“You know, this whole thing was sort of a continuum, starting at the May 23rd meeting, ending up at the end of the line when the transcript of the call came out. And as I said to counsel, it started as talk to Rudy, then others talk to Rudy. Corruption was mentioned. Then, as time went on—and, again, I can’t nail down the dates—then let’s get the Ukrainians to give a statement about corruption. And then, no, corruption isn’t enough, we need to talk about the 2016 election and the Burisma investigations. And it was always described to me as ongoing investigations that had been stopped by the previous administration and they wanted them started up again. That’s how it was always described. And then finally at some point I made the Biden-Burisma connection, and then the transcript was released. So I can’t tell you on that continuum when, what dates, but that’s kind of what happened.”

“It kept—it kept getting more insidious as [the] timeline went on, and back in July, it was all about just corruption.”
During an Oval Office meeting on May 23, 2019, with Ambassador Sondland, Ambassador Volker, and Secretary Perry, President Trump “just kept saying: Talk to Rudy, talk to Rudy.” (Page 61-62)

Q: When President Trump told you to—you and the others, I understand, everyone at that meeting, and we’ll get to that meeting in more detail—but when he told you to discuss with Rudy Giuliani concerns about Ukraine, did you know at that point what he was referring to?
A: He didn’t even—he wasn’t even specific about what he wanted us to talk to Giuliani about. He just kept saying: Talk to Rudy, talk to Rudy.
Q: Right, I understand that, and I understand he wasn’t specific. But when he said that, did you know what he was talking about?
A: I didn’t, other than he said: Ukraine is a problem.

State Department officials were “fully aware of the issues” with Mr. Giuliani, but “there was very little they could do about it if the President decided he wanted his lawyer involved.” (Page 356-358)

Q: Did you ever discuss Rudy Giuliani with Secretary Pompeo?
A: Only in general terms.
Q: And what did you discuss?
A: That he’s involved in affairs. And Pompeo rolled his eyes and said: Yes, it’s something we have to deal with.
Q: What about his counselor, Ulrich Brechbuhl? You said you had lots of conversations with Mr. Brechbuhl?
A: On and off, yes.
Q: Did you discuss the linkage between the security assistance, the White House meeting, and the investigations with him?
A: I don’t believe I did, but I don’t recall.
Q: What about Rudy Giuliani, did you discuss Giuliani with Brechbuhl?
A: I may have. Again, people usually smiled when they heard Rudy’s name because he was always swirling around somewhere.
Q: Yeah, but, I mean, he was causing serious issues in the U.S. relationship with Ukraine. Did you raise those concerns with—
A: Listen, the State Department was fully aware of the issues, and there was very little they could do about it if the President decided he wanted his lawyer involved.
Q: And does that include Secretary Pompeo and his counselor, Ulrich Brechbuhl?
A: My speculation is yes, that they hit a brick wall when it came to getting rid of Mr. Giuliani.

Mr. Giuliani’s demands “kept getting more insidious” as Ambassador Sondland “became aware that there might be a link between the White House visit and aid to the Ukraine that was being held up.” (Page 91-92, 240, 253-254)

Q: When did you first get an inkling of what Mr. Giuliani was interested in?
A: You know, this whole thing was sort of a continuum, starting at the May 23rd meeting, ending up at the end of the line when the transcript of the call came out. And as I said to counsel, it started as talk to Rudy, then others talk to Rudy. Corruption was mentioned. Then, as time went on—and, again, I can’t nail down the dates—then let’s get the Ukrainians to give a statement about corruption. And then, no, corruption isn’t enough, we need to talk about the 2016 election and the Burisma investigations. And it was always described to me as ongoing investigations that had been stopped by the previous administration and they wanted them started up again. That’s how it was always described. And then finally at some point I made the Biden-Burisma connection, and then the transcript was released. So I can’t tell you on that continuum when, what dates, but that’s kind of what happened.

... Because the first time I recall hearing about 2016 and Burisma was during the negotiations of the press statement. Again, unless there’s some text that I’ve completely have [sic] forgotten about, that’s when I first remember getting into those issues. It was always just about corruption prior to that. It kept—it kept getting more insidious as [the] timeline went on, and back in July, it was all about just corruption.

