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**STATEMENT ON BEHALF OF
CHRISTOPHER STEELE AND ORBIS BUSINESS INTELLIGENCE
IN RESPONSE TO THE DOJ OIG REPORT INTO THE
CROSSFIRE HURRICANE INVESTIGATION**

FOR IMMEDIATE RELEASE

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Orbis Business Intelligence and Christopher Steele have cooperated voluntarily and fully with the OIG's investigation. Christopher Steele gave extensive testimony in person and by Skype, all subject to 18 U.S.C. § 1001. Orbis also provided the OIG team unprecedented access to Orbis internal company documentation, including contemporaneous memoranda of meetings with the FBI.

OIG gave Orbis highly redacted portions of the draft report for review and comment. Those portions contained numerous inaccurate and misleading statements as to which Orbis submitted suggested corrections and clarifications. Some of Orbis's suggestions appear to be reflected in the final report. At the twelfth hour late Sunday evening, Orbis was informed by the OIG that previously redacted material had been unredacted and that it contained negative information about Christopher Steele. Orbis was given no opportunity to review, much less comment, on this material.

The result is that the OIG Report contains several serious errors and misstatements that require this response.

- 1. Orbis Was Never Given an Opportunity to Respond to the Claims of the Purported "Primary Sub-Source."** The "unredacted" portions of the OIG Report, just described, includes the material from pages 186 to 193 of the Report addressing alleged discrepancies found in Orbis's reporting based on interviews with Orbis's "Primary Sub-Source." Orbis was not given an opportunity to respond to those materials. Public discussions about a source are always fraught with danger for the source and the source's sub-sources. Had Orbis been given the opportunity to respond in a private session, the statements by the "Primary Sub-Source" would be put in a very different light. The

“Primary Sub-Source’s” debriefings by Orbis were meticulously documented and recorded.

- 2. Orbis’s Investigation Relating to the 2016 Election was Performed on Behalf of a Private Client, Fusion GPS, Which Owns the Rights to the Intelligence Gathered by Orbis.** Orbis’s 2016 election reports were gathered and written for a private client, Fusion GPS. Fusion paid for the work, owned the intellectual property, and controlled what was done with the information in the reports. Fusion consented to Orbis voluntarily sharing the reports with the FBI, but the FBI had no control over what Fusion or Orbis did with those reports. The FBI knew Fusion was Orbis’s client from its very first meeting with Orbis about this work in July 2016. In this regard, the OIG concluded in its report that “at the outset of Steele’s interactions with the FBI in July 2016 regarding his election reporting work, it was clear that Steele was operating as a businessperson working on behalf of a client of his firm, rather than a CHS for the FBI.” OIG Report, p. 387.
- 3. Christopher Steele Was Never a Confidential Human Source (“CHS”) for the FBI With Respect to Any Matter.** At numerous places in the Report, the OIG applies the label “CHS” to Christopher Steele. In 2013, after having received a number of Orbis reports done for private clients, the FBI decided it wanted to engage Christopher Steele to conduct investigations on the FBI’s behalf. The FBI at that time had no history of contracting out work to private investigatory firms. The question then was how to characterize the relationship between Orbis, Christopher Steele, and the FBI. Orbis and Christopher Steele repeatedly told the FBI that he could not be a CHS because his obligations to his former government employer prohibited his acting in such a capacity. The OIG Report acknowledges that “Steele made available for the OIG’s review documentation referring to such a prohibition.” OIG Report, p. 88. Orbis and Christopher Steele told the FBI that the only acceptable arrangement was a contractual relationship between Orbis and the FBI—the same relationship Orbis had with its other clients. Nevertheless, FBI agents, for internal FBI purposes, decided to call Christopher Steele a “CHS.”

That label flies in the face of considerable evidence and of reality. Before doing work for the FBI, Orbis wrote a letter seeking permission to do that work from the UK government. That letter describes a “commercial relationship” between Orbis and the FBI and states that the information provided to the FBI would come from the firm. *See* Attached Letter; *see also* OIG Report, p. 87. At about the same time, the FBI also wrote to the UK Government stating “Steele is providing the FBI with information provided primarily through Mr. Steele’s privately owned company, Orbis Business Intelligence” OIG Report, p. 87. The FBI’s letter added: “In order to properly protect this information and Mr. Steele’s relationship with the FBI, our . . . Office will

treat any material provided as information obtained through a Confidential Human Source.” OIG Report, p. 87. Christopher Steele’s wife, because of her UK government employment, disclosed the relationship in the same terms. In fact, work done by Orbis for the FBI was performed not just by Christopher Steele but also by Orbis Co-Director Christopher Burrows, various Orbis employees, and Orbis source networks. Discussions and messages between the FBI and Orbis as to payments for work done included Christopher Burrows as well as Christopher Steele. All payments from the FBI were received by Orbis, not by any individual.

The OIG Report acknowledges that there is evidence to support “Steele’s position” that he was never a CHS and the Report concludes that the FBI and Christopher Steele never came to “a shared understanding on the terms of their relationship.” OIG Report, pp. 386, 390.

