiary or those principal beneficiaries had changed  
7 throughout the project?

8 A No, no.

9 BY MR. TURGEON:

10 Q How high up in the Turkish government did Mr.  
11 Alptekin have connections?

12 A I believe he had connections all the way up to  
13 the president.

14 Q And that's Mr. Erdogan?

15 A Yes.

16 Q How do you know that?

17 A My -- well the relationship, at least that I saw  
18 he had with Erdogan's son in law, so I observed that, and  
19 then I would just say in the back and forth communications  
20 that we had, that I just assumed that.

21 BY MR. GILLIS:

22 Q Is that son in law the minister that you were  
23 mentioning earlier?

24 A Yeah, yep.

25 BY MR. TURGEON:

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1 Q Who provided the initial approval for the  
2 project?

3 A In terms of what? I mean approval from like  
4 whether or not we were going to do it? Or whether or not  
5 it was going to happen? I mean, the approval really came  
6 finally from Ekim through an email, and what I recall is  
7 that he had been, you know -- he had been given the go  
8 ahead or the green light if you will, and as I remember it,  
9 it seemed like that came from the government of Turkey.

10 Q So is it fair to say that the project was taken  
11 with the understanding and involvement of Turkish  
12 government officials?

13 A Yes.

14 Q Were Turkish government officials involved  
15 throughout the project?

16 A Yes, yes.

17 Q What if anything did Mr. Rafiekian tell you  
18 during the project about how Mr. Alptekin's connections in  
19 the Turkish government were involved in the project?

20 A Say that again.

21 Q Do you recall Mr. Rafiekian ever telling you  
22 anything during the project about how Mr. Alptekin's  
23 connections in the Turkish government were involved in the  
24 project?

25 A Yeah, Bijan would talk about how he -- that this,

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1 you know, Ekim is talking about this all the way at the  
2 highest levels of the Turkish government. So Bijan would  
3 tell me that. He would relay that to me.

4 Q Is it fair to say that Mr. Alptekin acted as a  
5 go-between between FIG and Turkish government officials?

6 A Yes.

7 Q I'm showing you what's been marked as Exhibit No.  
8 2. Have you seen that email before?

9 A I have, yeah.

10 Q Do you see the first line where Mr. Alptekin  
11 says, "I met with M.C. and explained. They are likely to  
12 travel to D.C. next week"?

13 A Mm-hmm.

14 Q "He is interested in exploring this seriously and  
15 it is likely he will want to meet with you and M.F."

16 A Mm-hmm.

17 Q Based upon your involvement in the project do you  
18 know who M.C. refers to?

19 A Yeah, that's the Minister of Foreign Affairs.

20 Q Are those his initials?

21 A Yeah.

22 Q Who is M.F.?

23 A That's me.

24 Q Do you see the next paragraph?

25 A Mm-hmm.

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1 Q Which reads, "We agreed to meet again before he  
2 leaves to D.C. and he asked me to formulate what kind of  
3 output we can generate on the short and midterm as well as  
4 an indicate budget."

5 A Mm-hmm.

6 Q Is that email an example of the involvement of  
7 high-level Turkish government officials in the early stages  
8 of the project?

9 A Yep, sure is.

10 Q I'm showing you what's been marked as Exhibit No.  
11 3. Have you seen that email before?

12 A I have, yep.

13 Q Do you see on the third line where Mr. Alptekin  
14 says, "I met with the M.F.A. and explained our proposed  
15 approached. He is receptive and indicated he would like to  
16 meet with us during his upcoming visit to D.C."?

17 A Yep.

18 Q Based upon your involvement in the project do you  
19 know who the M.F.A. is?

20 A That's the Minister of Foreign Affairs.

21 Q So is this email an example of Alptekin acting as  
22 a go-between on the project between FIG and Turkish  
23 government officials?

