

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 MONICA BABAYAN</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						
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 style="text-align: center;"><b>INDEX</b></p> <p>WITNESS: MONICA BABAYAN  Direct Examination by Mr. Leavitt</p> <p style="text-align: center;">---</p> <p style="text-align: center;"><b>PLAINTIFF'S EXHIBITS</b></p> <p style="text-align: center;">---</p> <table border="0" style="width: 100%;"> <tr> <td style="text-align: left;">NUMBER</td> <td style="text-align: left;">DESCRIPTION</td> <td style="text-align: right;">PAGE</td> </tr> <tr> <td colspan="3" style="text-align: center;">(No exhibits marked.)</td> </tr> </table>	NUMBER	DESCRIPTION	PAGE	(No exhibits marked.)			5
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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><b>APPEARANCES:</b></p> <p>On behalf of the Plaintiff:  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:  JAS BRAR, ESQUIRE  FOGLER, BRAR, FORD, O'NEIL &amp; GRAY, LLP  909 Fannin Street  Suite 1640  Houston, Texas 77010  (713)481-1010  fbfog@fbfog.com</p>	4
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  12:38 p.m.</p> <p style="text-align: center;">* * *</p> <p>THE VIDEOGRAPHER: Good afternoon. This is the beginning of Media 1, Volume 1 in the video deposition of Monica Babayan being held at the office of Radisson Blu Prado, Plaza Plateria de Martinez, 53, 28014, Madrid in Spain. This is being taken on the 7th of August 2018 at 13:36 p.m. as indicated on the video screen.</p> <p>This deposition is being taken in the matter of Free and Sovereign State Veracruz De Ignacio La Llave against 18 Shallowford Place, 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 is Rachel McRoy of Ross Reporting Services. My name is David Eros and I'm the official videographer here also on behalf of Ross Reporting Service standby interpreter is Steven Carlin of Transatlantic Video Depositions. Would counsel please introduce themselves and who they represent?</p> <p>MR. LEAVITT: Chris Leavitt for the</p>	9



1 MR. BRAR: Jas Brar on behalf of the  
 2 defendants.  
 3 THE VIDEOGRAPHER: Will the court reporter  
 4 now please swear in the witness and the  
 5 interpreter?  
 6 THE REPORTER: I need to swear in the  
 7 Interpreter. Do you swear or affirm to translate from  
 8 English to Spanish and from Spanish to English to the  
 9 best of your ability?  
 10 Thereupon,  
 11 The Interpreter, STEPHEN CARLIN, was sworn to translate  
 12 from English to Spanish and from Spanish to English.  
 13 THE INTERPRETER: I do.  
 14 THE REPORTER: Do you swear or affirm the  
 15 testimony you will give will be the truth, the whole truth  
 16 and nothing but the truth?  
 17 Thereupon,  
 18 Deposition taken before Rachel M. Mcroy,  
 19 Notary Public, in the above cause.  
 20 THE WITNESS: Yes, I swear.  
 21 THE VIDEOGRAPHER: Thank you.  
 22 DIRECT EXAMINATION  
 23 BY MR. LEAVITT:  
 24 Q. Please state your name for the Ladies and  
 25 Gentlemen of the jury, please.

1 A. Monica Babayan.  
 2 Q. Can you please provide your address, please?  
 3 THE WITNESS: (Speaking without interpreter) Do I  
 4 write it?  
 5 BY MR. LEAVITT:  
 6 Q. Are you going to be using a translator? If so,  
 7 you need to probably wait for the translator otherwise the  
 8 court reporter is going to get fussy with us.  
 9 A. So it's Jorge Juan 115 interior to A, Valencia,  
 10 Spain postcode 46004.  
 11 Q. And of course you don't have to use the  
 12 interpreter if you don't want to?  
 13 THE WITNESS: (Speaking without interpreter) I  
 14 want to. Thank you.  
 15 BY MR. LEAVITT:  
 16 Q. Ma'am, what is your husband's name?  
 17 A. Jose Antonio Bandin Ruiz.  
 18 Q. We're taking this deposition in Spain because you  
 19 have been indicted in Mexico, correct?  
 20 MR. BRAR: Objection. I instruct my  
 21 client not to answer this question because any  
 22 answer by you to this question could possibly  
 23 permit someone to use or misuse your answer or  
 24 combine your answer with something else in a way  
 25 that would violate your rights under the Fifth

1 Amendment to U.S. Constitution. The Supreme  
 2 Court's decision in Ohio v. Reiner, under certain  
 3 laws of your county or under certain  
 4 international conventions, I, therefore, advise  
 5 you, as your lawyer, that you are not to answer  
 6 this question. Please confirm to Mr. Leavitt  
 7 that you heard and understood my advice and  
 8 instruction and that you will follow my  
 9 instruction and will not answer this question.  
 10 THE WITNESS: So I refuse to answer that  
 11 question based on the counsel of my lawyer, and  
 12 my constitutional rights including those  
 13 protected by the Fifth Amendment.  
 14 MR. BRAR: We have the same agreement that  
 15 that applies to every time I instruct my witness.  
 16 MR. LEAVITT: Absolutely. If we can  
 17 provide a way to make it even shorter. I can  
 18 provide you any assurance you need, so we can  
 19 move this along because I think we know where  
 20 it's all headed.  
 21 BY MR. LEAVITT:  
 22 Q. Ma'am, we're taking this deposition in Spain  
 23 because if you return to Mexico you would be arrested,  
 24 correct?  
 25 MR. BRAR: Objection. Form. And I also

1 instruct my client the answer to this question  
 2 will violate her right of the Fifth Amendment or  
 3 certain laws of your country or international  
 4 conventions, I, therefore, advise and instruct  
 5 you not to answer the question.  
 6 THE WITNESS: I refuse to answer that  
 7 question based on counsel of my lawyer and my  
 8 constitutional rights including those protected  
 9 by the Fifth Amendment.  
 10 BY MR. LEAVITT:  
 11 Q. We're taking this deposition in Spain because if  
 12 you came to the United States you would be arrested as  
 13 well, correct?  
 14 MR. BRAR: Objection. Form. I will also  
 15 instruct you that any answer to this question, it  
 16 would violate your Fifth Amendment rights or  
 17 certain laws of your country and international  
 18 convention I, therefore, advise and instruct you  
 19 not to answer this question.  
 20 THE WITNESS: I refuse to answer that  
 21 question based on the counsel of my lawyer and my  
 22 constitutional rights including those protected  
 23 by the Fifth Amendment.  
 24 BY MR. LEAVITT:  
 25 Q. You previously made an agreement along with your

9	<p>1 husband with the governor of Veracruz to return the sum of</p> <p>2 the money that you two stole, correct?</p> <p>3 MR. BRAR: Objection. Form. I will also</p> <p>4 instruct my client that any answer to this</p> <p>5 question, it would violate her Fifth Amendment</p> <p>6 rights or certain laws of your country and</p> <p>7 international convention I, therefore, advise my</p> <p>8 client not to answer this question.</p> <p>9 THE WITNESS: I refuse to answer that</p> <p>10 question based on the counsel of my lawyer and 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. You agreed to return these properties because</p> <p>15 they have been purchased with money from the state of</p> <p>16 Veracruz, correct?</p> <p>17 MR. BRAR: Objection. Form. I will also</p> <p>18 instruct my client not to answer this question</p> <p>19 because her answer would violate her right under</p> <p>20 the Fifth Amendment rights or certain laws of</p> <p>21 your country and international convention and I,</p> <p>22 therefore, advise my client not to answer this</p> <p>23 question.</p> <p>24 THE WITNESS: I refuse to answer that</p> <p>25 question based on the counsel of my lawyer and my</p>	11	<p>1 and instruct her not to answer this question.</p> <p>2 THE WITNESS: I refuse to answer that</p> <p>3 question based on the counsel of my lawyer and my</p> <p>4 constitutional rights including those protected</p> <p>5 by the Fifth Amendment.</p> <p>6 BY MR. LEAVITT:</p> <p>7 Q. You understand your husband is a childhood friend</p> <p>8 of Moises Mansur, correct?</p> <p>9 MR. BRAR: Objection. Form. I will also</p> <p>10 instruct my client that any answer to this</p> <p>11 question, it would violate her Fifth Amendment</p> <p>12 rights or certain laws of her country and</p> <p>13 international conventions, I, therefore, advise</p> <p>14 and instruct her not to answer this question.</p> <p>15 THE WITNESS: I refuse to answer that</p> <p>16 question based on the counsel of my lawyer and my</p> <p>17 constitutional rights including those protected</p> <p>18 by the Fifth Amendment.</p> <p>19 BY MR. LEAVITT:</p> <p>20 Q. You understand that Mr. Mansur was a college</p> <p>21 friend of Governor Javier Duarte, correct?</p> <p>22 MR. BRAR: I instruct my client that any</p> <p>23 answer to this question, it would violate her</p> <p>24 Fifth Amendment rights or certain laws of her</p> <p>25 country and international conventions, I,</p>
10	<p>1 constitutional rights including those protected</p> <p>2 by the Fifth Amendment.</p> <p>3 BY MR. LEAVITT:</p> <p>4 Q. You and your husband had previously agreed to</p> <p>5 return over \$20 million worth of property and assets in</p> <p>6 cash to the government of Veracruz, correct?</p> <p>7 MR. BRAR: Objection. Form. I will also</p> <p>8 instruct my client that any answer to this</p> <p>9 question, it would violate her Fifth Amendment</p> <p>10 rights or certain laws of her country and</p> <p>11 international convention, therefore I advise her</p> <p>12 and instruct her not to answer this question.</p> <p>13 THE WITNESS: I refuse to answer that</p> <p>14 question based on the counsel of my lawyer and my</p> <p>15 constitutional rights including those protected</p> <p>16 by the Fifth Amendment.</p> <p>17 BY MR. LEAVITT:</p> <p>18 Q. After reaching this agreement with the government</p> <p>19 of Veracruz, you and your husband decided not to return</p> <p>20 the money and have since fled to Spain, correct?</p> <p>21 MR. BRAR: Objection. Form. I will also</p> <p>22 instruct my client that any answer to this</p> <p>23 question, it would violate her Fifth Amendment</p> <p>24 rights or certain laws of her country or</p> <p>25 international conventions, I, therefore, advise</p>	12	<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 that</p> <p>4 question based on the counsel of my lawyer and 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. And through Mr. Mansur you and your husband</p> <p>9 became good friends with Javier Duarte, correct?</p> <p>10 MR. BRAR: I instruct my client that any</p> <p>11 answer to this question, it would violate her</p> <p>12 rights under the Fifth Amendment, certain laws of</p> <p>13 her country and international conventions, I,</p> <p>14 therefore, advise and instruct my client not to</p> <p>15 answer this question.</p> <p>16 THE WITNESS: I refuse to answer that</p> <p>17 question based on the counsel of my lawyer and 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. You, your husband and Mr. Duarte eventually</p> <p>22 became business partners, correct?</p> <p>23 MR. BRAR: I instruct my client that any</p> <p>24 answer to this question, it would violate her</p> <p>25 rights under the Fifth Amendment, certain laws of</p>

13	<p>1 her country and international conventions, I, 2 therefore, advise and instruct my client not to 3 answer this question. 4 THE WITNESS: I refuse to answer that 5 question based on the counsel of my lawyer and my 6 constitutional rights including those protected 7 by the Fifth Amendment. 8 BY MR. LEAVITT: 9 Q. You and your husband and Mr. Duarte were part of 10 a conspiracy to unlawfully take money from the state of 11 Veracruz, correct? 12 MR. BRAR: Objection. Form. I instruct 13 my client that any answer to this question, it 14 would violate her rights under the Fifth 15 Amendment, certain laws of her country and 16 international conventions, I, therefore, advise 17 and instruct her not to answer this question. 18 THE WITNESS: I refuse to answer that 19 question based on the counsel of my lawyer and my 20 constitutional rights including those protected 21 by the Fifth Amendment. 22 BY MR. LEAVITT: 23 Q. You and your husband and Mr. Duarte took this 24 money from the state of Veracruz unlawfully using theft 25 and corruption and graft, correct?</p>	15	<p>1 answer to this question, it would violate her 2 rights under the Fifth Amendment, certain laws of 3 her country and international conventions, I, 4 therefore, advise and instruct her not to answer 5 that question. 6 THE WITNESS: I refuse to answer that 7 question based on the counsel of my lawyer and my 8 constitutional rights including those protected 9 by the Fifth Amendment. 10 BY MR. LEAVITT: 11 Q. What did you and Mr. Duarte talk about? 12 MR. BRAR: Objection. Form. I instruct 13 my client that any answer to this question, it 14 would violate her rights under the Fifth 15 Amendment, certain laws of her country and 16 international conventions, I, therefore, advise 17 and instruct my client not to answer that 18 question. 19 THE WITNESS: I refuse to answer that 20 question based on the counsel of my lawyer and my 21 constitutional rights including those protected 22 by the Fifth Amendment. 23 BY MR. LEAVITT: 24 Q. Although lead by Mr. Duarte this conspiracy 25 including you as a major component -- well, strike that.</p>
14	<p>1 MR. BRAR: Objection. Form. I also 2 instruct my client that any answer to this 3 question, it would violate her rights under the 4 Fifth Amendment, certain laws of her country and 5 international conventions, I, therefore, advise 6 and instruct her not to answer this question. 7 THE WITNESS: I refuse to answer that 8 question based on the counsel of my lawyer and my 9 constitutional rights including those protected 10 by the Fifth Amendment. 11 BY MR. LEAVITT: 12 Q. When was the last time you saw Javier Duarte? 13 MR. BRAR: I also instruct my client that 14 any answer to this question, it would violate her 15 rights under the Fifth Amendment, certain laws of 16 her country and international conventions, I, 17 therefore, advise and instruct her not to answer 18 this question. 19 THE WITNESS: I refuse to answer that 20 question based on the counsel of my lawyer and my 21 constitutional rights including those protected 22 by the Fifth Amendment. 23 BY MR. LEAVITT: 24 Q. When was the last time you spoke with Mr. Duarte? 25 MR. BRAR: I instruct my client that any</p>	16	<p>1 As part of this conspiracy with Mr. Duarte and 2 your, husband you organized a group of businessmen that 3 were complicit in your efforts to unlawfully take money 4 from the government of Veracruz, correct? 5 MR. BRAR: Objection. Form. I also 6 instruct my client that any answer to this 7 question, it would violate her rights under the 8 Fifth Amendment, certain laws of her country and 9 international conventions, I, therefore, advise 10 and instruct my client not to answer that 11 question. 12 THE WITNESS: I refuse to answer that 13 question based on the counsel of my lawyer and my 14 constitutional rights including those protected 15 by the Fifth Amendment. 16 BY MR. LEAVITT: 17 Q. Along with your husband, you helped organize and 18 help direct a group of businessmen that participated in 19 this conspiracy to take money unlawfully from the state of 20 Veracruz, correct? 21 MR. BRAR: Objection. Form. I instruct 22 my client that any answer to this question, it 23 would violate her rights under the Fifth 24 Amendment, certain laws of her country and 25 international conventions, I, therefore, advise</p>

