

1	<p>CAUSE NO. 2018-06745</p> <p>FREE AND SOVEREIGN STATE OF) IN THE DISTRICT COURT OF VERACRUZ DE IGNANCIO DE LA) LLAVE,) 334 JUDICIAL DISTRICT</p> <p>vs.) HARRIS COUNTY, TEXAS</p> <p>18 SHALLOWFORD PL., LLC) JAVIER DUARTE DE OCHOA, JOSE) A. BANDIN, and MONICA BABAYAN,)</p> <p>Defendants.)</p> <hr/> <p>DEPOSITION OF JOSE BANDIN</p> <p>Taken on behalf of Plaintiff</p> <p style="text-align: center;">* * *</p> <p>August 7, 2018 Calle de Moratin, 53 28014, Madrid, Spain</p>	3												
2	<p style="text-align: center;">INDEX</p> <p>WITNESS: Jose Bandin PAGE Direct Examination by Mr. Leavitt 6</p> <p style="text-align: center;">---</p> <p style="text-align: center;">PLAINTIFF'S EXHIBITS</p> <p style="text-align: center;">---</p> <table border="0" style="width: 100%;"> <thead> <tr> <th style="text-align: left;">NUMBER</th> <th style="text-align: left;">DESCRIPTION</th> <th style="text-align: right;">PAGE</th> </tr> </thead> <tbody> <tr> <td>EXHIBIT 1</td> <td>Sworn Declaration</td> <td style="text-align: right;">51</td> </tr> <tr> <td>EXHIBIT 2</td> <td>Ownership entities/properties</td> <td style="text-align: right;">103</td> </tr> <tr> <td>EXHIBIT 3</td> <td>Investigation document</td> <td style="text-align: right;">110</td> </tr> </tbody> </table>	NUMBER	DESCRIPTION	PAGE	EXHIBIT 1	Sworn Declaration	51	EXHIBIT 2	Ownership entities/properties	103	EXHIBIT 3	Investigation document	110	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	<p>APPEARANCES:</p> <p>On behalf of the Plaintiff:</p> <p>CHRISTOPHER J. LEAVITT, ESQUIRE THE BUZBEE LAW FIRM 600 Travis Street Suite 7300 Houston, Texas 77002 (713)223-5393 cleavitt@txattorneys.com</p> <p>On behalf of the Defendant:</p> <p>JAS BRAR, ESQUIRE FOGLER, BRAR, FORD, O'NEIL & GRAY, LLP 909 Fannin Street Suite 1640 Houston, Texas 77010 (713)481-1010 fbfog@fbfog.com</p>	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	<p>MADRID, SPAIN, MONDAY, AUGUST 7, 2018 9:00 a.m.</p> <p style="text-align: center;">* * *</p> <p>THE VIDEOGRAPHER: Good morning. This is the beginning of Media number 1, Volume 1 in the video deposition of Jose A. Bandin being held at the officers of Radisson Blu Prado, Plaza Plateria de Martinez, 53, 28014, Madrid in Spain. This is being taken on the 7th of August, 2018 at 9:02 a.m. as indicated on the video screen. This deposition is being taken in the matter of Free and Sovereign State of Veracruz De Ignacio La Llave against 18 Shallowford, P.L, dot, comma, LLC, Javier Duarte De Ochoa, Jose Bandin and Monica Babayan. Case number 2018-06745 being heard before the District Court of the 334th Judicial District, Harris County, Texas.</p> <p>The court reporter today is Rachel McRoy of Ross Reporting Services. My name is David ErDOS, and I'm the official videographer here also on behalf Ross Reporting Performances. The standby interpreter is Stephen Carlin of Transatlantic Video Deposition Services.</p> <p>Would Counsel now please introduce themselves and who they represent?</p>	4
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1 plaintiff.

2 MR. BRAR: Jas Brar on behalf of the

3 defendants.

4 THE REPORTER: Do you swear or affirm the

5 testimony you will give will be the truth, the

6 whole truth and nothing but the truth?

7 Thereupon,

8 Deposition taken before Rachel M. Mcroy,

9 Notary Public, in the above cause.

10 THE WITNESS: I do.

11 THE REPORTER: I need to swear in the

12 Interpreter. Do you swear or affirm to translate from

13 English to Spanish and from Spanish to English to the

14 best of your ability?

15 Thereupon,

16 The Interpreter, STEPHEN CARLIN, was sworn to translate

17 from English to Spanish and from Spanish to English.

18 THE INTERPRETER: I do.

19 DIRECT EXAMINATION

20 BY MR. LEAVITT:

21 Q. Sir, will you tell the Ladies and Gentlemen of

22 the Jury your name, please.

23 A. My name is Jose Antonio Bandin.

24 Q. And, sir, what is your current address?

25 A. The street name is Jorge Juan No. 15 2A Valencia,

6

1 Spain zip code 46004.

2 Q. Yes, sir. And your wife is Monica Babayan,

3 right?

4 A. Yes.

5 Q. We're taking this deposition in Spain, sir,

6 because you have been indicted in Mexico, correct?

7 MR. BRAR: Objection. I instruct my

8 witness that any answer by you to this question

9 could possibly permit someone to use and to

10 misuse your answer or combined your answer with

11 something else in a way that would violate your

12 rights under the Fifth Amendment and the U.S.

13 Constitution and the Supreme Court's decision in

14 Ohio v. Reiner under certain laws of your country

15 or under certain international conventions. I,

16 therefore, advise and instruct you, as your

17 lawyer, that you are not to answer this question.

18 Please confirm to Mr. Leavitt that you've heard

19 and understand my advice and instruction and that

20 you will follow my instruction and will not

21 answer the question.

22 THE WITNESS: I refuse to answer that

23 question under the counsel of my lawyer, and I

24 take the Fifth Amendment to protect my rights.

25 MR. LEAVITT: Yes, sir. And I hope we

7

1 don't have to go through that each time, do we?

2 MR. BRAR: Same as when you ask the

3 question every time --

4 MR. LEAVITT: I will stipulate it if you

5 just want to say I would like to take the Fifth

6 and you can say I will take my lawyer's advice,

7 so we don't have to do that read on of the case

8 law and all that.

9 MR. BRAR: Yeah. If we can stipulate that

10 the same running instruction throughout the

11 deposition every time, yeah, I will shorten it

12 down, but it will be the same as first one.

13 MR. LEAVITT: Understood. This is not

14 trickery. I have a limited number of hours to

15 get through, and I know we would all like to

16 hurry through this, especially since we know what

17 the answers are going to be. If you can shorten

18 it, I expect him to take the Fifth. If you

19 agree, I am not going to make any legal -- that

20 you waive the instruction. That's just a lot of

21 talking to say I take the Fifth.

22 THE WITNESS: Correct, yes.

23 BY MR. LEAVITT:

24 Q. We're taking this deposition in Spain because if

25 you return to Mexico you would be arrested, correct?

8

1 MR. BRAR: I instruct my client not to

2 answer this question because it violates his

3 rights of the Fifth Amendment certain laws and

4 international conventions, so I advise you not to

5 answer his question.

6 THE WITNESS: So I refuse to answer the

7 question under the counsel of my lawyer to

8 protect my rights under the Fifth Amendment.

9 BY MR. LEAVITT:

10 Q. We're taking this deposition in Spain because

11 after negotiating a plea bargain with the government of

12 Veracruz you fled from Mexico to Spain, correct?

13 MR. BRAR: I instruct my client not to

14 answer the question because it would violate his

15 rights of the Fifth Amendment and other laws of

16 his country or international conventions; I,

17 therefore, advise him not to answer this

18 question.

19 THE WITNESS: So I refuse to answer this

20 question under counsel of my lawyer under the

21 Fifth Amendment.

22 BY MR. LEAVITT:

23 Q. You met with Governor Yunes in a hotel room in

24 Mexico City and agreed return the properties that you had

25 purchased with stolen money, correct?

1 MR. BRAR: I instruct my client not to
2 answer this question because it would violate his
3 rights under the Fifth Amendment and certain laws
4 of his country or international convention,
5 therefore I advise him not to answer this
6 question.

7 THE WITNESS: I will refuse to answer the
8 question under the counsel of my lawyer and to
9 protect my rights under the Fifth Amendment.

10 BY MR. LEAVITT:

11 Q. You agreed to return these properties because
12 they had been stolen -- they had been purchased with
13 stolen money -- stolen from the state of Veracruz,
14 correct?

15 MR. BRAR: I instruct my client not to
16 answer this question because it violates his
17 rights under the Fifth Amendment of U.S.
18 Constitution and certain laws of his country or
19 international conventions; I, therefore, advise
20 him not to answer the question. I think I have
21 been jumping in to quickly because I don't think
22 the question is being translated, so let me wait
23 for you to translate it and then I will jump in.
24 Sorry about that. I have been jumping in.

25 THE WITNESS: I refuse to answer the

1 question under counsel of my lawyer to protect my
2 constitutional rights under the Fifth Amendment.

3 BY MR. LEAVITT:

4 Q. You were a childhood friend of Moises Mansur,
5 correct?

6 MR. BRAR: I instruct my client not to
7 answer this question because it violates his
8 rights under the Fifth Amendment, certain laws of
9 his country or international convention. I,
10 therefore, instruct him not to answer this
11 question.

12 THE WITNESS: I refuse to answer that
13 question under the counsel of my lawyer to
14 protect my constitutional rights under the Fifth
15 Amendment.

16 BY MR. LEAVITT:

17 Q. Mr. Mansur was a college friend of Javier Duarte,
18 right?

19 MR. BRAR: I instruct my client not to
20 answer this question because it violates his
21 rights under the Fifth Amendment and
22 international conventions; I, therefore, instruct
23 him not to answer this question.

24 THE WITNESS: So I refuse to answer that
25 question under counsel of my lawyer to protect my

1 question under the counsel of my lawyer and under
2 my Fifth Amendment rights.

3 BY MR. LEAVITT:

4 Q. You agreed to return well over \$20 million,
5 correct?

6 MR. BRAR: I instruct my client not to
7 answer this question because it violates his
8 Fifth Amendment rights and certain laws of his
9 country or international conventions; I,
10 therefore, advise, him as his lawyer, not to
11 answer this question.

12 THE WITNESS: I refuse to answer the
13 question under the counsel of my lawyer and under
14 my constitutional rights including the Fifth
15 Amendment.

16 BY MR. LEAVITT:

17 Q. After agreeing to return the money you decided
18 not to and then you fled to Spain, correct?

19 MR. BRAR: I instruct my client not to
20 answer this question because it would violate his
21 rights under the Fifth Amendment and certain laws
22 of his country of international convention, so I,
23 therefore, advise him not to answer this
24 question.

25 THE WITNESS: I refuse to answer the

1 constitutional rights under the Fifth Amendment.

2 BY MR. LEAVITT:

3 Q. And you became a friend of Javier Duarte,
4 correct?

5 MR. BRAR: I instruct my client not to
6 answer this question because it would violate his
7 rights under the Fifth Amendment and
8 international convention; I, therefore, instruct
9 my client not to answer this question.

10 THE WITNESS: So I refuse to answer that
11 question upon counsel of my lawyer to protect my
12 constitutional rights under the Fifth Amendment.

13 BY MR. LEAVITT:

14 Q. And then you two became business partners,
15 correct?

16 MR. BRAR: I instruct my client not to
17 answer this question because it would violate his
18 rights under the Fifth Amendment of certain laws
19 of his country or international convention. I,
20 therefore, advise and instruct him not to answer
21 this question.

22 BY MR. LEAVITT:

23 Q. When is the last time you saw -- I'm sorry.

24 THE WITNESS: I refuse to answer that
25 question under counsel of my lawyer to protect my

13	<p>1 constitutional rights under the Fifth Amendment.</p> <p>2 BY MR. LEAVITT:</p> <p>3 Q. When is the last time you saw Mr. Duarte?</p> <p>4 MR. BRAR: I instruct my client not to</p> <p>5 answer this question because it would violate his</p> <p>6 rights under the Fifth Amendment of certain laws</p> <p>7 of his country or international conventions; I,</p> <p>8 therefore, advise him and instruct him not to</p> <p>9 answer this question.</p> <p>10 THE WITNESS: I refuse to answer that</p> <p>11 question under counsel of my lawyer to protect my</p> <p>12 constitutional rights under the Fifth Amendment.</p> <p>13 BY MR. LEAVITT:</p> <p>14 Q. When was the last time you spoke to Mr. Duarte?</p> <p>15 MR. BRAR: I instruct my client not to</p> <p>16 answer that question because it would violate his</p> <p>17 rights under the Fifth Amendment of certain laws</p> <p>18 of his country or international conventions; I,</p> <p>19 therefore, advise him and instruct him not to</p> <p>20 answer this question.</p> <p>21 THE WITNESS: I refuse to answer that</p> <p>22 question under counsel of my lawyer to protect my</p> <p>23 constitutional rights under the Fifth Amendment.</p> <p>24 BY MR. LEAVITT:</p> <p>25 Q. What did you and Mr. Duarte talk about last?</p>	15	<p>1 answer this question because it would violate his</p> <p>2 rights under the Fifth Amendment certain laws of</p> <p>3 his country for international convention,</p> <p>4 therefore I advise and instruct my client not to</p> <p>5 answer this question.</p> <p>6 THE WITNESS: I refuse to answer that</p> <p>7 question upon counsel of my lawyer to protect my</p> <p>8 rights under the Fifth Amendment.</p> <p>9 BY MR. LEAVITT:</p> <p>10 Q. Sir, you organized a group of businessman that</p> <p>11 were implicit in this theft and corruption, correct?</p> <p>12 MR. BRAR: I instruct my client not to</p> <p>13 answer this question because it would violate his</p> <p>14 rights under the Fifth Amendment of certain laws</p> <p>15 of his country or international conventions; I,</p> <p>16 therefore, advise and instruct my client not to</p> <p>17 answer this question.</p> <p>18 THE WITNESS: I refuse to answer that</p> <p>19 question under counsel of my lawyer to protect my</p> <p>20 constitutional rights under the Fifth Amendment.</p> <p>21 BY MR. LEAVITT:</p> <p>22 Q. Sir, you organized this group of business people</p> <p>23 such that they were willing to invoice various agencies of</p> <p>24 the Veracruz government for fraudulent sums, correct?</p> <p>25 MR. BRAR: Object to the form. But also I</p>
14	<p>1 MR. BRAR: I instruct my client not to</p> <p>2 answer this question because it would violate his</p> <p>3 rights under the Fifth Amendment of certain laws</p> <p>4 of his country or international conventions; I,</p> <p>5 therefore, advise and instruct him not to answer</p> <p>6 this question.</p> <p>7 THE WITNESS: I refuse to answer that</p> <p>8 question under counsel of my lawyer to protect my</p> <p>9 constitutional rights under the Fifth Amendment.</p> <p>10 BY MR. LEAVITT:</p> <p>11 Q. You and Mr. Duarte were part of a conspiracy to</p> <p>12 steal money from the city of Veracruz, correct?</p> <p>13 MR. BRAR: I instruct my client not to</p> <p>14 answer this question because it would violate his</p> <p>15 rights under the Fifth Amendment certain laws in</p> <p>16 his country or international conventions; I,</p> <p>17 therefore, instruct my client not to answer this</p> <p>18 question.</p> <p>19 THE WITNESS: I refuse to answer that</p> <p>20 question under counsel of my lawyer to protect my</p> <p>21 institutional rights under the Fifth Amendment.</p> <p>22 BY MR. LEAVITT:</p> <p>23 Q. This conspiracy to steal money was done by both</p> <p>24 theft and grand corruption?</p> <p>25 MR. BRAR: I instruct my client not to</p>	16	<p>1 instruct my client not to answer this question</p> <p>2 because it violates his rights under the Fifth</p> <p>3 Amendment and of certain laws of his country or</p> <p>4 international conventions; I, therefore, advise</p> <p>5 and instruct, him as his lawyer, not to answer</p> <p>6 this question.</p> <p>7 THE WITNESS: I refuse to answer that</p> <p>8 question upon counsel of my lawyer to protect my</p> <p>9 constitutional rights under the Fifth Amendment.</p> <p>10 MR. LEAVITT: What was the form?</p> <p>11 MR. BRAR: It was vague and ambiguous. I</p> <p>12 think you said group of individuals, and that's</p> <p>13 vague and ambiguous.</p> <p>14 BY MR. LEAVITT:</p> <p>15 Q. Sir, this group of business people you</p> <p>16 organized -- let me start over.</p> <p>17 Sir, this group of business people that you</p> <p>18 organized for Mr. Duarte sent fraudulent invoices to the</p> <p>19 state of Veracruz, correct?</p> <p>20 MR. BRAR: Object to the form. Also</p> <p>21 instruct my client not to answer this question</p> <p>22 because it would violate his rights under the</p> <p>23 Fifth Amendment certain laws of his country of</p> <p>24 international convention; I, therefore, advise</p> <p>25 him and instruct him not to answer this question.</p>