24 A Mm-hmm, yep. Definitely at that time, yep.

25 Q I'm going to show you another email which is

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1 marked as Exhibit 4. Have you seen that email before?

2 A I have.

3 Q Do you see the first paragraph where Mr. Alptekin  
4 says, "I had a long meeting with the Minister of Economy  
5 upon the referral of M.F.A. Cavusoglu. I explained what we  
6 can offer. He agreed to discuss in general lines at the  
7 Council of Ministers today and subsequently with P.M.  
8 Yildirin in more detail."

9 A Mm-hmm.

10 Q Who is M.F.A. Cavusoglu?

11 A He is the Minister of Foreign Affairs.

12 Q And who is P.M. Yildirin?

13 A Prime minister, so he's the number two.

14 Q In the Turkish government?

15 A Mm-hmm.

16 Q Is this email another example about Alptekin  
17 acting as a go-between on the project between FIG and  
18 Turkish government officials?

19 A Yes. Yep, sure is.

20 Q I'm going to show you another email marked as  
21 Exhibit 5. Have you seen that email before?

22 A I have, yep.

23 Q Do you see at the beginning of the email where  
24 Mr. Rafiekian says, "Ekim, it was my pleasure continuing  
25 our conversations today. General Flynn and I have

1 discussed broad contours of The Truth Campaign"?

2 A Mm-hmm.

3 Q Was that email about the Turkey project?

4 A Yes.

5 Q Was the Turkey project sometimes known as The  
6 Truth Campaign and sometimes known as The Confidence  
7 Project or Project Confidence?

8 A Yeah, yeah. I mean -- yes. Yes, it became  
9 Project Confidence.

10 Q Do those terms refer to the same project?

11 A Yes, yep.

12 Q Early in the project were there any discussions  
13 between you and Mr. Rafiekian about potential deliverables  
14 for the project?

15 A Yes. I mean, we talked about the types of  
16 assessments and things that we could do.

17 Q What deliverables did you discuss?

18 A We discussed --

19 BY MR. GILLIS:

20 Q Just if you could, I'm sorry, what does  
21 "deliverable" mean to you?

22 A It means to me what in a 90-day period of time  
23 for this consulting agreement, what we could actually do,  
24 the things that we could actually provide to them.

25 Q Okay, thank you.

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1           A     At the end of it, yeah. So it ranged from videos  
2 to articles, to -- news articles to, you know, attending  
3 meetings, and also providing early on, providing some type  
4 of assessment of what we were being asked to look at, a  
5 written assessment.

6                   BY MR. TURGEON:

7           Q     You mentioned news articles; did you also discuss  
8 op-eds?

9           A     Mm-hmm. Sure did.

10          Q     I want to show you what's been marked as Exhibit  
11 6. Have you seen that email before?

12          A     I have, yep.

13          Q     Do you see the first part of the email where Mr.  
14 Alptekin says, "Gentlemen, I just finished in Ankara after  
15 several meetings today with Min. of Economy Zeybekci and  
16 M.F.A. Cavusoglu. I have a green light to discuss  
17 confidentiality, budget, and the scope of the contract"?

18          A     Mm-hmm.

19          Q     Is this email an example of how Turkish  
20 government officials provided the initial approval for the  
21 project?

22          A     Sure is.

23          Q     Originally what was the planned source of funding  
24 for the project?

25          A     Initially I was told that the Turkish government

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1 would likely -- you know, may fund it. And then it changed  
2 when that came back that they would not fund it, that it  
3 would be funded, you know, via different means -- by Ekim's  
4 business, basically.

5 Q Who told you that the Turkish government may fund  
6 the project originally?

7 A Bijan. Conversations we had.

8 Q Do you recall the name of Mr. Alptekin's company?

9 A Inovo.

10 Q Where is Inovo based?

11 A It's based in the Netherlands, I believe. It's a  
12 Dutch company.

13 Q When the source of funding changed, what else  
14 about the project changed?

15 A I mean, I'm not sure much changed. It sort of  
16 stayed on track. Pretty much, it pretty much stayed the  
17 same.