17	<p>1 and instruct my client not to answer that</p> <p>2 question.</p> <p>3 THE WITNESS: I refuse to answer that</p> <p>4 question based on the counsel of my lawyer and 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. Along with your husband, you organized and</p> <p>9 directed a group of business people to submit fraudulent</p> <p>10 invoices for fraudulent sums to be paid by the government</p> <p>11 of Veracruz, correct?</p> <p>12 MR. BRAR: Objection. Form. I instruct</p> <p>13 my client that any answer to this question, it</p> <p>14 would violate her rights under the Fifth</p> <p>15 Amendment, certain laws of her country and</p> <p>16 international conventions, I, therefore, advise</p> <p>17 and instruct her not to answer this question.</p> <p>18 THE WITNESS: I refuse to answer that</p> <p>19 question based on the counsel of my lawyer and my</p> <p>20 constitutional rights including those protected</p> <p>21 by the Fifth Amendment.</p> <p>22 BY MR. LEAVITT:</p> <p>23 Q. And you and your husband and Mr. Duarte made sure</p> <p>24 those invoices were paid, correct?</p> <p>25 MR. BRAR: Objection. Form. I instruct</p>	19	<p>1 submit invoices for things like road construction at your</p> <p>2 direction, correct?</p> <p>3 MR. BRAR: Objection. Form. I also</p> <p>4 instruct my client that any answer to this</p> <p>5 question, it would violate her rights under the</p> <p>6 Fifth Amendment, certain laws of her country and</p> <p>7 international conventions, I, therefore, advise</p> <p>8 and instruct her not to answer this question.</p> <p>9 THE WITNESS: I refuse to answer that</p> <p>10 question based on the counsel of my lawyer and 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. But it's your direction that not all of the roads</p> <p>15 got built, correct?</p> <p>16 MR. BRAR: Objection. Form. I also</p> <p>17 instruct my client not to answer to this</p> <p>18 question, it would violate her rights under the</p> <p>19 Fifth Amendment, certain laws of her country and</p> <p>20 international conventions, I, therefore, advise</p> <p>21 and instruct her not to answer this question.</p> <p>22 THE WITNESS: I refuse to answer that</p> <p>23 question based on the counsel of my lawyer and my</p> <p>24 constitutional rights including those protected</p> <p>25 by the Fifth Amendment.</p>
18	<p>1 my client that any answer to this question, it</p> <p>2 would violate her rights under the Fifth</p> <p>3 Amendment, certain laws of her country and</p> <p>4 international conventions, I, therefore, advise</p> <p>5 and instruct her not to answer this question.</p> <p>6 THE WITNESS: I refuse to answer that</p> <p>7 question based on the counsel of my lawyer and my</p> <p>8 constitutional rights including those protected</p> <p>9 by the Fifth Amendment.</p> <p>10 BY MR. LEAVITT:</p> <p>11 Q. All of this conspiracy was lead by Javier Duarte</p> <p>12 who played a major roll in it, correct?</p> <p>13 MR. BRAR: Objection. Form. I instruct</p> <p>14 my client that any answer to this question, it</p> <p>15 would violate her rights under the Fifth</p> <p>16 Amendment, certain laws of her country and</p> <p>17 international conventions, I, therefore, advise</p> <p>18 and instruct her not to answer this question.</p> <p>19 THE WITNESS: I refuse to answer that</p> <p>20 question based on the counsel of my lawyer and my</p> <p>21 constitutional rights including those protected</p> <p>22 by the Fifth Amendment.</p> <p>23 BY MR. LEAVITT:</p> <p>24 Q. Some of these -- strike that.</p> <p>25 Some of the members of this conspiracy would</p>	20	<p>1 BY MR. LEAVITT:</p> <p>2 Q. At your direction the invoices included amounts</p> <p>3 for materials that were never used, correct?</p> <p>4 MR. BRAR: Objection. Form. I also</p> <p>5 instruct my client not to answer to this</p> <p>6 question, it would violate her rights under the</p> <p>7 Fifth Amendment, certain laws of her country and</p> <p>8 international conventions, I, therefore, advise</p> <p>9 and instruct her not to answer this question.</p> <p>10 THE WITNESS: I refuse to answer that</p> <p>11 question based on the counsel of my lawyer and my</p> <p>12 constitutional rights including those protected</p> <p>13 by the Fifth Amendment.</p> <p>14 BY MR. LEAVITT:</p> <p>15 Q. But you and your husband and Mr. Duarte would</p> <p>16 make sure those invoices were paid full, correct?</p> <p>17 MR. BRAR: Objection. Form. I also</p> <p>18 instruct my client not to answer this question,</p> <p>19 it would violate her rights under the Fifth</p> <p>20 Amendment, certain laws of her country and</p> <p>21 international conventions, I, therefore, advise</p> <p>22 and instruct her not to answer this question.</p> <p>23 THE WITNESS: I refuse to answer that</p> <p>24 question based on the counsel of my lawyer and my</p> <p>25 constitutional rights including those protected</p>

21	<p>1 by the Fifth Amendment.</p> <p>2 BY MR. LEAVITT:</p> <p>3 Q. There were also invoices sent for things like</p> <p>4 medications for sick people in the state of Veracruz,</p> <p>5 correct?</p> <p>6 MR. BRAR: Objection. Form. I also</p> <p>7 instruct my client not to answer this question,</p> <p>8 it would violate her rights under the Fifth</p> <p>9 Amendment, certain laws of her country and</p> <p>10 international conventions, I, therefore, advise</p> <p>11 and instruct her not to answer this question.</p> <p>12 THE WITNESS: I refuse to answer that</p> <p>13 question based on the counsel of my lawyer and 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. These invoices for medicine would include a</p> <p>18 certain amount of medicine such as chemotherapy or insulin</p> <p>19 but not all were actually purchased, correct?</p> <p>20 MR. BRAR: Objection. Form. I also</p> <p>21 instruct my client not to answer this question,</p> <p>22 it would violate her rights under the Fifth</p> <p>23 Amendment, certain laws of her country and</p> <p>24 international conventions, I, therefore, advise</p> <p>25 and instruct her not to answer this question.</p>	23	<p>1 Amendment, certain laws of her country and</p> <p>2 international conventions, I, therefore, instruct</p> <p>3 and advise my client not to answer this question.</p> <p>4 THE WITNESS: I refuse to answer that</p> <p>5 question based on the counsel of my lawyer and my</p> <p>6 constitutional rights including those protected</p> <p>7 by the Fifth Amendment.</p> <p>8 BY MR. LEAVITT:</p> <p>9 Q. But the invoices were paid in full, correct?</p> <p>10 MR. BRAR: Objection. Form. I also</p> <p>11 instruct my client not to answer this question,</p> <p>12 it would violate her rights under the Fifth</p> <p>13 Amendment, certain laws of her country and</p> <p>14 international conventions, I, therefore, instruct</p> <p>15 and advise my client not to answer this question</p> <p>16 THE WITNESS: I refuse to answer that</p> <p>17 question based on the counsel of my lawyer and 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. And you and your husband and Mr. Duarte would</p> <p>22 keep most of the profits from these fraudulent invoices,</p> <p>23 correct?</p> <p>24 MR. BRAR: Objection. Form. I also</p> <p>25 instruct my client not to answer this question,</p>
22	<p>1 THE WITNESS: I refuse to answer that</p> <p>2 question based on the counsel of my lawyer and my</p> <p>3 constitutional rights including those protected</p> <p>4 by the Fifth Amendment.</p> <p>5 BY MR. LEAVITT:</p> <p>6 Q. Not all of the medicine that was paid for was</p> <p>7 actually delivered to the sick people in Veracruz,</p> <p>8 correct?</p> <p>9 MR. BRAR: Objection. Form. I also</p> <p>10 instruct my client not to answer this question,</p> <p>11 it would violate her rights under the Fifth</p> <p>12 Amendment, certain laws of her country and</p> <p>13 international conventions, I, therefore, advise</p> <p>14 and instruct my client not to answer this</p> <p>15 question.</p> <p>16 THE WITNESS: I refuse to answer that</p> <p>17 question based on the counsel of my lawyer and 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. Instead of receiving medicine, the sick people</p> <p>22 would receive instead saline, correct?</p> <p>23 MR. BRAR: Objection. Form. I also</p> <p>24 instruct my client not to answer this question,</p> <p>25 it would violate her rights under the Fifth</p>	24	<p>1 it would violate her rights under the Fifth</p> <p>2 Amendment, certain laws of her country and</p> <p>3 international conventions, I, therefore, advise</p> <p>4 and instruct her 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 and my</p> <p>7 constitutional rights including those protected</p> <p>8 by the Fifth Amendment.</p> <p>9 BY MR. LEAVITT:</p> <p>10 Q. And after these invoices were paid, the people</p> <p>11 that submitted the invoices they would receive a</p> <p>12 commission for doing so, correct?</p> <p>13 MR. BRAR: Objection. Form. I also</p> <p>14 instruct my client that an answer to this</p> <p>15 question, it would violate her rights under the</p> <p>16 Fifth Amendment, certain laws of her country and</p> <p>17 international conventions, I, therefore, advise</p> <p>18 and instruct her not to answer this question.</p> <p>19 THE WITNESS: I refuse to answer that</p> <p>20 question based on the counsel of my lawyer and my</p> <p>21 constitutional rights including those protected</p> <p>22 by the Fifth Amendment.</p> <p>23 BY MR. LEAVITT:</p> <p>24 Q. After taking commission, these people who</p> <p>25 submitted the fraudulent invoices would send the rest of</p>

25	<p>1 the profits to you and Mr. Duarte and your husband, 2 correct?</p> <p>3 MR. BRAR: Objection. Form. I also 4 instruct my client that any answer to this 5 question, it would violate her rights under the 6 Fifth Amendment, certain laws of her country and 7 international conventions, I, therefore, advise 8 and instruct my client not to answer this 9 question.</p> <p>10 THE WITNESS: I refuse to answer that 11 question based on the counsel of my lawyer and my 12 constitutional rights including those protected 13 by the Fifth Amendment.</p> <p>14 BY MR. LEAVITT: 15 Q. These payments would be sent to shell companies 16 set up by you and your husband that include Terra 17 Inmobiliaria, Grupo Brades, Inmobiliara Cartujano, Boydar, 18 Valkany, Controladora Prado Norte and Inmobiliara 135 19 Prado Norte, correct?</p> <p>20 MR. BRAR: Objection. Form. I also 21 instruct my client any answer to this question, 22 it would violate her rights under the Fifth 23 Amendment, certain laws of her country and 24 international conventions, I, therefore, advise 25 and instruct my client not to answer this</p>	27	<p>1 it would violate her rights under the Fifth 2 Amendment, certain laws of her country and 3 international conventions, I, therefore, advise 4 and instruct my client not to answer this 5 question.</p> <p>6 THE WITNESS: I refuse to answer that 7 question based on the counsel of my lawyer and my 8 constitutional rights including those protected 9 by the Fifth Amendment.</p> <p>10 BY MR. LEAVITT: 11 Q. Then you and your husband directed these funds to 12 be sent to Texas where they were then invested in real 13 estate, correct?</p> <p>14 MR. BRAR: Objection. Form. I also 15 instruct my client that any answer to this 16 question, it would violate her rights under the 17 Fifth Amendment, certain laws of her country and 18 international conventions, I, therefore, advise 19 and instruct my client not to answer this 20 question.</p> <p>21 THE WITNESS: I refuse to answer that 22 question based on the counsel of my lawyer and my 23 constitutional rights including those protected 24 by the Fifth Amendment.</p> <p>25 BY MR. LEAVITT:</p>
26	<p>1 question.</p> <p>2 THE WITNESS: I refuse to answer that 3 question based on the counsel of my lawyer and my 4 constitutional rights including those protected 5 by the Fifth Amendment.</p> <p>6 BY MR. LEAVITT: 7 Q. And you would eventually receive money from these 8 shell companies for your involvement in this conspiracy in 9 fraud, correct?</p> <p>10 MR. BRAR: Objection. Form. I also 11 instruct my client that any answer to this 12 question, it would violate her rights under the 13 Fifth Amendment, certain laws of her country and 14 international conventions, I, therefore, advise 15 and instruct my client not to answer this 16 question.</p> <p>17 THE WITNESS: I refuse to answer that 18 question based on the counsel of my lawyer and my 19 constitutional rights including those protected 20 by the Fifth Amendment.</p> <p>21 BY MR. LEAVITT: 22 Q. Mr. Duarte would also receive some of the funds 23 from this fraud and conspiracy, correct?</p> <p>24 MR. BRAR: Objection. Form. I also 25 instruct my client not to answer this question,</p>	28	<p>1 Q. The real estate these funds were invested in 2 were those that are named in the lawsuit pending against 3 you, correct?</p> <p>4 MR. BRAR: Objection. Form. Objection. 5 Form. I also instruct my client that any answer 6 to this question, it would violate her rights 7 under the Fifth Amendment, certain laws of her 8 country and international conventions, I, 9 therefore, advise and instruct her not to answer 10 this question.</p> <p>11 THE WITNESS: I refuse to answer that 12 question based on the counsel of my lawyer and my 13 constitutional rights including those protected 14 by the Fifth Amendment.</p> <p>15 BY MR. LEAVITT: 16 Q. Jaime Roberte also participated in this scheme to 17 unlawfully take money from the state of Veracruz, correct?</p> <p>18 MR. BRAR: Objection. Form. I also 19 instruct my client that any answer to this 20 question, it would violate her rights under the 21 Fifth Amendment, certain laws of her country and 22 international conventions, I, therefore, advise 23 and instruct my client not to answer this 24 question.</p> <p>25 THE WITNESS: I refuse to answer that</p>

