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<p>BEFORE THE CAMPAIGN FINANCE AND PUBLIC DISCLOSURE BOARD OF THE STATE OF MINNESOTA</p> <p>-----</p> <p>In the Matter of the Republican Party of Minnesota</p> <p>-----</p> <p>Deposition of DANIEL G. PUHL, taken in the above-entitled matter, pursuant to Notice, before Julie A. Rixe, court reporter and notary public, at Suite 190, 658 Cedar Street, in the City of St. Paul, County of Ramsey, State of Minnesota, on the 13th day of June, 2012, commencing at approximately 2:00 p.m.</p> <p style="text-align: center;">* * *</p>	<p style="text-align: center;">I N D E X</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;"></th> <th style="width: 50%; text-align: right;">PAGE</th> </tr> </thead> <tbody> <tr> <td>1</td> <td></td> </tr> <tr> <td>2</td> <td>WITNESS</td> </tr> <tr> <td>3</td> <td>DANIEL G. PUHL</td> </tr> <tr> <td>4</td> <td>Examination by Mr. Goldsmith</td> </tr> <tr> <td>5</td> <td>Examination by Mr. Sigurdson</td> </tr> <tr> <td>6</td> <td></td> </tr> <tr> <td>7</td> <td></td> </tr> <tr> <td>8</td> <td></td> </tr> <tr> <td>9</td> <td></td> </tr> <tr> <td>10</td> <td></td> </tr> <tr> <td>11</td> <td></td> </tr> <tr> <td>12</td> <td></td> </tr> <tr> <td>13</td> <td></td> </tr> <tr> <td>14</td> <td></td> </tr> <tr> <td>15</td> <td></td> </tr> <tr> <td>16</td> <td></td> </tr> <tr> <td>17</td> <td></td> </tr> <tr> <td>18</td> <td></td> </tr> <tr> <td>19</td> <td></td> </tr> <tr> <td>20</td> <td></td> </tr> <tr> <td>21</td> <td></td> </tr> <tr> <td>22</td> <td></td> </tr> <tr> <td>23</td> <td></td> </tr> <tr> <td>24</td> <td></td> </tr> <tr> <td>25</td> <td></td> </tr> </tbody> </table>		PAGE	1		2	WITNESS	3	DANIEL G. PUHL	4	Examination by Mr. Goldsmith	5	Examination by Mr. Sigurdson	6		7		8		9		10		11		12		13		14		15		16		17		18		19		20		21		22		23		24		25	
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<p>1 APPEARANCES:</p> <p>2 GARY GOLDSMITH, Executive Director, and</p> <p>3 JEFFREY SIGURDSON, Assistant Executive Director,</p> <p>4 and JODY POPE, Management Analyst, Minnesota</p> <p>5 Campaign Finance and Public Disclosure Board,</p> <p>6 Centennial Office Building, Suite 190, 658 Cedar</p> <p>7 Street, St. Paul, Minnesota 55155-1603, appeared</p> <p>8 for and on behalf of the Minnesota Campaign</p> <p>9 Finance and Public Disclosure Board.</p> <p>10 The Deponent appeared pro se.</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22 WHEREUPON, the following proceedings</p> <p>23 were duly had and entered of record, to wit:</p> <p>24</p> <p>25</p>	<p>1 DANIEL G. PUHL,</p> <p>2 after having been first duly sworn, was</p> <p>3 examined and testified on his oath as follows:</p> <p>4 MR. GOLDSMITH: For the record,</p> <p>5 appearances are Gary Goldsmith from the Campaign</p> <p>6 Finance Board; Jeff Sigurdson, assistant executive</p> <p>7 director, Campaign Finance Board; and Jody Pope,</p> <p>8 our management analyst, is also here.</p> <p>9 EXAMINATION</p> <p>10 BY MR. GOLDSMITH:</p> <p>11 Q So we'll get started. If you would, please, state</p> <p>12 your full name for the record and spell your last</p> <p>13 name.</p> <p>14 A Daniel Girard Puhl, last name is spelled P, as in</p> <p>15 president, U-H-L.</p> <p>16 Q And your current mailing address?</p> <p>17 A 1533 Crowell Road, Vienna, Virginia 22182.</p> <p>18 Q And a phone number if we need to reach you?</p> <p>19 A This one, 763-291-0606.</p> <p>20 Q And we have your e-mail as</p> <p>21 danpuhl@cardinalsfec.com; is that correct?</p> <p>22 A That's correct. Yes, that's correct.</p> <p>23 Q Just looking at my phone to see figure if I can</p> <p>24 out how to stop calls from coming in, but I guess</p> <p>25 they're going to stop. We have a new phone system</p>