18 Q How did the focus on the project change?

19 A From my perspective in the early conversations,  
20 you know, from a business climate bank to really focus in  
21 on Gulen and Gulen's status, I think that it pretty much  
22 stayed the same.

23 BY Mr. GILLIS:

24 Q So general, if I may. So I think we're asking is  
25 as a result, first of all, did you care where the funding

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1 was coming from?

2 A No, no.

3 BY MR. TURGEON:

4 Q To the best of your knowledge did the amount of  
5 that you were to be paid for this project change as a  
6 consequence of exchanging from the government of Turkey to  
7 Alptekin?

8 A I don't believe it ever changed, yeah.

9 Q So as a consequence of that change in payment,  
10 not over time but just as a consequence of that change and  
11 who was going to pay, was there any change to the project?

12 A I don't believe so. Yeah, I don't believe there  
13 was any change to the project. It pretty much stayed from  
14 our initial discussions all the way through to the end, you  
15 know, the period of time that we had the contract for  
16 didn't change.

17 Q At any point before or during the project did you  
18 hear anything about FIG performing a separate project  
19 involving the government of Turkey?

20 A None.

21 Q At any point before or during the project did you  
22 hear anything about FIG performing a separate project  
23 involving Mr. Alptekin or Inovo?

24 A Not that I'm aware of.

25 Q At any point before or during the project did you

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1 hear anything about FIG performing a separate project  
2 involving radical Islam?

3 A I am not aware of that.

4 Q At any point before or during the project did you  
5 hear anything about FIG refunding money to Mr. Alptekin for  
6 lobbying or PR, public relations work, that had not been  
7 performed?

8 A I do not, no.

9 Q At any point during the project did you hear  
10 anything about FIG refunding money to anyone in connection  
11 with the project?

12 A No.

13 Q At some point during the project did you become  
14 aware that two payments, each for \$40,000, were made from  
15 FIG to Mr. Alptekin's company, Inovo?

16 A I do. Yeah, I do remember that.

17 Q Were those payments refunds for lobbying or PR  
18 work that had not been performed?

19 A Now that I'm aware of.

20 Q Were those payments refunds for anything?

21 A Well they were for what I believe were services  
22 that he provided as a, essentially, advisor to us during  
23 this project.

24 Q Were those payments refunds?

25 A I don't believe that they were refunds. I mean,

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1 they were payments to him based on the contract that we had  
2 signed with him.

3 Q I'm showing you what's been marked as Exhibit 7.

4 A Yep.

5 Q Have you seen that email before?

6 A I have, yep.

7 Q Do you see right at the beginning of the email  
8 where Mr. Rafiekian says, "We are about to be engaged by a  
9 Dutch client for the above campaign"?

10 A Mm-hmm.

11 Q What does "the Dutch client" refer to in that  
12 email?

13 A That's referring to Ekim -- Inovo.

14 Q Inovo?

15 A Yeah, yeah.

16 Q So this is about the same Turkey project we've  
17 been discussing?

18 A Yes, yep.

19 Q Attached to that email is a budget --

20 A Okay.

21 Q -- on the back or on page 2. Do you see that?

22 A I do.

23 Q Is that a draft budget that you received for the  
24 project?

25 A I believe it is, yep. Yep.

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1 Q Are you aware of a meeting for the project that  
2 took place in New York City on September 19, 2016?

3 A Yes, yeah.

4 Q Was that meeting related to the Turkey project?

5 A Yes, yeah.

6 Q Who attended that meeting?

7 A So this is the one where Ekim had worked with  
8 Bijan to set up a meeting between FIG principals and senior  
9 members of the Turkish government.