29	<p>1 question based on the counsel of my lawyer and 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. You and he created Reban Construction, LLC,</p> <p>6 correct?</p> <p>7 MR. BRAR: I instruct my client that any</p> <p>8 answer to this question, it would violate her</p> <p>9 rights under the Fifth Amendment, certain laws of</p> <p>10 her country and international conventions, I,</p> <p>11 therefore, advise and instruct her not to answer</p> <p>12 this question.</p> <p>13 THE WITNESS: I refuse to answer that</p> <p>14 question based on the counsel of my lawyer and my</p> <p>15 constitutional rights including those protected</p> <p>16 by the Fifth Amendment.</p> <p>17 BY MR. LEAVITT:</p> <p>18 Q. He also created Reban Safety, LLC, correct?</p> <p>19 MR. BRAR: I instruct my client that any</p> <p>20 answer to this question, it would violate her</p> <p>21 rights under the Fifth Amendment, certain laws of</p> <p>22 her country and international conventions, I,</p> <p>23 therefore, advise and instruct he not to answer</p> <p>24 this question.</p> <p>25 THE WITNESS: I refuse to answer that</p>	31	<p>1 and international conventions, I, therefore,</p> <p>2 advise and instruct her not to answer this</p> <p>3 question.</p> <p>4 THE WITNESS: I refuse to answer that</p> <p>5 question based on the counsel of my lawyer and my</p> <p>6 constitutional rights including those protected</p> <p>7 by the Fifth Amendment.</p> <p>8 BY MR. LEAVITT:</p> <p>9 Q. Both Mr. Roberte and you received funds stolen</p> <p>10 from the state of Veracruz, correct?</p> <p>11 MR. BRAR: Objection. Form. I also</p> <p>12 instruct my client that any answer to this</p> <p>13 question, it would violate her rights under the</p> <p>14 Fifth Amendment or certain laws of her country</p> <p>15 and international conventions, I, therefore,</p> <p>16 advise and instruct her not to answer this</p> <p>17 question.</p> <p>18 THE WITNESS: I refuse to answer that</p> <p>19 question based on the counsel of my lawyer and my</p> <p>20 constitutional rights including those protected</p> <p>21 by the Fifth Amendment.</p> <p>22 BY MR. LEAVITT:</p> <p>23 Q. You and Alejandro Ortiz Carpintero created</p> <p>24 TwoOffice Suites, LLC, correct?</p> <p>25 MR. BRAR: Objection. Form. I also</p>
30	<p>1 question based on the counsel of my lawyer and 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. You created these entities with the intention</p> <p>6 that they would receive stolen funds from the state of</p> <p>7 Veracruz, correct?</p> <p>8 MR. BRAR: Objection. Form. I also</p> <p>9 instruct my client that any answer to this</p> <p>10 question, it would violate her rights under the</p> <p>11 Fifth Amendment, certain laws of her country and</p> <p>12 international conventions, I, therefore, advise</p> <p>13 and instruct my client not to answer this</p> <p>14 question.</p> <p>15 THE WITNESS: I refuse to answer that</p> <p>16 question based on the counsel of my lawyer and my</p> <p>17 constitutional rights including those protected</p> <p>18 by the Fifth Amendment.</p> <p>19 BY MR. LEAVITT:</p> <p>20 Q. And these entities did in fact receive funds</p> <p>21 stolen from the state of Veracruz, correct?</p> <p>22 MR. BRAR: Objection. Form. I also</p> <p>23 instruct my client that any answer to this</p> <p>24 question, it would violate her rights under the</p> <p>25 Fifth Amendment or certain laws of her country</p>	32	<p>1 instruct my client that any answer to this</p> <p>2 question, it would violate her rights under the</p> <p>3 Fifth Amendment or certain laws of her country</p> <p>4 and international conventions, I, therefore,</p> <p>5 instruct and advise her not to answer this</p> <p>6 question.</p> <p>7 THE WITNESS: I refuse to answer that</p> <p>8 question based on the counsel of my lawyer and my</p> <p>9 constitutional rights including those protected</p> <p>10 by the Fifth Amendment.</p> <p>11 BY MR. LEAVITT:</p> <p>12 Q. You and Mr. Carpintero created this with the</p> <p>13 intention that it would receive stolen funds from the</p> <p>14 state of Veracruz, correct?</p> <p>15 MR. BRAR: Objection. Form. I instruct</p> <p>16 my client that any answer to this question, it</p> <p>17 would violate her rights under the Fifth</p> <p>18 Amendment or certain laws of her country and</p> <p>19 international conventions, I, therefore, advise</p> <p>20 and instruct her not to answer this question.</p> <p>21 THE WITNESS: I refuse to answer that</p> <p>22 question based on the counsel of my lawyer and my</p> <p>23 constitutional rights including those protected</p> <p>24 by the Fifth Amendment.</p> <p>25 BY MR. LEAVITT:</p>



33	<p>1 Q. And this entity did, in fact, receive funds 2 stolen from the state of Veracruz, correct? 3 MR. BRAR: Objection. Form. I also 4 instruct my client that any answer to this 5 question, it would violate her rights under the 6 Fifth Amendment or certain laws of her country 7 and international conventions, I, therefore, 8 instruct and advise her not to answer this 9 question. 10 THE WITNESS: I refuse to answer that 11 question based on the counsel of my lawyer and my 12 constitutional rights including those protected 13 by the Fifth Amendment. 14 BY MR. LEAVITT: 15 Q. Let me finish up, both you and Mr. Carpintero 16 received funds stolen from the state of Veracruz, correct? 17 MR. BRAR: Objection. Form. I also 18 instruct my client that any answer to this 19 question, it would violate her rights under the 20 Fifth Amendment or certain laws of her country 21 and international conventions, I, therefore, 22 advise 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 and my</p>	35	<p>1 question based on the counsel of my lawyer and my 2 constitutional rights including those protected 3 by the Fifth Amendment. 4 BY MR. LEAVITT: 5 Q. And it's your direction he did in fact send 6 fraudulent invoices and those fraudulent invoices were 7 paid, correct? 8 MR. BRAR: Objection. Form. I also 9 instruct my client that any answer to this 10 question, it would violate her rights under the 11 Fifth Amendment or certain laws of her country 12 and international conventions, I, therefore, 13 advise and instruct her not to answer this 14 question. 15 THE WITNESS: I refuse to answer that 16 question based on the counsel of my lawyer and my 17 constitutional rights including those protected 18 by the Fifth Amendment. 19 BY MR. LEAVITT: 20 Q. And you received stolen funds from those 21 invoices, correct? 22 MR. BRAR: Objection. Form. I also 23 instruct my client that any answer to this 24 question, it would violate her rights under the 25 Fifth Amendment or certain laws of her country</p>
34	<p>1 constitutional rights including those protected 2 by the Fifth Amendment. 3 MR. LEAVITT: I think we're going to take 4 a quick break. 5 THE VIDEOGRAPHER: This is the end of 6 Media 1, Volume 1 in the video deposition of 7 Monica Babayan. Going off the record at 8 14:20 p.m. as indicated on the video screen. 9 (Recess taken at 14:20 p.m.) 10 THE VIDEOGRAPHER: This is the beginning 11 of Media 2, Volume 1 in the video deposition of 12 Monica Babayan going back on the record at 13 14:30 p.m. as indicated on the video screen. 14 Thank you, Counsel. 15 BY MR. LEAVITT: 16 Q. Mr. Mansur was also someone who participated in 17 sending fraudulent invoices to the state of Veracruz at 18 your direction, correct? 19 MR. BRAR: Objection. Form. I also 20 instruct my client not to answer this question, 21 it would violate her rights under the Fifth 22 Amendment or certain laws of her country and 23 international conventions, I, therefore, advise 24 and instruct her not to answer this question. 25 THE WITNESS: I refuse to answer that</p>	36	<p>1 and international conventions, I, therefore, 2 advise and instruct her not to answer this 3 question. 4 THE WITNESS: I refuse to answer that 5 question based on the counsel of my lawyer and my 6 constitutional rights including those protected 7 by the Fifth Amendment. 8 BY MR. LEAVITT: 9 Q. Jorge Ramirez also participated in this 10 conspiracy along with you and your husband and Javier 11 Duarte, correct? 12 MR. BRAR: Objection. Form. I also 13 instruct my client that any answer to this 14 question, it would violate her rights under the 15 Fifth Amendment or certain laws of her country 16 and international conventions, I, therefore, 17 advise 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 and my 21 constitutional rights including those protected 22 by the Fifth Amendment. 23 BY MR. LEAVITT: 24 Q. It's your direction Jorge Ramirez sent fraudulent 25 invoices to the state of Veracruz, correct?</p>

37	<p>1 MR. BRAR: Objection. Form. I also</p> <p>2 instruct my client not to answer this question.</p> <p>3 It would violate her rights under the Fifth</p> <p>4 Amendment or certain laws of her country and</p> <p>5 international conventions, I, therefore, advise</p> <p>6 and instruct her not to answer this question.</p> <p>7 THE WITNESS: I refuse to answer that</p> <p>8 question based on the counsel of my lawyer and my</p> <p>9 constitutional rights including those protected</p> <p>10 by the Fifth Amendment.</p> <p>11 BY MR. LEAVITT:</p> <p>12 Q. As a result of those fraudulent invoices, both</p> <p>13 you and Jorge Ramirez received funds that were stolen from</p> <p>14 the state of Veracruz, correct?</p> <p>15 MR. BRAR: Objection. Form. I also</p> <p>16 instruct my client that any answer to this</p> <p>17 question, it would violate her rights under the</p> <p>18 Fifth Amendment or certain laws of her country</p> <p>19 and international conventions, I, therefore,</p> <p>20 advise and instruct her not to answer this</p> <p>21 question.</p> <p>22 THE WITNESS: I refuse to answer that</p> <p>23 question based on the counsel of my lawyer and my</p> <p>24 constitutional rights including those protected</p> <p>25 by the Fifth Amendment.</p>	39	<p>1 question based on the counsel of my lawyer and 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. As a result of those fraudulent invoices, both</p> <p>6 you and Mr. Inake received funds that were unlawfully</p> <p>7 obtained from the state of Veracruz?</p> <p>8 MR. BRAR: Objection. Form. I also</p> <p>9 instruct my client that any answer to this</p> <p>10 question, it would violate her rights under the</p> <p>11 Fifth Amendment or certain laws of her country</p> <p>12 and international conventions, I, therefore,</p> <p>13 advise and instruct my client not to answer this</p> <p>14 question.</p> <p>15 THE WITNESS: I refuse to answer that</p> <p>16 question based on the counsel of my lawyer and my</p> <p>17 constitutional rights including those protected</p> <p>18 by the Fifth Amendment.</p> <p>19 BY MR. LEAVITT:</p> <p>20 Q. Monica Tubeya was also someone who participated</p> <p>21 in this conspiracy along with you and your husband and</p> <p>22 Javier Duarte, correct?</p> <p>23 MR. BRAR: Objection. Form. I also</p> <p>24 instruct my client that any answer to this</p> <p>25 question because it would violate her rights</p>
38	<p>1 BY MR. LEAVITT:</p> <p>2 Q. Negretti Inake was also someone who participated</p> <p>3 in the conspiracy along with you and your husband and</p> <p>4 Javier Duarte, correct?</p> <p>5 MR. BRAR: Objection. Form. I also instruct my</p> <p>6 client that any answer to this question, it would</p> <p>7 violate her rights under the Fifth Amendment or</p> <p>8 certain laws of her country and international</p> <p>9 conventions, I, therefore, advise and instruct my</p> <p>10 client not to answer this question.</p> <p>11 THE WITNESS: I refuse to answer that</p> <p>12 question based on the counsel of my lawyer and my</p> <p>13 constitutional rights including those protected</p> <p>14 by the Fifth Amendment.</p> <p>15 BY MR. LEAVITT:</p> <p>16 Q. It's your direction that Mr. Inake send</p> <p>17 fraudulent invoices to the city of Veracruz, correct?</p> <p>18 MR. BRAR: Objection. Form. I also</p> <p>19 instruct my client that any answer to this</p> <p>20 question, it would violate her rights under the</p> <p>21 Fifth Amendment or certain laws of her country</p> <p>22 and international conventions, I, therefore,</p> <p>23 advise and instruct my client not to answer this</p> <p>24 question.</p> <p>25 THE WITNESS: I refuse to answer that</p>	40	<p>1 under the Fifth Amendment or certain laws of her</p> <p>2 country and international conventions, I,</p> <p>3 therefore, advise and instruct my client not to</p> <p>4 answer this question.</p> <p>5 THE WITNESS: I refuse to answer that</p> <p>6 question based on the counsel of my lawyer and my</p> <p>7 constitutional rights including those protected</p> <p>8 by the Fifth Amendment.</p> <p>9 BY MR. LEAVITT:</p> <p>10 Q. It's your direction Monica Tubeya send fraudulent</p> <p>11 invoices to the state of Veracruz, correct?</p> <p>12 MR. BRAR: Objection. Form. I also</p> <p>13 instruct my client not to answer to this</p> <p>14 question, it would violate her rights under the</p> <p>15 Fifth Amendment or certain laws of her country</p> <p>16 and international conventions, I, therefore,</p> <p>17 advise and 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 based on the counsel of my lawyer and my</p> <p>21 constitutional rights including those protected</p> <p>22 by the Fifth Amendment.</p> <p>23 BY MR. LEAVITT:</p> <p>24 Q. As a result of these fraudulent invoices, both</p> <p>25 Monica Tubeya and you received money unlawfully obtained</p>

