

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

BEAN LLC d/b/a FUSION GPS)
)
)
 Plaintiff,)
)
 v.)
) Civil Action 17-cv-2187-RJL
 DEFENDANT BANK,)
)
 Defendant,)
)
 and)
)
 PERMANENT SELECT COMMITTEE)
 ON INTELLIGENCE OF THE U.S.)
 HOUSE OF REPRESENTATIVES,)
)
 Defendant-Intervenor.)
_____)

**DECLARATION OF GLENN R. SIMPSON IN SUPPORT OF
PLAINTIFF'S NOTICE OF ADDITIONAL RECORD EVIDENCE**

I, GLENN R. SIMPSON, hereby declare as follows:

1. My name is Glenn R. Simpson, and I am of legal age and competent to give this declaration. I am familiar with the facts and circumstances set forth herein and if called upon could competently testify thereto.

2. I am a member of Bean LLC d/b/a Fusion GPS ("Fusion GPS"), which is a partnership of four individuals. Fusion GPS was founded by experienced investigative journalists who apply investigative reporting skills to Fusion's clients' projects and needs.

3. On August 22, 2017, I participated in a closed-door interview with the Senate Judiciary Committee related to the Committee's investigation into Russian interference in the 2016 presidential election. At that interview, staff from the Senate Judiciary Committee asked

about Defendant Bank by name, and I confirmed its identity as Fusion GPS's bank. I am not aware of any other sources from which the Committee or the media could have learned of this information.

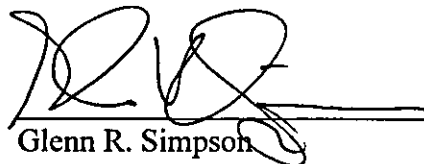
4. On October 4, 2017, Congressman Devin Nunes, chairman of the House Permanent Select Committee on Intelligence ("HPSI"), served Fusion GPS's bank with a subpoena demanding all of Fusion GPS's records from August 2015 to the present. I was informed on October 13 that the subpoena had been served.

5. The bank records reflect that Fusion contracted with Nellie Ohr, a former government official expert in Russian matters, to help our company with its research and analysis of Mr. Trump I am not aware of any other sources from which the Committee or the media could have learned of this information.

6. At my voluntary interview before HPSCI, on November 14, 2017, I disclosed that I met with Bruce Ohr, at his request, after the November 2016 election to discuss our findings regarding Russia and the election I am not aware of any other sources from which the Committee or the media could have learned of this information.

7. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 12th day of December 2017 in Washington, D.C.


Glenn R. Simpson