10 Q Can you name some of the attendees?

11 A Yeah. On our side it was Brian McCauley, myself,  
12 Bijan, and Jim Woolsey. On the other side it was Ekim, the  
13 son in law who I just don't recall his name, but -- and  
14 then the Minister of Foreign Affairs. And I believe there  
15 was another individual that was with them but I think he  
16 was more of a security person. But that was principally,  
17 those were the principal members of that meeting.

18 Q Do you recall having met Mr. Alptekin in person  
19 prior to that meeting?

20 A I don't. I don't.

21 Q What was the purpose --

22 A I mean, I may have, but I don't recall.

23 Q What was the purpose of the meeting?

24 A The purpose of the meeting was to -- for Ekim to  
25 introduce our, you know, FIG principal group to the

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1 leadership of Turkey that was represented in that room;  
2 provide an overview from us to them as kind of what we were  
3 doing, what we were involved in; and basically just a meet  
4 and greet. And I think that from Ekim's perspective it was  
5 also to show that he was -- you know, he had the right  
6 people doing this project.

7 Q Who did most of the talking at the meeting on the  
8 Turkish side?

9 A The son in law did most of the talking.

10 Q What was the focus of the conversation?

11 A It was, initially it was sort of high level and  
12 then as it went on -- and it was probably a 20 to 30 minute  
13 meeting -- it was about, you know, the son in law was  
14 talking about Gulen in general.

15 Q What was the goal of the Turkish officials  
16 regarding Gulen?

17 A They were clearly anti-Gulen. I think their  
18 desire was to figure out a way to, basically to you know,  
19 get the United States to understand that this is a bad guy,  
20 he's affecting the relationship, and that they wanted to  
21 get him back.

22 Q They wanted him to be brought back to Turkey?

23 A Yeah. I mean they work in various ways to  
24 understand how to get him back.

25 BY MR. GILLIS:

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1 Q I'm sorry. Do you know, General, whether up  
2 until that point the United States government had taken a  
3 position with Turkey about whether they were going to send  
4 him back or not?

5 A I believe we did. You know, I mean I don't have  
6 the specifics, but I believe there was a -- there was  
7 certainly discussion about it.

8 Q So before this meeting there had been discussion  
9 with the United States government and the Turkish  
10 government?

11 A I believe so, yeah. Yeah.

12 Q Sorry, just to clarify.

13 A Yeah, because when the coup occurred there was  
14 all this noise about Gulen certainly in the media so I -- I  
15 mean, I'm going to make an assumption that there was a --

16 Q Don't make an assumption.

17 A -- there was a position.

18 Q Okay.

19 A Well I mean, what I'm saying is it was known that  
20 he was somebody that the Turkish government wanted back.  
21 That was pretty clear.

22 BY MR. TURGEON:

23 Q Other than the project, what business or  
24 potential business was discussed at that meeting?

25 A That's really it. I mean, just kind of an

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1 overview of what we were doing.

2 Q I'm showing you what's been marked as Exhibit 8.  
3 Have you seen that email before?

4 A I have.

5 Q What is the subject line of the email?

6 A September 19th of 20th.

7 Q Do you see where Mr. Rafiekian says, "We don't  
8 have the details but we'll have it from the client shortly.  
9 The duration will not exceed on hour. As I mentioned, the  
10 meeting is with high-level audience, cabinet plus level  
11 related to confidence"?

12 A Yep.

13 Q Does that email concern the New York City meeting  
14 on September 19, 2016 --

15 A Yes.

16 Q -- that you just discussed?

17 A Yes, yep.

18 Q After that meeting what conversations did you  
19 have with Mr. Alptekin about the project?

20 A I mean, I think just in general how things were  
21 going, that he was running it at that point. The various  
22 things that we were talking about doing, were they moving  
23 forward, were things moving in the right direction, and was  
24 the client -- in this case, was Ekim satisfied that  
25 everything was moving along.

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1 Q How did those conversations take place?

2 A Emails with me. It was either email contact,  
3 phone calls with Bijan, and then from about that point we  
4 started, you know -- we did these Friday afternoon, you  
5 know, conference calls with Ekim.