41	<p>1 from the state of Veracruz, correct?</p> <p>2 MR. BRAR: Objection. Form. I also</p> <p>3 instruct my client not to answer this question,</p> <p>4 it would violate her rights under the Fifth</p> <p>5 Amendment or certain laws of her country and</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 that</p> <p>10 question based on the counsel of my lawyer and 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. Arturo Zurita was also someone who participated</p> <p>15 in this conspiracy with both you and your husband and</p> <p>16 Javier Duarte, correct?</p> <p>17 MR. BRAR: Objection. Form. I also</p> <p>18 instruct my client that any answer to this</p> <p>19 question, it would violate her rights under the</p> <p>20 Fifth Amendment or certain laws of her country or</p> <p>21 international conventions, I, therefore, advise</p> <p>22 and instruct my client not to answer this</p> <p>23 question.</p> <p>24 THE WITNESS: I refuse to answer that</p> <p>25 question based on the counsel of my lawyer and my</p>	43	<p>1 and international conventions, I, therefore,</p> <p>2 advise and instruct my client not to answer this</p> <p>3 question.</p> <p>4 THE WITNESS: I refuse to answer that</p> <p>5 question based on the counsel of my lawyer and my</p> <p>6 constitutional rights including those protected</p> <p>7 by the Fifth Amendment.</p> <p>8 BY MR. LEAVITT:</p> <p>9 Q. Sergio Ortiz was also someone who participated in</p> <p>10 this conspiracy along with you, your husband and Javier</p> <p>11 Duarte, correct?</p> <p>12 MR. BRAR: Objection. Form. I also</p> <p>13 instruct my client that any answer to this</p> <p>14 question, it would violate her rights under the</p> <p>15 Fifth Amendment or certain laws of her country</p> <p>16 and international conventions, I, therefore,</p> <p>17 advise and instruct her not to answer this</p> <p>18 question.</p> <p>19 THE WITNESS: I refuse to answer that</p> <p>20 question based on the counsel of my lawyer and my</p> <p>21 constitutional rights including those protected</p> <p>22 by the Fifth Amendment.</p> <p>23 BY MR. LEAVITT:</p> <p>24 Q. It's your direction Mr. Ortiz send fraudulent</p> <p>25 invoices to the state of Veracruz, correct?</p>
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42	<p>1 constitutional rights including those protected</p> <p>2 by the Fifth Amendment.</p> <p>3 BY MR. LEAVITT:</p> <p>4 Q. It's your direction Arturo Zurita sent fraudulent</p> <p>5 invoices to the state of Veracruz, correct?</p> <p>6 MR. BRAR: Objection. Form. I also</p> <p>7 instruct my client that any answer to this</p> <p>8 question, it would violate her rights under the</p> <p>9 Fifth Amendment or certain laws of her country</p> <p>10 and international conventions, I, therefore,</p> <p>11 advise and instruct my client not to answer this</p> <p>12 question.</p> <p>13 THE WITNESS: I refuse to answer that</p> <p>14 question based on the counsel of my lawyer and my</p> <p>15 constitutional rights including those protected</p> <p>16 by the Fifth Amendment.</p> <p>17 BY MR. LEAVITT:</p> <p>18 Q. As a result of these fraudulent invoices both you</p> <p>19 and Mr. Zurita received funds unlawfully obtained by the</p> <p>20 state of Veracruz, correct?</p> <p>21</p> <p>22 MR. BRAR: Objection. Form. I also</p> <p>23 instruct my client that any answer to this</p> <p>24 question, it would violate her rights under the</p> <p>25 Fifth Amendment or certain laws of her country</p>	44	<p>1 MR. BRAR: Objection. Form. I also</p> <p>2 instruct my client that any answer to this</p> <p>3 question, it would violate her rights under the</p> <p>4 Fifth Amendment or certain laws of her country</p> <p>5 and international conventions, I, therefore,</p> <p>6 advise and instruct her not to answer this</p> <p>7 question.</p> <p>8 THE WITNESS: I refuse to answer that</p> <p>9 question based on the counsel of my lawyer and my</p> <p>10 constitutional rights including those protected</p> <p>11 by the Fifth Amendment.</p> <p>12 BY MR. LEAVITT:</p> <p>13 Q. As a result of these fraudulent invoices both you</p> <p>14 and Mr. Ortiz received funds unlawfully obtained from the</p> <p>15 state of Veracruz, correct?</p> <p>16 MR. BRAR: Objection. Form. I also</p> <p>17 instruct my client that any answer to this</p> <p>18 question, it would violate her rights under the</p> <p>19 Fifth Amendment or certain laws of her country</p> <p>20 and international conventions, I, therefore,</p> <p>21 advise and instruct my client not to answer this</p> <p>22 question.</p> <p>23 THE WITNESS: I refuse to answer that</p> <p>24 question based on the counsel of my lawyer and my</p> <p>25 constitutional rights including those protected</p>
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45	<p>1 by the Fifth Amendment.</p> <p>2 BY MR. LEAVITT:</p> <p>3 Q. You agree with me that you were not sued in this</p> <p>4 case or any of your cases because you filed property deeds</p> <p>5 or invested in real estate, correct?</p> <p>6 MR. BRAR: Objection. Form. I also</p> <p>7 instruct my client that any answer to this</p> <p>8 question, it would violate her rights under the</p> <p>9 Fifth Amendment or certain laws of her country</p> <p>10 and international conventions, I, therefore,</p> <p>11 advise and instruct my client not to answer this</p> <p>12 question.</p> <p>13 THE WITNESS: I refuse to answer that</p> <p>14 question based on the counsel of my lawyer and my</p> <p>15 constitutional rights including those protected</p> <p>16 by the Fifth Amendment.</p> <p>17 BY MR. LEAVITT:</p> <p>18 Q. You agree with me you were not sued because any</p> <p>19 of your First Amendment rights were infringed, correct?</p> <p>20 MR. BRAR: Objection. Form. I also</p> <p>21 instruct my client not to answer this question,</p> <p>22 it would violate her rights under the Fifth</p> <p>23 Amendment or certain laws of her country and</p> <p>24 international conventions, I, therefore, advise</p> <p>25 and instruct her not to answer this question.</p>	47	<p>1 Amendment or certain laws of her country and</p> <p>2 international conventions, I, therefore, instruct</p> <p>3 and advise my client not to answer this question.</p> <p>4 THE WITNESS: I refuse to answer that</p> <p>5 question based on the counsel of my lawyer and my</p> <p>6 constitutional rights including those protected</p> <p>7 by the Fifth Amendment.</p> <p>8 BY MR. LEAVITT:</p> <p>9 Q. This lawsuit has nothing to do -- strike that.</p> <p>10 This lawsuit has nothing to do with your right to</p> <p>11 free speech, correct?</p> <p>12 MR. BRAR: Objection. Form. I also</p> <p>13 instruct my client that any answer to this</p> <p>14 question, it would violate her rights under the</p> <p>15 Fifth Amendment or certain laws of her country</p> <p>16 and international conventions, I, therefore,</p> <p>17 advise and 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 based on the counsel of my lawyer and my</p> <p>21 constitutional rights including those protected</p> <p>22 by the Fifth Amendment.</p> <p>23 BY MR. LEAVITT:</p> <p>24 Q. You agree with me that this lawsuit does not</p> <p>25 implicate your right by association, correct?</p>
46	<p>1 THE WITNESS: I refuse to answer that</p> <p>2 question based on the counsel of my lawyer and my</p> <p>3 constitutional rights including those protected</p> <p>4 by the Fifth Amendment.</p> <p>5 BY MR. LEAVITT:</p> <p>6 Q. You agree with me, do you not, that none of your</p> <p>7 First Amendment rights have ever been infringed by the</p> <p>8 lawsuit, correct?</p> <p>9 MR. BRAR: Objection. Form. I also</p> <p>10 instruct my client that any answer to this</p> <p>11 question, it would violate her rights under the</p> <p>12 Fifth Amendment or certain laws of her country</p> <p>13 and international conventions, I, therefore,</p> <p>14 advise and instruct my client not to answer this</p> <p>15 question.</p> <p>16 THE WITNESS: I refuse to answer that</p> <p>17 question based on the counsel of my lawyer and 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. You agree with me that you were not sued because</p> <p>22 you exercised any constitutional right, correct?</p> <p>23 MR. BRAR: Objection. Form. I also</p> <p>24 instruct my client not to answer this question,</p> <p>25 it would violate her rights under the Fifth</p>	48	<p>1 MR. BRAR: Objection. Form. I also</p> <p>2 instruct my client that any answer to this</p> <p>3 question because it would violate her rights</p> <p>4 under the Fifth Amendment or certain laws of her</p> <p>5 country and international conventions, I,</p> <p>6 therefore, instruct and advise my client not to</p> <p>7 answer this question.</p> <p>8 THE WITNESS: I refuse to answer that</p> <p>9 question based on the counsel of my lawyer and my</p> <p>10 constitutional rights including those protected</p> <p>11 by the Fifth Amendment.</p> <p>12 BY MR. LEAVITT:</p> <p>13 Q. You agree with me you are not getting sued</p> <p>14 because you filled property deeds, property records or</p> <p>15 taxation and appraisal information, correct?</p> <p>16 MR. BRAR: Objection. Form. I also</p> <p>17 instruct my client not to the answer question it</p> <p>18 would violate her rights under the Fifth</p> <p>19 Amendment or certain laws of her country and</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 that</p> <p>24 question based on the counsel of my lawyer and my</p> <p>25 constitutional rights including those protected</p>

1 by the Fifth Amendment.  
 2 BY MR. LEAVITT:  
 3 Q. You agree with me that the only reason you're  
 4 getting sued is because you took money that belonged to  
 5 the state of Veracruz, correct?  
 6 MR. BRAR: Objection. Form. I also  
 7 instruct my client that any answer to this  
 8 question, it would violate her rights under the  
 9 Fifth Amendment or certain laws of her country  
 10 and international conventions, I, therefore,  
 11 advise and instruct my client not to answer this  
 12 question.  
 13 THE WITNESS: I refuse to answer that  
 14 question based on the counsel of my lawyer and my  
 15 constitutional rights including those protected  
 16 by the Fifth Amendment.  
 17 BY MR. LEAVITT:  
 18 Q. Ma'am, if you will look at Exhibit 1 that is  
 19 marked in front of you. This is a sworn declaration  
 20 provided by Armando Cedas who is a prosecutor for the  
 21 state of Veracruz. I gather you might be able to read  
 22 English, but if you would like to have it translated that  
 23 is also okay if you need to ask.  
 24 MR. BRAR: If you're just going to ask her  
 25 the same questions, I think we can just go.

1 BY MR. LEAVITT:  
 2 Q. You have no reason to disagree with the evidence  
 3 provided by Mr. Cedas' sworn testimony, correct?  
 4 MR. BRAR: Objection. Form. I also  
 5 instruct my client that any answer to this  
 6 question, it would violate her rights under the  
 7 Fifth Amendment or certain laws of her country  
 8 and international conventions, I, therefore,  
 9 advise 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 and my  
 13 constitutional rights including those protected  
 14 by the Fifth Amendment.  
 15 BY MR. LEAVITT:  
 16 Q. Mr. Cedas sworn testimony that you conspired  
 17 Mr. Duarte and others to divert money away from social  
 18 programs and groups; it's true, isn't it?  
 19 MR. BRAR: Objection. Form. I also  
 20 instruct my client that any answer to this  
 21 question, it would violate her rights under the  
 22 Fifth Amendment or certain laws of her country  
 23 and international conventions, I, therefore,  
 24 advise and instruct my client not to answer this  
 25 question.

1 MR. LEAVITT: I promise they're going to  
 2 be the same.  
 3 BY MR. LEAVITT:  
 4 Q. But I do want to make sure you understand what is  
 5 written there.  
 6 A. Yes.  
 7 MR. BRAR: For the record, she was also  
 8 here when it was read in Spanish earlier.  
 9 MR. LEAVITT: Fair enough.  
 10 BY MR. LEAVITT:  
 11 Q. In this sworn declaration, Mr. Cedas provides  
 12 evidence of your conspiracy with your husband and Javier  
 13 Duarte to steal money from the state of Veracruz?  
 14 Mr. Cedas sworn statement is true, isn't it?  
 15 MR. BRAR: Objection. Form. I also  
 16 instruct my client that any answer to this  
 17 question, it would violate her rights under the  
 18 Fifth Amendment or certain laws of her country  
 19 and international conventions, I, therefore,  
 20 advise 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 and my  
 24 constitutional rights including those protected  
 25 by the Fifth Amendment.

1 THE WITNESS: I refuse to answer that  
 2 question based on the counsel of my lawyer and my  
 3 constitutional rights including those protected  
 4 by the Fifth Amendment.  
 5 BY MR. LEAVITT:  
 6 Q. Mr. Cedas sworn testimony that you set up shell  
 7 companies to receive these stolen funds is true, isn't it?  
 8 MR. BRAR: Objection. Form. I also  
 9 instruct my client not to this question, it would  
 10 violate her rights under the Fifth Amendment or  
 11 certain laws of her country and international  
 12 conventions, I, therefore, advise and instruct my  
 13 client not to answer this question.  
 14 THE WITNESS: I refuse to answer that  
 15 question based on the counsel of my lawyer and my  
 16 constitutional rights including those protected  
 17 by the Fifth Amendment.  
 18 BY MR. LEAVITT:  
 19 Q. Mr. Cedas sworn testimony that you took this  
 20 stolen money and then used it to purchase real estate in  
 21 the United States is true, isn't it?  
 22 MR. BRAR: Objection. Form. I also  
 23 instruct my client that any answer to this  
 24 question, it would violate her rights under the  
 25 Fifth Amendment or certain laws of her country

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1 and international conventions, I, therefore,  
 2 advise and instruct my client not to answer that  
 3 question.  
 4 THE WITNESS: I refuse to answer that  
 5 question based on the counsel of my lawyer and my  
 6 constitutional rights including those protected  
 7 by the Fifth Amendment.  
 8 BY MR. LEAVITT:  
 9 Q. Mr. Cedas' sworn testimony that you and your  
 10 husband stole more than \$100 million from the state of  
 11 Veracruz is true, isn't it?  
 12 MR. BRAR: Objection. Form. I also  
 13 instruct my client that any answer to this  
 14 question, it would violate her rights under the  
 15 Fifth Amendment or certain laws of her country  
 16 and international conventions, I, therefore,  
 17 advise 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 and my  
 21 constitutional rights including those protected  
 22 by the Fifth Amendment.  
 23 BY MR. LEAVITT:  
 24 Q. Mr. Cedas' sworn testimony that you participated  
 25 with Javier Duarte in corruption involving government

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1 contracts is also true, correct?  
 2 MR. BRAR: Objection. Form. I also  
 3 instruct my client that any answer to this  
 4 question, it would violate her rights under the  
 5 Fifth Amendment or certain laws of her country  
 6 and international conventions, I, therefore,  
 7 instruct and advise my client not to answer this  
 8 question.  
 9 THE WITNESS: I refuse to answer that  
 10 question based on the counsel of my lawyer and my  
 11 constitutional rights including those protected  
 12 by the Fifth Amendment.  
 13 BY MR. LEAVITT:  
 14 Q. Mr. Duarte would assign government contracts that  
 15 you controlled or conspired with, correct?  
 16 MR. BRAR: Objection. Form. I also  
 17 instruct my client that any answer to this  
 18 question, it would violate her rights under the  
 19 Fifth Amendment or certain laws of her country  
 20 and international conventions, I, therefore,  
 21 advise and instruct my client not to answer this  
 22 question.  
 23 THE WITNESS: I refuse to answer that  
 24 question based on the counsel of my lawyer and my  
 25 constitutional rights including those protected

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1 by the Fifth Amendment.  
 2 BY MR. LEAVITT:  
 3 Q. And the entities would overcharge the government  
 4 for the work that had been assigned at your direction,  
 5 correct?  
 6 MR. BRAR: Objection. Form. I also  
 7 instruct my client that any answer to this  
 8 question, it would violate her rights under the  
 9 Fifth Amendment or certain laws of her country  
 10 and international conventions, I, therefore,  
 11 advise and instruct my client not to answer this  
 12 question.  
 13 THE WITNESS: I refuse to answer that  
 14 question based on the counsel of my lawyer and my  
 15 constitutional rights including those protected  
 16 by the Fifth Amendment.  
 17 BY MR. LEAVITT:  
 18 Q. You would personally receive some of this money  
 19 that the government had been overcharged, correct?  
 20 MR. BRAR: Objection. Form. I also  
 21 instruct my client that any answer to this  
 22 question, it would violate her rights under the  
 23 Fifth Amendment or certain laws of her country  
 24 and international conventions, I, therefore,  
 25 advise and instruct my client not to answer this

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1 question.  
 2 THE WITNESS: I refuse to answer that  
 3 question based on the counsel of my lawyer and my  
 4 constitutional rights including those protected  
 5 by the Fifth Amendment.  
 6 BY MR. LEAVITT:  
 7 Q. You had no lawful right to that money, correct?  
 8 MR. BRAR: Object to form. I also  
 9 instruct my client that any answer to this  
 10 question, it would violate her rights under the  
 11 Fifth Amendment or certain laws of her country  
 12 and international conventions, I, therefore,  
 13 advise 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 and my  
 17 constitutional rights including those protected  
 18 by the Fifth Amendment.  
 19 BY MR. LEAVITT:  
 20 Q. You were not authorized to take that money from  
 21 the state of Veracruz, correct?  
 22 MR. BRAR: Objection. Form. I also  
 23 instruct my client not to answer this question,  
 24 it would violate her rights under the Fifth  
 25 Amendment or certain laws of her country and