17	<p>1 THE WITNESS: So I refuse to answer that</p> <p>2 question based on the counsel of my lawyer, my</p> <p>3 constitutional rights including under the Fifth</p> <p>4 Amendment.</p> <p>5 BY MR. LEAVITT:</p> <p>6 Q. And it's your direction that these group of</p> <p>7 people did send fraudulent invoices to the state of</p> <p>8 Veracruz, correct?</p> <p>9 MR. BRAR: Object to the form. I also</p> <p>10 instruct my client not to answer this question</p> <p>11 because it would violate his rights under the</p> <p>12 Fifth Amendment, certain laws of his country or</p> <p>13 international conventions, so I, therefore,</p> <p>14 advice and instruct him not to answer this</p> <p>15 question.</p> <p>16 THE WITNESS: I refuse to answer this</p> <p>17 question based on counsel of my lawyer. My</p> <p>18 institutional rights including those under the</p> <p>19 Fifth Amendment.</p> <p>20 BY MR. LEAVITT:</p> <p>21 Q. And Mr. Duarte made sure those invoices got paid,</p> <p>22 correct?</p> <p>23 MR. BRAR: Object to the form. I also</p> <p>24 object and instruct my client not to answer this</p> <p>25 question because it violates his rights under the</p>	19	<p>1 because it would violate the Fifth Amendment,</p> <p>2 certain laws of his country or international</p> <p>3 convention; I, therefore, advise and instruct my</p> <p>4 client not to answer this question.</p> <p>5 THE WITNESS: I refuse to answer that</p> <p>6 question based on the counsel of my lawyer, my</p> <p>7 constitutional rights including those covered</p> <p>8 under the Fifth Amendment.</p> <p>9 BY MR. LEAVITT:</p> <p>10 Q. But the invoices were paid in full, correct?</p> <p>11 MR. BRAR: Object to the form. I also</p> <p>12 instruct my client not to answer this question</p> <p>13 because it would violate his rights under the</p> <p>14 Fifth Amendment certain laws of his country</p> <p>15 international conventions; I, therefore, advise</p> <p>16 and instruct him not to answer the question.</p> <p>17 THE WITNESS: I refuse to answer that</p> <p>18 question based on the counsel of my lawyer, my</p> <p>19 constitutional rights including those covered</p> <p>20 under the Fifth Amendment.</p> <p>21 BY MR. LEAVITT:</p> <p>22 Q. Like the roads, there were contracts or invoices</p> <p>23 to purchase medicine, correct?</p> <p>24 MR. BRAR: Object to the form. I also</p> <p>25 instruct my client not to answer this question</p>
18	<p>1 Fifth Amendment and certain laws of his country</p> <p>2 of international conventions; I, therefore,</p> <p>3 advise and instruct him not to answer the</p> <p>4 question.</p> <p>5 THE WITNESS: I refuse to answer that</p> <p>6 question based on the counsel of my lawyer, my</p> <p>7 constitutional rights including those covered</p> <p>8 under the Fifth Amendment.</p> <p>9 BY MR. LEAVITT:</p> <p>10 Q. Those invoices were for things like road</p> <p>11 construction, right?</p> <p>12 MR. BRAR: I instruct my client not to</p> <p>13 answer the question because it would violate his</p> <p>14 rights under the Fifth Amendment certain laws of</p> <p>15 his country and international conventions; I,</p> <p>16 therefore, advise and instruct you, as your</p> <p>17 lawyer, not to answer this question.</p> <p>18 THE WITNESS: I refuse to answer that</p> <p>19 question based on counsel of my lawyer, my</p> <p>20 constitutional rights including those covered in</p> <p>21 the Fifth Amendment.</p> <p>22 BY MR. LEAVITT:</p> <p>23 Q. Not all the roads got built, correct?</p> <p>24 MR. BRAR: Object to the form. I also</p> <p>25 instruct my client not to answer the question</p>	20	<p>1 because it would violate his rights under the</p> <p>2 Fifth Amendment, certain laws of his country or</p> <p>3 international conventions; I, therefore, advise</p> <p>4 and instruct my client not to answer this</p> <p>5 question.</p> <p>6 THE WITNESS: I refuse to answer that</p> <p>7 question based on the counsel of my lawyer, my</p> <p>8 constitutional rights, including those under the</p> <p>9 Fifth Amendment.</p> <p>10 BY MR. LEAVITT:</p> <p>11 Q. There were contracts or invoices to pay for</p> <p>12 medicine like chemotherapy and insulin but not all the</p> <p>13 medicines were actually purchased, correct?</p> <p>14 MR. DRAR: I object to this question, the form.</p> <p>15 I also instruct my client not to answer because it</p> <p>16 would violate his rights of the Fifth Amendment,</p> <p>17 certain laws of his country are international</p> <p>18 conventions; I, therefore, advise and instruct him not</p> <p>19 to answer this question.</p> <p>20 THE WITNESS: I refuse to answer that</p> <p>21 question based on the counsel of my lawyer. My</p> <p>22 constitutional rights including those covered</p> <p>23 under the Fifth Amendment.</p> <p>24 BY MR. LEAVITT:</p> <p>25 Q. Instead of actually delivering medicine what was</p>

21

1 actually delivered was saline, correct?

2 MR. DRAR: Object to the form. I also instruct

3 my client not to answer those question because it

4 would violate his rights of the Fifth Amendment,

5 certain laws of his country are international

6 conventions; I, therefore, advise and

7 instruct my client not to answer this question.

8 THE WITNESS: I refuse to answer that

9 question based on the counsel of my lawyer, my

10 constitutional rights including those covered

11 under the Fifth Amendment.

12 BY MR. LEAVITT:

13 Q. And then you and your co-conspirators, including

14 Mr. Duarte, would kept the proceeds of this, correct?

15 MR. BRAR: Object to the form. I also

16 instruct my client not to answer this question

17 because it would violate his rights under the

18 Fifth Amendment, certain laws of his country or

19 international conventions; I, therefore, advise

20 and instruct him not to answer this question.

21 THE WITNESS: I refuse to answer that

22 question based on the counsel of my lawyer, my

23 constitutional rights including this covered

24 under the Fifth Amendment.

25 BY MR. LEAVITT:

22

1 Q. And after these invoices were paid these business

2 people would keep a commission and give the rest to you

3 and Mr. Duarte, correct?

4 MR. BRAR: Object to the form. I also

5 instruct my client not to answer this question

6 because it would violate his rights under the

7 Fifth Amendment, certain laws of his country or

8 international conventions; I, therefore, advise

9 and instruct him not to answer this question.

10 THE WITNESS: I refuse to answer that

11 question based on the counsel of my lawyer, my

12 constitutional rights including those covered

13 under the Fifth Amendment.

14 BY MR. LEAVITT:

15 Q. Sir, these payments you made to companies set up

16 by you and Mr. Duarte to receive these funds, correct?

17 MR. BRAR: Object to the form. I also

18 instruct my client not to answer this question

19 because it would violates his rights under the

20 Fifth Amendment, certain laws of his country are

21 international conventions; I, therefore, advise

22 and instruct you not to answer this question.

23 THE WITNESS: I refuse to answer that

24 question based on the counsel of my lawyer, my

25 constitutional rights including those covered

23

1 under the Fifth Amendment.

2 BY MR. LEAVITT:

3 Q. And these companies set up to receive these

4 stolen funds would include Terra Inmobiliaria, Grupo

5 Brades, Inmobiliara Cartujano, Boydar, Valkany,

6 Controladora Prado Norte and Inmobiliara 135 Prado Norte,

7 correct?

8 MR. BRAR: Object to the form. I also

9 instruct my client not to answer this question

10 because it would violate his rights under the

11 Fifth Amendment, certain laws of his country are

12 international conventions; I, therefore, advise

13 and instruct him not to answer this question.

14 THE WITNESS: I refuse to answer that

15 question based on the counsel of my lawyer, my

16 constitutional rights including those covered

17 under the Fifth Amendment.

18 BY MR. LEAVITT:

19 Q. And Mr. Duarte would make sure you get some of

20 these funds for organizing this fraud, correct?

21 MR. BRAR: Object to the form. I also

22 instruct my client not to answer this question

23 because it would violate his rights under the

24 Fifth Amendment certain laws of his country or

25 international conventions; I, therefore, advise

24

1 and instruct him not to answer this question.

2 THE WITNESS: I refuse to answer that

3 question based on the counsel of my lawyer, my

4 constitutional rights including those covered

5 under the Fifth Amendment.

6 BY MR. LEAVITT:

7 Q. Your wife would also get a share of some of these

8 funds, correct?

9 MR. BRAR: Object to the form. I also

10 instruct my client not to answer the question

11 because it would violate his rights under the

12 Fifth Amendment certain laws of his country or

13 international conventions; I, therefore, advise

14 and instruct him not to answer this question.

15 THE WITNESS: I refuse to answer that

16 question based on the counsel of my lawyer, my

17 constitutional rights including those covered

18 under the Fifth Amendment.

19 BY MR. LEAVITT:

20 Q. Mr. Mansur hid some of this money, correct?

21 MR. BRAR: Object to the form. I also

22 instruct my client not to answer the question

23 because it would violate his rights under the

24 Fifth Amendment certain laws of his country or

25 international conventions; I, therefore, advise

25

1 and instruct my client not to answer this
 2 question.
 3 THE WITNESS: I refuse to answer that
 4 question based on the counsel of my lawyer, my
 5 constitutional rights including those covered
 6 under the Fifth Amendment.
 7 BY MR. LEAVITT:
 8 Q. And Mr. Duarte would also get some of this money,
 9 correct?
 10 MR. BRAR: Object to the form. I also
 11 instruct my client not to answer this question
 12 because it would violate his rights under the
 13 Fifth Amendment, certain laws of his country or
 14 international conventions; I, therefore, advise
 15 and instruct my client not to answer this
 16 question.
 17 THE WITNESS: I refuse to answer that
 18 question based on the counsel of my lawyer, my
 19 constitutional rights including those covered
 20 under the Fifth Amendment.
 21 BY MR. LEAVITT:
 22 Q. And then you and your wife would send this money
 23 to Texas where it was invested in real estate, correct?
 24 MR. BRAR: Object to the form. I also
 25 instruct my client not to answer this question

26

1 because it would violate his rights under the
 2 Fifth Amendment, certain laws of his country or
 3 international conventions; I, therefore, advise
 4 and instruct my client not to answer this
 5 question.
 6 THE WITNESS: I refuse to answer that
 7 question based on the counsel of my lawyer, my
 8 constitutional rights including those covered
 9 under the Fifth Amendment.
 10 BY MR. LEAVITT:
 11 Q. Mr. Jaime Roberte also participated in this
 12 conspiracy with you, correct?
 13 MR. BRAR: Object to the form. I also
 14 instruct my client not to answer this question
 15 because it would violate his rights under the
 16 Fifth Amendment, certain laws of his country or
 17 international conventions; I, therefore, advise
 18 and instruct my client not to answer this
 19 question.
 20 THE WITNESS: I refuse to answer that
 21 question based on the counsel of my lawyer, my
 22 constitutional rights including those covered
 23 under the Fifth Amendment.
 24 BY MR. LEAVITT:
 25 Q. You created Reban Construction, correct?

27

1 MR. BRAR: I instruct my client not to
 2 answer this question because it would violate his
 3 rights under the Fifth Amendment, certain laws of
 4 his country or international conventions; I,
 5 therefore, advise and instruct my client not to
 6 answer this question.
 7 THE WITNESS: I refuse to answer that
 8 question based on the counsel of my lawyer, my
 9 constitutional rights including those covered
 10 under the Fifth Amendment.
 11 BY MR. LEAVITT:
 12 Q. Reban Construction was a limited liability
 13 company created in the United States, correct?
 14 MR. BRAR: I also instruct my client not
 15 to answer this question because it would violate
 16 his rights under the Fifth Amendment, certain
 17 laws of his country or international conventions;
 18 I, therefore, advise and instruct him not to
 19 answer this question.
 20 THE WITNESS: I refuse to answer that
 21 question based on the counsel of my lawyer, my
 22 constitutional rights including those protected
 23 under the Fifth Amendment.
 24 BY MR. LEAVITT:
 25 Q. You and he also created Reban Safety, LLC, in the

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1 United States, correct?
 2 MR. BRAR: I also instruct my client not
 3 to answer this question because it would violate
 4 his rights under the Fifth Amendment certain laws
 5 of his country or international conventions; I,
 6 therefore, advise and instruct my client not to
 7 answer this question.
 8 THE WITNESS: I refuse to answer that
 9 question based on the counsel of my lawyer, my
 10 constitutional rights including those protected
 11 under the Fifth Amendment.
 12 BY MR. LEAVITT:
 13 Q. You created these with the intention of receiving
 14 and investing in stolen funds from the state of Veracruz,
 15 correct?
 16 MR. BRAR: Object to the form. I also
 17 instruct my client not to answer this question
 18 because it would violate his rights under the
 19 Fifth Amendment, certain laws of his country or
 20 international conventions; I, therefore, advise
 21 and instruct him not to answer this question.
 22 THE WITNESS: I refuse to answer that
 23 question based on the counsel of my lawyer, my
 24 constitutional rights including those protected
 25 under the Fifth Amendment.

