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	BEFORE THE CAMPAIGN FINANCE	1	INDEX
	AND PUBLIC DISCLOSURE BOARD	2	WITNESS PAGE
	OF THE STATE OF MINNESOTA	3	ROBERT P. CUMMINS
		4	Examination by Mr. Goldsmith 4
		5	Examination by Mr. Sigurdson 7
	In the Matter of the Republican	6	
	Party of Minnesota	7	
		8	
	Deposition of ROBERT P. CUMMINS, taken	9	
	in the above-entitled matter, pursuant to Notice,	10	
	before Julie A. Rixe, court reporter and notary public,	11 12	
	at Suite 190, 658 Cedar Street, in the City of	13	
	St. Paul, County of Ramsey, State of Minnesota, on the	14	
	13th day of June, 2012, commencing at approximately	15	
	2:30 p.m.	16	
		17	
		18	
		19	
		20	
	* * *	21	
		22	
		23 24	
		24 25	
	Page 2	23	Page 4
1	APPEARANCES:	1	ROBERT P. CUMMINS,
2	GARY GOLDSMITH, Executive Director, and	2	after having been first duly sworn, was
3	JEFFREY SIGURDSON, Assistant Executive Director,	3	examined and testified on his oath as follows:
4	and JODY POPE, Management Analyst, Minnesota	4	EXAMINATION
5	Campaign Finance and Public Disclosure Board,	5	BY MR. GOLDSMITH:
6	Centennial Office Building, Suite 190, 658 Cedar	6	Q Would you state your full name for the record,
7	Street, St. Paul, Minnesota 55155-1603, appeared	7	spelling your last name?
8	for and on behalf of the Minnesota Campaign	8	A Robert Paul Cummins, C-U-M-M-I-N-S.
9	Finance and Public Disclosure Board.	9	Q And your address, please?
10 11	JOHN H. HINDERAKER, Attorney at Law, Faegre, Baker, Daniels, 2200 Wells Fargo Center,	10 11	A 18850 North Home Boulevard, Deep Haven, Minnesota.  Q Thank you. As you know from your attorney, we're
12	90 South Seventh Street, Minneapolis, Minnesota	12	here to talk about the operations of the
13	55402-3901, appeared for and on behalf of the	13	corporation named Count Them All Properly, Inc.,
14	Deponent.	14	which we sometimes refer to, for abbreviation, as
15	r	15	CTAP. And we actually just completed another
16		16	deposition in the same matter, so we know a little
17		17	bit more now than we did a half hour ago.
18		18	We understand that you issued a check to
19		19	CTAP in February of 2011; is that correct?
20		20	A That's what it looks like.
21	WHEDELIDON 41 CH. 1	21	Q Okay. Do you remember how it came about that you
22	WHEREUPON, the following proceedings	22	gave The check, by the way, was \$30,000,
23 24	were duly had and entered of record, to wit:	23 24	according to our records. Do you know how it came about that you made this transfer of \$30,000 to
25		25	CTAP?
		127	V1/11 .

		Page 5		Page 7
1	A	Well, I think that Tony Sutton told me that they	1	legal bill, and that's about as much as I knew,
2		had legal bills to pay for the recount and they	2	really.
3		set up some special fund for the legal	3	Q And that was Mr. Sutton told you that?
4		reimbursement or whatever to handle those legal	4	A Yeah, it must have been him. Like I said, it's a
5		bills, and he asked me if I'd help him.	5	little fuzzy, but he would have probably been the
6	Q		6	guy.
7	A		7	Q Okay. Just give me one moment here. I actually
8	Q	•	8	think that's all the questions I have, but I do
9		total amount of the legal bills was?	9	have my assistant director, Jeff Sigurdson, here
10	A		10	who catches anything that I miss. I'm going to
11	Q	Okay. So he gave you the name of the Did he	11	ask him if he has any questions.
12		give you the name of the company to write the	12	EXAMINATION  DV MD. SIGUEDSON
13		check to or did he give that to somebody else?	13	BY MR. SIGURDSON:
14 15	Α	Well, he gave it to I think he e-mailed it to	14 15	Q I just have one question, sir. And this is just,
		From what I can see here, he e-mailed it to	16	I suppose, to verify that it was Mr. Sutton that
16 17	0	Mike Scholl and then Mike passed it on to me.	17	contacted you. We're also under the impression
18		And who is Mike Scholl?	18	that Tom Emmer was also making certain phone calls looking for funding for use in the recount. Do
19	A	I work with him. He's kind of my gatekeeper for	19	you recall if you were contacted by him for that
20	Ω	contributions. He just passed it on. And that's S-C-H-O-L-L; is that correct?	20	purpose?