57	<p>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 and my                  6 constitutional rights including those protected                  7 by the Fifth Amendment.                  8 BY MR. LEAVITT:                  9 Q. Taking this money was not an accident or omission                  10 on your part, correct?                  11 MR. BRAR: Objection. Form. I instruct                  12 my client also not to answer this question, it                  13 would violate her rights under the Fifth                  14 Amendment or certain laws of her country and                  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 of my lawyer and my                  20 constitutional rights including those protected                  21 by the Fifth Amendment.                  22 BY MR. LEAVITT:                  23 Q. You voluntarily made misrepresentations to the                  24 state of Veracruz that you knew were not a threat, right?                  25 MR. BRAR: Objection. Form. I also</p>	59	<p>1 Q. The objective of this conspiracy was to steal                  2 money from the state of Veracruz, correct?                  3 MR. BRAR: Objection. Form. I also                  4 instruct my client that any answer to this                  5 question, it would violate her rights under the                  6 Fifth Amendment or certain laws of her country                  7 and international conventions, I, therefore,                  8 advise and instruct my client not to answer this                  9 question.                  10 THE WITNESS: I refuse to answer that                  11 question based on the counsel of my lawyer and my                  12 constitutional rights including those protected                  13 by the Fifth Amendment.                  14 BY MR. LEAVITT:                  15 Q. And you and your husband and Mr. Duarte all                  16 agreed to participate in this plan to take money from the                  17 state of Veracruz unlawfully, correct?                  18 MR. BRAR: Objection. Form. I also                  19 instruct my client not to answer this question,                  20 it would violate her rights under the Fifth                  21 Amendment or certain laws of her country and                  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</p>
58	<p>1 instruct my client not to answer this question,                  2 it would violate her rights under the Fifth                  3 Amendment or certain laws of her country and                  4 international conventions, I, therefore, advise                  5 and instruct my client not to answer this                  6 question.                  7 THE WITNESS: I refuse to answer that                  8 question based on the counsel of my lawyer and my                  9 constitutional rights including those protected                  10 by the Fifth Amendment.                  11 BY MR. LEAVITT:                  12 Q. You and your husband and Mr. Duarte all jointly                  13 agreed to take money that did not belong to you all from                  14 the state of Veracruz, correct?                  15 MR. BRAR: Objection. Form. I also                  16 instruct my client not to answer this question,                  17 it would violate her rights under the Fifth                  18 Amendment or certain laws of her country and                  19 international conventions, I, therefore, advise                  20 and instruct her not to answer this question.                  21 THE WITNESS: I refuse to answer that                  22 question based on the counsel of my lawyer and my                  23 constitutional rights including those protected                  24 by the Fifth Amendment.                  25 BY MR. LEAVITT:</p>	60	<p>1 question based on the counsel of my lawyer and my                  2 constitutional rights including those protected                  3 by the Fifth Amendment.                  4 BY MR. LEAVITT:                  5 Q. You own property at 8976 Chatsworth Drive in                  6 Houston, Texas 77024, correct?                  7 MR. BRAR: Objection. Form. I also                  8 instruct my client not to answer this question,                  9 it would violate her rights under the Fifth                  10 Amendment or certain laws of her country and                  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 and my                  16 constitutional rights including those protected                  17 by the Fifth Amendment.                  18 BY MR. LEAVITT:                  19 Q. This property was purchased with funds unlawfully                  20 obtained from the state of Veracruz, correct?                  21 MR. BRAR: Objection. Form. I also                  22 instruct my client that any answer to this                  23 question, it would violate her rights under the                  24 Fifth Amendment or certain laws of her country                  25 and international conventions, I, therefore,</p>

61	<p>1 advise 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 and my 5 constitutional rights including those protected 6 by the Fifth Amendment. 7 BY MR. LEAVITT: 8 Q. You were responsible for unlawfully obtaining 9 these funds from the state of Veracruz, correct?? 10 MR. BRAR: Objection. Form. I also 11 instruct my client not to answer this question, 12 it would violate her rights under the Fifth 13 Amendment or certain laws of her country and 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 and my 19 constitutional rights including those protected 20 by the Fifth Amendment. 21 BY MR. LEAVITT: 22 Q. You own property at 38 Shallowford Place in 23 Tomball, Texas, correct? 24 MR. BRAR: Objection. Form. I also 25 instruct my client not to answer this question,</p>	63	<p>1 these fund from the state of Veracruz, correct? 2 MR. BRAR: Objection. Form. I also 3 instruct my client that any answer to this 4 question, it would violate her rights under the 5 Fifth Amendment or certain laws of her country 6 and international conventions, I, therefore, 7 advise and instruct my client not to answer this 8 question. 9 THE WITNESS: I refuse to answer that 10 question based on the counsel of my lawyer and my 11 constitutional rights including those protected 12 by the Fifth Amendment. 13 BY MR. LEAVITT: 14 Q. You also own property 18 Shallowford Place in 15 Spring, Texas, correct? 16 MR. BRAR: I instruct my client that any 17 answer to this question, it would violate her 18 rights under the Fifth Amendment or certain laws 19 of her country and international conventions, I, 20 therefore, advise and instruct my client not to 21 answer this question. 22 THE WITNESS: I refuse to answer that 23 question based on the counsel of my lawyer and my 24 constitutional rights including those protected 25 by the Fifth Amendment.</p>
62	<p>1 it would violate her rights under the Fifth 2 Amendment or certain laws of her country and 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 and my 8 constitutional rights including those protected 9 by the Fifth Amendment. 10 BY MR. LEAVITT: 11 Q. This property was purchased with funds unlawfully 12 obtained 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 her rights under the Fifth 16 Amendment or certain laws of her country and 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 and my 22 constitutional rights including those protected 23 by the Fifth Amendment. 24 BY MR. LEAVITT: 25 Q. And you were responsible for unlawfully obtaining</p>	64	<p>1 BY MR. LEAVITT: 2 Q. This property is held by an entity named 18 3 Shallowford, LLC, right? 4 MR. BRAR: Objection. I instruct my 5 client that any answer to this question, it would 6 violate her rights under the Fifth Amendment or 7 certain laws of her country and international 8 conventions, I, therefore, advise and instruct my 9 client not to answer this question. 10 THE WITNESS: I refuse to answer that 11 question based on the counsel of my lawyer and my 12 constitutional rights including those protected 13 by the Fifth Amendment. 14 BY MR. LEAVITT: 15 Q. This entity was created to receive funds 16 unlawfully obtained from the state of Veracruz, correct? 17 MR. BRAR: Objection. Form. I also 18 instruct my client not to answer this question, 19 it would violate her rights under the Fifth 20 Amendment or certain laws of her country and 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 and my</p>



65	<p>1 constitutional rights including those protected</p> <p>2 by the Fifth Amendment.</p> <p>3 BY MR. LEAVITT:</p> <p>4 Q. This property did, in fact, receive funds</p> <p>5 unlawfully obtained in the state of Veracruz, correct?</p> <p>6 MR. BRAR: Objection. Form. I also</p> <p>7 instruct my client that any answer to this</p> <p>8 question, it would violate her rights under the</p> <p>9 Fifth Amendment or certain laws of her country</p> <p>10 and international conventions, I, therefore,</p> <p>11 advise and instruct my client not to answer this</p> <p>12 question.</p> <p>13 THE WITNESS: I refuse to answer that</p> <p>14 question based on the counsel of my lawyer and my</p> <p>15 constitutional rights including those protected</p> <p>16 by the Fifth Amendment.</p> <p>17 BY MR. LEAVITT:</p> <p>18 Q. And this property was purchased with those funds</p> <p>19 that were unlawfully obtained from the state of Veracruz,</p> <p>20 correct?</p> <p>21 MR. BRAR: Objection. Form. I also instruct my</p> <p>22 client that any answer to this question, it would</p> <p>23 violate her rights under the Fifth Amendment or</p> <p>24 certain laws of her country and international</p> <p>25 conventions, I, therefore, advise and instruct my</p>	67	<p>1 Fifth Amendment or certain laws of her country</p> <p>2 and international conventions, I, therefore,</p> <p>3 advise and instruct my client not to answer this</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 and my</p> <p>7 constitutional rights including those protected</p> <p>8 by the Fifth Amendment.</p> <p>9 BY MR. LEAVITT:</p> <p>10 Q. This property is held by an entity named 18</p> <p>11 Shallowford Place, LLC, correct?</p> <p>12 MR. BRAR: Objection. Form. I also</p> <p>13 instruct my client not to answer to this</p> <p>14 question, it would violate her rights under the</p> <p>15 Fifth Amendment or certain laws of her country</p> <p>16 and international conventions, I, therefore,</p> <p>17 advise and 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 based on the counsel of my lawyer and my</p> <p>21 constitutional rights including those protected</p> <p>22 by the Fifth Amendment. correct?</p> <p>23 BY MR. LEAVITT:</p> <p>24 Q. This is an entity that was created by you to</p> <p>25 receive funds unlawfully obtained from the state of</p>
66	<p>1 client not to answer this question.</p> <p>2 THE WITNESS: I refuse to answer that</p> <p>3 question based on the counsel of my lawyer and my</p> <p>4 constitutional rights including those protected</p> <p>5 by the Fifth Amendment.</p> <p>6 BY MR. LEAVITT:</p> <p>7 Q. Are you responsible for unlawfully obtaining</p> <p>8 those funds from the state of Veracruz, correct?</p> <p>9 MR. BRAR: Objection. Form. I also</p> <p>10 instruct my client that any answer to this</p> <p>11 question, it would violate her rights under the</p> <p>12 Fifth Amendment or certain laws of her country</p> <p>13 and international conventions, I, therefore,</p> <p>14 advise and instruct my client not to answer this</p> <p>15 question.</p> <p>16 THE WITNESS: I refuse to answer that</p> <p>17 question based on the counsel of my lawyer and 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. You also own property 8350 Ashlane way, Suite A,</p> <p>22 The Woodlands, Texas?</p> <p>23 MR. BRAR: Objection. Form. I also</p> <p>24 instruct my client that any answer to this</p> <p>25 question, it would violate her rights under the</p>	68	<p>1 Veracruz, correct?</p> <p>2 MR. BRAR: Objection. Form. I also</p> <p>3 instruct my client not to answer this question,</p> <p>4 it would violate her rights under the Fifth</p> <p>5 Amendment or certain laws of her country and</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 that</p> <p>10 question based on the counsel of my lawyer and 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 entity did, in fact, receive funds</p> <p>15 unlawfully obtained from the state of Veracruz, correct?</p> <p>16 MR. BRAR: Objection. Form. I also</p> <p>17 instruct my client not to answer to this</p> <p>18 question, it would violate her rights under the</p> <p>19 Fifth Amendment or certain laws of her country</p> <p>20 and international conventions, I, therefore,</p> <p>21 advise and instruct my client not to answer this</p> <p>22 question.</p> <p>23 THE WITNESS: I refuse to answer that</p> <p>24 question based on the counsel of my lawyer and my</p> <p>25 constitutional rights including those protected</p>

69	<p>1 by the Fifth Amendment.</p> <p>2 BY MR. LEAVITT:</p> <p>3 Q. This entity then used those fund to purchase this</p> <p>4 property, correct?</p> <p>5 MR. BRAR: Objection. Form. I also</p> <p>6 instruct my client not to answer this question,</p> <p>7 it would violate her rights under the Fifth</p> <p>8 Amendment or certain laws of her country and</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 that</p> <p>13 question based on the counsel of my lawyer and 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. And you were responsible for unlawfully obtaining</p> <p>18 those funds from the state of Veracruz, correct?</p> <p>19 MR. BRAR: Objection. Form. I also</p> <p>20 instruct my client not to answer this question,</p> <p>21 it would violate her rights under the Fifth</p> <p>22 Amendment or certain laws of her country and</p> <p>23 international conventions, I, therefore, advise</p> <p>24 and instruct my client not to answer this</p> <p>25 question.</p>	71	<p>1 and instruct my client not to answer this</p> <p>2 question.</p> <p>3 THE WITNESS: I refuse to answer that</p> <p>4 question based on the counsel of my lawyer and 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. This is an entity that you created to receive</p> <p>9 stolen funds from the state of Veracruz, correct?</p> <p>10 MR. BRAR: Objection. Form. I also</p> <p>11 instruct my client not answer to this question,</p> <p>12 it would violate her rights under the Fifth</p> <p>13 Amendment or certain laws of her country and</p> <p>14 international conventions, I, therefore, advise</p> <p>15 and instruct my client not to answer this</p> <p>16 question.</p> <p>17 THE WITNESS: I refuse to answer that</p> <p>18 question based on the counsel of my lawyer and my</p> <p>19 constitutional rights including those protected</p> <p>20 by the Fifth Amendment.</p> <p>21 BY MR. LEAVITT:</p> <p>22 Q. This entity did, in fact, receive funds</p> <p>23 unlawfully obtained from the state of Veracruz, correct?</p> <p>24 MR. BRAR: Objection. Form. I also</p> <p>25 instruct my client not answer to this question,</p>
70	<p>1 THE WITNESS: I refuse to answer that</p> <p>2 question based on the counsel of my lawyer and my</p> <p>3 constitutional rights including those protected</p> <p>4 by the Fifth Amendment.</p> <p>5 BY MR. LEAVITT:</p> <p>6 Q. You also own property at 8350 Ashlane, Way Suites</p> <p>7 3 and 4 in The Woodlands, Texas, correct, Suites 3 and 4?</p> <p>8 MR. BRAR: I instruct my client not answer</p> <p>9 to this question, it would violate her rights</p> <p>10 under the Fifth Amendment or certain laws of her</p> <p>11 country and 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 the counsel of my lawyer and 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. Both of these pieces of property are owned by</p> <p>20 Bamba Offices, LLC, correct?</p> <p>21 MR. BRAR: Objection. I instruct my</p> <p>22 client not answer to this question because it</p> <p>23 would violate her rights under the Fifth</p> <p>24 Amendment or certain laws of her country and</p> <p>25 international conventions, I, therefore, advise</p>	72	<p>1 it would violate her rights under the Fifth</p> <p>2 Amendment or certain laws of her country and</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 and my</p> <p>8 constitutional rights including those protected</p> <p>9 by the Fifth Amendment.</p> <p>10 BY MR. LEAVITT:</p> <p>11 Q. And these funds were used to purchase suites 3</p> <p>12 and 4 at 8350 Ashlane Way, correct?</p> <p>13 MR. BRAR: Objection. Form. I also</p> <p>14 instruct my client not answer to this question,</p> <p>15 it would violate her rights under the Fifth</p> <p>16 Amendment or certain laws of her country and</p> <p>17 international conventions, I, therefore, advise</p> <p>18 and instruct her not to answer this question.</p> <p>19 THE WITNESS: I refuse to answer that</p> <p>20 question based on the counsel of my lawyer and my</p> <p>21 constitutional rights including those protected</p> <p>22 by the Fifth Amendment.</p> <p>23 BY MR. LEAVITT:</p> <p>24 Q. And you were responsible for unlawfully obtaining</p> <p>25 the funds that were used to purchase suites 3 and 4, 8350</p>