6 Q How often were those conference calls?

7 A They were, I think we probably had three, you  
8 know, ish. At least three I think we had usually on a  
9 Friday afternoon.

10 Q Who else from FIG participated in these calls?

11 A Usually it would be Bijan. He would set it up,  
12 myself, and there was sometimes three or four, or five or  
13 six. It depended on their people's availability. I mean,  
14 people like Mike Boston, Ryan McCauley. Paul Becker was  
15 there a couple times. So, yeah.

16 Q What was the purpose of these calls?

17 A It was an update. Update calls.

18 Q Update about what?

19 A About the status of the -- of what we were  
20 involved in, what we were doing. You know, we -- there  
21 would usually be a set of talking points that Bijan would  
22 prepare. We'd go through the talking points. Ekim would  
23 give us feedback from wherever he was at. Sometimes he was  
24 overseas it seemed, and he would give us feedback on his  
25 conversations with Turkish government officials.

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1 Q About the project?

2 A Mm-hmm.

3 Q What was the subject matter of the work that FIG  
4 was performing on the project?

5 A Primarily it was about Gulen. I mean, it was  
6 this -- we did a game. There was talk about the video  
7 production that seemed to take, you know, too long actually,  
8 and then just other things that people had been doing in  
9 their own areas.

10 So each person would provide, you know, if they  
11 had done something in that period of time between  
12 conference calls, they would talk about what actions they  
13 had taken.

14 Q Was all of that work product about Gulen?

15 A For the most part I think, yeah. I'd say yes,  
16 for the most part.

17 Q What work product do you know of that was not  
18 about Gulen?

19 A I don't think there was anything that we had done  
20 that had anything to do with, you know, anything else like  
21 business climates or stuff like that.

22 Q What did Mr. Alptekin say he was doing with the  
23 information you provided him on those calls?

24 A He was providing it back to his contacts in the  
25 Turkish government.

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1 Q To which contacts?

2 A Same ones we've been talking about. He would  
3 mention names or he would mention -- but pretty much the  
4 same set of characters that we've been discussing. That  
5 seemed to be his conduit backed into basically the senior  
6 levels of the Turkish government.

7 Q What feedback did you receive during those calls?

8 A I mean generally, my concern was were we -- you  
9 know, were we moving along, was the project moving along,  
10 and were they generally satisfied. And that's what I was  
11 looking for, because they were paying us.

12 Q When you say, "Were they generally satisfied,"  
13 who do you mean by "they"?

14 A Primarily Ekim because he was the conduit. He  
15 was the person that was sort of the direct client, the face  
16 of the client. But I think also the Turkish government.

17 BY MR. GILLIS:

18 Q He was the conduit for the Turkish government?  
19 Is that what --

20 A Yeah, it seemed like that. It seemed like his  
21 conversations with us, you know, his feedback, his  
22 interactions were always about how he was talking back to  
23 the Turkish, to senior members of the Turkish government,  
24 and then he would give us their sense of what they felt.  
25 You know?

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1           And I never go the impression that we were moving  
2 in the wrong direction, and that was really my thing was  
3 sort of pop in, get an update, and as long as we're moving  
4 in the right direction and they were happy, then I was  
5 okay.

6           BY MR. TURGEON:

7           Q     I'm showing you what's been marked as Exhibit 9.

8           A     Yep.

9           Q     Have you seen that before?

10          A     I have, yep.

11          Q     Is that a text message that you sent on October  
12 22nd, 2016?

13          A     Yep.

14          Q     In the first line do you see where you said,  
15 "Overall a very good call"?

16          A     Mm-hmm.

17          Q     "I may be meeting with him early next week during  
18 an American-Turkish conference in W.D.C."?

19          A     Mm-hmm.

20          Q     Is that a reference to one of the update calls  
21 you had with Mr. Alptekin about the project?

22          A     I believe it is. I believe that this is a  
23 response to, you know, our call.

24          Q     Do you see a few lines down in the text message  
25 where you state, "I walked him through the social media

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1 analysis which he found very interesting and worth talking  
2 to the F.M. about"?