21	Q	Yep.	21	A To my best recollection, I don't think I was.
22		Okay. Prior to Mr. Sutton contacting you	22	Q Okay.
23	Ų	soliciting a contribution, had you known anything	23	A I could have been, but I don't I don't think
24		about some other organization that might be paying	24	SO.
25		the legal bills?	25	Q Okay. That's all I have, sir. Thank you.
		Page 6		Page 8
1	Α	I don't know. I don't recall. I don't think so.	1	A Okay.
2	0			MR. GOLDSMITH: That would conclude our
3		for additional contributions to this corporation?	3	questions, unless, John, you have something or,
4	A	I don't recall that either. It's possible, I just	4	Mr. Cummins, you want to say anything additional.
5		don't recall.	5	MR. HINDERAKER: No, I don't have any
6	Q	Okay. And you have not made any additional	6	questions, Gary. I don't know, in the rules that
7		contributions to this corporation; is that	7	we're operating under here, if there's a provision
8		correct?	8	for reading and signing of deposition
9	A	I think that's correct. I think that's right.	9	transcripts. I don't think that's necessary, in
10	Q	Okay. I mean, we don't have any record of them.	10	any event, under these circumstances. So to the
11		I'm just trying to confirm that that's correct.	11	extent that Mr. Cummins has rights in that regard,
12	A	Yeah. I mean, I think that we did My wife and	12	we will waive them.
13		I, I think we did a search when we got your	13	MR. GOLDSMITH: Okay. As a courtesy,
14		request for information. And sort of as near as	14	I'll send you an electronic copy.
15		our as far as Quicken knows, which is where we	15	MR. HINDERAKER: We'd like to get a copy
16		keep all of our checking stuff, it says this was	16	of it, but I think that's plenty for our purposes.
17	_	it.	17	MR. GOLDSMITH: All right. That
18	Q	• •	18	concludes the deposition. Thank you,
19		questioned or wondered why you would be giving	19	Mr. Cummins.
20		this money to some other organization? You had	20	
21		previously been a generous donor to the Republican	21	
22		Party. Did you question why the Party itself	22	
23		wasn't simply going to pay these bills?	23	
24	A	Well, it was just explained to me that this was a	24 25	
25		special fund they set up just to handle their	⊿5	

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      STATE OF MINNESOTA )
 2
                  ) ss.
 3
      COUNTY OF DAKOTA )
 4
 5
 6
 7
         Be it known that I took the deposition of ROBERT
 8
      P. CUMMINS on the 13th day of June, 2012, at Suite 190,
 9
      658 Cedar Street, St. Paul, Minnesota;
10
11
         That I was then and there a notary public in and
12
      for the County of Dakota, State of Minnesota, and that
13
      I was duly authorized to administer an oath;
14
15
         That the witness before testifying was first duly
16
      sworn to testify the truth and nothing but the truth;
17
18
         That the testimony was recorded by myself and
19
      transcribed into a computer-aided transcript and that
20
      the deposition is a true record of the testimony given
21
      by the witness to the best of my ability;
22
23
         That I am not related to any of the parties hereto
24
      nor interested in the outcome of the action;
25
                                                     Page 10
 1
         That the cost of the original transcript has been
 2
      charged to the party noticing the deposition, unless
 3
      otherwise agreed by Counsel, and that copies have been
 4
      made available to all parties at the same cost, unless
 5
      otherwise agreed upon by Counsel;
 6
 7
         That the reading and signing of the deposition by
 8
      the witness was waived.
 9
10
         WITNESS MY HAND AND SEAL this 25th day of June.
      2012.
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15
                  JULIE A. RIXE
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                  Court Reporter
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