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1 and I don't really know quite how to use it
 2 completely.
 3 A That's fine. At least I know what that noise was.
 4 Q So if you hear a chime, that's a call to me.
 5 You know we're here to talk primarily --
 6 or, actually, exclusively about a corporation
 7 called Count Them All Properly, Inc.
 8 And before I actually get into that, I
 9 want to talk about the days or weeks leading up to
 10 the November 2010 elections. I've been told, and
 11 I don't know if it's correct or not, that during
 12 that time, Cardinals was doing some work for the
 13 Republican Party that was having trouble with some
 14 of its FEC reports. Is that correct?
 15 A Let me think. Yeah, that's -- I'm trying to think
 16 of the timing. Yes, they had some difficulty
 17 with -- You know, I don't know the timing, but
 18 yes, they had some reports that needed to be
 19 amended.
 20 Q Okay. Let me get a little bit more specific,
 21 because I'm trying to pin down whether what I have
 22 been told by others is correct or not, and that is
 23 that right around the election or leading up to
 24 the election in 2010, you personally had some
 25 temporary office space at the Republican Party

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1 headquarters in St. Paul because you were working
 2 there with them on a regular basis. Do you
 3 remember that?
 4 A The fact of that matter is that they had -- Since
 5 I started working there in 2009 -- or my company
 6 had started working there in 2009, they had always
 7 had a space available with a computer and a desk
 8 for the use of myself or my employees.
 9 Q Okay. And that would have gone leading up at
 10 least through the election in 2010, then?
 11 A As far as I know it's still there --
 12 Q Okay.
 13 A -- available. I'm not sure if it still is or not,
 14 we just don't use it very often.
 15 Q Okay. I take it you know Tony Sutton?
 16 A Yes.
 17 Q How long have you known Tony?
 18 A I met him -- Again, the dates are going to not be
 19 accurate, but events are.
 20 Q Sure.
 21 A I was working with Jerry Blakey for mayor,
 22 St. Paul, Minnesota, and he got the Republican
 23 endorsement during that election. That's when I
 24 met Tony Sutton. I did not have any contact with
 25 him between the end of that election, well,

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1 primary, and when he was running for chair of the
 2 Party, and that was I went to a reception for
 3 him. I think he had just been elected. I went to
 4 a reception for him as the newly-elected chairman.
 5 Q Would you describe your relationship, then, as
 6 business rather than as a personal friendship?
 7 A Yeah. I've never had a drink or gone to lunch or
 8 been to his house or anything like that. His wife
 9 doesn't -- I mean, she might know me, but, no, we
 10 don't have any... And with any of my clients it's
 11 kind of a blanket thing. With any of the clients
 12 of my company I don't have a non-business
 13 relationship with any of those folks.
 14 Q Okay, thanks. At some point you or you and others
 15 came up with an idea that an organization should
 16 be formed that would be involved in some way with
 17 the recount of the gubernatorial election in
 18 2010. Can you tell me when that idea first formed
 19 or was introduced to you?
 20 A Well, it wasn't my idea. It was the Democrats'
 21 idea. And they apparently had asked the Campaign
 22 Finance Board for a ruling or an opinion about
 23 paying for recount-related bills, legal bills, and
 24 I followed that in the news.
 25 And when the document came out, it was

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1 fairly widely distributed and I got a copy of it
 2 and kind of waited around. And the Democrats, you
 3 know, went about their business and started theirs
 4 and did what they needed to do. And nobody was --
 5 You know, I didn't see anything for Emmer and the
 6 Republicans.
 7 And I thought this is a good opportunity
 8 for me business-wise because I can have a new
 9 client for my bookkeeping, billing. And so I went
 10 ahead and started this corporation, because
 11 basically nobody else had and it was a business
 12 opportunity for me.
 13 Q Okay. So the concept came from work that the
 14 Board did and published, but the idea that
 15 somebody ought to actually do it in the context of
 16 the Emmer election was your idea, then?
 17 A Well, you know, I don't have any specific
 18 knowledge of conversations or anything like that,
 19 but I'm sure that this didn't -- that the concept
 20 that this should be done for the Emmer effort, you
 21 know, might not have been my original idea. I may
 22 have overheard people talking about it, hey,
 23 Dayton has somebody doing it for him, why
 24 shouldn't Emmer have somebody doing it for him.
 25 So I won't claim original idea. I might