73	<p>1 Ashlane Way, correct?</p> <p>2 MR. BRAR: Objection. Form. I also</p> <p>3 instruct my client not answer to this question,</p> <p>4 it would violate her rights under the Fifth</p> <p>5 Amendment or certain laws of her country and</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 that</p> <p>10 question based on the counsel of my lawyer and 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. You also own property at 43 North Spinning Wheel</p> <p>15 Circle in The Woodlands, Texas, correct?</p> <p>16 MR. BRAR: Object to the form. I instruct</p> <p>17 my client not answer to this question, it would</p> <p>18 violate her rights under the Fifth Amendment or</p> <p>19 certain laws of her country and international</p> <p>20 conventions, I, therefore, advise and instruct my</p> <p>21 client not to answer this question.</p> <p>22 THE WITNESS: I refuse to answer that</p> <p>23 question based on the counsel of my lawyer and my</p> <p>24 constitutional rights including those protected</p> <p>25 by the Fifth Amendment.</p>	75	<p>1 question based on the counsel of my lawyer and 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 did in fact receive funds unlawfully</p> <p>6 obtain from the state of Veracruz, correct?</p> <p>7 MR. BRAR: Object to the form. I also</p> <p>8 instruct my client not answer to this question,</p> <p>9 it would violate her rights under the Fifth</p> <p>10 Amendment or certain laws of her country and</p> <p>11 international conventions, I, therefore, advise</p> <p>12 and instruct my client not to answer this</p> <p>13 question.</p> <p>14 THE WITNESS: I refuse to answer that</p> <p>15 question based on the counsel of my lawyer and 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. And this property was in fact purchased with</p> <p>20 funds unlawfully obtained by the state of Veracruz,</p> <p>21 correct?</p> <p>22 MR. BRAR: Object to form. I also</p> <p>23 instruct my client not answer to this question.</p> <p>24 It would violate her rights under the Fifth</p> <p>25 Amendment or certain laws of her country and</p>
74	<p>1 BY MR. LEAVITT:</p> <p>2 Q. This property is held by an entity named 43</p> <p>3 Spinning Wheel, LLC, correct?</p> <p>4 MR. BRAR: Object to the from. I also</p> <p>5 instruct my client not answer to this question,</p> <p>6 it would violate her rights under the Fifth</p> <p>7 Amendment or certain laws of her country and</p> <p>8 international conventions, I, therefore, advise</p> <p>9 and instruct my client not to answer this</p> <p>10 question.</p> <p>11 THE WITNESS: I refuse to answer that</p> <p>12 question based on the counsel of my lawyer and my</p> <p>13 constitutional rights including those protected</p> <p>14 by the Fifth Amendment.</p> <p>15 BY MR. LEAVITT:</p> <p>16 Q. This is an entity that you created to receive</p> <p>17 funds unlawfully obtained from the state of Veracruz,</p> <p>18 correct?</p> <p>19 MR. BRAR: Object to the form. I also</p> <p>20 instruct my client not answer to this question,</p> <p>21 it would violate her rights under the Fifth</p> <p>22 Amendment or certain laws of her country and</p> <p>23 international conventions, I, therefore, instruct</p> <p>24 and advise her not to answer this question.</p> <p>25 THE WITNESS: I refuse to answer that</p>	76	<p>1 international conventions, I, therefore, advise</p> <p>2 and instruct my client not to answer this</p> <p>3 question.</p> <p>4 THE WITNESS: I refuse to answer that</p> <p>5 question based on the counsel of my lawyer and my</p> <p>6 constitutional rights including those protected</p> <p>7 by the Fifth Amendment.</p> <p>8 MR. LEAVITT: We need to take a quick</p> <p>9 break.</p> <p>10 THE VIDEOGRAPHER: This is the end of</p> <p>11 Media 2, Volume 1 of the video deposition Monica</p> <p>12 Babayan at 15:32 p.m. as indicated on the video</p> <p>13 screen.</p> <p>14 (Recess taken at 15:32 p.m.)</p> <p>15 THE VIDEOGRAPHER: This is the beginning</p> <p>16 of Media 3, Volume 1 in the video deposition of</p> <p>17 Monica Babayan. Going back on the record at</p> <p>18 15: 46 p.m. as indicated on the video screen.</p> <p>19 Thank you, Counsel.</p> <p>20 BY MR. LEAVITT:</p> <p>21 Q. Ma'am, you also own property located at 138 Bryce</p> <p>22 Branch Circle in The Woodlands, Texas, correct?</p> <p>23 MR. BRAR: Object to the form. I instruct</p> <p>24 my client not answer to this question, it would</p> <p>25 violate her rights under the Fifth Amendment or</p>

77	<p>1 certain laws of her country and international 2 conventions, I, therefore, advise and instruct my 3 client not to answer this question. 4 THE WITNESS: I refuse to answer that 5 question based on the counsel of my lawyer and my 6 constitutional rights including those protected 7 by the Fifth Amendment. 8 BY MR. LEAVITT: 9 Q. This property is held by an entity named 138 10 Bryce Branch is that right? 11 MR. BRAR: Objection. Objection. Form. 12 I instruct my client not answer to this question, 13 it would violate her rights under the Fifth 14 Amendment or certain laws of her country and 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 of my lawyer and my 20 constitutional rights including those protected 21 by the Fifth Amendment. 22 BY MR. LEAVITT: 23 Q. This property is held by an entity name 138 Bryce 24 Branch, LLC, correct? 25 MR. BRAR: Objection. Form. I also</p>	79	<p>1 BY MR. LEAVITT: 2 Q. These entities did, in fact, receive funds 3 unlawfully obtained from the state of Veracruz, correct? 4 MR. BRAR: Objection. Form. I also 5 instruct my client not answer to this question, 6 it would violate her rights under the Fifth 7 Amendment or certain laws of her country and 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 and my 13 constitutional rights including those protected 14 by the Fifth Amendment. 15 BY MR. LEAVITT: 16 Q. Your responsible for unlawfully obtaining funds 17 from state of Veracruz for 138 Bryce Branch Circle in The 18 Woodlands, Texas, correct? 19 MR. BRAR: Objection. Form. I also 20 instruct my client not answer to this question 21 because it violates her rights under the Fifth 22 Amendment or certain laws of her country and 23 international conventions, I, therefore, advise 24 and instruct my client not to answer this 25 question.</p>
78	<p>1 instruct my client not answer to this question, 2 it would violate her rights under the Fifth 3 Amendment or certain laws of her country and 4 international conventions, I, therefore, advise 5 and instruct my client not to answer this 6 question. 7 THE WITNESS: I refuse to answer that 8 question based on the counsel of my lawyer and my 9 constitutional rights including those protected 10 by the Fifth Amendment. 11 BY MR. LEAVITT: 12 Q. Both of these entities were created to receive 13 funds unlawfully obtained from the state of Veracruz. 14 Correct? 15 MR. BRAR: Objection. Form. I also 16 instruct my client not answer to this question, 17 it would violate her rights under the Fifth 18 Amendment or certain laws of her country and 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 and my 24 constitutional rights including those protected 25 by the Fifth Amendment.</p>	80	<p>1 THE WITNESS: I refuse to answer that 2 question based on the counsel of my lawyer and my 3 constitutional rights including those protected 4 by the Fifth Amendment. 5 BY MR. LEAVITT: 6 Q. You also own property at 18 Griffin Hill Court in 7 The Woodlands, Texas, correct? 8 MR. BRAR: Objection. Form. I also 9 instruct my client not answer to this question, 10 it would violate her rights under the Fifth 11 Amendment or certain laws of her country and 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 and my 17 constitutional rights including those protected 18 by the Fifth Amendment.? 19 BY MR. LEAVITT: 20 Q. This property is owned -- strike that. 21 This property is held by an entity named 18 22 Griffin Hill, LLC, correct? 23 MR. BRAR: I instruct my client not answer 24 to this question, it would violate her rights 25 under the Fifth Amendment or certain laws of her</p>

81	<p>1 country and international conventions, I, 2 therefore, advise and instruct my client not to 3 answer this question. 4 THE WITNESS: I refuse to answer that 5 question based on the counsel of my lawyer and my 6 constitutional rights including those protected 7 by the Fifth Amendment. 8 BY MR. LEAVITT: 9 Q. This is an entity that you created to receive 10 stolen funds from the state of Veracruz, correct? 11 MR. BRAR: Objection. Form. I also 12 instruct my client not answer to this question, 13 it would violate her rights under the Fifth 14 Amendment or certain laws of her country and 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 of my lawyer and my 20 constitutional rights including those protected 21 by the Fifth Amendment. 22 BY MR. LEAVITT: 23 Q. This entity, in fact, received stolen funds from 24 the state of Veracruz, correct? 25 MR. BRAR: Objection. Form. I also</p>	83	<p>1 Q. You also own property at 175 West New Harmony 2 Trail in Spring, Texas, correct? 3 MR. BRAR: I instruct my client not answer 4 to this question, it would violate her rights 5 under the Fifth Amendment or certain laws of her 6 country and 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 of my lawyer and my 11 constitutional rights including those protected 12 by the Fifth Amendment. 13 BY MR. LEAVITT: 14 Q. This property is held by an entity named 175 West 15 New Harmony, LLC, correct? 16 MR. BRAR: I instruct my client not answer 17 to this question it violates her rights under the 18 Fifth Amendment or certain laws of her country 19 and international conventions, I, therefore, 20 advise 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 and my 24 constitutional rights including those protected 25 by the Fifth Amendment.</p>
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82	<p>1 instruct my client not answer to this question, 2 it would violate her rights under the Fifth 3 Amendment or certain laws of her country and 4 international conventions, I, therefore, advise 5 and instruct my client not to answer this 6 question. 7 THE WITNESS: I refuse to answer that 8 question based on the counsel of my lawyer and my 9 constitutional rights including those protected 10 by the Fifth Amendment. 11 BY MR. LEAVITT: 12 Q. This property was purchased with funds unlawfully 13 obtained by you from the state of Veracruz, correct? 14 MR. BRAR: Objection. Form. I also 15 instruct my client not answer to this question, 16 it would violate her rights under the Fifth 17 Amendment or certain laws of her country and 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 and my 23 constitutional rights including those protected 24 by the Fifth Amendment. 25 BY MR. LEAVITT:</p>	84	<p>1 BY MR. LEAVITT: 2 Q. This is an entity that you created to receive the 3 funds unlawfully obtained from the state of Veracruz, 4 correct? 5 MR. BRAR: Objection. Form. I also 6 instruct my client not answer to this question, 7 it would violate her rights under the Fifth 8 Amendment or certain laws of her country and 9 international conventions, I, therefore, instruct 10 and advise my client not to answer this question. 11 THE WITNESS: I refuse to answer that 12 question based on the counsel of my lawyer and my 13 constitutional rights including those protected 14 by the Fifth Amendment. 15 BY MR. LEAVITT: 16 Q. And this property did, in fact, receive funds 17 unlawfully obtained from the state of Veracruz, correct? 18 MR. BRAR: Objection. Form. I also 19 instruct my client not answer to this question, 20 it would violate her rights under the Fifth 21 Amendment or certain laws of her country and 22 international conventions, I, therefore, instruct 23 and advise my client not to answer this question. 24 THE WITNESS: I refuse to answer that 25 question based on the counsel of my lawyer and my</p>
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85	<p>1 constitutional rights including those protected</p> <p>2 by the Fifth Amendment.</p> <p>3 BY MR. LEAVITT:</p> <p>4 Q. This property was purchased with funds unlawfully</p> <p>5 obtained by you from the state of Veracruz, correct?</p> <p>6 MR. BRAR: Objection. Form. I also</p> <p>7 instruct my client not answer to this question,</p> <p>8 it would violate her rights under the Fifth</p> <p>9 Amendment or certain laws of her country and</p> <p>10 international conventions, I, therefore, instruct</p> <p>11 and advise my client not to answer this question.</p> <p>12 THE WITNESS: I refuse to answer that</p> <p>13 question based on the counsel of my lawyer and 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 also own property at 83 West Jagged Ridge</p> <p>18 Circle in The Woodlands, Texas, correct?</p> <p>19 MR. BRAR: I instruct my client not answer</p> <p>20 to this question, it would violate her rights</p> <p>21 under the Fifth Amendment or certain laws of her</p> <p>22 country and international conventions, I,</p> <p>23 therefore, instruct and advise my client not to</p> <p>24 answer this question.</p> <p>25 THE WITNESS: I refuse to answer that</p>	87	<p>1 THE WITNESS: I refuse to answer that</p> <p>2 question based on the counsel of my lawyer and my</p> <p>3 constitutional rights including those protected</p> <p>4 by the Fifth Amendment.</p> <p>5 BY MR. LEAVITT:</p> <p>6 Q. This entity did, in fact, receive funds</p> <p>7 unlawfully obtained from the state of Veracruz, correct?</p> <p>8</p> <p>9 MR. BRAR: Objection. Form. I also</p> <p>10 instruct my client not answer to this question,</p> <p>11 it would violate her rights under the Fifth</p> <p>12 Amendment or certain laws of her country and</p> <p>13 international conventions, I, therefore, instruct</p> <p>14 and advise my client not to answer this question.</p> <p>15 THE WITNESS: I refuse to answer that</p> <p>16 question based on the counsel of my lawyer and my</p> <p>17 constitutional rights including those protected</p> <p>18 by the Fifth Amendment.</p> <p>19 BY MR. LEAVITT:</p> <p>20 Q. This property was purchased with funds unlawfully</p> <p>21 obtained from the state of Veracruz by you, correct?</p> <p>22 MR. BRAR: Objection. Form. I also</p> <p>23 instruct my client not answer to this question,</p> <p>24 it would violate her rights under the Fifth</p> <p>25 Amendment or certain laws of her country and</p>
86	<p>1 question based on the counsel of my lawyer and 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 property is held by an entity named 83 West</p> <p>6 Jagged Ridge, correct?</p> <p>7 MR. BRAR: Instruct my client not answer</p> <p>8 to this question, it would violate her rights</p> <p>9 under the Fifth Amendment or certain laws of her</p> <p>10 country and international conventions, I,</p> <p>11 therefore, instruct and advise my client not to</p> <p>12 answer this question.</p> <p>13 THE WITNESS: I refuse to answer that</p> <p>14 question based on the counsel of my lawyer and my</p> <p>15 constitutional rights including those protected</p> <p>16 by the Fifth Amendment.</p> <p>17 BY MR. LEAVITT:</p> <p>18 Q. This entity was created by you to receive funds</p> <p>19 unlawfully obtained from the state of Veracruz, correct?</p> <p>20 MR. BRAR: Objection. Form. I also</p> <p>21 instruct my client not answer to this question</p> <p>22 because it violate her rights under the Fifth</p> <p>23 Amendment or certain laws of her country and</p> <p>24 international conventions, I, therefore, instruct</p> <p>25 and advise my client not to answer this question.</p>	88	<p>1 international conventions, I, therefore, instruct</p> <p>2 and advise my client not to answer this question.</p> <p>3 THE WITNESS: I refuse to answer that</p> <p>4 question based on the counsel of my lawyer and 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. You purchased this property with the funds that</p> <p>9 you unlawfully obtained from the state of Veracruz,</p> <p>10 correct?</p> <p>11 MR. BRAR: Object to the form. I also</p> <p>12 instruct my client not answer to this question,</p> <p>13 it would violate her rights under the Fifth</p> <p>14 Amendment or certain laws of her country and</p> <p>15 international conventions, I, therefore, instruct</p> <p>16 and advise my client not to answer.</p> <p>17 THE WITNESS: I refuse to answer that</p> <p>18 question based on the counsel of my lawyer and my</p> <p>19 constitutional rights including those protected</p> <p>20 by the Fifth Amendment.</p> <p>21 BY MR. LEAVITT:</p> <p>22 Q. You also own property 87 West Jagged Ridge Circle</p> <p>23 in The Woodlands, Texas, correct?</p> <p>24 MR. BRAR: Instruct my client not answer</p> <p>25 to this question, it would violate her rights</p>