1 BY MR. LEAVITT:

2 Q. And these entities did, in fact, receive and then
3 invest stolen funds from the state of Veracruz, correct?

4 MR. BRAR: Object to the form. I also advise my
5 client not to answer this question because it would
6 violate his rights under the Fifth Amendment certain
7 laws of his country or international conventions; I,
8 therefore, advise and instruct him not to answer this
9 question.

10 THE WITNESS: I refuse to answer that
11 question based on the counsel of my lawyer, my
12 constitutional rights including those protected
13 under the Fifth Amendment.

14 BY MR. LEAVITT:

15 Q. Someone else who participated in this conspiracy
16 with you was Alejandro Ortiz Carpintero, correct?

17 MR. BRAR: Object to the form. I also
18 instruct my client not to answer this question
19 because it would violate his rights under the
20 Fifth Amendment, certain laws of his country or
21 international conventions; I, therefore, advise
22 and instruct my client not to answer this
23 question.

24 THE WITNESS: I refuse to answer that
25 question based on the counsel of my lawyer, my

1 THE WITNESS: I refuse to answer that
2 question based on the counsel of my lawyer, my
3 constitutional rights including those protected
4 under the Fifth Amendment.

5 BY MR. LEAVITT:

6 Q. And this entity did, in fact, receive and invest
7 stolen funds from the state of Veracruz, correct?

8 MR. BRAR: Object to the form. I also
9 instruct my client not to answer this question
10 because it would violate his rights under the
11 Fifth Amendment, certain laws of his country or
12 international conventions; I, therefore, advise
13 and instruct my client not to answer this
14 question.

15 THE WITNESS: I refuse to answer that
16 question based on the counsel of my lawyer, my
17 constitutional rights including those protected
18 under the Fifth Amendment.

19 BY MR. LEAVITT:

20 Q. Jorge Ramirez was also somebody who participated
21 in this conspiracy with you and Mr. Duarte, correct?

22 MR. BRAR: Object to the form. I also
23 instruct my client not to answer this question
24 based on it would violate his rights under the
25 Fifth Amendment, certain laws of his country or

1 constitutional rights including those covered
2 under the Fifth Amendment.

3 BY MR. LEAVITT:

4 Q. You and he created TwoOffice Suites, LLC,
5 together, correct?

6 MR. BRAR: I also instruct my client not
7 to answer this question because it would violate
8 his rights under the Fifth Amendment certain laws
9 of his country or international conventions; I,
10 therefore, advise and instruct him not to answer
11 this question.

12 THE WITNESS: I refuse to answer that
13 question based on the counsel of my lawyer, my
14 constitutional rights and including those
15 protected under the Fifth Amendment.

16 BY MR. LEAVITT:

17 Q. You and he created this entity with the intention
18 of receiving and investing stolen funds from the state of
19 Veracruz, correct?

20 MR. BRAR: Object to the form. I also
21 instruct my client not to answer this question
22 because it would violate his rights under the
23 Fifth Amendment certain laws of his country or
24 international conventions; I, therefore, advise
25 and instruct him not to answer this question.

1 international conventions; I, therefore, advise
2 and instruct my client not to answer this
3 question.

4 THE WITNESS: I refuse to answer that
5 question based on the counsel of my lawyer, my
6 constitutional rights including those protected
7 under the Fifth Amendment.

8 BY MR. LEAVITT:

9 Q. Mr. Ramirez send fraudulent invoices to the state
10 of Veracruz, correct?

11 MR. BRAR: Object to the form. I also
12 instruct my client not to answer this question
13 because it would violate his rights under the
14 Fifth Amendment, certain laws of his country or
15 international conventions; I, therefore, advise
16 and instruct my client not to answer this
17 question.

18 THE WITNESS: I refuse to answer the
19 question based on the counsel of my lawyer, my
20 constitutional rights including those protected
21 under the Fifth Amendment.

22 BY MR. LEAVITT:

23 Q. Mr. Ramirez received money from the state of
24 Veracruz for the invoices, correct?

25 MR. BRAR: Object to the form. I also

1 instruct my client not to answer this question
2 because it would violate his rights under the
3 Fifth Amendment certain international laws of his
4 country or international conventions; I,
5 therefore, advise and instruct him not to answer
6 this question.

7 THE WITNESS: I refuse to answer the
8 question based on the counsel of my lawyer, my
9 constitutional rights, including those protected
10 under the Fifth Amendment.

11 BY MR. LEAVITT:

12 Q. Mr. Ramirez then gave some of that money to both
13 you and Mr. Duarte, correct?

14 MR. BRAR: Object to the form. I also
15 instruct my client not to answer this question
16 because it would violate his rights under the
17 Fifth Amendment, certain laws of his country or
18 international conventions; I, therefore, advise
19 and instruct my client not to answer this
20 question.

21 THE WITNESS: I refuse to answer that
22 question based on the counsel of my lawyer, my
23 constitutional rights including those protected
24 under the Fifth Amendment.

25 BY MR. LEAVITT:

1 each.

2 MR. LEAVITT: That's fine. That's fine.
3 I'm certainly not trying to put him in a legal
4 box or have him waive any rights, but we can fast
5 track this a little bit, but it is what it is.

6 THE WITNESS: I did not respond yet to
7 your last question.

8 MR. LEAVITT: Feel free, sir.

9 THE WITNESS: I refuse to answer that
10 question based on the counsel of my lawyer, my
11 constitutional rights including those protected
12 under the Fifth Amendment.

13 BY MR. LEAVITT:

14 Q. Moises Mansur also send fraudulent invoices to
15 the state of Veracruz under your direction, correct?

16 MR. BRAR: Object to the form. I also
17 instruct my client not to answer this question
18 because it would violate his rights under the
19 Fifth Amendment, certain international
20 conventions, laws of his country, I, therefore,
21 advise and instruct him not to answer this
22 question.

23 THE WITNESS: I refuse to answer the
24 question based on the counsel of my lawyer, my
25 constitutional rights including those protected

1 Q. Mr. Ramirez profited from participating in this
2 conspiracy as well as you, correct?

3 MR. BRAR: Object to the form. I also
4 instruct my client not to answer this question
5 because it would violate his rights under the
6 Fifth Amendment, certain laws of his country or
7 international conventions; I, therefore, advise
8 and instruct my client not to answer this
9 question.

10 MR. BRAR: We have been going almost an
11 hour, so whenever you get to a stopping point.

12 MR. LEAVITT: You pick.

13 MR. BRAR: Yeah, I don't want to interrupt
14 you if you're --

15 MR. LEAVITT: We can probably go
16 another --

17 MR. BRAR: Yeah.

18 MR. LEAVITT: -- 10 minutes or so and I
19 can get through this next section and then --

20 MR. BRAR: Yeah. Sure. I understand.

21 MR. LEAVITT: Let me ask you this: Do you
22 need to give him your -- if he's willing to just
23 plead the Fifth, does he need to follow your
24 counsel each time or can you just --

25 MR. BRAR: I think we have to go through

1 under the Fifth Amendment.

2 BY MR. LEAVITT:

3 Q. Mr. Mansur received funds from the state of
4 Veracruz in exchange for these invoices, correct?

5 MR. BRAR: Object to the form. I also
6 instruct my client not to answer this question
7 because it would violate his rights under the
8 Fifth Amendment, certain laws of his country or
9 international conventions; I, therefore, advise
10 and instruct him not to answer this question.

11 THE WITNESS: I refuse to answer that
12 question based on the counsel of my lawyer, my
13 constitutional rights including those protected
14 under the Fifth Amendment.

15 BY MR. LEAVITT:

16 Q. Mr. Mansur shared some of this money with you and
17 Mr. Duarte as part of this conspiracy, correct?

18 MR. BRAR: Object to the form. I also
19 instruct my client not to answer this question
20 because it violates his rights under the Fifth
21 Amendment, certain laws of his country or
22 international conventions; I, therefore, advise
23 and instruct him not to answer this question.

24 THE WITNESS: I refuse to answer that
25 question based on the counsel of my lawyer, my

1 constitutional rights including those protected
 2 under the Fifth Amendment.
 3 BY MR. LEAVITT:
 4 Q. Negretti Inake also sent fraudulent invoices to
 5 Veracruz at your direction, correct?
 6 MR. BRAR: Object to the form. I also
 7 instruct my client not to answer this question
 8 because it would violate his rights under the
 9 Fifth Amendment, certain laws of his country or
 10 international conventions; I, therefore, advise
 11 and instruct him not to answer this question.
 12 THE WITNESS: I refuse to answer that
 13 question based on the counsel of my lawyer, my
 14 constitutional rights, including those protected
 15 under the Fifth Amendment.
 16 BY MR. LEAVITT:
 17 Q. Mr. Inake received money from the state of
 18 Veracruz for these invoices, correct?
 19 MR. BRAR: Object to the form. I also
 20 instruct my client not to answer this question
 21 because it would violate his rights under the
 22 Fifth Amendment, certain laws of his country or
 23 international conventions; I, therefore, advise
 24 and instruct him not to answer this question.
 25 THE WITNESS: I refuse to answer that

1 and instruct my client not to answer this
 2 question.
 3 THE WITNESS: I refuse to answer that
 4 question based on the counsel of my lawyer, my
 5 constitutional rights including those protected
 6 under the Fifth Amendment.
 7 BY MR. LEAVITT:
 8 Q. And that's Javier Duarte's wife, correct?
 9 MR. BRAR: I also instruct my client not
 10 to answer this question because it would violate
 11 his rights under the Fifth Amendment certain laws
 12 of his country or international conventions; I,
 13 therefore, advise and instruct my client not to
 14 answer this question.
 15 THE WITNESS: I refuse to answer the
 16 question based on the counsel of my lawyer, my
 17 constitutional rights including those protected
 18 under the Fifth Amendment.
 19 BY MR. LEAVITT:
 20 Q. She received money from the state of Veracruz for
 21 these fraudulent invoices, correct?
 22 MR. BRAR: Object to the form. I also
 23 instruct my client not to answer this question
 24 because it would violate his rights under the
 25 Fifth Amendment certain laws of his country or

1 question based on the counsel of my lawyer, my
 2 constitutional rights including those protected
 3 under the Fifth Amendment.
 4 BY MR. LEAVITT:
 5 Q. Mr. Inake then shared some of this money from the
 6 state of Veracruz with you and Mr. Duarte, correct?
 7 MR. BRAR: Objection to form. I also
 8 instruct my client not to answer this question
 9 because it would violate his rights under the
 10 Fifth Amendment, certain laws of his country or
 11 international conventions; I, therefore, advise
 12 and instruct my client not to answer this
 13 question.
 14 THE WITNESS: I refuse to answer that
 15 question based on the counsel of my lawyer my
 16 constitutional rights including those protected
 17 under the Fifth Amendment.
 18 BY MR. LEAVITT:
 19 Q. Monica Babayan also sent fraudulent invoices to
 20 the state of Veracruz at your direction, correct?
 21 MR. BRAR: Object to the form. I also
 22 instruct my client not to answer this question
 23 because it would violate his rights under the
 24 Fifth Amendment certain laws of his country or
 25 international conventions; I, therefore, advise

1 international conventions; I, therefore, advise
 2 and instruct my client not to answer this
 3 question.
 4 THE WITNESS: I refuse to answer that
 5 question based on the counsel of my lawyer, my
 6 constitutional rights including those protected
 7 under the Fifth Amendment.
 8 BY MR. LEAVITT:
 9 Q. She shared -- strike that.
 10 She then shared some of this money with both you
 11 and her husband, Mr. Duarte, correct?
 12 MR. BRAR: Object to the form. I also
 13 instruct my client not to answer this question
 14 because it would violate his rights under the
 15 Fifth Amendment, certain laws of his country or
 16 international conventions; I, therefore, advise
 17 and instruct my client not to answer this
 18 question.
 19 THE WITNESS: I refuse to answer that
 20 question based on the counsel of my lawyer, my
 21 constitutional rights including those protected
 22 under the Fifth Amendment.
 23 BY MR. LEAVITT:
 24 Q. Arturo Zurita also sent fraudulent invoices to
 25 the state of Veracruz under your direction; correct?

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1 MR. BRAR: Object to the form. I also
 2 instruct my client not to answer this question
 3 because it violates his rights under the Fifth
 4 Amendment, certain laws of his country or
 5 international conventions; I, therefore, advise
 6 and instruct him not to answer this question.
 7 THE WITNESS: I refuse to answer that
 8 question based upon counsel of my lawyer my
 9 constitutional rights including those protected
 10 under the Fifth Amendment.
 11 BY MR. LEAVITT:
 12 Q. Mr. Zurita received money from the state of
 13 Veracruz for these invoices, correct?
 14 MR. BRAR: Object to the form. I also
 15 instruct my client not to answer this question
 16 because it would violate his rights under the
 17 Fifth Amendment, certain laws of his country or
 18 international conventions; I, therefore, advise
 19 and instruct him not to answer this question.
 20 THE WITNESS: I refuse to answer that
 21 question based on the counsel of my lawyer, my
 22 constitutional rights including those protected
 23 under the Fifth Amendment.
 24 BY MR. LEAVITT:
 25 Q. He then shared that money with both you and

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1 Mr. Duarte, correct?
 2 MR. BRAR: Object to the form. I also
 3 instruct my client not to answer this question
 4 because it would violate his rights under the
 5 Fifth Amendment certain laws of his country or
 6 international conventions; I, therefore, advise
 7 and instruct him not to answer this question.
 8 THE WITNESS: I refuse to answer that
 9 question based on counsel of my lawyer, my
 10 constitutional rights including those protected
 11 under the Fifth Amendment.
 12 BY MR. LEAVITT:
 13 Q. Sergio Ortiz also sent fraudulent invoices to the
 14 state of Veracruz under your direction, correct?
 15 MR. BRAR: Object to the form. I also
 16 instruct my client not to answer this question
 17 because it would violate his rights under the
 18 Fifth Amendment, certain laws of his country or
 19 international conventions; I, therefore, advise
 20 and instruct my client not to answer this
 21 question.
 22 THE WITNESS: I refuse to answer that
 23 question based on the counsel of my lawyer, my
 24 constitutional rights including those protected
 25 under the Fifth Amendment.