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1 have overheard and even participated in
 2 conversations that that was discussed.
 3 Q As the decision was being made to actually go
 4 ahead and form a corporation, did you discuss that
 5 with Tony Sutton?
 6 A I did not. I did this entirely on my own. I
 7 decided to form a corporation, and I decided
 8 specifically to make it a taxable regular
 9 corporation because I wanted it absolutely
 10 separate from any campaign finance, anything. And
 11 that's why I chose that perhaps extreme form of
 12 organization. But it was a very specific decision
 13 on my part to make sure that it never got involved
 14 in anything political at all.
 15 Q Okay. In making that -- thinking about that and
 16 reaching that conclusion, did you consult with
 17 anybody for legal or campaign finance advice?
 18 A I did not. Because I read the Campaign Finance
 19 Board's document and it said that, you know, this
 20 is post-election. This is not Campaign Finance
 21 related, not covered under Campaign Finance law.
 22 So I figured, well, there's no need to contact
 23 Campaign Finance because I've got the opinion
 24 here.
 25 As for the corporate formation, you

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1 know, fairly simple paperwork type of thing. The
 2 Secretary of -- Minnesota Secretary of State's
 3 office has a fabulous website that you just
 4 download the documents in the Microsoft Word
 5 format and just fill in the blanks, for the most
 6 part, pay the fee, and then you have a
 7 corporation, structure of a corporation. So
 8 that's -- It just kind of took on its own life and
 9 went fairly quickly.
 10 Q Sure. So you were the only one that was
 11 responsible for getting those documents developed
 12 and filed with the Secretary of State?
 13 A Correct, did them all personally.
 14 Q Okay. And so you would say up to the point when
 15 the Certificate of Incorporation was issued, which
 16 was December 3rd of 2010, neither Tony Sutton or
 17 anybody from the Republican Party had been
 18 involved?
 19 A Correct, that's absolutely correct, nor anybody
 20 from the Emmer campaign or anybody else.
 21 Q All right. Prior to forming the corporation, had
 22 you talked to Tony Sutton or anybody from the
 23 Republican Party unit or the Emmer campaign about
 24 how your corporation might raise money?
 25 A No. As a matter of fact, when I announced it, and

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1 I tried to tell as many people as possible after I
 2 formed it, they were a bit surprised that I had
 3 done that, but...
 4 Q Tell me about the announcement, because I don't
 5 think I read specifically about that in the
 6 paper.
 7 A And you wouldn't because I don't deal with the
 8 press, as much as I can. I just told, you know,
 9 basically everybody I knew and everybody I was
 10 working with that I had done this, that I formed
 11 this corporation, just like the Democrats had
 12 done. And, you know, we're going to gather the
 13 legal bills from the recount, and then we're going
 14 to, you know, provide some services to raise money
 15 to pay off the legal bills.
 16 Q Okay. In your letter to us you said that prior to
 17 the issuance of the Certificate of Incorporation,
 18 Count Them All Properly had conducted no
 19 business. That's an accurate statement?
 20 A Absolutely not, because obviously we didn't know
 21 there would be a recount.
 22 Q Well, it didn't incorporate until December 3rd, so
 23 by then the recount was already going on.
 24 A Right, right. There was nothing going on prior to
 25 that.

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1 Q Okay. And the recount ended, really, on
 2 December 8th, when Tom Emmer conceded. Up to that
 3 date, December 8th, had CTAP conducted any
 4 business?
 5 A Conducted any business like money in or out? I
 6 don't think so. I don't think we had an
 7 organizational meeting at that point. I was still
 8 looking for directors I think.
 9 Q Right. I think your first organizational meeting,
 10 at least according to the materials that we have
 11 been provided, was February 17th, which was a
 12 meeting at the Meritage, M-E-R-I-T-A-G-E. Does
 13 that match your recollection?
 14 A Yeah.
 15 Q Okay. I don't know if you do, but we've been
 16 referring to Count Them All Properly as CTAP.
 17 A That's fine.
 18 Q So it would be accurate to say that CTAP did not
 19 at any time actually hire attorneys to provide
 20 legal services for the recount; is that correct?
 21 A That is correct.
 22 Q And it didn't order any photocopies of ballots or
 23 anything else from county auditors that might help
 24 with the recount?
 25 A That is correct as well.