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1 under the Fifth Amendment or certain laws of her  
 2 country and international conventions, I,  
 3 therefore, instruct and advise my client not to  
 4 answer this question.  
 5 THE WITNESS: I refuse to answer that  
 6 question based on the counsel of my lawyer and my  
 7 constitutional rights including those protected  
 8 by the Fifth Amendment.  
 9 BY MR. LEAVITT:  
 10 Q. This property is held by an entity named 87 West  
 11 Jagged Ridge, LLC, correct?  
 12 MR. BRAR: Instruct my client not answer  
 13 to this question, it would violate her rights  
 14 under the Fifth Amendment or certain laws of her  
 15 country and international conventions, I,  
 16 therefore, instruct and advise my client not to  
 17 answer this question.  
 18 THE WITNESS: I refuse to answer that  
 19 question based on the counsel of my lawyer and my  
 20 constitutional rights including those protected  
 21 by the Fifth Amendment.  
 22 BY MR. LEAVITT:  
 23 Q. You created this entity with the intention that  
 24 it receives stolen from the state of Veracruz, correct?  
 25 MR. BRAR: Objection. Form. I also

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1 instruct my client not answer to this question.  
 2 Any answer would violate her Fifth Amendment  
 3 rights or certain laws of her country and  
 4 international conventions, I, therefore, advise  
 5 and instruct my client not to answer this  
 6 question.  
 7 THE WITNESS: I refuse to answer that  
 8 question based on the counsel of my lawyer and my  
 9 constitutional rights including those protected  
 10 by the Fifth Amendment.  
 11 BY MR. LEAVITT:  
 12 Q. This entity did, in fact, receive funds  
 13 unlawfully obtained from the state of Veracruz, correct?  
 14 MR. BRAR: Object to the form. I also  
 15 instruct my client not answer to this question,  
 16 it would violate her rights under the Fifth  
 17 Amendment or certain laws of her country and  
 18 international conventions, therefore, I 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 and my  
 23 constitutional rights including those protected  
 24 by the Fifth Amendment.  
 25 BY MR. LEAVITT:

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1 Q. This property was purchased with funds that you  
 2 unlawfully obtained from the state of Veracruz, correct?  
 3 MR. BRAR: I object to this question, the  
 4 form. I also instruct my client not answer to  
 5 this question, it would violate her rights under  
 6 the Fifth Amendment or certain laws of her  
 7 country and international conventions, I,  
 8 therefore, advise and instruct my client not to  
 9 answer this question.  
 10 THE WITNESS: I refuse to answer that  
 11 question based on the counsel of my lawyer and my  
 12 constitutional rights including those protected  
 13 by the Fifth Amendment.  
 14 BY MR. LEAVITT:  
 15 Q. You also own property at 7940 East Clinton Street  
 16 in Scottsdale, Arizona, correct?  
 17 MR. BRAR: Object to the form. I also  
 18 instruct my client not answer to this question,  
 19 it would violate her rights under the Fifth  
 20 Amendment or certain laws of her country and  
 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 and my

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1 constitutional rights including those protected  
 2 by the Fifth Amendment.  
 3 BY MR. LEAVITT:  
 4 Q. This property was purchased with funds that you  
 5 unlawfully obtained from the state of Veracruz, correct?  
 6 MR. BRAR: Object to the form. I also  
 7 instruct my client not answer to this question,  
 8 it would violate her rights under the Fifth  
 9 Amendment or certain laws of her country and  
 10 international conventions, I, therefore, advise  
 11 and instruct my client not to answer this  
 12 question.  
 13 THE WITNESS: I refuse to answer that  
 14 question based on the counsel of my lawyer and my  
 15 constitutional rights including those protected  
 16 by the Fifth Amendment.  
 17 BY MR. LEAVITT:  
 18 Q. You also own property at 307 Bloomhill Place in  
 19 Magnolia, Texas?  
 20 MR. BRAR: Object to the form. I also  
 21 instruct my client not answer to this question,  
 22 it would violate her rights under the Fifth  
 23 Amendment or certain laws of her country and  
 24 international conventions, I, therefore, advise  
 25 and instruct my client not to answer this

1 question.

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

6 BY MR. LEAVITT:

7 Q. This property was purchased with funds you  
8 unlawfully obtained from the state of Veracruz, correct?

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

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

20 BY MR. LEAVITT:

21 Q. You also own a piece of real estate at North Lot  
22 15 on Levy Lane in Tomball, Texas, correct?

23 MR. BRAR: Object to the form. I also  
24 instruct my client not answer to this question  
25 because it violates her rights under the Fifth

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

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

12 BY MR. LEAVITT:

13 Q. This is an entity that you created to receive  
14 funds on lawfully obtained from the state of Veracruz,  
15 correct?

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

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

1 Amendment or certain laws of her country and  
2 international conventions, I, therefore, advise  
3 and instruct my client not to answer this  
4 question.

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

9 BY MR. LEAVITT:

10 Q. This property was purchased with funds that you  
11 unlawfully obtained from the state of Veracruz, correct?

12 MR. BRAR: Object to the form. I also  
13 instruct my client not answer to this question  
14 because it violates her rights under the Fifth  
15 Amendment or certain laws of her country and  
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 and my  
21 constitutional rights including those protected  
22 by the Fifth Amendment.

23 BY MR. LEAVITT:

24 Q. You also own an entity named 8051 Bryce Branch,  
25 LLC, correct?

1 by the Fifth Amendment.

2 BY MR. LEAVITT:

3 Q. You did, in fact, receive funds from the state of  
4 Veracruz, right?

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

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

16 BY MR. LEAVITT:

17 Q. And you were the one that was responsible for  
18 unlawfully obtaining these funds from the state of  
19 Veracruz, correct?

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



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

6 BY MR. LEAVITT:

7 Q. This entity is still in possession of funds  
8 unlawfully obtained by the state of Veracruz, correct?

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

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

19 BY MR. LEAVITT:

20 Q. You also own an entity called 7 Rose Brush, LLC,  
21 correct?

22 MR. BRAR: Object to the form. I also  
23 instruct my client not answer to this question  
24 because it violates her rights under the Fifth  
25 Amendment or certain laws of her country and

1 Amendment or certain laws of her country and  
2 international conventions, I, therefore, instruct  
3 and advise my client not to answer this question.

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

8 BY MR. LEAVITT:

9 Q. And you were the one responsible for unlawfully  
10 obtaining these funds from the state of Veracruz, correct?

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

17 THE WITNESS: I refuse to answer that  
18 question based on the counsel of my lawyer and my  
19 constitutional rights including those protected  
20 by the Fifth Amendment.

21 BY MR. LEAVITT:

22 Q. You also own Bamba Construction, LLC, correct?

23 MR. BRAR: Object to the form. I also  
24 instruct my client not answer to this question  
25 because it violates her rights under the Fifth

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

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

7 BY MR. LEAVITT:

8 Q. This is an entity that you created to receive  
9 funds and unlawfully obtain from the state of Veracruz?

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

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

20 BY MR. LEAVITT:

21 Q. This entity did, in fact, receive funds  
22 unlawfully from the state of Veracruz, right?

23 MR. BRAR: Object to the form. I also  
24 instruct my client not answer to this question  
25 because it violates her rights under the Fifth

1 Amendment or certain laws of her country and  
2 international conventions, I, therefore, advise  
3 and instruct my client not to answer this  
4 question.

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

9 BY MR. LEAVITT:

10 Q. This is an entity that you created to receive  
11 funds unlawfully obtained from the state of Veracruz,  
12 correct?

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

19 THE WITNESS: I refuse to answer that  
20 question based on the counsel of my lawyer and my  
21 constitutional rights including those protected  
22 by the Fifth Amendment.

23 BY MR. LEAVITT:

24 Q. And this entity did, in fact, received funds  
25 unlawfully obtained from the state of Veracruz, correct?

101	<p>1 MR. BRAR: Object to the form. I also</p> <p>2 instruct my client not answer to this question</p> <p>3 because it violates her rights under the Fifth</p> <p>4 Amendment or certain laws of her country and</p> <p>5 international conventions, I, therefore, instruct</p> <p>6 and advise my client not to answer this question.</p> <p>7 THE WITNESS: I refuse to answer that</p> <p>8 question based on the counsel of my lawyer and my</p> <p>9 constitutional rights including those protected</p> <p>10 by the Fifth Amendment.</p> <p>11 BY MR. LEAVITT:</p> <p>12 Q. And you were the one responsible for unlawfully</p> <p>13 obtaining these funds from the state of Veracruz, correct?</p> <p>14 MR. BRAR: Object to the form. I also</p> <p>15 instruct my client not answer to this question</p> <p>16 because it violates her rights under the Fifth</p> <p>17 Amendment or certain laws of her country and</p> <p>18 international conventions, I, therefore, instruct</p> <p>19 her not 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 and 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. You also own an entity named Bamba Land and</p>	103	<p>1 BY MR. LEAVITT:</p> <p>2 Q. This entity did, in fact, receive funds</p> <p>3 unlawfully obtained from the state of Veracruz, right?</p> <p>4 MR. BRAR: Object to the form. I also</p> <p>5 instruct my client not answer to this question</p> <p>6 because it violates her rights under the Fifth</p> <p>7 Amendment or certain laws of her country and</p> <p>8 international conventions, I, therefore, instruct</p> <p>9 and advise my client not to answer this question.</p> <p>10 THE WITNESS: I refuse to answer that</p> <p>11 question based on the counsel of my lawyer and my</p> <p>12 constitutional rights including those protected</p> <p>13 by the Fifth Amendment.</p> <p>14 BY MR. LEAVITT:</p> <p>15 Q. And you were the one responsible for unlawfully</p> <p>16 obtaining these funds from the state Veracruz, correct?</p> <p>17 MR. BRAR: Object to the form. I also</p> <p>18 instruct my client not answer to this question</p> <p>19 because it violates her rights under the Fifth</p> <p>20 Amendment or certain laws of her country and</p> <p>21 international conventions, I, therefore, instruct</p> <p>22 and advise my client not to answer this question.</p> <p>23 THE WITNESS: I refuse to answer that</p> <p>24 question based on the counsel of my lawyer and my</p> <p>25 constitutional rights including those protected</p>
102	<p>1 Development, LLC, correct?</p> <p>2 MR. BRAR: Object to the form. I also</p> <p>3 instruct my client not answer to this question</p> <p>4 because it violates her rights under the Fifth</p> <p>5 Amendment or certain laws of her country and</p> <p>6 international conventions, I, therefore, instruct</p> <p>7 and advise my client not to answer</p> <p>8 THE WITNESS: I refuse to answer that</p> <p>9 question based on the counsel of my lawyer and my</p> <p>10 constitutional rights including those protected</p> <p>11 by the Fifth Amendment.</p> <p>12 BY MR. LEAVITT:</p> <p>13 Q. That was an entity that you created to receive</p> <p>14 funds unlawfully obtained from the state of Veracruz,</p> <p>15 correct?</p> <p>16 MR. BRAR: Object to the form. I also</p> <p>17 instruct my client not answer to this question</p> <p>18 because it violates her rights under the Fifth</p> <p>19 Amendment or certain laws of her country and</p> <p>20 international conventions, I, therefore, instruct</p> <p>21 my client not to answer this question.</p> <p>22 THE WITNESS: I refuse to answer that</p> <p>23 question based on the counsel of my lawyer and my</p> <p>24 constitutional rights including those protected</p> <p>25 by the Fifth Amendment.</p>	104	<p>1 by the Fifth Amendment.</p> <p>2 BY MR. LEAVITT:</p> <p>3 Q. And this entity currently has possession of funds</p> <p>4 unlawfully obtained from the state of Veracruz, correct?</p> <p>5 MR. BRAR: Object to the form. I also</p> <p>6 instruct my client not answer to this question</p> <p>7 because it violates her rights under the Fifth</p> <p>8 Amendment or certain laws of her country and</p> <p>9 international conventions, I, therefore, instruct</p> <p>10 and advise my client not to answer this question.</p> <p>11 THE WITNESS: I refuse to answer that</p> <p>12 question based on the counsel of my lawyer and my</p> <p>13 constitutional rights including those protected</p> <p>14 by the Fifth Amendment.</p> <p>15 BY MR. LEAVITT:</p> <p>16 Q. You also own an entity named Bandin Real Estate,</p> <p>17 correct?</p> <p>18 MR. BRAR: Object to the form. I also</p> <p>19 instruct my client not answer to this question</p> <p>20 because it violates her rights under the Fifth</p> <p>21 Amendment or certain laws of her country and</p> <p>22 international conventions, I, therefore, instruct</p> <p>23 and advise my client not to answer this question.</p> <p>24 THE WITNESS: I refuse to answer that</p> <p>25 question based on the counsel of my lawyer and my</p>