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1 BY MR. LEAVITT:
 2 Q. You received money from the state of Veracruz
 3 after submitting these fraudulent invoices, correct?
 4 MR. BRAR: Object to the form. I also
 5 instruct my client not to answer this question
 6 because it would violate his rights under the
 7 Fifth Amendment certain laws of his country or
 8 international conventions; I, therefore, advise
 9 and instruct my client not to answer this
 10 question.
 11 THE WITNESS: I refuse to answer that
 12 question based on the counsel of my lawyer, my
 13 constitutional rights including those protected
 14 under the Fifth Amendment.
 15 BY MR. LEAVITT:
 16 Q. You then shared some of his money with both you
 17 and Mr. Duarte, correct?
 18 MR. BRAR: Object to the form. I also
 19 instruct my client not to answer this question
 20 because it would violate his rights under the
 21 Fifth Amendment certain laws of his country or
 22 international conventions; I, therefore, advise
 23 and instruct my client not to answer this
 24 question.
 25 THE WITNESS: I refuse to answer that

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1 question based on the counsel of my lawyer, my
 2 constitutional rights including those protected
 3 under the Fifth Amendment.
 4 THE VIDEOGRAPHER: This is the end of
 5 Media 1, Volume 1 in the video deposition of Jose
 6 Antonio Bandin. Going off the record at
 7 10:40 a.m. as indicated on the video screen.
 8 (Recess taken at 10:40 a.m.)
 9 THE VIDEOGRAPHER: This is the beginning
 10 of Media 2, Volume 1 in the video deposition of
 11 Jose Antonio Bandin, going back on the record at
 12 10:22 a.m. as indicated on the video screen.
 13 Thank you, Counsel.
 14 BY MR. LEAVITT:
 15 Q. Sir, we're back after a short break. Are you
 16 prepared to continue?
 17 A. Yes.
 18 Q. Sir, you would agree with me, would you not, that
 19 you were not sued because you filed property deeds or any
 20 other public document, right?
 21 MR. BRAR: Object to the form. I also
 22 instruct -- sorry. I interrupted you, sorry.
 23 Object to the form. I also instruct my client
 24 not to answer this question because it would
 25 violate his rights under the Fifth Amendment,

1 certain laws of his country or international
2 conventions; I, therefore, advise and instruct my
3 client not to answer.

4 THE WITNESS: I refuse to answer that
5 question based on the counsel for my lawyer, my
6 constitutional rights including those protected
7 under the Fifth Amendment.

8 BY MR. LEAVITT:

9 Q. You agree with me, sir, don't you that were not
10 sued because you invested in real estate, correct?

11 MR. BRAR: Object to the form. I also
12 instruct my client not to answer this question
13 because it would violate his rights under the
14 Fifth Amendment, certain laws of his country or
15 international conventions; I, therefore, advise
16 and instruct my client not to answer this
17 question.

18 THE WITNESS: I refuse to answer that
19 question based on the counsel from my lawyer, my
20 constitutional rights including those protected
21 under the Fifth Amendment.

22 BY MR. LEAVITT:

23 Q. Sir, you agree with me that you were not sued
24 because any of your first amendment rights were not
25 infringed, correct?

1 Q. You agree with me, sir, that you were not sued
2 because you exercised any constitutional right, correct?

3 MR. BRAR: Object to the form. I also
4 instruct my client that this question violates
5 his rights under the Fifth Amendment certain laws
6 of his country or international conventions; I,
7 therefore, advise and instruct my client not to
8 answer this question.

9 THE WITNESS: I refuse to answer that
10 question based on the counsel from my lawyer, my
11 constitutional rights including those protected
12 under the Fifth Amendment.

13 BY MR. LEAVITT:

14 Q. You agree with me, sir, that the lawsuits filed
15 against you have nothing to do with your right to free
16 speech in the United States, correct?

17 MR. BRAR: Object to the form. I also
18 instruct my client not to answer this question
19 because it violates his rights under the Fifth
20 Amendment, certain laws of his country or
21 international conventions; I, therefore, advise
22 and instruct him not to answer this question.

23 THE WITNESS: I refuse to answer that
24 question based on the counsel from my lawyer, my
25 constitutional rights including those protected

1 MR. BRAR: Object to the form. I also
2 instruct my client that this question violates
3 his rights under the Fifth Amendment certain laws
4 of his country or international conventions,
5 therefore I instruct him not to answer this
6 question.

7 THE WITNESS: I refuse to answer that
8 question based on the counsel for my lawyer, my
9 constitutional rights including those protected
10 under the Fifth Amendment.

11 BY MR. LEAVITT:

12 Q. You agree with me, sir, that none of your first
13 amendment rights were ever infringed by the lawsuits filed
14 against you, correct?

15 MR. BRAR: Object to the form. I also
16 instruct my client that this question violates
17 his rights under the Fifth Amendment certain laws
18 of his country or international conventions; I,
19 therefore, advise and instruct him not to answer
20 this question.

21 THE WITNESS: I refuse to answer that
22 question based on the counsel from my lawyer, my
23 constitutional rights including those protected
24 under the Fifth Amendment.

25 BY MR. LEAVITT:

1 under the Fifth Amendment.
2 BY MR. LEAVITT:

3 Q. You agree with me, sir, that lawsuit -- strike
4 that.

5 You agree with me, sir, that these lawsuits filed
6 against you do not implicate or infringe your right or
7 association, correct?

8 MR. BRAR: Object to the form. I also
9 instruct my client that this question violates
10 his rights under the Fifth Amendment, certain
11 laws of his country or international conventions;
12 I, therefore, advise and instruct him not to
13 answer this question.

14 THE WITNESS: I refuse to answer that
15 question based on the counsel from my lawyer, my
16 constitutional rights including those protected
17 under the Fifth Amendment.

18 BY MR. LEAVITT:

19 Q. You agree with me, sir, that you're not getting
20 sued because you filed land deeds, land records or
21 taxation and appraisal information, correct?

22 MR. BRAR: Object to the form. I also
23 instruct my client that this question violates
24 his rights under the Fifth Amendment, certain
25 laws of his country or international conventions;

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1 I, therefore, advise and instruct him not to
 2 answer this question.
 3 THE WITNESS: I refuse to answer the
 4 question based on the counsel from my lawyer, my
 5 constitutional rights including those protected
 6 under the Fifth Amendment.
 7 BY MR. LEAVITT:
 8 Q. Sir, you agree with me, don't you, that you are
 9 getting sued because you took money that belonged to the
 10 state of Veracruz and then used that money to purchase the
 11 properties in the lawsuit, correct?
 12 MR. BRAR: Object to the form. I also
 13 instruct my client that this question violates
 14 his rights under the Fifth Amendment, certain
 15 laws of his country or international conventions;
 16 I, therefore, advise and instruct him not to
 17 answer this question.
 18 THE WITNESS: I refuse to answer that
 19 question based on the counsel from my lawyer, my
 20 constitutional rights including those protected
 21 under the Fifth Amendment.
 22 BY MR. LEAVITT:
 23 Q. You agree with me that taking something that does
 24 not belong to you has nothing to do with any
 25 constitutional right you may or may not have, correct?

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1 MR. BRAR: Object to the form. I also
 2 instruct my client that this question violates
 3 his rights under the Fifth Amendment, certain
 4 laws of his country or international conventions;
 5 I, therefore, instruct him not to answer this
 6 question.
 7 THE WITNESS: I refuse to answer that
 8 question based on the counsel from my lawyer, my
 9 constitutional rights including those protected
 10 under the Fifth Amendment.
 11 BY MR. LEAVITT:
 12 Q. Let me try that again. You agree with me, sir,
 13 that taking something that is not yours has nothing to do
 14 with the infringement of any First Amendment rights you
 15 may or may not have under the Constitution of the United
 16 States, correct?
 17 MR. BRAR: Object to the form. I also
 18 instruct my client that this question violates
 19 his rights under the Fifth Amendment or certain
 20 laws of his country or international conventions;
 21 I, therefore, advise and instruct him not to
 22 answer this question.
 23 THE WITNESS: I refuse to answer that
 24 question based upon counsel from my lawyer, my
 25 constitutional rights including those protected

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1 under the Fifth Amendment.
 2 BY MR. LEAVITT:
 3 Q. Sir, I am going to hand you a sworn declaration
 4 provided by a government official in the state of
 5 Veracruz, Armando Cedas. Take a second if you like to
 6 refer it. It's in English, so I don't know if you can
 7 read that or not. We obviously have a translator here if
 8 you would like him to read it aloud in Spanish.
 9 THE VIDEOGRAPHER: Is that an exhibit?
 10 MR. LEAVITT: It's already been marked as
 11 Exhibit 1.
 12 (Exhibit No. 1 was marked for
 13 identification.)
 14 THE WITNESS: Please.
 15 THE INTERPRETER: (Interpreter translates
 16 document from English to Spanish.)
 17 THE WITNESS: Is this for me?
 18 BY MR. LEAVITT:
 19 Q. It's for the record. I was going to ask you a
 20 couple of questions about that if it's okay. In that
 21 sworn declaration, sir, Mr. Cedas provides evidence of
 22 your conspiracy with Mr. Duarte and others to steal money
 23 from the state of Veracruz. Mr. Cedas sworn statement is
 24 true; isn't it?
 25 MR. BRAR: Object to the form. I also

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1 instruct my client that in answering this
 2 question violates his rights under the Fifth
 3 Amendment, certain laws of his country or
 4 international conventions; I, therefore, advise
 5 and instruct him not to answer this question.
 6 THE WITNESS: I refuse to answer that
 7 question based upon counsel from my lawyer, my
 8 constitutional rights including those protected
 9 under the Fifth Amendment.
 10 BY MR. LEAVITT:
 11 Q. You have no reason to disagree with Mr. Cedas
 12 sworn testimony, correct?
 13 MR. BRAR: Object to the form. I also
 14 instruct my client that this question violates
 15 his rights under the Fifth Amendment, certain
 16 laws of his country or international conventions;
 17 I, therefore, advise and instruct him not to
 18 answer this question.
 19 THE WITNESS: I refuse to answer based on
 20 the counsel from my lawyer, my constitutional
 21 rights including those protected under the Fifth
 22 Amendment.
 23 BY MR. LEAVITT:
 24 Q. Mr. Cedas sworn you conspired with Mr. Duarte and
 25 others to divert money away from social programs and

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1 groups, that is true, correct?

2 MR. BRAR: Object to the form. I also

3 instruct my client that answering this question

4 would violate his rights under the Fifth

5 Amendment, certain laws of his country or

6 international conventions; I, therefore, advise

7 and instruct my client not to answer this

8 question.

9 THE WITNESS: I refuse to answer that

10 question based on counsel from my lawyer, my

11 constitutional rights including those protected

12 under the Fifth Amendment.

13 BY MR. LEAVITT:

14 Q. Mr. Cedas swore that you set up shell companies

15 to receive these stolen funds, that is true, correct?

16 MR. BRAR: Object to the form. I also

17 instruct my client that answering this question

18 violates his rights under the Fifth Amendment,

19 certain laws of his country or international

20 conventions; I, therefore, advise and instruct

21 him not to answer this question.

22 THE WITNESS: I refuse to answer that

23 question based on counsel from my lawyer, my

24 constitutional rights including those protected

25 under the Fifth Amendment.

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1 BY MR. LEAVITT:

2 Q. Mr. Cedas swore that you took that stolen money

3 and used it to purchase real estate in the United States,

4 correct?

5

6 MR. BRAR: Object to the form. I also

7 instruct my client that answering this question

8 violates his rights under the Fifth Amendment,

9 certain laws of his country or international

10 conventions; I, therefore, advise and instruct

11 him not to answer this question.

12 THE WITNESS: I refuse to answer that

13 question based on counsel from my lawyer, my

14 constitutional rights including those protected

15 under the Fifth Amendment.

16 BY MR. LEAVITT:

17 Q. Mr. Cedas sworn testimony is accurate, isn't it?

18 MR. BRAR: Object to the form. I also

19 instruct my client that answering this question

20 violates his rights under the Fifth Amendment,

21 certain laws of his country or international

22 conventions; I, therefore, advise and instruct

23 him not to answer this question.

24 THE WITNESS: I refuse to answer based on

25 counsel from my lawyer, my constitutional rights

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1 including those protected under the Fifth

2 Amendment.

3 BY MR. LEAVITT:

4 Q. Mr. Cedas provided sworn testimony that you and

5 Mr. Duarte were involved in corruption for government

6 contracts, Mr. Cedas sworn testimony is correct; isn't it?

7 MR. BRAR: Object to the form. I also

8 instruct my client that this question violates

9 his rights under the Fifth Amendment, certain

10 laws of his country or international conventions;

11 I, therefore, advise and instruct him not to

12 answer this question.

13 THE WITNESS: I refuse to answer this

14 question based on counsel from my lawyer, my

15 constitutional rights including those protected

16 under the Fifth Amendment.

17 BY MR. LEAVITT:

18 Q. Mr. Cedas provided sworn testimony that you were

19 involved in the theft of more than of \$100 millions from

20 the state of Veracruz, Mr. Cedas' sworn testimony is

21 correct; isn't it?

22 MR. BRAR: Object to the form. I also

23 instruct my client that this question violates

24 his rights under the Fifth Amendment, certain

25 laws of his country or international conventions;

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1 I, therefore, advise and instruct him not to

2 answer this question.

3 THE WITNESS: I refuse to answer based on

4 counsel from my lawyer, my constitutional rights

5 including those protected under the Fifth

6 Amendment.

7 BY MR. LEAVITT:

8 Q. Mr. Duarte, with signed government contracts, to

9 entities that you controlled or had conspired with to

10 steal money, correct?

11 MR. BRAR: Object to the form. I also

12 instruct my client that this question violates

13 his rights under the Fifth Amendment or certain

14 laws of his country or international conventions;

15 I, therefore, advise and instruct him not to

16 answer this question.

17 THE WITNESS: I refuse to answer based

18 upon counsel from my lawyer, my constitutional

19 rights including those protected under the Fifth

20 Amendment.

21 BY MR. LEAVITT:

22 Q. These entities would either overcharge the

23 government or not do the work at all, correct?