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1 Q And CTAP did not recruit volunteers or otherwise
 2 participate in the actual activity of the recount?
 3 A That's correct.
 4 Q Okay. Did you have any conversations with Tony
 5 Sutton shortly after and in response to your
 6 announcement of the formation of the corporation?
 7 A Oh, sure, sure. I was talking to anybody who
 8 would listen, for the most part, asking them two
 9 things, first of all, especially with Tony. One
 10 of them was that we were letting people know that
 11 their money was welcome, and, you know, the
 12 service we were providing is to pay off these
 13 legal bills. And, of course, we needed to get the
 14 legal bills, anyone who wanted to provide their
 15 legal bill to us related to the recount, needed to
 16 do that in order for us to work on paying it off,
 17 obviously.
 18 And Tony had had a lot of contact with
 19 those folks, and I knew that would be a good way
 20 for them to get the word.
 21 Q I want to pick up this phone. Are you there yet?
 22 A Yeah.
 23 Q My headset was kind of muffling the speaker, so I
 24 think it will be a little better this way.
 25 Did you talk to Tony about how he or the

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1 Republican Party might help you with fund-raising?
 2 A No. Actually, we never -- You probably got this
 3 from Mary Igo too. We never really had a very
 4 good -- I should say we didn't have a specific
 5 plan of how we were going to get money.
 6 Q Okay.
 7 A I guess my expectation was that people on the
 8 right side of the political spectrum were excited
 9 to assist here and that money would kind of
 10 appear. Just because people heard that there was
 11 this organization that was formed to pay off these
 12 bills, you know, the assumption was that there
 13 would be money coming in. So there wasn't an
 14 initial plan on how to make the money.
 15 Q I'm just curious as to why you thought or what you
 16 thought might be the advantage of having a
 17 corporate entity pay these costs rather than just
 18 having the Party pay them itself?
 19 A Well, first of all, I want to be real specific
 20 about this. I guess my reading of the Campaign
 21 Finance Board's, you know, response to the
 22 Democrats' request specifically said that this is
 23 recount stuff, it's not campaign finance stuff, so
 24 this doesn't belong to a political committee,
 25 whether it be Emmer or the Republican Party of

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1 Minnesota. This is kind of -- It didn't count
 2 because it wasn't covered under the law, you know,
 3 these types of expenses and this activity. So it
 4 made sense to create an entity to pay for it and
 5 have a responsible entity there to pay for it.
 6 Q Okay. I mentioned that your records indicate your
 7 first meeting was February 17th, and that's when
 8 you had the board of directors actually formally
 9 come on board. But, actually, the corporate
 10 records indicate that you'd received a check from
 11 Robert Cummins in the amount of \$30,000 prior to
 12 that date.
 13 Can you explain how that check came
 14 about?
 15 A It was a result of Tony Sutton asking some people
 16 to contribute.
 17 Q Okay. Had Tony communicated with you about his
 18 efforts to get money for CTAP?
 19 A I don't recall if he did or not.
 20 Q Okay. Did you have any discussions yourself with
 21 Mr. Cummins?
 22 A I have not.
 23 Q So you knew from Tony that the check was being
 24 worked on and eventually it arrived?
 25 A I think what arrived -- You know, I don't remember

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1 exactly what the timing was, but I understood that
 2 Tony was responsible for asking Mr. Cummins, yes.
 3 Q Okay. Do you know the names of any other people
 4 that Mr. Sutton might have asked to make
 5 contributions to CTAP?
 6 A No, I don't.
 7 Q And no other contributions were forthcoming?
 8 A Unfortunately, no.
 9 Q In fact, CTAP actually has never engaged in any
 10 fund-raising efforts of its own, is that correct,
 11 other than your --
 12 A That is correct.
 13 Q -- other than you talking it up among people who
 14 might want to donate?
 15 A Yes, that's correct.
 16 Q So CTAP gets the \$30,000 and eventually gets the
 17 bills from three law firms. What was your role in
 18 getting these invoices from the three law firms?
 19 That would be Trimble & Associates, Briggs and
 20 Morgan, and the Bryan Cave firm?
 21 A Just, you know, basically announcing and telling
 22 Tony Sutton and, I don't remember, some other
 23 people I'm sure that, you know, we were accepting
 24 these invoices that were related to the -- that
 25 were directly related to the recount or as a