... The continuum was, first of all, an unconditional phone call and an unconditional invitation to the White House, and then I believe the next part of the continuum was some kind of a commitment to investigate corruption generally. And then the next part of the continuum was talking about the Burisma and the 2016 election, which as I recall, was heavily discussed during the negotiation of the short-lived press statement, which only lasted a few days, and then it died. And then at the end of that continuum I became aware that there might be a link between the White House visit and aid to the Ukraine that was being held up when I couldn’t get a straight answer as to why the aid was being held up, both Senator Johnson and Ambassador Taylor raised the possibility that there might be a link. And then the aid was released, and then this whole thing blew up. That’s the best I can recall the sort of progression.

With respect to the “demands” made by President Trump and Rudy Giuliani to investigate the 2016 election and Burisma, “those conditions would have to be complied with prior to getting a meeting.” (Page 280, 282-283)

Q: There were demands, weren’t there, that an investigation take place of 2016 or Burisma? Ultimately those were demands, were they not?
A: Ultimately, yes.
Q: And it’s fair to say that you had to navigate those demands, you had to accommodate what the President and his lawyer wanted, if you were going to set up this meeting you thought very important?
A: I think that’s fair.
...
Q: But I think you said, Ambassador, that over time things got more and more insidious. I think those were your words. It started out with no condition, and then there was a condition for investigation into the corruption, and then there was a condition of an investigation into 2016 and Burisma, and then on the call itself it became clear the condition was investigation of 2016 and the Bidens. I think you described that as becoming more and more insidious, correct?
A: That’s correct.
Q: And isn’t it also fair to say that because there were added conditions to this meeting that Ukraine desperately wanted and that you wanted to make happen, that that meeting wasn’t going to happen unless Ukraine played ball in meeting the demands of the President and Mr. Giuliani? Isn’t that a fair use of that colloquial expression?
A: Well, that expression came up in previous testimony, and I’d never heard the term “play ball.”
Q: But you understand what that means, right?
A: If you mean that those conditions would have to be complied with prior to getting a meeting, that was my understanding.

With respect to President Trump’s demand that Ukraine investigate the Bidens, “whatever the Ukrainians were going to promise in any context, he wanted it public.” (Page 142-143)

A: I believe that what Mayor Giuliani passed on, or I believe what I heard from Ambassador Volker, likely coming from Mayor Giuliani, because the President never made that statement directly to me or to anyone, to the best of my knowledge, was that whatever the Ukrainians were going to promise in any context, he wanted it public.
Q: You also mentioned that in going through the chronology with the minority counsel, that over time, you learned more and more about what the President and his lawyer truly wanted from Ukraine. And there was an evolution from generic interest in fighting corruption to an interest in Burisma, to finally the realization that what they were interested in was investigation of the Bidens. Is that a fair summary?
A: Yes.

The demands that Ukraine investigate the former Vice President’s son were “improper.” (Page 308)

Q: When you said in your statement, on page 8 of your statement, you did not understand until much later that Mr. Giuliani’s agenda might have also included an effort to prompt the Ukrainians to investigate Vice President Biden or his son or to involve Ukrainians directly or indirectly in the President’s 2020 reelection campaign, why did you—why do you think that either of those activities are problematic?
A: Because I believe I testified that it would be improper to do that.
Q: And illegal, right?
A: I’m not a lawyer, but I assume so.
Q: Sir, one last question, which is: Do you believe that, with regard to Burisma, that the effort by Giuliani to investigate Burisma, now that we know that it was actually intended to go after Mr. Biden’s son Hunter, was ever a proper inquiry?

A: I mean, I think I testified to that at the beginning, that it would not be proper.

Q: And illegal, correct?

A: Again, I’m not a lawyer. I don’t know the law exactly. It doesn’t sound good.

After asking why military assistance to Ukraine was frozen, Ambassador Sondland “kept getting different answers from different people” and “could not get a straight answer.” (Page 121-122)

Q: Did you ever have any discussions with National Security Council staff about the 7/18 hold? On July 18th, that’s when the aid was held up.

A: I don’t believe I talked to the NSC staff. I believe I was told by Ambassador Taylor through a text that there was a hold. He had participated in a SVTC [secure video teleconference] and he had found out about a hold. And that was frustrating to me because it just put another obstacle in the way of getting a meeting.

Q: What facts or what firsthand accounts can you provide about the aid holdup?

A: None.

Q: Okay.

A: Other than I was aware of it, I didn’t know why I kept getting different answers from different people.