105	<p>1 constitutional rights including those protected</p> <p>2 by the Fifth Amendment.</p> <p>3 BY MR. LEAVITT:</p> <p>4 Q. This was an entity that you created to receive</p> <p>5 funds unlawfully obtained from the state of Veracruz,</p> <p>6 correct?</p> <p>7 MR. BRAR: Object to the form. I also</p> <p>8 instruct my client not answer to this question</p> <p>9 because it violates her rights under the Fifth</p> <p>10 Amendment or certain laws of her country and</p> <p>11 international conventions, I, therefore, instruct</p> <p>12 and advise my client not to answer this question.</p> <p>13 THE WITNESS: I refuse to answer that</p> <p>14 question based on the counsel of my lawyer and my</p> <p>15 constitutional rights including those protected</p> <p>16 by the Fifth Amendment.</p> <p>17 BY MR. LEAVITT:</p> <p>18 Q. This entity did, in fact, receive funds</p> <p>19 unlawfully obtained from the state of Veracruz, correct?</p> <p>20 MR. BRAR: Object to the form. I also</p> <p>21 instruct my client not answer to this question</p> <p>22 because it violates her rights under the Fifth</p> <p>23 Amendment or certain laws of her country and</p> <p>24 international conventions, I, therefore, advise</p> <p>25 and instruct my client not to answer this</p>	107	<p>1 Amendment or certain laws of her country and</p> <p>2 international conventions, I, therefore, advise</p> <p>3 and instruct my client not to answer this</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 and my</p> <p>7 constitutional rights including those protected</p> <p>8 by the Fifth Amendment.</p> <p>9 BY MR. LEAVITT:</p> <p>10 Q. You also own an entity named Bull Business and</p> <p>11 Storage, LLC, correct?</p> <p>12 MR. BRAR: Object to the form. I also</p> <p>13 instruct my client not answer to this question</p> <p>14 because it violates her rights under the Fifth</p> <p>15 Amendment or rights of certain laws of her</p> <p>16 country and international conventions, I,</p> <p>17 therefore, instruct and advise my client not to</p> <p>18 answer this question.</p> <p>19 THE WITNESS: I refuse to answer that</p> <p>20 question based on the counsel of my lawyer and my</p> <p>21 constitutional rights including those protected</p> <p>22 by the Fifth Amendment.</p> <p>23 BY MR. LEAVITT:</p> <p>24 Q. This is an entity that you created to receive</p> <p>25 funds to unlawfully obtained from the state of Veracruz,</p>
106	<p>1 question.</p> <p>2 THE WITNESS: I refuse to answer that</p> <p>3 question based on the counsel of my lawyer and my</p> <p>4 constitutional rights including those protected</p> <p>5 by the Fifth Amendment.</p> <p>6 BY MR. LEAVITT:</p> <p>7 Q. And you were the one responsible for lawfully</p> <p>8 obtaining these funds from the state of Veracruz, correct?</p> <p>9 MR. BRAR: Object to the form. I also</p> <p>10 instruct my client not answer to this question</p> <p>11 because it violates her rights under the Fifth</p> <p>12 Amendment, international conventions or certain</p> <p>13 laws of her country, I, therefore, instruct and</p> <p>14 advise my client not to answer this question.</p> <p>15 THE WITNESS: I refuse to answer that</p> <p>16 question based on the counsel of my lawyer and my</p> <p>17 constitutional rights including those protected</p> <p>18 by the Fifth Amendment.</p> <p>19 BY MR. LEAVITT:</p> <p>20 Q. And this entity currently is in possession of</p> <p>21 funds unlawfully obtained from the state of Veracruz,</p> <p>22 correct?</p> <p>23 MR. BRAR: Object to the form. I also</p> <p>24 instruct my client not answer to this question</p> <p>25 because it violates her rights under the Fifth</p>	108	<p>1 correct?</p> <p>2 MR. BRAR: Object to the form. I also</p> <p>3 instruct my client not answer to this question</p> <p>4 because it violates her rights under the Fifth</p> <p>5 Amendment or certain laws of her country and</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 that</p> <p>10 question based on the counsel of my lawyer and 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 entity did in fact receive funds unlawfully</p> <p>15 obtained from the state of Veracruz, correct?</p> <p>16 MR. BRAR: Object to the form. I also</p> <p>17 instruct my client not answer to this question</p> <p>18 because it violates her rights under the Fifth</p> <p>19 Amendment or certain laws of her country and</p> <p>20 international conventions, I, therefore, instruct</p> <p>21 and advise my client not to answer this question.</p> <p>22 THE WITNESS: I refuse to answer that</p> <p>23 question based on the counsel of my lawyer and my</p> <p>24 constitutional rights including those protected</p> <p>25 by the Fifth Amendment.</p>

109	<p>1 (Reporter reads back last question.)</p> <p>2 BY MR. LEAVITT:</p> <p>3 Q. And you were responsible for unlawfully obtaining</p> <p>4 these funds from the state of Veracruz, correct?</p> <p>5 MR. BRAR: Object to the form. I also</p> <p>6 instruct my client not answer to this question</p> <p>7 because it violates her rights under the Fifth</p> <p>8 Amendment or certain laws of her country and</p> <p>9 international conventions, I, therefore, instruct</p> <p>10 and advise my client not to answer this question.</p> <p>11 THE WITNESS: I refuse to answer that</p> <p>12 question based on the counsel of my lawyer and my</p> <p>13 constitutional rights including those protected</p> <p>14 by the Fifth Amendment.</p> <p>15 BY MR. LEAVITT:</p> <p>16 Q. This entity is currently in possession of funds</p> <p>17 unlawfully obtained from the state of Veracruz, correct?</p> <p>18 MR. BRAR: Object to the form. I also</p> <p>19 instruct my client not answer to this question</p> <p>20 because it violates her rights under the Fifth</p> <p>21 Amendment or certain laws of her country and</p> <p>22 international conventions, I, therefore, instruct</p> <p>23 and advise my client not to answer this question.</p> <p>24 THE WITNESS: I refuse to answer that</p> <p>25 question based on the counsel of my lawyer and my</p>	111	<p>1 international conventions, I, therefore, instruct</p> <p>2 and advise my client not to answer.</p> <p>3 THE WITNESS: I refuse to answer that</p> <p>4 question based on the counsel of my lawyer and 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. What properties do you currently own in the</p> <p>9 United States?</p> <p>10 MR. BRAR: Object to the form. I also</p> <p>11 instruct my client not answer to this question</p> <p>12 because it violates her rights under the Fifth</p> <p>13 Amendment or certain laws of her country and</p> <p>14 international conventions, I, therefore, instruct</p> <p>15 and advise my client not to answer this question.</p> <p>16 THE WITNESS: I refuse to answer that</p> <p>17 question based on the counsel of my lawyer and 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. Other than the properties we have discussed</p> <p>22 today, what other properties do you own in the United</p> <p>23 States?</p> <p>24 MR. BRAR: Object to the form. I also</p> <p>25 instruct my client not answer to this question</p>
110	<p>1 constitutional rights including those protected</p> <p>2 by the Fifth Amendment.</p> <p>3 BY MR. LEAVITT:</p> <p>4 Q. Ma'am, and contained within 2, which is right in</p> <p>5 front of you, is a number of property ownership and</p> <p>6 corporate formation documents, and these documents</p> <p>7 demonstrate your ownership in the properties, we have</p> <p>8 discussed and the corporate entities we have discussed,</p> <p>9 correct?</p> <p>10 MR. BRAR: Object to the form. I also</p> <p>11 instruct my client not answer to this question</p> <p>12 because it violates her rights under the Fifth</p> <p>13 Amendment or certain laws of her country and</p> <p>14 international conventions, I, therefore, instruct</p> <p>15 and advise my client not to answer this question.</p> <p>16 THE WITNESS: I refuse to answer that</p> <p>17 question based on the counsel of my lawyer and 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. What properties, ma'am, do you currently own?</p> <p>22 MR. BRAR: Object to the form. I also</p> <p>23 instruct my client not answer to this question</p> <p>24 because it violates her rights under the Fifth</p> <p>25 Amendment or certain laws of her country and</p>	112	<p>1 because it violates her rights under the Fifth</p> <p>2 Amendment or certain laws of her country and</p> <p>3 international conventions, I, therefore, instruct</p> <p>4 and advise my 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 and my</p> <p>7 constitutional rights including those protected</p> <p>8 by the Fifth Amendment.</p> <p>9 BY MR. LEAVITT:</p> <p>10 Q. What entities you currently own or have control</p> <p>11 over?</p> <p>12 MR. BRAR: Object to the form. I also</p> <p>13 instruct my client not answer to this question</p> <p>14 because it violates her rights under the Fifth</p> <p>15 Amendment or certain laws of her country and</p> <p>16 international conventions, I, therefore, instruct</p> <p>17 her not to answer this question.</p> <p>18 THE WITNESS: I refuse to answer that</p> <p>19 question based on the counsel of my lawyer and my</p> <p>20 constitutional rights including those protected</p> <p>21 by the Fifth Amendment.</p> <p>22 BY MR. LEAVITT:</p> <p>23 Q. What corporate entities do you currently have</p> <p>24 control over or ownership of in the United States?</p> <p>25 MR. BRAR: Object to the form. I also</p>

113	<p>1 instruct my client not answer to this question                  2 because it violates her rights under the Fifth                  3 Amendment or certain laws of her country and                  4 international conventions, I, therefore, instruct                  5 and advise my client not to answer this question.                  6 THE WITNESS: I refuse to answer that                  7 question based on the counsel of my lawyer and my                  8 constitutional rights including those protected                  9 by the Fifth Amendment.                  10 BY MR. LEAVITT:                  11 Q. What corporate entities do you own or have                  12 control over that control real estate?                  13 MR. BRAR: Object to the form. I instruct                  14 my client not answer to this question because it                  15 violates her rights under the Fifth Amendment or                  16 certain laws of her country and international                  17 conventions, I, therefore, advise and instruct my                  18 client not to answer.                  19 THE WITNESS: I refuse to answer that                  20 question based on the counsel of my lawyer and my                  21 constitutional rights including those protected                  22 by the Fifth Amendment.                  23 BY MR. LEAVITT:                  24 Q. What bank accounts in the United States do you                  25 currently own or have control over?</p>	115	<p>1 currently own or have control over?                  2 MR. BRAR: Object to the form. I also                  3 instruct my client not answer to this question                  4 because it violates her rights under the Fifth                  5 Amendment or certain laws of her country and                  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 the counsel of my lawyer and my                  11 constitutional rights including those protected                  12 by the Fifth Amendment.                  13 BY MR. LEAVITT:                  14 Q. What banks financial or institutions did you                  15 transfer money to from Mexico?                  16 MR. BRAR: Object to the form. I also                  17 instruct my client not answer to this question                  18 because it violates her rights under the Fifth                  19 Amendment or certain laws of her country and                  20 international conventions, I, therefore, instruct                  21 and advise my client not to answer this question.                  22 THE WITNESS: I refuse to answer that                  23 question based on the counsel of my lawyer and my                  24 constitutional rights including those protected                  25 by the Fifth Amendment.</p>
114	<p>1 MR. BRAR: Object to the form. I also                  2 instruct my client not answer to this question                  3 because it violates her rights under the Fifth                  4 Amendment or certain laws of her country and                  5 international conventions, I, therefore, instruct                  6 my client not to answer this question.                  7 THE WITNESS: I refuse to answer that                  8 question based on the counsel of my lawyer and my                  9 constitutional rights including those protected                  10 by the Fifth Amendment.                  11 BY MR. LEAVITT:                  12 Q. What bank accounts do you own or have control                  13 over in Europe?                  14 MR. BRAR: Objection. Form. I also                  15 instruct my client not answer to this question                  16 because it violates her rights under the Fifth                  17 Amendment or certain laws of her country and                  18 international conventions, I, therefore, instruct                  19 and advise my client not to answer this question.                  20 THE WITNESS: I refuse to answer that                  21 question based on the counsel of my lawyer and my                  22 constitutional rights including those protected                  23 by the Fifth Amendment.                  24 BY MR. LEAVITT:                  25 Q. What trust funds or brokerage accounts do you</p>	116	<p>1 BY MR. LEAVITT:                  2 Q. Please provide information on each of the                  3 international bank accounts that you currently have.                  4 MR. BRAR: Object to the form. I also                  5 instruct my client not answer because it violates                  6 her rights under the Fifth Amendment or certain                  7 laws of her country and international                  8 conventions, I, therefore, instruct and advise my                  9 client not to answer this question.                  10 THE WITNESS: I refuse to answer that                  11 question based on the counsel of my lawyer and my                  12 constitutional rights including those protected                  13 by the Fifth Amendment.                  14 BY MR. LEAVITT:                  15 Q. Please provide the addresses for all the real                  16 estate you own in Europe.                  17 MR. BRAR: Object to the form. I also                  18 instruct my client not answer to this question                  19 because it violates her rights under the Fifth                  20 Amendment or certain laws of her country and                  21 international conventions, I, therefore, instruct                  22 and advise my client not to answer.                  23 THE WITNESS: I refuse to answer that                  24 question based on the counsel of my lawyer and my                  25 constitutional rights including those protected</p>

1 by the Fifth Amendment.  
 2 BY MR. LEAVITT:  
 3 Q. In front of you, ma'am, marked as Exhibit 3 is a  
 4 document the state of Veracruz outlining an investigation.  
 5 Please take a second to review. That document provides  
 6 that you're under investigation in the state of Veracruz  
 7 for unlawfully taking money that belong to the state of  
 8 Veracruz, correct?

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

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

19 BY MR. LEAVITT:  
 20 Q. The statements in Exhibit 3 are correct, aren't  
 21 they?

22 MR. BRAR: Object to the form. I also  
 23 instruct my client not answer based off it  
 24 violates her rights under the Fifth Amendment or  
 25 certain laws of her country and international

1 THE REPORTER: You wanted a rough and  
 2 fine. Did you want a --

3 MR. BRAR: I just want a final.  
 4 (Off-the-record discussion.)

5 THE VIDEOGRAPHER: This is the end of Media 3,  
 6 Volume 1 and the end of the video deposition of Monica  
 7 Babayan. Going off the record at 16:53 p.m. as  
 8 indicated on the video screen.

9 (Deposition concluded at 16:53 p.m.)

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

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

7 BY MR. LEAVITT:

8 Q. You have no reason to dispute any of the  
 9 statements in Exhibit 3, correct?

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

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

20 BY MR. LEAVITT:

21 Q. All right. Thank you, ma'am. Nice to meet you.

22 MR. LEAVITT: We reserve our questions.

23 THE VIDEOGRAPHER: Before we go off the  
 24 record, do you take any orders? Rachel has  
 25 the --

1 DEPOSITION ERRATA SHEET

2 PAGE NO. \_\_\_\_\_ LINE NO. \_\_\_\_\_ CHANGE TO: \_\_\_\_\_

3 \_\_\_\_\_

4 REASON FOR CHANGE: \_\_\_\_\_

5 PAGE NO. \_\_\_\_\_ LINE NO. \_\_\_\_\_ CHANGE TO: \_\_\_\_\_

6 \_\_\_\_\_

7 REASON FOR CHANGE: \_\_\_\_\_

8 PAGE NO. \_\_\_\_\_ LINE NO. \_\_\_\_\_ CHANGE TO: \_\_\_\_\_

9 \_\_\_\_\_

10 REASON FOR CHANGE: \_\_\_\_\_

11 PAGE NO. \_\_\_\_\_ LINE NO. \_\_\_\_\_ CHANGE TO: \_\_\_\_\_

12 \_\_\_\_\_

13 REASON FOR CHANGE: \_\_\_\_\_

14 PAGE NO. \_\_\_\_\_ LINE NO. \_\_\_\_\_ CHANGE TO: \_\_\_\_\_

15 \_\_\_\_\_

16 REASON FOR CHANGE: \_\_\_\_\_

17 PAGE NO. \_\_\_\_\_ LINE NO. \_\_\_\_\_ CHANGE TO: \_\_\_\_\_

18 \_\_\_\_\_

19 REASON FOR CHANGE: \_\_\_\_\_

20 PAGE NO. \_\_\_\_\_ LINE NO. \_\_\_\_\_ CHANGE TO: \_\_\_\_\_

21 \_\_\_\_\_

22 REASON FOR CHANGE: \_\_\_\_\_

23 PAGE NO. \_\_\_\_\_ LINE NO. \_\_\_\_\_ CHANGE TO: \_\_\_\_\_

24 \_\_\_\_\_

25 REASON FOR CHANGE: \_\_\_\_\_

1 DEPOSITION ERRATA SHEET  
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 22 REASON FOR CHANGE: \_\_\_\_\_  
 23 \_\_\_\_\_  
 24 SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_  
 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  
 23 Notary Public No: 962493  
 24 My Commission Expires: May 16, 2021  
 25

Unofficial Copy Office of Chris Daniel District Clerk