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1 result of the recount. You know, I knew that Cave
 2 and Trimble and Briggs and Morgan, based on media,
 3 I knew they had worked on the recount and that
 4 they had bills. And so that's what I expected,
 5 that they would send them to us, and they did.
 6 Q Okay. Once you got the bills, what was Tony
 7 Sutton's role, if any, in the decision as to who
 8 should be paid and how much each firm should be
 9 paid?
 10 A Well, nobody outside the corporation had a role in
 11 the decision. However, I think we did discuss, as
 12 a board, that we would contact the Party and Tony
 13 Sutton and let them know what our plan was, to pay
 14 for whomever we were paying.
 15 For instance, we had the 30,000 and we
 16 were going to pay, I don't remember, like 9,000
 17 per law firm. And we just let them know, you
 18 know, this is what we're doing. And since he had
 19 so much contact with these folks and he was
 20 communicating -- had communicated with them, you
 21 know, we thought that that was a reasonable thing
 22 to provide -- reasonable amount of information to
 23 provide to him.
 24 Q Okay.
 25 A Now, I don't know -- I can't say that we did that

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1 when we made the \$9,000 payments, but we might
 2 have.
 3 Q You're the one that signs the checks?
 4 A Yeah. Actually, there were -- We don't -- We have
 5 a checking account. We don't have any checks. I
 6 just go get the bank check.
 7 Q Oh, I see. And other than the three payments of
 8 \$9,000 each to the attorneys, no payments for
 9 recount costs have been made by CTAP?
 10 A Other than incorporation and tax preparation and
 11 stuff like that, I don't believe so, no.
 12 Q Your corporate operational accounts, but none of
 13 the recount debt?
 14 A That's as far as I know, no.
 15 Q Okay. I'm just reviewing here.
 16 Does your company work with the
 17 Republican Party of Minnesota on preparing its
 18 reports that are filed with the Campaign Finance
 19 and Public Disclosure Board?
 20 A We're a federal reporting company. When we have
 21 state parties as clients, as a courtesy we will,
 22 you know, in the case of Minnesota we'll load up
 23 the information into the database, but we don't
 24 provide any assurance. We don't provide any
 25 assurance on our federal reports either. We put

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1 these reports together.
 2 As for the Minnesota one, basically we
 3 did that. We did data input into the database,
 4 with the information they provided us, and then
 5 provided it to their decision-makers for approval
 6 and filing, things of that nature.
 7 Q This is sort of a separate subject, but it's part
 8 of what the Board is looking at, as well, is the
 9 fact that on the 2011 -- I'm sorry -- 2010
 10 year-end reports for the Republican Party, certain
 11 transactions that were owed but not paid, and
 12 under state law you report transactions that are
 13 owed as well as paid. Certain transactions were
 14 left off of those reports. Among those were the
 15 three attorney's bills that we talked about.
 16 Did you have any discussion with
 17 Mr. Sutton about whether that data should be
 18 entered into the database or not?
 19 A No. As a matter of fact, as I mentioned before,
 20 you know, the document from the Campaign Finance
 21 Board specifically said that if it's recount, it's
 22 not covered -- you know, it's not under Campaign
 23 Finance law so it's not part of this.
 24 So that information was not provided to
 25 me or to my company to put that into the

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1 database. And I'm not sure that they would
 2 consider that -- You know, I think everybody that
 3 I dealt with was under the same belief that I am,
 4 that this document says it's not, you know, under
 5 Campaign Finance Law so you wouldn't deal with --
 6 Why would you report it if it's not under that.
 7 And the way that we operate is that we put on
 8 reports the information we are provided.
 9 Q Sure.
 10 A We don't go back and say, gee, is this
 11 everything. It's not an accounting firm that we
 12 have.
 13 Q Sure.
 14 A We just -- We do recordkeeping and reporting for
 15 these organizations. If we get the records, if we
 16 have the documents, then, you know, we will put
 17 those into the system.
 18 In the case of Republican Party of
 19 Minnesota, we didn't get the mail.
 20 Q Okay. I don't know the federal law well at all,
 21 but I wanted to ask you a question about it. In
 22 the context of federal law, I mean, we know that
 23 the Republican Party of Minnesota has a federal
 24 account as well. Does federal law permit them to
 25 leave off of their reports to the FEC transactions