3 A Yep.

4 Q Who is the F.M.?

5 A Foreign Minister, I believe.

6 Q Is that an example of Mr. Alptekin telling you  
7 that he was passing information about the project to  
8 Turkish government officials?

9 A Yes, yep. Yep.

10 Q What written opinion pieces, or op-eds, were  
11 published as part of the project?

12 A An op-ed that was published on Gulen  
13 specifically.

14 Q I'm showing you what's been marked as Exhibit 10;  
15 do you recognize that?

16 A Yep.

17 Q What is it?

18 A It's an op-ed on kind of what the title says on  
19 Gulen, and the crisis going on in Turkey.

20 Q What was the title of the op-ed?

21 A The title of the op-ed is, "Our ally Turkey is in  
22 crisis and needs our support."

23 Q Where was that op-ed published?

24 A I mean it was published in The Hill here but I  
25 think it also was published in a couple other, you know,

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1 publications, but principally The Hill.

2 Q When was it published?

3 A It was published on I believe November 9th.

4 Right? Yeah, I think it was November 9th. It was the day  
5 of the election.

6 Q Do you see the byline of the article?

7 A Yep, I do, yeah.

8 Q What publication date --

9 A The 8th, the 8th, yeah.

10 Q Whose name is listed as the author of the op-ed?

11 A My name.

12 Q How did you first find out that this op-ed was in  
13 the works?

14 A Bijan had sent me a draft of it a couple of days  
15 prior, maybe about a week prior.

16 Q How did he send you that draft?

17 A He sent it to me in an email I believe.

18 Q What conversations did you and Mr. Rafiekian have  
19 about writing this op-ed before you received that email  
20 with a draft of the op-ed?

21 A We really didn't have any conversations about  
22 this op-ed. We talked in general that op-eds would be a  
23 potential product that we would provide, but we never had  
24 any conversations about this specific one.

25 Q Did you sketch out specific ideas for this

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1 particular op-ed with him before you saw the draft?

2 A No.

3 BY MR. GILLIS:

4 Q And General, was this op-ed one of the  
5 deliverables for this project?

6 A I felt it was. I felt it was one of the things  
7 that we needed to show that we had done something, because  
8 we really hadn't done much by that point.

9 BY MR. TURGEON:

10 Q I'm showing you what's been marked as Exhibit No.  
11 11. Do you recognize that?

12 A I do. Yep, I do.

13 Q What is it?

14 A It's a lobbying registration document.

15 Q Is that a lobbying registration document under  
16 the Lobbying Disclosure Act of 1995?

17 A Yeah, yep. Looks like it, yep, LB1, yeah.

18 Q On page 2 what is the date of the registration?

19 A September 30th, 2016. Is that the date you're  
20 looking for here?

21 Q The date the registration was signed.

22 A Yeah, so 9-30-2016, yep.

23 Q How did you first come to see this registration?

24 A I believe that this was sent to me by Bijan.

25 Q In line 10 of the registration --

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1 A Okay.

2 Q Who is listed as the lobbyist for FIG?

3 A Robert Kelly.

4 Q What role did Robert Kelly have at FIG?

5 A Robert Kelly was the lawyer that we used for this  
6 project.

7 Q Did Robert Kelly ever do any lobbying on the  
8 project for FIG?

9 A None that I'm aware of.

10 BY MR. GILLIS:

11 Q Being as involved in the project as you were, at  
12 any point did you have any discussion with him about doing  
13 lobbying?

14 A Lobbying Bob Kelly, no, no, no.

15 Q Did you have any discussion with Rafiekian about  
16 Bob Kelly doing any lobbying in connection with this  
17 project?

