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CAUSE NO. 2018-06745	1 INDEX
FREE AND SOVEREIGN STATE OF) IN THE DISTRICT COURT OF	2 WITNESS: MONICA BABAYAN PAGE
VERACRUZ DE IGNANCIO DE LA)	3 Direct Examination by Mr. Leavitt 5
LLAVE,) 334 JUDICIAL DISTRICT	4
vs.)	5 ---
) HARRIS COUNTY, TEXAS	6 PLAINTIFF'S EXHIBITS
18 SHALLOWFORD PL., LLC)	7 ---
JAVIER DUARTE DE OCHOA, JOSE)	8 NUMBER DESCRIPTION PAGE
A. BANDIN, and MONICA BABAYAN,)	9
Defendants.)	10 (No exhibits marked.)
DEPOSITION OF MONICA BABAYAN	11
Taken on behalf of Plaintiff	12
* * *	13
August 7, 2018	14
Calle de Moratin, 53	15
28014, Madrid, Spain	16
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1 APPEARANCES:	1 MADRID, SPAIN, MONDAY, AUGUST 7, 2018
2 On behalf of the Plaintiff:	2 12:38 p.m.
3 CHRISTOPHER J. LEAVITT, ESQUIRE	3 * * *
4 THE BUZBEE LAW FIRM	4 THE VIDEOGRAPHER: Good afternoon. This
5 600 Travis Street	5 is the beginning of Media 1, Volume 1 in the
6 Suite 7300	6 video deposition of Monica Babayan being held at
7 Houston, Texas 77002	7 the office of Radisson Blu Prado, Plaza Plateria
8 (713)223-5393	8 de Martinez, 53, 28014, Madrid in Spain. This is
9 cleavitt@txattorneys.com	9 being taken on the 7th of August 2018 at
10 On behalf of the Defendant:	10 13:36 p.m. as indicated on the video screen.
11 JAS BRAR, ESQUIRE	11 This deposition is being taken in the matter of
12 FOGLER, BRAR, FORD, O'NEIL & GRAY, LLP	12 Free and Sovereign State Veracruz De Ignacio La
13 909 Fannin Street	13 Llave against 18 Shallowford Place, LLC, Javier
14 Suite 1640	14 Duarte De Ochoa, Jose Bandin and Monica Babayan.
15 Houston, Texas 77010	15 Case number 2018-06745 being heard before the
16 (713)481-1010	16 District Court of the 334th Judicial District,
17 fbfog@fbfog.com	17 Harris County, Texas.
18	18 The court reporter is Rachel McRoy of Ross
19	19 Reporting Services. My name is David Eros and
20	20 I'm the official videographer here also on behalf
21	21 of Ross Reporting Service standby interpreter is
22	22 Steven Carlin of Transatlantic Video Depositions.
23	23 Would counsel please introduce themselves and who
24	24 they represent?
25	25 MR. LEAVITT: Chris Leavitt for the



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	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	35	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
34	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	36	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?

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

53	<p>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</p>	55	<p>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</p>
54	<p>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</p>	56	<p>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</p>

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

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

<p style="text-align: right;">81</p> <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>	<p style="text-align: right;">83</p> <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>
<p style="text-align: right;">82</p> <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>	<p style="text-align: right;">84</p> <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>

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>

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

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

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:

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: _____
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 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
 2 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____
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 4 REASON FOR CHANGE: _____
 5 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____
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 7 REASON FOR CHANGE: _____
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 19 REASON FOR CHANGE: _____
 20 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____
 21 _____
 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 _____
 23 Rachel Mcroy
 24 Notary Public No: 962493
 25 My Commission Expires: May 16, 2021

Unofficial Copy Office of Chris Daniel District Clerk