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1 that go through the federal account because for
 2 some reason the Party might believe that they are
 3 not relevant or covered by federal law?
 4 A Well, federal law is a lot more broad than
 5 Minnesota's law is related to that. Specifically,
 6 recount is considered within federal election law,
 7 so anything related to that there would be no
 8 question, confusion, nothing. It would be
 9 reported, it's on there.
 10 The only question -- I mean, if it's a
 11 non-federal expense, then it wouldn't be listed on
 12 the federal reports. That's the only type of debt
 13 that would not be on the federal report.
 14 Q But that debt wouldn't go through the federal
 15 account, would it, or would it?
 16 A I'm sorry, which?
 17 Q Non-federal expense.
 18 A Correct, it would not be reported at all. And,
 19 you're right, it would not go through the federal
 20 account. Now, it could. And if it was, then the
 21 expense would be shown as a federal expense, but
 22 the debt would never show up on there.
 23 Q I'm not quite sure you've answered my question.
 24 It wasn't specific to recounts, it was whether any
 25 expense that is paid through the Party's federal

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1 account could be omitted from the federal report?
 2 A And I actually answered that in the last statement
 3 I made.
 4 Q Oh, okay.
 5 A The only time that it could is, for example, if
 6 they paid a non-federal expense with federal
 7 money, which is totally permissible.
 8 Q Okay.
 9 A But, you know, unless -- And I guess I'll have to
 10 use an example. If Republican Party of Minnesota
 11 owes Company X \$1,000, but it's a non-federal
 12 activity that produced that \$1,000 bill, and the
 13 bill was dated April 15th, let me pick a date,
 14 2012, the Republican Party of Minnesota wouldn't
 15 report that on their monthly report to the Federal
 16 Election Commission at all. Yet if they paid it
 17 with federal money on May 31st, then it would show
 18 up on their May 31st -- or if they paid \$500 of
 19 it, it would show up as a \$500 expense on their
 20 May report.
 21 Q Okay.
 22 A So I'd love to say that the answer is no, but the
 23 answer is, well, it could be in that type of
 24 situation.
 25 Q Sure. I understand now. Thank you.

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1 There were other expenses that the
 2 Republican Party allegedly left off of its 2011 --
 3 I'm sorry -- 2010 and, also, 2009 reports. But
 4 I'm presuming, correct me if I'm wrong, that your
 5 response would be the same. If they weren't on
 6 the reports, it means that the data was not given
 7 to you to enter into the system?
 8 A That's correct, with the caveat that we do make
 9 errors, so it's possible that we overlooked
 10 something that was provided. But, in general, the
 11 answer is the same as before.
 12 Q Did you have any discussions with Tony Sutton
 13 specifically about not -- him not providing you
 14 with certain data for unpaid bills?
 15 A You know, I didn't have a lot of -- You know, my
 16 interaction and my company's interaction with the
 17 client is generally not with the person in charge,
 18 so I didn't have a lot of interactions with Tony
 19 Sutton at all with any of the business. It went
 20 through the finance director and the treasurer
 21 almost exclusively. And when we provided a report
 22 draft, it would always go to the finance director
 23 and the treasurer. We never gave it to the -- As
 24 far as I know, we never gave it to the Party
 25 chair. They may have circulated it. So I would

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1 never have any discussions like that with Tony
 2 Sutton.
 3 MR. GOLDSMITH: Okay. I'm just going to
 4 ask Mr. Sigurdson if he has caught anything that I
 5 have missed and should have asked and see if he
 6 wants to ask a question.
 7 EXAMINATION
 8 BY MR. SIGURDSON:
 9 Q Mr. Puhl, I just have one part of this which I'm
 10 unclear on. There seemed to be a fair amount of
 11 work in getting the invoices from the law firms,
 12 you might say, reissued or reinviced to CTAP.
 13 Can you tell us about the communication
 14 that occurred there in terms of CTAP getting those
 15 reinviced to you, who you worked with with the
 16 Party on that issue?
 17 A You know, Jeff, I didn't quite catch the last part
 18 of that, the last half of the question.
 19 MR. SIGURDSON: Gary and I are switching
 20 places. Sorry, speaker phone. Let me try again.
 21 THE WITNESS: Thank you.
 22 BY MR. SIGURDSON:
 23 Q Thank you.
 24 A I'm a little hard of hearing too. I apologize.
 25 Q My question is, getting the various invoices from