24 MR. BRAR: Object to the form. I also

25 instruct my client that this question violates

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1 his rights under the Fifth Amendment or certain
 2 laws of his country or international conventions;
 3 I, therefore, advise and instruct him not to
 4 answer this question.
 5 THE WITNESS: I refuse to answer based on
 6 counsel from my lawyer, my constitutional rights
 7 including those protected under the Fifth
 8 Amendment.
 9 BY MR. LEAVITT:
 10 Q. And you would eventually get the money that these
 11 entities made from these contracts, correct?
 12 MR. BRAR: Object to the form. I also
 13 instruct my client that this question violates
 14 his rights under the Fifth Amendment or certain
 15 laws of his country or international conventions;
 16 I, therefore, advise and instruct him not to
 17 answer this question.
 18 THE WITNESS: I refuse to answer based on
 19 counsel from my lawyer, my constitutional rights
 20 including those protected under the Fifth
 21 Amendment.
 22 BY MR. LEAVITT:
 23 Q. You agree with me that you had no legal right to
 24 that money, correct?
 25 MR. BRAR: Object to the form. I also

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1 instruct my client that this question violates
 2 his rights under the Fifth Amendment or certain
 3 laws of his country or international conventions;
 4 therefore advise and instruct him not to answer
 5 this question.
 6 THE WITNESS: I refuse to answer based on
 7 counsel from my lawyer, my constitutional rights
 8 including those protected under the Fifth
 9 Amendment.
 10 BY MR. LEAVITT:
 11 Q. Sir, and you agree with me that the submission of
 12 these fraudulent invoices was not an accident or a
 13 mission, correct?
 14 MR. BRAR: Object to the form. I also
 15 instruct my client that this question violates
 16 his rights under the Fifth Amendment or certain
 17 laws of his country or international conventions;
 18 I, therefore, advise and instruct my client not
 19 to answer this question.
 20 THE WITNESS: I refuse to answer based on
 21 counsel from my lawyer, my constitutional rights
 22 including those protected under the Fifth
 23 Amendment.
 24 BY MR. LEAVITT:
 25 Q. Sir, you agree with me in submitting these

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1 invoices to the government of Veracruz you made
 2 representations that were not true, correct?
 3 MR. BRAR: Object to the form. I also
 4 instruct my client that this question violates
 5 his rights under the Fifth Amendment or certain
 6 laws of his country or international conventions;
 7 I, therefore, advise and instruct my client not
 8 to answer this question.
 9 THE WITNESS: I refuse to answer based on
 10 counsel from my lawyer and my constitutional
 11 rights including those protected under the Fifth
 12 Amendment.
 13 BY MR. LEAVITT:
 14 Q. And you knew those representations were not true
 15 when you made them, correct?
 16 MR. BRAR: Object to the form. I also
 17 instruct my client that this question violates
 18 his rights under the Fifth Amendment or certain
 19 laws of his country or international conventions;
 20 I, therefore, advise and instruct my client not
 21 to answer this question.
 22 THE WITNESS: (No answer.)
 23 BY MR. LEAVITT:
 24 Q. You agree with me that some of this money from
 25 the state of Veracruz was transferred by you to the United

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1 States and used to purchase the real estate in these
 2 lawsuits, correct?
 3 MR. BRAR: Object to the form. I also
 4 instruct my client that this question violates
 5 his rights under the Fifth Amendment or certain
 6 laws of his country or international conventions;
 7 I, therefore, advise and instruct him not to
 8 answer this question.
 9 THE WITNESS: I refuse to answer based on
 10 counsel from my lawyer, my constitutional rights
 11 including those protected under the Fifth
 12 Amendment.
 13 BY MR. LEAVITT:
 14 Q. Sir, you agree with me you and Mr. Duarte had an
 15 agreement to participate in this scheme, correct?
 16 MR. BRAR: Object to the form. I also
 17 instruct my client that this question violates
 18 his rights under the Fifth Amendment or certain
 19 laws of his country or international conventions;
 20 I, therefore, advise and instruct him not to
 21 answer this question.
 22 THE WITNESS: I refuse to answer that
 23 question based upon counsel with my lawyer, my
 24 constitutional rights including those protected
 25 under the Fifth Amendment.

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1 BY MR. LEAVITT:
 2 Q. You and Mr. Duarte agreed that the object was to
 3 take money from the state of Veracruz, correct?
 4 MR. BRAR: Object to the form. I also
 5 instruct my client that this question violates
 6 his rights under the Fifth Amendment or certain
 7 laws of his country or international conventions;
 8 I, therefore, advise and instruct my client not
 9 to answer this question.
 10 THE WITNESS: I refuse to answer the
 11 question based on counsel from my lawyer, my
 12 constitutional rights including those protected
 13 under the Fifth Amendment.
 14 BY MR. LEAVITT:
 15 Q. And you agree with me the way in which this
 16 conspiracy was accomplished was by submitting fraudulent
 17 invoices to various agencies of the government of
 18 Veracruz, correct?
 19 MR. BRAR: Object to the form. I also
 20 instruct my client that this question violates
 21 his rights under the Fifth Amendment or certain
 22 laws of his country or international conventions;
 23 I, therefore, advise and instruct my client not
 24 to answer this question.
 25 THE WITNESS: I refuse to answer this

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1 question based upon counsel from my lawyer, my
 2 constitutional rights including those protected
 3 under the Fifth Amendment.
 4 BY MR. LEAVITT:
 5 Q. 8976 Chatsworth Drive, Houston, Texas 77024 is a
 6 property that you own, correct?
 7 MR. BRAR: Object to the -- I also
 8 instruct my client that this question violates
 9 his rights under the Fifth Amendment or certain
 10 laws of his country or international conventions;
 11 I, therefore, advise and instruct my client not
 12 to answer this question.
 13 THE WITNESS: I refuse to answer based on
 14 counsel from my lawyer, my constitutional rights
 15 including those protected under the Fifth
 16 Amendment.
 17 BY MR. LEAVITT:
 18 Q. This was a property that was purchased by you
 19 with funds stolen from the state of Veracruz, correct?
 20 MR. BRAR: Object to the form. I also
 21 instruct my client that this question violates
 22 his rights under the Fifth Amendment or certain
 23 laws of his country or international conventions;
 24 I, therefore, advise and instruct my client not
 25 to answer this question.

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1 THE WITNESS: I refuse to answer that
 2 question based upon counsel from my lawyer, my
 3 constitutional rights including those protected
 4 under the Fifth Amendment.
 5 BY MR. LEAVITT:
 6 Q. And this money was taken from the state of
 7 Veracruz in conjunction with the conspiracy -- strike
 8 that.
 9 38 Shallowford Place, Tomball, Texas, is a
 10 property that you own, correct?
 11 MR. BRAR: Object to the form. I also
 12 instruct my client that this question violates
 13 his rights under the Fifth Amendment or certain
 14 laws of his country or international conventions;
 15 I, therefore, advise and instruct him not to
 16 answer this question.
 17 THE WITNESS: I refuse to answer based on
 18 counsel from my lawyer, my constitutional rights
 19 including those protected under the Fifth
 20 Amendment.
 21 BY MR. LEAVITT:
 22 Q. This is a property that you purchased with funds
 23 stolen from the state of Veracruz, right?
 24 MR. BRAR: Object to the form. I also
 25 instruct my client that this question violates

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1 his Fifth Amendment rights or certain laws of his
 2 country or international conventions; I,
 3 therefore, advise and instruct him not to answer
 4 this question.
 5 THE WITNESS: I refuse to respond based on
 6 counsel from my lawyer, my constitutional rights
 7 including those protected under the Fifth
 8 Amendment.
 9 BY MR. LEAVITT:
 10 Q. These funds were stolen in a conspiracy with
 11 Javier Duarte, correct?
 12 MR. BRAR: Object to the form. I also
 13 instruct my client that this question violates
 14 his rights under the Fifth Amendment or certain
 15 laws of his country or international conventions;
 16 I, therefore, advise and instruct my client not
 17 to answer this question.
 18 THE WITNESS: I refuse to answer based
 19 upon counsel from my lawyer, my constitutional
 20 rights including those protected by the Fifth
 21 Amendment.
 22 BY MR. LEAVITT:
 23 Q. 18 Shallowford Place in Spring, Texas is a
 24 property owned by you, correct?
 25 MR. BRAR: I also instruct my client that

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1 this question violates his rights under the Fifth
 2 Amendment or certain laws of his country or
 3 international conventions; I, therefore, advise
 4 and instruct him not to answer this question.
 5 THE WITNESS: I refuse to answer this
 6 question based on counsel from my lawyer, my
 7 constitutional rights including those protected
 8 under the Fifth Amendment.
 9 BY MR. LEAVITT:
 10 Q. This property is owned by an entity named 18
 11 Shallowford Place, LLC, correct?
 12 MR. BRAR: I also instruct my client not
 13 to answer this question it violates his rights
 14 under the Fifth Amendment or certain laws of his
 15 country or international conventions; I,
 16 therefore, advise and instruct my client not to
 17 answer this question.
 18 THE WITNESS: I refuse to answer based on
 19 counsel from my lawyer, my constitutional rights
 20 including those protected under the Fifth
 21 Amendment.
 22 BY MR. LEAVITT:
 23 Q. This is an entity that you and your wife created
 24 and still control, correct?
 25 MR. BRAR: Object to this question. I

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1 instruct my client that this question violates
 2 his rights under the Fifth Amendment or certain
 3 laws of his country or international conventions,
 4 therefore, I instruct him not to answer this
 5 question.
 6 THE WITNESS: I refuse to answer based on
 7 counsel from my lawyer, my constitutional rights
 8 including those protected under the Fifth
 9 Amendment.
 10 BY MR. LEAVITT:
 11 Q. This entity was created in order to receive
 12 stolen funds from the state of Veracruz, correct?
 13 MR. BRAR: Object to the form. I also
 14 instruct my client that this question violates
 15 his rights under the Fifth Amendment or certain
 16 laws of his country or international conventions,
 17 therefore, I advise my client not to answer this
 18 question.
 19 THE WITNESS: I refuse to answer based on
 20 counsel from my lawyer, my constitutional rights
 21 including those protected by the Fifth Amendment.
 22 BY MR. LEAVITT:
 23 Q. And you agree with me this property was in fact
 24 purchased with funds stolen from the state of Veracruz,
 25 correct?

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1 MR. BRAR: Object to the form. I also
 2 instruct my client that an answer to this
 3 question violates his rights under the Fifth
 4 Amendment or certain laws of his country or
 5 international conventions, therefore, I instruct
 6 him not to answer this question.
 7 THE WITNESS: I refuse to answer based
 8 upon counsel from my lawyer, my constitutional
 9 rights including those protected under the Fifth
 10 Amendment.
 11 BY MR. LEAVITT:
 12 Q. 8350 Ashlane Way, Suite 8 in The Woodlands, Texas
 13 is a property owned by you, correct?
 14 MR. BRAR: I instruct my client that this
 15 question violates his rights under the Fifth
 16 Amendment or certain laws of his country or
 17 international conventions; I, therefore, advise
 18 and instruct him not to answer this question.
 19 THE WITNESS: I refuse to answer based
 20 upon counsel from my lawyer, my constitutional
 21 rights including those protected by the Fifth
 22 Amendment.
 23 BY MR. LEAVITT:
 24 Q. This property is held by a company named 18
 25 Shallowford Place, LLC, right?

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1 MR. BRAR: I instruct my client that an
 2 answer to this question would violate his rights
 3 under the Fifth Amendment or certain laws of his
 4 country or international conventions; I,
 5 therefore, advise and instruct him not to answer
 6 this question.
 7 THE WITNESS: I refuse to answer based
 8 upon counsel from my lawyer, my constitutional
 9 rights including those protected by the Fifth
 10 Amendment.
 11 BY MR. LEAVITT:
 12 Q. This is an entity -- strike that.
 13 This is an entity that you and your wife created
 14 in order to receive stolen funds from the state of
 15 Veracruz, correct?
 16 MR. BRAR: Object to the form. I also
 17 instruct my client that an answer to this
 18 question would violate his rights to the Fifth
 19 Amendment or certain laws of his country or
 20 international conventions, and therefore I advise
 21 my client not to answer this question.
 22 THE WITNESS: I refuse to respond based on
 23 counsel from my lawyer, my constitutional rights
 24 including those protected by the Fifth Amendment.
 25 BY MR. LEAVITT:

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1 Q. This property was, in fact, purchased with stolen
 2 funds from the state of Veracruz, correct?
 3 MR. BRAR: Object to the form. I also
 4 instruct my client that an answer to this
 5 question would violate his rights under the Fifth
 6 Amendment or certain laws of his country or
 7 international conventions; I, therefore, advise
 8 and instruct my client not to answer this
 9 question.
 10 THE WITNESS: I refuse to answer based
 11 upon counsel from my lawyer, my constitutional
 12 rights including those protected under the Fifth
 13 Amendment.
 14 BY MR. LEAVITT:
 15 Q. 8350 Ashlane Way, Suite 4, in The Woodlands,
 16 Texas is another property that you own, correct?
 17 MR. BRAR: I also instruct my client that
 18 any answer to this question would violate his
 19 rights under the Fifth Amendment or certain laws
 20 of his country or international conventions; I,
 21 therefore, advise and instruct my client not to
 22 answer this question.
 23 THE WITNESS: I refuse to answer that
 24 question based upon counsel from my lawyer, my
 25 constitutional rights including those protected

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1 under the Fifth Amendment.
 2 BY MR. LEAVITT:
 3 Q. This property is held by an entity named Bamba
 4 Offices, LLC, correct?
 5 MR. BRAR: I instruct my client that an
 6 answer to this question violates his rights under
 7 the Fifth Amendment or certain laws of his
 8 country or international conventions; I,
 9 therefore, advise and instruct my client not to
 10 answer this question.
 11 THE WITNESS: I refuse to answer that
 12 question based on counsel from my lawyer, my
 13 constitutional rights including those protected
 14 under the Fifth Amendment.
 15 BY MR. LEAVITT:
 16 Q. This is an entity that you and your wife created
 17 in order to receive stolen funds from the state of
 18 Veracruz, right?
 19 MR. BRAR: Object to the form. I also
 20 instruct my client that an answer to this
 21 question violates his rights under the Fifth
 22 Amendment or certain laws of his country or
 23 international conventions; I, therefore, advise
 24 and instruct my client not to answer this
 25 question.