Q: Okay.

A: There was never any clear—any clear articulation by anyone of, is there even a hold, is it a review, is it an audit, is it the Europeans? I could never get a straight answer out of anyone.

Q: So you never tried to contact OMB or National Security Council to find out more?

A: I think I—I think I made a couple of calls. I may have asked a couple of my folks in the mission. And I just—it just kept getting to be a dead end. I just could not get a straight answer.

After Ambassador Bill Taylor texted Ambassador Sondland on September 9, 2019, that “I think it’s crazy to withhold security assistance for help with a political campaign,” Ambassador Sondland called President Trump, and in response to a question “What do you want from Ukraine?” the President said: “I want no quid pro quo. I want Zelensky to do the right thing.” (Page 105-106)

Q: Okay. So when you telephoned the President, tell us what happened.

A: Well, from the time that the aid was held up until I telephoned the President there were a lot of rumors swirling around as to why the aid had been held up,

1 Ambassador Sondland submitted a declaration to supplement his testimony on November 4, 2019, in which he stated that the opening statements of Ambassador William Taylor and Tim Morrison refreshed his recollection. Ambassador Sondland stated that he “cannot specifically recall if I had one or two phone calls with President Trump in the September 6-9 time frame.” (Decl. Page 2)
including they wanted a review, they wanted Europe to do more. There were all kinds of rumors. And I know in my few previous conversations with the President he’s not big on small talk so I would have one shot to ask him. And rather than asking him, “Are you doing X because of X or because of Y or because of Z?” I asked him one open-ended question: What do you want from Ukraine? And as I recall, he was in a very bad mood. It was a very quick conversation. He said: I want nothing. I want no quid pro quo. I want Zelensky to do the right thing. And I said: What does that mean? And he said: I want him to do what he ran on. And that was the end of the conversation. I wouldn’t say he hung up [on] me, but it was almost like he hung up on me.

Ambassador Sondland did not remember suggesting in March 2019 that Ambassador Yovanovitch should issue a tweet in support of the President after the publication of news stories apparently based on Rudy Giuliani’s claims against her. (Page 58, 189)

Q: Did you—do you recall that at the end of March there were some articles that came out that included some accusations related to her?
A: That may have been the press I was referring to.
Q: Do you know what press you might have read it in?
A: I have no idea.
Q: And you don’t remember having a conversation with her after those allegations came out?
A: I don’t remember.
Q: Do you remember giving her any advice on how to handle the situation?
A: I don’t. I don’t.
Q: You don’t?
A: No.
Q: You don’t remember suggesting that she issue a tweet in support of the President?
A: No, I don’t remember that.

…
Q: Okay. Did Ambassador Yovanovitch lean on you for career counseling?
A: We may have—I don’t remember. I honestly don’t remember the conversation. I’m not denying it occurred. I just don’t remember.
Q: Okay. So to the best of your recollection, you never—
A: It wasn’t, you know, a momentous enough conversation that I would have remembered it.
Q: Okay. You never encouraged her, to the best of your recollection, to tweet or something to that effect, support of the President?
A: Again, I don’t—would I swear 100 percent I didn’t, no, but I don’t—I just don’t remember it.
Ambassador Sondland did not recall when he understood that Mr. Giuliani’s demands that Ukraine investigate Burisma were intended to target the Bidens. (Page 71-72)

Q: Well, but Mr. Giuliani was talking about Burisma and the Bidens. And it’s your testimony today you had no idea of any Biden connection to Burisma, it came as a complete revelation when you read the call record in September?
A: I don’t recall when I finally—when the light finally went on that Burisma and the Bidens were connected, but certainly not early on at all. I can’t tell you the day that finally I said, oh, Burisma equals Biden. I have no idea when that was.
Q: But I think you suggested in your opening statement that you didn’t know until you read the call record, and it was an epiphany that the President wasn’t simply interested in this energy company—which, by the way, he doesn’t mention in the call record—but he was really interested in an investigation involving the Bidens.
A: No, I think I said that I didn’t know what was in the call until I saw the call record. I had no idea that he had brought up the Bidens in the call until I saw the call report.
Q: But I think you were also suggesting that until you read that call record—and correct me if I’m wrong—until you read that call record, you never put two and two together that actually Burisma involved the Bidens, correct?
A: I don’t recall when I finally put it together. I don’t recall what the date was or the place was or the time was. I don’t recall.