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1 the law firms, from the three law firms,
 2 reissued or reissued to CTAP, who were you
 3 working with with the Republican Party to get that
 4 to occur?
 5 A It might have been -- It would have been one of
 6 two people. And I know I shouldn't answer a
 7 question like this, saying it's one or two people,
 8 but it would have either been Ron Huettl, the
 9 finance director, or Tony Sutton.
 10 Q Okay.
 11 A It doesn't stick in my mind because it wasn't a
 12 big -- I didn't spend a lot of time on it. It
 13 didn't seem like a big deal.
 14 Q Is it fair to say that the Republican Party was --
 15 I'm not quite sure what word I want to use, but if
 16 not cooperative, at least very willing to have
 17 those invoices reissued to CTAP?
 18 A Oh, yeah. That's very fair to say.
 19 Q And then what sorts of discussions did you have or
 20 did you have any discussions with the law firms in
 21 terms of taking over that debt?
 22 A Not -- No discussions at all with those folks.
 23 Q So you didn't have any direct contact with, like,
 24 Tony Trimble or with any of the attorneys?
 25 A Nope, nope. In fact, I talked to Tony Trimble

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1 once about something separate than this. It was
 2 not a pleasant conversation. I've never met him.
 3 Never talked to any of the other guys. Got a
 4 couple of voice messages from one of the Briggs
 5 and Morgan guys, but never connected up with him.
 6 There was no discussion. The bills showed up.
 7 Q At this point are they continuing to invoice you
 8 for those fees?
 9 A Well, obviously the original invoices stand, and
 10 then I think Trimble sends something
 11 periodically. If he sends it to me -- Like I
 12 said, my conversation with him was unpleasant and
 13 he's blocked from my e-mail. So if he would send
 14 something to me, I wouldn't get it. But I think I
 15 recall talking with Tom Datwyler, and I think he
 16 mentioned that Trimble sends a bill every month.
 17 Q From your perspective -- Well, one thing I was
 18 thinking about with CTAP, I was a little unclear
 19 with your current relationship with CTAP. Are you
 20 still an officer or are you no longer affiliated
 21 with CTAP?
 22 A No, I'm no longer affiliated. Once I moved out
 23 here, it was too cumbersome to maintain anything.
 24 Okay.
 25 Q Okay. I believe that's all the questions I have.

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1 Thank you.
 2 MR. GOLDSMITH: That's all I have, too,
 3 unless there's anything else that you would care
 4 to add that would clarify or add to our
 5 information.
 6 THE WITNESS: I guess just two things.
 7 First of all, obviously the issues with this came
 8 as a surprise to me. You know, I started this
 9 corporation based on the information that I got as
 10 a result of the Board's document response to the
 11 Democrats' stuff -- or question. So, you know, it
 12 comes as a complete kind of shock to me that now
 13 this is somehow related to Campaign Finance
 14 stuff. So, you know, perhaps I'm really ignorant,
 15 but that was a real surprise.
 16 And the second thing that I would say is
 17 almost a plea, and this is related to law. As I
 18 mentioned, federal campaign finance law is soups
 19 and nuts and includes recounts. And if you have
 20 any way of influencing the change in the law to
 21 eliminate any confusion in a situation like this,
 22 everything is covered, you know. If it's a
 23 recount that's still related to an election, this
 24 is all covered, you know, so there's no question.
 25 You can't, you know, start a corporation and pay

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1 bills related to something after the election.
 2 Federal law is very clear, you just can't do
 3 that. And it would be very helpful if Minnesota
 4 law was like that as well.
 5 MR. GOLDSMITH: Appreciate those
 6 comments. Thank you. I think that concludes the
 7 deposition, and we thank you for your time.
 8 THE WITNESS: Okay. Thanks.
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1 STATE OF MINNESOTA)
2) ss.
3 COUNTY OF DAKOTA)
4
5
6

7 Be it known that I took the deposition of DANIEL
8 G. PUHL 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;

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,
11 2012.

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16 JULIE A. RIXE
17 Court Reporter
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