

1 A Harvest, the Chinese company.

2 Q So Joe Biden was going to sit on the board of Harvest when he left the Vice  
3 Presidency?

4 A That was the proposal that was subsequently discussed. I mentioned it in  
5 my opening statement.

6 And, to answer your question, sorry, yes, yes, that was -- that was the  
7 understanding. And that's what this was referencing, to my recollection.

8 Q I believe you also mentioned in your opening statement intangible goods,  
9 and that is also in this email.

10 Quote, "Henry understands the intangible goods that come with the partnership,"  
11 quote.

12 Is that in the same vein?

13 A It is.

14 Q Okay. Did Devon Archer ever communicate to you that he understood the  
15 creative idea and the intangible goods to be Joe Biden eventually sitting on the board of  
16 Harvest?

17 A Yes, that's my recollection.

18 Q And I -- I want to be clear. I keep saying the board. Is that the board of  
19 directors? Is that, like, a board of advisors, if you know?

20 A I don't know.

21 Q Okay.

22 A I suspect it was board of advisors. That would have been the ceremonial  
23 role that we -- that's the role that we had discussed. If it was something more than that,  
24 I wasn't part of that --

25 Q Okay.

1 A -- discussion.

2 Q So, by July of 2014, it has been broached that Joe Biden would sit on a board  
3 of a Chinese entity.

4 How does -- what is your understanding of that connection to Burnham?

5 A I'm not sure I understand the question.

6 Q Would Burnham receive anything in connection with Harvest because of Joe  
7 Biden being promised to sit on the board?

8 A Yes.

9 Q What was your understanding of that, what that would be?

10 A Harvest was to be -- was to become an investor in Burnham. So it was to  
11 receive money. The original proposal was \$18 million. There were different numbers  
12 discussed based on the ongoing negotiations. And so that was -- they were connected,  
13 inextricably connected, events or proposals.

14 Q Okay.

15 A I think there are emails that confirm that.

16 Q I'll show you one more email.

17 Mr. [REDACTED]. This will be exhibit 3.

18 [Galanis Exhibit No. 3

19 was marked for identification.]

20 BY MR. [REDACTED]:

21 Q I want to be clear about what this document is. This appears to be Devon  
22 Archer sending to you on August 23rd, 2014, so about the next month after the last email,  
23 an email -- he's forwarding you an email from Michael Leonard to James Bulgar. Is that  
24 correct?

25 A Yes.