- 4. The FBI Never Asked Christopher Steele Not to Disclose Information to the Media.** There were two meetings between Christopher Steele and FBI agents that addressed Orbis’s investigation. At neither meeting, and at no other time, did the FBI ask Christopher Steele not to disclose information from Orbis reports to the media—a request he would have, in any event, had to reject given the requirements of his private client. The FBI’s records and statements recounted in the OIG Report on this point are unreliable and inaccurate.

The first meeting, initiated by Orbis, was held in July 2016 and attended by one FBI agent and, for Orbis, Christopher Steele and Christopher Burrows. Significantly, we understand, the FBI agent’s record of the meeting does not mention that Burrows attended the meeting, much less, as Orbis’s contemporaneous memorandum of the meeting shows, that he was an active participant in the meeting. The agent’s failure to record that Christopher Burrows participated in the meeting is unprofessional and a serious omission. As such, and as highlighted by us in our review, it should have been addressed in the body of the OIG Report.

The second meeting occurred on October 3, 2016 and was attended by four FBI agents and Christopher Steele. The OIG Report devotes considerable attention to this meeting. The Report shows that the FBI agents who attended the meeting have very different recollections of what was and was not discussed at the meeting. For Orbis’s part, what was discussed at the meeting was recorded in detail shortly after the meeting in an internal Orbis memorandum that has been shown to OIG investigators in unredacted form. Moreover, the OIG found that “[t]he notes that Steele made available to the OIG to review . . . were consistent with his testimony to the OIG.” OIG Report, p. 112, n.248. That memorandum confirms Christopher Steele’s testimony on two key points: First, he explicitly stated that his client was Fusion and he would not “dump[]” Fusion in favor of

the FBI. OIG Report, p. 112. Second, the subject of contacts with the media was not mentioned by anyone at the meeting—a subject that, had it come up, would certainly have been recorded in Orbis’s internal memorandum since, at the direction of Fusion, Christopher Steele and Fusion had just had an “off the record” meeting with representatives the media. *See* OIG Report, p. 113. Christopher Steele would have had no reason to deny these media contacts if asked about them by the FBI, as they related to intellectual property that belonged to Fusion, Orbis’s paying client on this project, and not the U.S. Government.

- 5. Carter Page Has Himself Acknowledged the Accuracy of Information in Orbis’s Reporting About Him.** The Report appears to suggest that none of Orbis’s reporting about Carter Page has been corroborated. To the contrary, Carter Page has himself corroborated key aspects of Orbis’s reporting. In particular, Page has admitted to having met with an associate of Igor Sechin, the head of Russian oil company Rosneft, and having discussed U.S. sanctions lift and the sale of a significant portion of Rosneft. *See* Mueller Report, pp. 100-101, 166 n. 1195; *see also* 11/2/17 Carter Page Testimony Before the House Permanent Select Committee on Intelligence, pp. 138-140.

- 6. The Report Inaccurately Attributes an Intelligence Report to Orbis.** The Report suggests that Orbis had reported that there were links between the Alfa Bank server and Trump Tower. In fact, Orbis did not investigate or report on that issue. Christopher Steele merely passed on what he had heard from various sources, including public ones, on this subject, consistent with the FBI’s request that he share with them any relevant information that he came across. Even a minimal investigation by the FBI would have found articles in major publications that describe the computer scientists who claimed to have found this alleged link; indeed, a prominent New Yorker article recounts how one of those computer scientists brought the analysis to the FBI prior to the 2016 election. Yet the OIG Report cites an FBI expert as pointing to this issue as a reason to question the quality of Orbis reports.

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[REDACTED]

Dear [REDACTED]

As I think you are aware, Chris BURROWS [REDACTED] and I [REDACTED] founded Orbis Business Intelligence Limited in 2009 after long careers in the Service. The Cabinet Office/Service agreement covering this move set down specific guidelines under which we were required to operate for the first two years, and more general ones for our activities thereafter.

Since 2009, Orbis BI has developed and grown, providing a range of enhanced due diligence (EDD); anti money laundering (AML); and investigative services to a range of largely blue chip, British private sector clients. We also have done contracted work for the UK financial regulatory authorities (mainly on Russia/CIS issues) in the form of the FSA (now FCA) and Listings Authority (UKLA). After the FCA conducted enhanced company vetting on Orbis BI we were taken on by them as Russia/CIS Preferred Supplier.

More recently we have been invited to provide similar services to the US financial regulatory community, in this case by FBI, in support of its policy making and enforcement functions. We are keen to take up this opportunity to win an important new client, with long-term potential and a wide range of Russian and global requirements. However, before signing a contract with them, both we and FBI thought it appropriate that we should inform you of this proposed commercial relationship.

On a separate but important point, any and all intellectual property (IP) we would be supplying to the USG would have been obtained exclusively by us as Orbis BI since our departure [REDACTED] 4 years ago. We would anticipate some contact with the FBI representative in London as part of this arrangement, of which the CIA Chief of Station would be made aware, but substantive business would be conducted mostly in New York and Washington DC. For your information, the main FBI agent we have been in contact with on this matter to date is [REDACTED], who recently moved from NYO to the FBI's International Division.

[REDACTED]

Yours truly,

Chris Steele, Director