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1 THE WITNESS: I refuse to answer based on
 2 counsel from my lawyer, my constitutional rights
 3 including those protected under the Fifth
 4 Amendment.
 5 BY MR. LEAVITT:
 6 Q. This property was, in fact, purchased with funds
 7 stolen from the state of Veracruz, correct?
 8 MR. BRAR: Object to the form. I also
 9 instruct my client that this question violates
 10 his rights under the Fifth Amendment or certain
 11 laws of his country or international conventions;
 12 I, therefore, advise and instruct my client not
 13 to answer this question.
 14 THE WITNESS: I refuse to answer that
 15 question based on counsel from my lawyer, my
 16 constitutional rights including those protected
 17 under the Fifth Amendment.
 18 BY MR. LEAVITT:
 19 Q. 8350 Ashlane Way, Suite 3 in The Woodlands, Texas
 20 is also owned by you, correct?
 21 MR. BRAR: I instruct my client that any
 22 answer to this question violates his rights under
 23 the Fifth Amendment or certain laws of his
 24 country or international conventions; I,
 25 therefore, advise and instruct my client not to

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1 answer this question.
 2 THE WITNESS: I refuse to answer based
 3 upon counsel from my lawyer, my constitutional
 4 rights including those protected by the Fifth
 5 Amendment.
 6 BY MR. LEAVITT:
 7 Q. This office is also held by Bamba Offices, LLC,
 8 correct?
 9 MR. BRAR: I instruct my client that an
 10 answer to this question violates his rights under
 11 the Fifth Amendment or certain laws of his
 12 country or international conventions; I,
 13 therefore, advise and instruct him not to answer
 14 this question.
 15 THE WITNESS: I refuse to answer based
 16 upon counsel from my lawyer, my constitutional
 17 rights including those protected by the Fifth
 18 Amendment.
 19 BY MR. LEAVITT:
 20 Q. Sir, and this property was also purchased with
 21 funds stolen from the state of Veracruz, correct?
 22 MR. BRAR: Object to the form. I also
 23 instruct my client that an answer to this
 24 question violates his rights under the Fifth
 25 Amendment or certain laws of his country or

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1 international conventions; I, therefore, advise
 2 and instruct my client not to answer this
 3 question.
 4 THE WITNESS: I refuse to answer based on
 5 counsel from my lawyer, my constitutional rights
 6 including those protected by the Fifth Amendment.
 7 BY MR. LEAVITT:
 8 Q. Sir, 43 North Spinning Wheel Circle in the
 9 Woodland Circle is also owned by you, correct?
 10 MR. BRAR: I instruct my client that an
 11 answer to this question violates his rights under
 12 the Fifth Amendment or certain laws of his
 13 country or international conventions; I,
 14 therefore, advise and instruct him not to answer
 15 this question.
 16 THE WITNESS: I refuse to answer this
 17 question based upon counsel from my lawyer, my
 18 constitutional rights including those protected
 19 under the Fifth Amendment.
 20 BY MR. LEAVITT:
 21 Q. This property is owned by 43 Spinning Wheel, LLC,
 22 correct?
 23 MR. BRAR: I will instruct my client not
 24 to answer this question. It violates his rights
 25 under the Fifth Amendment or certain laws of his

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1 country or international conventions; I,
 2 therefore, advise and instruct him not to answer
 3 this question.
 4 THE WITNESS: I refuse to answer based
 5 upon counsel from my lawyer, my constitutional
 6 rights including those protected under the Fifth
 7 Amendment.
 8 BY MR. LEAVITT:
 9 Q. And that is an entity you and your wife created
 10 in order to receive stolen funds from the state of
 11 Veracruz, correct?
 12 MR. BRAR: Object to the form. I also
 13 instruct my client not to answer this question
 14 because it violates his rights under the Fifth
 15 Amendment or certain laws of his country or
 16 international conventions; I, therefore, advise
 17 and instruct him not to answer this question.
 18 THE WITNESS: I refuse to answer based
 19 upon counsel from my lawyer, my constitutional
 20 rights including those protected by the Fifth
 21 Amendment.
 22 BY MR. LEAVITT:
 23 Q. This property was in fact purchased with funds
 24 stolen from the state of Veracruz, correct?
 25 MR. BRAR: Object to the form. I also

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1 instruct my client not to answer this question
 2 violates his rights under the Fifth Amendment or
 3 certain laws of his country or international
 4 conventions; I, therefore, advise and instruct my
 5 client not to answer this question.
 6 THE WITNESS: I refuse to answer based
 7 upon counsel from my lawyer, my constitutional
 8 rights including those protected under the Fifth
 9 Amendment.
 10 BY MR. LEAVITT:
 11 Q. Sir, 138 Bryce Branch Circle in The Woodlands,
 12 Texas is another property owned by you, correct?
 13 MR. BRAR: I instruct my client that an
 14 answer to this question violates his rights under
 15 the Fifth Amendment or certain laws of his
 16 country or international conventions; I,
 17 therefore, advise and instruct him not to answer
 18 this question.
 19 THE WITNESS: I refuse to answer this
 20 question based upon counsel from my lawyer, my
 21 constitutional rights including those protected
 22 by the Fifth Amendment.
 23 BY MR. LEAVITT:
 24 Q. This property is held by a company named 138
 25 Bryce Branch, LLC, correct?

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1 MR. BRAR: I instruct my client not to
 2 answer that this question violates his rights
 3 under the Fifth Amendment or certain laws of his
 4 country or international conventions; I,
 5 therefore, advise and instruct him not to answer
 6 this question.
 7 THE WITNESS: I refuse to answer based
 8 upon counsel from my lawyer, my constitutional
 9 rights including those protected by the Fifth
 10 Amendment.
 11 BY MR. LEAVITT:
 12 Q. This property is held by a company named 138 Bay
 13 Branch, LLC, correct?
 14 MR. BRAR: I instruct my client that the
 15 answer to this question violates his rights under
 16 the Fifth Amendment or certain laws of his
 17 country or international conventions; I,
 18 therefore, advise and instruct him not to answer
 19 this question.
 20 THE WITNESS: I refuse to answer based
 21 upon counsel from my lawyer, my constitutional
 22 rights including those protected under the Fifth
 23 Amendment.
 24 BY MR. LEAVITT:
 25 Q. Both of these entities were created to receive

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1 stolen funds from the state of Veracruz, correct?
 2 MR. BRAR: Object to the form. I also
 3 instruct my client not to answer this question
 4 violates his rights under the Fifth Amendment or
 5 certain laws of his country or international
 6 conventions; I, therefore, advise and instruct my
 7 client not to answer this question.
 8 THE WITNESS: I refuse to answer the
 9 question based upon counsel from my lawyer, my
 10 constitutional rights including those protected
 11 under the Fifth Amendment.
 12 BY MR. LEAVITT:
 13 Q. And 138 Bryce Branch Circle in The Woodlands,
 14 Texas was, in fact, purchased with funds stolen money from
 15 state of Veracruz, correct?
 16 MR. BRAR: Object to the form. I also
 17 instruct my client that an answer to this
 18 question violates his rights under the Fifth
 19 Amendment or certain laws of his country or
 20 international conventions; I, therefore, advise
 21 and instruct my client not to answer this
 22 question.
 23 THE WITNESS: I refuse to answer based
 24 upon counsel from my lawyer, my constitutional
 25 rights including those protected by the Fifth

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1 Amendment.
 2 BY MR. LEAVITT:
 3 Q. 18 Griffin Hill Court in the Woodland Hills,
 4 Texas is also a property owned by you, correct?
 5 MR. BRAR: I instruct my client that an
 6 answer to this question violates his rights under
 7 the Fifth Amendment or certain laws of his
 8 country or international conventions; I,
 9 therefore, advise and instruct my client not to
 10 answer this question.
 11 THE WITNESS: I refuse to answer based
 12 upon counsel from my lawyer, my constitutional
 13 rights including those protected under the Fifth
 14 Amendment.
 15 BY MR. LEAVITT:
 16 Q. This property is held by an entity named 18
 17 Griffin Hill, LLC, correct?
 18 MR. BRAR: I instruct my client that an
 19 answer to this question violates his rights under
 20 the Fifth Amendment or certain laws of his
 21 country or international conventions; I,
 22 therefore, advise and instruct my client not to
 23 answer this question.
 24 THE WITNESS: I refuse to answer based
 25 upon counsel from my lawyer, my constitutional

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1 rights including those protected under the Fifth
 2 Amendment.
 3 BY MR. LEAVITT:
 4 Q. This is an entity created by you and your wife in
 5 order to receive stolen funds from the state of Veracruz,
 6 right?
 7 MR. BRAR: Object to the form. I also
 8 instruct my client that an answer to this
 9 question violates his rights under the Fifth
 10 Amendment or certain laws of his country or
 11 international conventions; I, therefore, advise
 12 and instruct him not to answer this question.
 13 THE WITNESS: I refuse to answer based
 14 upon counsel from my lawyer, my constitutional
 15 rights including those protected by the Fifth
 16 Amendment.
 17 BY MR. LEAVITT:
 18 Q. This property was, in fact, purchased with funds
 19 stolen from the state of Veracruz, correct?
 20 MR. BRAR: Object to the form. I also
 21 instruct my client that an answer to this
 22 question violates his rights under the Fifth
 23 Amendment or certain laws of his country or
 24 international conventions; I, therefore, advise
 25 and instruct my client not to answer this

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1 question.
 2 THE WITNESS: I refuse to answer based
 3 upon counsel from my lawyer, my constitutional
 4 rights including those protected by the Fifth
 5 Amendment.
 6 MR. LEAVITT: Let's switch, and take a break.
 7 THE VIDEOGRAPHER: This is the end of Media 2,
 8 Volume 1, in the video deposition of Jose Antonio Bandin.
 9 Going off the record at 11:22 a.m. as indicated on the
 10 video screen.
 11 (Recess taken at 11:22 a.m.)
 12 THE VIDEOGRAPHER: This is the beginning
 13 of Media 3, Volume 1 in the video deposition of
 14 Jose Antonio Bandin. Going back on the record at
 15 11:39 as indicated on the video screen.
 16 BY MR. LEAVITT:
 17 Q. Sir, you own a property at 175 West New Harmony
 18 Trail in Spring, Texas, correct?
 19 MR. BRAR: I instruct my client that any
 20 answer to this question would violate his rights
 21 under the Fifth Amendment or certain laws of his
 22 country or international conventions; I,
 23 therefore, instruct and advise my client not to
 24 answer this question.
 25 THE WITNESS: I refuse to answer this

81	<p>1 question based on counsel from my lawyer, my</p> <p>2 constitutional rights including those protected</p> <p>3 by the Fifth Amendment.</p> <p>4 BY MR. LEAVITT:</p> <p>5 Q. This entity is -- I'm sorry -- strike that.</p> <p>6 This property is held by an entity named 175 West</p> <p>7 New Harmony, LLC, correct?</p> <p>8 MR. BRAR: I instruct my client that any</p> <p>9 answer to this question would violate his rights</p> <p>10 under the Fifth Amendment or certain laws of his</p> <p>11 country or international conventions; I,</p> <p>12 therefore, advise and instruct my client not to</p> <p>13 answer this question.</p> <p>14 THE WITNESS: I refuse to answer that</p> <p>15 question based on counsel from my lawyer, my</p> <p>16 constitutional rights including those protected</p> <p>17 by the Fifth Amendment.</p> <p>18 BY MR. LEAVITT:</p> <p>19 Q. This property was, in fact, purchased with funds</p> <p>20 stolen from the state of Veracruz, correct?</p> <p>21 MR. BRAR: Object to the form. I also</p> <p>22 instruct my client that this question violates</p> <p>23 his rights under the Fifth Amendment or certain</p> <p>24 laws of his country or international conventions;</p> <p>25 I, therefore, advise and instruct my client not</p>	83	<p>1 therefore, advise and instruct my client not to</p> <p>2 answer this question.</p> <p>3 THE WITNESS: I refuse to answer based</p> <p>4 upon counsel from my lawyer, my constitutional</p> <p>5 rights including those protected by the Fifth</p> <p>6 Amendment.</p> <p>7 BY MR. LEAVITT:</p> <p>8 Q. This property was, in fact, purchased with funds</p> <p>9 stolen from the state of Veracruz, correct?</p> <p>10 MR. BRAR: Object to the form. I also</p> <p>11 instruct my client that any answer to this</p> <p>12 question would violate his rights under the Fifth</p> <p>13 Amendment or certain laws of his country or</p> <p>14 international conventions; I, therefore, advise</p> <p>15 and instruct my client not to answer.</p> <p>16 THE WITNESS: I refuse to answer based</p> <p>17 upon counsel from my lawyer, my constitutional</p> <p>18 rights including those protected by the Fifth</p> <p>19 Amendment.</p> <p>20 BY MR. LEAVITT:</p> <p>21 Q. You also own property at 87 West Jagged Ridge</p> <p>22 Circle in The Woodlands, Texas, correct?</p> <p>23 MR. BRAR: I instruct my client that any</p> <p>24 answer to this question would violate his rights</p> <p>25 under the Fifth Amendment or certain laws of his</p>
82	<p>1 to answer this question.</p> <p>2 THE WITNESS: I refuse to answer based</p> <p>3 upon counsel from my lawyer, my constitutional</p> <p>4 rights including those protected by the Fifth</p> <p>5 Amendment.</p> <p>6 BY MR. LEAVITT:</p> <p>7 Q. You also own a property at the address 83 West</p> <p>8 Jagged Ridge Circle in Woodlands, Texas, correct?</p> <p>9 MR. BRAR: I instruct my client not to</p> <p>10 answer this question because violates his rights</p> <p>11 under the Fifth Amendment or certain laws of his</p> <p>12 country or international conventions; I,</p> <p>13 therefore, advise and instruct my client not to</p> <p>14 answer this question.</p> <p>15 THE WITNESS: I refuse to answer based</p> <p>16 upon counsel from my lawyer, my constitutional</p> <p>17 rights including those protected by the Fifth</p> <p>18 Amendment.</p> <p>19 BY MR. LEAVITT:</p> <p>20 Q. This property is held by an entity named 83 West</p> <p>21 Jagged Ridge, LLC, correct?</p> <p>22 MR. BRAR: I instruct my client that any</p> <p>23 answer to this question would violates his rights</p> <p>24 under the Fifth Amendment or certain laws of his</p> <p>25 country or international conventions; I,</p>	84	<p>1 country or international conventions; I,</p> <p>2 therefore, advise and instruct my client not to</p> <p>3 answer this question.</p> <p>4 THE WITNESS: I refuse to answer based</p> <p>5 upon counsel from my lawyer, my constitutional</p> <p>6 rights including those protected by the Fifth</p> <p>7 Amendment.</p> <p>8 BY MR. LEAVITT:</p> <p>9 Q. Sir, this property is held by an entity 38 West</p> <p>10 Jagged Ridge, LLC, correct?</p> <p>11 MR. BRAR: I instruct my client that any</p> <p>12 answer to this question would violate his rights</p> <p>13 under the Fifth Amendment or certain laws of his</p> <p>14 country or international conventions; I,</p> <p>15 therefore, advise and instruct my client not to</p> <p>16 answer this question.</p> <p>17 THE WITNESS: I refuse to answer based</p> <p>18 upon counsel from my lawyer, my constitutional</p> <p>19 rights including -- and including those protected</p> <p>20 by the Fifth Amendment.</p> <p>21 BY MR. LEAVITT:</p> <p>22 Q. Excuse me -- strike that.</p> <p>23 This is an entity you and your wife created to</p> <p>24 receive stolen funds from the state of Veracruz, correct?</p> <p>25 MR. BRAR: Objection to the form. I also</p>