18 A I don't believe I ever did, nope. No.

19 BY MR. TURGEON:

20 Q Do you see at line 12 which asks about specific  
21 lobbying issues, current and anticipated?

22 A Yep.

23 Q What is listed in line 12?

24 A "The registrant will advise client on U.S.  
25 domestic and foreign policy, F-1635 and the house

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1 counterpart, HR-1735, and the Senate counterpart."

2 Q Do you know what those bills are?

3 A No idea.

4 Q Did the project have anything to do with pending  
5 legislation?

6 A Not that I'm aware of.

7 Q Do you recall any discussions with anyone at FIG  
8 about pending legislation in relation to the project?

9 A I don't, no.

10 BY MR. GILLIS:

11 Q General, if I could ask you to take a look at  
12 Grand Jury Exhibit 13.

13 A Okay.

14 Q Have you seen that before?

15 A I have.

16 Q Do you recall before this meeting with the  
17 Turkish officials in New York Bijan Rafiekian sending out  
18 talking points regarding what was to take place there?

19 A Yes, yep.

20 Q By the way, was that typical for him to do in  
21 connection with these calls or other meetings that he would  
22 have?

23 A Yeah, he normally did. He normally did. He  
24 would send, you know, for the calls that I've talked about  
25 already he would have an orange sheet sort of set of bullet

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1 talking points.

2 Q Okay. If you'd turn the page there and actually  
3 just look through. I know you've recently had a chance to  
4 look at this but if you would just turn the pages there to  
5 look through those several numbered paragraphs.

6 A Okay.

7 Q Okay. To the best of your recollection is that  
8 what that meeting in New York was about?

9 A Yes.

10 Q If I could show you -- I'm going to show you  
11 Exhibit -- I'm going to withdraw that question, general.

12 A Okay.

13 MR. GILLIS: If I could have one moment.

14 BY MR. GILLIS:

15 Q Do you recall there being a discussion about the  
16 Turkish officials' expectations of FIG being higher than  
17 what you might be able to provide?

18 A I do recall an exchange with Bijan about that.

19 Q Tell us about --

20 A This was after this meeting.

21 Q After the New York meeting?

22 A Yeah, I believe that was.

23 Q Tell us what you recall about that.

24 A That I think that they, what they expected us to  
25 do in a short period of time was unrealistic.

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1 Q "They" being the Turkish?

2 A They being the Turkish government officials,  
3 yeah.

4 MR. GILLIS: General, if we could ask you to step  
5 outside.

6 THE WITNESS: Okay.

7 MR. GILLIS: But before we do let me just have a  
8 look here. You can come up to the door.

9 THE WITNESS: See you.

10 (Whereupon, the witness was excused.)

11 (Whereupon, at 10:38 a.m., the taking of the  
12 testimony in the presence of a full quorum of the Grand  
13 Jury was concluded.)

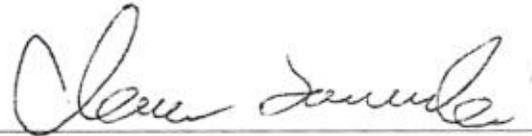
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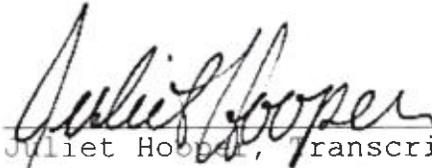
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C-E-R-T-I-F-I-C-A-T-E

I, Isaac Lewandowski, the reporter for the United States Attorney's Office, do hereby certify that the witness whose testimony appears in the foregoing pages was first duly sworn by the Foreperson or the Deputy Foreperson of the Grand Jury when there was a full quorum of the Grand Jury present; that the testimony of said witness was taken by me and thereafter reduced to typewritten form; and that the transcript is a true record of the testimony given by said witness.



Isaac Lewandowski, Official Reporter



Juliet Hobbs, Transcriber

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