Ambassador Sondland did not recall having a call with President Zelensky, Ambassador Volker, Ambassador Taylor, and Secretary Perry on June 28, 2019, but he did recall “negotiating a public statement to get a Burisma, 2016 … the language that was being proposed by Giuliani.” (Page 83, 160-161)

Q: Do you recall having a conference call around June 28th with Ambassador Volker, Ambassador Taylor, and Secretary Perry, and after you spoke to them you may have patched in President Zelensky?
A: I’m not saying it didn’t occur. I don’t remember the call, though.
Q: You wouldn’t remember having a conversation with President Zelensky?
A: I’ve had several conversations with him, and I speak with a lot of foreign leaders from a lot of countries. It wasn’t something that I can remember.
Q: So you don’t remember that you—whether you encouraged President Zelensky to initiate any investigations in order to get the White House meeting on that conference call?
A: I think the only discussion that I had in negotiating a public statement was to get a Burisma, 2016—this was the language that was being proposed by Giuliani.

... 

Q: I’m trying to refresh your recollection as to whether or not you remember anything more about a conference call that you might have had with the Ambassador Volker, Ambassador Taylor, and Secretary Perry on June 28th?
A: I don’t. I do not recall.
Q: And whether you would have patched in President Zelensky?
A: I might have, but I don’t—again, I don’t remember the contents of that call.
Ambassador Sondland did not recall if he had a conversation with Acting Chief of Staff Mick Mulvaney about a potential White House visit for President Zelensky or whether he had ever stated that there was an agreement to schedule a White House visit if Ukraine agreed to open specific investigations. (Page 165-167)

Q: Right. And so whether it was on this date or otherwise, obviously, you reference a conversation with Mulvaney. Did you have a conversation with Mr. Mulvaney about a White House visit for President Zelensky?
A: I don’t recall. All I can tell you is Mulvaney was almost impossible to get ahold of. He rarely responded to emails and almost never returned phone calls.
Q: So why would Ambassador Volker be asking you to talk about [sic] Mulvaney?
A: Because he figured I’d have a better chance of getting him than he would.
Q: You don’t have a recollection of—
A: We may have connected. I don’t recall.
Q: You don’t recall?
A: I don’t recall.
Q: And you don’t recall the substance of any conversation with Mr. Mulvaney that you may have had about a White House visit?
A: I don’t know the date, but I’m sure at some point, I had a phone conversation, or I may have run into Mr. Mulvaney in the White House, having been there for another reason, and asking, you know, why don’t we have the meeting yet? Why don’t we have the phone call? And I don’t think I got a definitive answer, other than, we’re working on it.
Q: He didn’t tell you at any point that the President needs these investigations in order to have a White House visit?
A: That was never linked. That was only specifically brought into the press statement for a brief period of time through Mr. Giuliani when we were negotiating a press statement.
Q: So if another witness were to testify that you relayed the substance of a conversation that you had with Mr. Mulvaney, where you indicated that you had an agreement on a White House visit as long as you got an investigation in early July, are you saying that that witness would not be telling the truth?
A: That I do not recall at all.
Q: And if there was a memorialization of that witness’ perspective and corroborates their testimony, are you saying that that testimony would be inaccurate?
A: I’m saying I don’t have any recollection about an investigation. The only thing that I have testified to is that the two items were to be mentioned in the press statement at one point during the press statement negotiations, which were conducted between Volker, Giuliani, and, as I said, I gave input.

Ambassador Sondland did not recall details about a July 10, 2019, White House meeting with Ukrainian officials, including whether he had requested that Ukraine conduct specific investigations. (Page 109-110, 112-114)

A: You know, it wasn’t really my meeting to run. I sat and listened. And I had a—some kind of a briefing prior to it and there were a number of subjects being
covered, energy, potential White House meeting, all kinds of things. And Ambassador Bolton pretty much ran the meeting.

Q: Do you remember how long the meeting lasted?
A: I want to say 30 minutes, my guess.
Q: And do you remember saying anything during the meeting?
A: I may have chimed in on a point or two, but I remember it being a very friendly meeting.
Q: Okay. Did you bring up the prospect of investigations that Ukrainians need to conduct?
A: Not to the best of my knowledge.