85	<p>1 instruct my client not to answer this question</p> <p>2 because it would violate his rights under the</p> <p>3 Fifth Amendment or certain laws of his country or</p> <p>4 international conventions; I, therefore, advise</p> <p>5 and instruct my client not to answer this</p> <p>6 question.</p> <p>7 THE WITNESS: I refuse to answer based</p> <p>8 upon counsel from my lawyer, my constitutional</p> <p>9 rights including those protected by the Fifth</p> <p>10 Amendment.</p> <p>11 BY MR. LEAVITT:</p> <p>12 Q. And this property was, in fact, purchased with</p> <p>13 the funds stolen from the state of Veracruz?</p> <p>14 MR. BRAR: Objection. Form. I also</p> <p>15 instruct my client that any answer to this</p> <p>16 question would violate his rights under the Fifth</p> <p>17 Amendment or certain laws of his country or</p> <p>18 international conventions; I, therefore, advise</p> <p>19 and instruct my client not to answer this</p> <p>20 question.</p> <p>21 THE WITNESS: I refuse to answer based</p> <p>22 upon counsel from my lawyer, my constitutional</p> <p>23 rights including those protected by the Fifth</p> <p>24 Amendment.</p> <p>25 BY MR. LEAVITT:</p>	87	<p>1 by the Fifth Amendment.</p> <p>2 BY MR. LEAVITT:</p> <p>3 Q. And you were responsible for stealing this money</p> <p>4 from the state of Veracruz, correct?</p> <p>5 MR. BRAR: Objection. Form. I also</p> <p>6 instruct my client that any answer to this</p> <p>7 question violates his rights under the Fifth</p> <p>8 Amendment or certain laws of his country or</p> <p>9 international conventions; I, therefore, advise</p> <p>10 and instruct my client not to answer this</p> <p>11 question.</p> <p>12 THE WITNESS: I refuse to answer this</p> <p>13 question based upon counsel from my lawyer, my</p> <p>14 constitutional rights including those protected</p> <p>15 by the Fifth Amendment.</p> <p>16 BY MR. LEAVITT:</p> <p>17 Q. You were, in fact, responsible for stealing all</p> <p>18 of the money from the state of Veracruz that you used to</p> <p>19 purchase all the properties that we talked about today,</p> <p>20 correct?</p> <p>21 MR. BRAR: Objection. Form. I also</p> <p>22 instruct my client that any answer to this</p> <p>23 question violates his rights under the Fifth</p> <p>24 Amendment or certain laws of his country or</p> <p>25 international conventions; I, therefore, advise</p>
86	<p>1 Q. You also own a property at 7940 East Clinton</p> <p>2 Street in Scottsdale, Arizona, correct?</p> <p>3 MR. BRAR: Objection. Form. I also</p> <p>4 instruct my client not to answer this question</p> <p>5 because it violates his rights under the Fifth</p> <p>6 Amendment or certain laws of his country or</p> <p>7 international conventions; I, therefore, instruct</p> <p>8 my client not to answer this question.</p> <p>9 THE WITNESS: I refuse to answer this</p> <p>10 question based upon counsel from my lawyer, my</p> <p>11 constitutional rights including those protected</p> <p>12 by the Fifth Amendment.</p> <p>13 BY MR. LEAVITT:</p> <p>14 Q. And this property was in fact purchased with</p> <p>15 stolen funds from the state of Veracruz, right?</p> <p>16 MR. BRAR: Objection. Form. I also</p> <p>17 instruct my client that any answer to this</p> <p>18 question violates his rights under the Fifth</p> <p>19 Amendment or certain laws of his country or</p> <p>20 international conventions; I, therefore, advise</p> <p>21 and instruct my client not to answer this</p> <p>22 question.</p> <p>23 THE WITNESS: I refuse to answer this</p> <p>24 question based upon counsel from my lawyer, my</p> <p>25 constitutional rights including those protected</p>	88	<p>1 and instruct my client not to answer this</p> <p>2 question.</p> <p>3 THE WITNESS: I refuse to answer based</p> <p>4 upon counsel from my lawyer, my constitutional</p> <p>5 rights including those protected by the Fifth</p> <p>6 Amendment.</p> <p>7 BY MR. LEAVITT:</p> <p>8 Q. You also own a property located at 307 Bloom Hill</p> <p>9 Place, Magnolia, Texas, correct?</p> <p>10 MR. BRAR: I instruct my client not to</p> <p>11 answer this question as it violates his rights</p> <p>12 under the Fifth Amendment or certain laws of his</p> <p>13 country or international conventions; I,</p> <p>14 therefore, advise and instruct my client not to</p> <p>15 answer.</p> <p>16 THE WITNESS: I refuse to answer this</p> <p>17 question based upon counsel from my lawyer, my</p> <p>18 constitutional rights including those protected</p> <p>19 by the Fifth Amendment.</p> <p>20 BY MR. LEAVITT:</p> <p>21 Q. This property was purchased with funds stolen</p> <p>22 from the state of Veracruz, correct?</p> <p>23 MR. BRAR: Objection. Form. I also</p> <p>24 instruct my client not to answer to this question</p> <p>25 because violates his rights under the Fifth</p>

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1 Amendment or certain laws of his country or
 2 international conventions; I, therefore, advise
 3 and instruct my client not to answer this
 4 question.
 5 THE WITNESS: I refuse to answer this
 6 question based upon counsel from my lawyer, my
 7 constitutional rights including those protected
 8 by the Fifth Amendment.
 9 BY MR. LEAVITT:
 10 Q. And you were responsible for stealing these funds
 11 from the state of Veracruz, correct?
 12 MR. BRAR: Objection. Form. I also
 13 instruct my client not to answer this question
 14 because it would violate his rights under the
 15 Fifth Amendment and certain laws of his country
 16 or international conventions; I, therefore,
 17 instruct and advise my client not to answer this
 18 question.
 19 THE WITNESS: I refused to answer based
 20 upon counsel from my lawyer, my constitutional
 21 rights including those protected by the Fifth
 22 Amendment.
 23 BY MR. LEAVITT:
 24 Q. North Lot 15 on Levy Lane in Tomball, Texas is a
 25 property owned by you, correct?

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1 MR. BRAR: Objection. Form. I also
 2 instruct my client not to answer this question
 3 because it violates his rights under the Fifth
 4 Amendment certain laws of his country or
 5 international convention; I, therefore, instruct
 6 and advise my client not to answer this question.
 7 THE WITNESS: I refuse to answer this
 8 question based upon counsel from my lawyer, my
 9 constitutional rights including those protected
 10 by the Fifth Amendment.
 11 BY MR. LEAVITT:
 12 Q. This is a property that was purchased with funds
 13 stolen from the state of Veracruz, correct?
 14 MR. BRAR: Objection. Form. I also
 15 instruct my client that any answer to this
 16 question would violate his rights under the
 17 Fifth Amendment or certain laws of his country or
 18 international convention; I, therefore, instruct
 19 my client not to answer this question.
 20 THE WITNESS: I refuse to answer based
 21 upon the counsel from my lawyer, my
 22 constitutional rights including those protected
 23 by the Fifth Amendment.
 24 BY MR. LEAVITT:
 25 Q. You were in fact responsible for stealing these

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1 funds from the state of Veracruz, correct?
 2 MR. BRAR: Objection. Form. I also
 3 instruct my client that any answer to this
 4 question would violate his rights under the Fifth
 5 Amendment or certain laws of his country or
 6 international conventions; I, therefore, advise
 7 and instruct my client not to answer this
 8 question.
 9 THE WITNESS: I refuse to answer this
 10 question based upon counsel from my lawyer, my
 11 constitutional rights and protected under the
 12 Fifth Amendment of the Constitution.
 13 BY MR. LEAVITT:
 14 Q. Seven Rose Brush, LLC, is an entity created by
 15 you and your wife, correct?
 16 MR. BRAR: Objection. Form. I also
 17 instruct my client that an answer to this
 18 question would violate his rights under the Fifth
 19 Amendment or certain laws of his country or
 20 international convention; I, therefore, advise
 21 and instruct him not to answer this question.
 22 THE WITNESS: I refuse to answer this
 23 question based upon counsel from my lawyer, my
 24 constitutional rights including those protected
 25 by the Fifth Amendment.

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1 BY MR. LEAVITT:
 2 Q. It was created to receive stolen funds from the
 3 state of Veracruz, correct?
 4 MR. BRAR: Objection. Form. I will also
 5 instruct my client that an answer to this
 6 question would violation his rights under the
 7 Fifth Amendment or certain laws of his country or
 8 international convention; I, therefore, advise
 9 and instruct my client not to answer this
 10 question.
 11 THE WITNESS: I refuse to answer this
 12 question based on counsel from my lawyer, my
 13 constitutional rights including those protected
 14 by the Fifth Amendment.
 15 BY MR. LEAVITT:
 16 Q. This entity did, in fact, receive funds stolen
 17 from the state of Veracruz, right?
 18 MR. BRAR: Objection. Form. I also
 19 instruct my client not to answer this question
 20 violates his rights under the Fifth Amendment or
 21 certain laws of his country or international
 22 conventions; I, therefore, advise and instruct my
 23 client not to answer this question.
 24 THE WITNESS: I refuse to answer based
 25 upon counsel from my lawyer, my constitutional

1 rights including those protected by the Fifth
 2 Amendment.
 3 BY MR. LEAVITT:
 4 Q. This entity is still in the possession of fund
 5 stolen from the state of Veracruz, correct?
 6 MR. BRAR: Objection. Form. I also
 7 instruct my client that any answer to this
 8 question would violate his rights under the Fifth
 9 Amendment or certain laws of his country or
 10 international conventions; I, therefore, advise
 11 and instruct my client not to answer this
 12 question.
 13 THE WITNESS: I refuse to answer this
 14 question based upon counsel from my lawyer, my
 15 constitutional rights including those protected
 16 by the Fifth Amendment.
 17 BY MR. LEAVITT:
 18 Q. Bamba Construction, LLC, is an entity that was
 19 created by you and your wife, correct?
 20 MR. BRAR: Objection. Form. I also
 21 instruct my client that any answer to this
 22 question would violate his rights under the Fifth
 23 Amendment or certain laws of his country or
 24 international conventions; I, therefore, advise
 25 and instruct my client not to answer this

1 international conventions; I, therefore, advise
 2 and instruct my client not to answer this
 3 question.
 4 THE WITNESS: I refuse to answer based on
 5 counsel from my lawyer, my constitutional rights
 6 including those protected by the Fifth Amendment.
 7 BY MR. LEAVITT:
 8 Q. This entity is still in possession of funds
 9 stolen from the state of Veracruz, correct?
 10 MR. BRAR: Objection. Form. I also
 11 instruct my client that any answer to this
 12 question would violate his rights under the Fifth
 13 Amendment or certain laws of his country or
 14 international conventions; I, therefore, advise
 15 and instruct my client not to answer this
 16 question.
 17 THE WITNESS: I refuse to answer this
 18 question based upon counsel from my lawyer, my
 19 constitutional rights and those protected by the
 20 Fifth Amendment.
 21 BY MR. LEAVITT:
 22 Q. Bamba -- excuse me -- strike that.
 23 Bamba Land and Development, LLC, is an entity
 24 created by you and your wife, correct?
 25 MR. BRAR: Objection. Form. I also

1 question.
 2 THE WITNESS: I refuse to answer based
 3 upon counsel from my lawyer, my constitutional
 4 rights including those protected by the Fifth
 5 Amendment.
 6 BY MR. LEAVITT: Q. And this entity was created to
 7 receive funds stolen from the state of Veracruz, correct?
 8 MR. BRAR: Objection to the form. I also
 9 instruct my client that any answer to this
 10 question would violate his rights under the Fifth
 11 Amendment or certain laws of his country or
 12 international conventions; I, therefore, advise
 13 and instruct my client not to answer this
 14 question.
 15 THE WITNESS: I refuse to answer based
 16 upon counsel from my lawyer, my constitutional
 17 rights including those protected by the Fifth
 18 Amendment.
 19 BY MR. LEAVITT:
 20 Q. This entity did, in fact, receive funds stolen
 21 from the state of Veracruz, right?
 22 MR. BRAR: Objection. Form. I also
 23 instruct my client not to answer this question.
 24 It would violate his rights under the Fifth
 25 Amendment or certain laws of his country or

1 instruct my client that any answer to this
 2 question would violate his rights under the Fifth
 3 Amendment or certain international conventions or
 4 laws in his country, I, therefore, advise and
 5 instruct my client not to answer this question.
 6 THE WITNESS: I refuse to answer this
 7 question based upon counsel from my lawyer, my
 8 constitutional rights and those protected by the
 9 Fifth Amendment.
 10 BY MR. LEAVITT:
 11 Q. This entity was created to receive funds stolen
 12 from the state of Veracruz, correct?
 13 MR. BRAR: Objection. Form. I also
 14 instruct my client not to answer this question.
 15 It would violate his rights under the Fifth
 16 Amendment or certain laws of his country or
 17 international conventions; I, therefore, advise
 18 and instruct my client not to answer this
 19 question.
 20 THE WITNESS: I refuse to answer based
 21 upon counsel from my lawyer, my constitutional
 22 rights including those protected by the Fifth
 23 Amendment.
 24 BY MR. LEAVITT:
 25 Q. This entity did, in fact, receive funds stolen

1 from the state of Veracruz, correct?
2 MR. BRAR: Object to the Form. I also
3 instruct my client that any answer to this
4 question would violate his rights under the Fifth
5 Amendment or certain laws of his country or
6 international conventions; I, therefore, advise
7 and instruct my client not to answer this
8 question.

9 THE WITNESS: I refuse to answer this
10 question based upon counsel from my lawyer, my
11 constitutional rights including those protected
12 by the Fifth Amendment.

13 BY MR. LEAVITT:

14 Q. This entity is still in possession of funds
15 stolen from the state of Veracruz, correct?

16 MR. BRAR: Objection. Form. I also
17 instruct my client that any answer to this
18 question would violate his rights under the Fifth
19 Amendment or certain laws of his country or
20 international conventions; I, therefore, advise
21 and instruct my client not to answer this
22 question.

23 THE WITNESS: I refuse to answer on the
24 basis of counsel from my lawyer, my
25 constitutional rights including those protected

1 THE WITNESS: I refuse to answer on the
2 based of counsel from my lawyer, my
3 constitutional rights including those protected
4 by the Fifth Amendment.

5 BY MR. LEAVITT:

6 Q. This entity did, in fact, receive funds stolen
7 from the state of Veracruz, correct?

8 MR. BRAR: Objection. Form. I also
9 instruct my client not to answer to this question
10 because it would violate his rights under the
11 Fifth Amendment or certain laws of his country or
12 international conventions; I, therefore, advise
13 and instruct my client not to answer this
14 question.

15 THE WITNESS: I refuse to answer on the
16 based of counsel from my lawyer, my
17 constitutional rights including those protected
18 by the Fifth Amendment.

19 BY MR. LEAVITT:

20 Q. This entity is still in possession of funds
21 stolen from the state of Veracruz, correct?

22 MR. BRAR: Objection. Form. I also
23 instruct my client that any answer to this
24 question would violate his rights under the Fifth
25 Amendment or certain laws of his country or

1 by the Fifth Amendment.

2 BY MR. LEAVITT:

3 Q. Bandin Real Estate, LLC, is an entity created by
4 you and your wife, correct?

5 MR. BRAR: Objection. Form. I also
6 instruct my client that any answer to this
7 question would violate his rights under the Fifth
8 Amendment or certain laws of his country or
9 international conventions; I, therefore, advise
10 and instruct my client not to answer this
11 question.

12 THE WITNESS: I refuse to answer this
13 question on the basis upon counsel from my
14 lawyer, my constitutional rights including those
15 protected by the Fifth Amendment.

16 BY MR. LEAVITT:

17 Q. This entity was created to receive stolen funds
18 from the state of Veracruz, correct?

19 MR. BRAR: Objection. Form. I also
20 instruct my client not to answer this question.
21 It would violate his rights under the Fifth
22 Amendment or certain laws of his country or
23 international conventions; I, therefore, advise
24 and instruct my client not to answer this
25 question.

1 international conventions; I, therefore, advise
2 and instruct my client not to answer this
3 question.

4 THE WITNESS: I refuse to answer this
5 question based upon counsel from my lawyer, my
6 constitutional rights including those protected
7 by the Fifth Amendment.

8 BY MR. LEAVITT:

9 Q. Bull Business and Storage, LLC, is an entity
10 created by you and your wife, correct?

11 MR. BRAR: Objection. Form. I also
12 instruct my client not to answer to this
13 question. It would violate his rights under the
14 Fifth Amendment or certain laws of his country or
15 international conventions; I, therefore, advise
16 and instruct my client not to answer this
17 question.

18 THE WITNESS: I refuse to answer this
19 question upon counsel from my lawyer, my
20 constitutional rights including those protected
21 by the Fifth Amendment.

22 BY MR. LEAVITT:

23 Q. This entity was created in order to receive
24 stolen funds from the state of Veracruz, correct?

25 MR. BRAR: Objection. Form. I also

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1 instruct my client not to answer to this
 2 question. It would violate his rights under the
 3 Fifth Amendment or certain laws of his country or
 4 international conventions; I, therefore, advise
 5 and instruct my client not to answer this
 6 question.
 7 THE WITNESS: I refuse to answer this
 8 question based upon counsel from my lawyer, my
 9 constitutional rights including those protected
 10 by the Fifth Amendment.
 11 BY MR. LEAVITT:
 12 Q. It created to receive funds stolen from the state
 13 of Veracruz, correct?
 14 MR. BRAR: Objection. Form. I also
 15 instruct my client not to answer to this
 16 question. It would violate his rights under the
 17 Fifth Amendment or certain laws of his country or
 18 international conventions; I, therefore, advise
 19 and instruct my client not to answer this
 20 question.
 21 THE WITNESS: I refuse to answer it on the
 22 basis upon counsel from my lawyer, my
 23 constitutional rights including those protected
 24 by the Fifth Amendment.
 25 BY MR. LEAVITT:

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1 Q. This entity did, in fact, receive funds stolen
 2 from the state of Veracruz, correct?
 3 MR. BRAR: Objection. Form. I also
 4 instruct my client not to answer to this
 5 question. It would violate his rights under the
 6 Fifth Amendment or certain laws of his country or
 7 international conventions; I, therefore, advise
 8 and instruct my client not to answer this
 9 question.
 10 THE WITNESS: I refuse to answer this
 11 question based upon counsel from my lawyer, my
 12 constitutional rights including those protected
 13 by the Fifth Amendment.
 14 BY MR. LEAVITT:
 15 Q. This entity is still in possession of funds
 16 stolen from the state of Veracruz, right?
 17 MR. BRAR: Objection. Form. I also
 18 instruct my client not to answer to this question
 19 as it would violate his rights under the Fifth
 20 Amendment or certain laws of his country or
 21 international conventions; I, therefore, advise
 22 and instruct my client not to answer this
 23 question.
 24 THE WITNESS: I refuse to answer this
 25 question on the basis of counsel from my lawyer,

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1 my constitutional rights including those
 2 protected by the Fifth Amendment.
 3 MR. LEAVITT: Counsel, can I have the one back so
 4 I can relabel it?
 5 BY MR. LEAVITT:
 6 Q. Sir, I'm going to hand you what I marked as
 7 Exhibit No. 2, and is a number of the -- a number of
 8 documents demonstrating your ownership or formation of the
 9 entities and properties we have discussed today.
 10 (Exhibit No. 2 was marked for identification.)
 11 BY MR. LEAVITT:
 12 Q. Take as much time as you need to review those,
 13 sir, but my ultimate question is going to be these
 14 documents demonstrate and prove your ownership in the
 15 properties we've discussed today and the entities we
 16 discussed today, correct?
 17 MR. BRAR: Objection. Go ahead.
 18 Objection. Form. I also advise and instruct my
 19 client that any answer to this question as it
 20 would violate his rights under the Fifth
 21 Amendment or certain laws of his country or
 22 international conventions; I, therefore, advise
 23 and instruct my client not to answer this
 24 question.
 25 THE WITNESS: I refuse to answer this

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1 question on the basis of counsel from my lawyer,
 2 my constitutional rights including those
 3 protected by the Fifth Amendment.
 4 BY MR. LEAVITT:
 5 Q. And these forms also demonstrate the formation of
 6 the entities that we discussed today, correct?
 7 MR. BRAR: Objection. Form. I also
 8 instruct my client not to answer to this question
 9 because it violates his rights under the Fifth
 10 Amendment or certain laws of his country or
 11 international conventions; I, therefore, advise
 12 and instruct my client not to answer this
 13 question.
 14 THE WITNESS: I refuse to answer on the
 15 basis of counsel of my lawyer this question based
 16 upon counsel from my lawyer, my constitutional
 17 rights including those protected by the Fifth
 18 Amendment.
 19 BY MR. LEAVITT:
 20 Q. Sir, what properties do you currently own?
 21 MR. BRAR: Objection. Form. I also
 22 instruct my client not to answer to this question
 23 because it would violate his rights under the
 24 Fifth Amendment or certain laws of his country or
 25 international conventions; I, therefore, advise

105	<p>1 and instruct my client not to answer this</p> <p>2 question.</p> <p>3 THE WITNESS: I refuse to answer on the</p> <p>4 basis upon counsel from my lawyer, my</p> <p>5 constitutional rights including those protected</p> <p>6 by the Fifth Amendment.</p> <p>7 BY MR. LEAVITT:</p> <p>8 Q. Other than the properties we discussed today,</p> <p>9 what other properties inside the United States do you</p> <p>10 currently own?</p> <p>11 MR. BRAR: I also instruct my client not</p> <p>12 to answer to this question as it would violate</p> <p>13 his rights under the Fifth Amendment or certain</p> <p>14 laws of his country or international conventions;</p> <p>15 I, therefore, advise and instruct my client not</p> <p>16 to answer this question.</p> <p>17 THE WITNESS: I refuse to answer this</p> <p>18 question on the basis of counsel from my lawyer,</p> <p>19 my constitutional rights including those</p> <p>20 protected by the Fifth Amendment.</p> <p>21 BY MR. LEAVITT:</p> <p>22 Q. What entities do you currently own or have</p> <p>23 control over?</p> <p>24 MR. BRAR: Objection. Form. I also</p> <p>25 instruct my client not to answer to this question</p>	107	<p>1 sir?</p> <p>2 MR. BRAR: Objection. Form. I also</p> <p>3 instruct my client not to answer to this question</p> <p>4 because it would violate his rights under the</p> <p>5 Fifth Amendment or certain laws of his country or</p> <p>6 international conventions; I, therefore, advise</p> <p>7 and instruct my client not to answer this</p> <p>8 question.</p> <p>9 THE WITNESS: I refuse to answer this</p> <p>10 question on the basis of counsel from my lawyer,</p> <p>11 my constitutional rights including those</p> <p>12 protected by the Fifth Amendment.</p> <p>13 BY MR. LEAVITT:</p> <p>14 Q. Sir, what trust funds or broker accounts do you</p> <p>15 currently own or have control over?</p> <p>16 MR. BRAR: Objection. Form. I also</p> <p>17 instruct my client that any answer to this</p> <p>18 question because it would violate his rights</p> <p>19 under the Fifth Amendment or certain laws of his</p> <p>20 country or international conventions; I,</p> <p>21 therefore, advise and instruct my client not to</p> <p>22 answer this question.</p> <p>23 THE WITNESS: I refuse to answer this</p> <p>24 question on the basis of counsel from my lawyer,</p> <p>25 my constitutional rights including those</p>
106	<p>1 as it would violate his rights under the Fifth</p> <p>2 Amendment or certain laws of his country or</p> <p>3 international conventions; I, therefore, advise</p> <p>4 and instruct my client not to answer this</p> <p>5 question.</p> <p>6 THE WITNESS: I refuse to answer this</p> <p>7 question on the basis of counsel from my lawyer,</p> <p>8 my constitutional rights including those</p> <p>9 protected by the Fifth Amendment.</p> <p>10 BY MR. LEAVITT:</p> <p>11 Q. Other than the ones discussed today, what other</p> <p>12 entities inside the United States do you own or have</p> <p>13 control over?</p> <p>14 MR. BRAR: I also instruct my client not</p> <p>15 to answer this question as it would violate his</p> <p>16 rights under the Fifth Amendment or certain laws</p> <p>17 of his country or international conventions; I,</p> <p>18 therefore, advise and instruct my client not to</p> <p>19 answer this question.</p> <p>20 THE WITNESS: I refuse to answer this</p> <p>21 question on the basis from my lawyer, my</p> <p>22 constitutional rights including those protected</p> <p>23 by the Fifth Amendment.</p> <p>24 BY MR. LEAVITT:</p> <p>25 Q. What bank accounts do you currently have set up,</p>	108	<p>1 protected by the Fifth Amendment.</p> <p>2 BY MR. LEAVITT:</p> <p>3 Q. Sir, what offshore banks did you send this money</p> <p>4 stolen from the state of Veracruz to?</p> <p>5 MR. BRAR: Objection. Form. Also I</p> <p>6 instruct my client that any answer to this</p> <p>7 question it would violate his rights under the</p> <p>8 Fifth Amendment or certain laws of his country or</p> <p>9 international conventions; I, therefore, advise</p> <p>10 and instruct my client not to answer this</p> <p>11 question.</p> <p>12 THE WITNESS: I refuse to answer this</p> <p>13 question on the basis of counsel from my lawyer,</p> <p>14 my constitutional rights including those</p> <p>15 protected by the Fifth Amendment.</p> <p>16 BY MR. LEAVITT:</p> <p>17 Q. Other than the assets we discussed today, sir,</p> <p>18 what other assets do you and your wife own or have control</p> <p>19 over?</p> <p>20 MR. BRAR: Objection. Form. I also</p> <p>21 instruct my client that any answer to this</p> <p>22 question would violate his rights under the Fifth</p> <p>23 Amendment or certain laws of his country or</p> <p>24 international conventions; I, therefore, advise</p> <p>25 and instruct my client not to answer this</p>

1 question.

2 THE WITNESS: I refuse to answer this

3 question based upon counsel received from my

4 lawyer, my constitutional rights including those

5 protected by the Fifth Amendment.

6 MR. LEAVITT: Let's take a quick break.

7 (Off-the-record discussion.)

8 THE VIDEOGRAPHER: This is the end of

9 Media 3, Volume 1 in the video deposition of Jose

10 Antonio Bandin. Going off the video record at

11 12:22 p.m. as indicated on the video screen.

12 (Recess taken at 12:22 p.m.)

13 THE VIDEOGRAPHER: Going back on the

14 record to continue Media 3, Volume 1 in the video

15 deposition of Jose Antonio Bandin at 12:23 p.m.

16 as indicated on the video screen.

17 BY MR. LEAVITT:

18 Q. Sir, have you understood all my questions today?

19 MR. BRAR: I instructed my client not to

20 answer his question because it would violate his

21 rights under the Fifth Amendment or certain laws

22 of his country or international conventions; I,

23 therefore, instruct my client not to answer this

24 question.

25 THE WITNESS: I refuse to answer this

1 against you in that document, correct?

2 MR. BRAR: Objection. Form. I also

3 instruct my client that any answer to this

4 question would violate his rights under the Fifth

5 Amendment or certain laws of his country or

6 international conventions; I, therefore, advise

7 and instruct my client not to answer this

8 question.

9 THE WITNESS: I refuse to answer this

10 question based upon counsel from my lawyer, my

11 constitutional rights including those protected

12 by the Fifth Amendment.

13 MR. LEAVITT: It's nice to meet you, sir.

14 MR. BRAR: We reserve our right to read.

15 THE VIDEOGRAPHER: This concludes the end

16 of Media ~~unit~~ 3, Volume 1 and the end of the

17 video deposition of Jose Antonio Bandin. Going

18 off the record of this continuous file at

19 12:26 p.m. as indicated on the video screen.

20 (Deposition concluded at 12:26 p.m.)

21

22

23

24

25

1 question on the basis of counsel from my lawyer,

2 my constitutional rights and those protected

3 under the Fifth Amendment.

4 BY MR. LEAVITT:

5 Q. Sir, this has been marked as Exhibit 3.

6 (Exhibit No. 3 was marked for identification.)

7 BY MR. LEAVITT:

8 Q. This is a document that demonstrates that you're

9 under investigation in Mexico for the theft of funds from

10 the state of Veracruz, correct?

11 MR. BRAR: Objection. Form. I also

12 instruct my client that any answer to this

13 question would violate his rights under the Fifth

14 Amendment or certain laws of his country or

15 international conventions; I, therefore, advise

16 and instruct my client not to answer this

17 question.

18 THE WITNESS: I refuse to answer this

19 question based upon counsel from my lawyer, my

20 constitutional rights including those protected

21 by the Fifth Amendment.

22 BY MR. LEAVITT:

23 Q. You have no ability to dispute that you were

24 under investigation in the state of Veracruz as reflected

25 in Exhibit 3 or the substance of the allegations made

1 DEPOSITION ERRATA SHEET

2 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____

3 _____

4 REASON FOR CHANGE: _____

5 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____

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7 REASON FOR CHANGE: _____

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 22 REASON FOR CHANGE: _____
 23 SIGNATURE: _____ DATE: _____
 24
 25

1 CERTIFICATE
 2
 3 I, Rachel McRoy, do hereby certify that I
 4 reported all proceedings adduced in the foregoing matter
 5 and that the foregoing transcript pages constitutes a
 6 full, true and accurate record of said proceedings to the
 7 best of my ability.
 8
 9 I further certify that I am neither related to
 10 counsel or any party to the proceedings nor have any
 11 interest in the outcome of the proceedings.
 12
 13 IN WITNESS WHEREOF, I have hereunto set my
 14 hand this 9th day of August, 2018.
 15
 16
 17
 18
 19
 20
 21
 22 _____
 Rachel Mcroy
 Notary Public No: 962493
 My Commission Expires: May 16, 2021
 23
 24
 25

Unofficial Copy Office of Chris Daniel District Clerk