…

Q: So she [Fiona Hill] never expressed dismay about the scheduling of the 7/10 meeting?
A: Not to me, that I recall.
Q: And she never expressed to you dismay about how the meeting—what occurred in the meeting in Ambassador Bolton’s office?
A: Not to—not to my recollection.
Q: And when you decamped to the Ward Room she didn’t express any dismay about what was discussed?
A: No. It was a typical policy discussion where people disagree on policy.
Q: Was she in the Ward Room meeting the whole time or did she leave early?
A: I don’t—I don’t remember.
Q: Okay.
A: It wasn’t even—it wasn’t even like a sit-down meeting. We were all standing up. We were just looking for a place to talk.
Q: Okay. And do you remember how long that lasted?
A: A few minutes.
Q: Okay. So much shorter than—
A: 10, 10 minutes maybe, 15 minutes. It wasn’t a—it wasn’t a long meeting.
Q: Okay. So you never even sat down?
A: I don’t think so.
Q: So the folks that were in the Ward Room was the same bunch that was in Ambassador Bolton’s office minus Ambassador—
A: I don’t believe the Ukrainians were there.
Q: Oh, they were not? Okay.
A: I don’t think so. I’m trying to remember.
Q: Okay.
A: I don’t recall—
Q: Okay.
A: —if the Ukrainians were there—
Q: Okay.
A: —or if a couple of them came. You know, we were—we were sort of on the move. It wasn’t a formally set meeting that I remember. It was sort of like let’s find a place to talk—
Q: Okay.
A: —once Bolton had to leave.
Q: Okay. And Dr. Hill never, even after that meeting, never expressed any discomfort or dismay?
A: No. I communicated with her on another subject a week or 2 later and it was just great. I mean, again, I’ve never had an unpleasant conversation with her that I can remember, of any kind.

Despite multiple accounts that Ambassador Sondland had stated to Ukrainian officials on July 10, 2019, that it was important for Ukraine to deliver specific investigations on the 2016 election and Burisma, he did not recall if the word “Burisma” was mentioned in the meetings. (Page 223-224)

Q: So you don’t have any recollection in either of those meetings on July 10th raising the issue of Ukraine conducting an investigation or ever mentioning the word “Burisma”?
A: I don’t remember that, no. I don’t remember that.
Q: Ambassador Sondland, in the Ward meeting do you remember ever mentioning the word “Burisma”?
A: I can’t say that the word “Burisma” wasn’t mentioned. I don’t know if I mentioned it or if Ambassador Volker did or if Mr. Vindman—I have no idea.
Q: So the word “Burisma” may have come up in the Ward Room?
A: It may have.

Ambassador Sondland did not recall whether, as publicly reported, he had told Senator Ron Johnson that the freezing of U.S. security assistance was linked to the specific investigations that President Trump and Mr. Giuliani wanted. (Page 211-212)

Q: Do you recall whether you and Senator Johnson discussed the freeze on Ukrainian assistance?
A: On that August 30th call?
Q: Yes.
A: We probably did.
Q: Do you recall what he said to you and you said to him about it?
A: No, other than I do remember he said that he was going to call the President to see if he could get to the bottom of it.
Q: So it’s been reported that he said that when, at least, you allegedly linked the assistance with the announcement by the Ukrainians of these investigations that the President and Rudy Giuliani wanted, Senator Johnson said he winced and his reaction was: Oh, God, I don’t want to see those two things combined. Do you

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2 In his supplemental declaration, Ambassador Sondland stated that “by the beginning of September 2019, and in the absence of any credible explanation for the suspension of aid, I presumed that the aid suspension had become linked to the proposed anti-corruption statement” and “it would have been natural for me to have voiced what I had presumed to Ambassador Taylor, Senator Johnson, the Ukrainians, and Mr. Morrison.” Ambassador Sondland acknowledged telling one of President Zelensky’s advisors in Warsaw that “resumption of U.S. aid would likely not occur until Ukraine provided the public anti-corruption statement that we had been discussing for many weeks.” (Decl. Page 2)
have any reason to doubt that that was Senator Johnson’s reaction to your phone call?

A: I don’t recall—I don’t recall the call going that way, because, again, I was trying to think of why would I have the basis to know that they were linked at that point. I’m not sure I did have the basis to know that. I think we were both pipe dreaming or speculating as to why the aid still hadn’t been released, because I think Senator Johnson was a strong advocate of having the aid released immediately, without any further ado.