

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR MIAMI-
DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO. 2018-005132-CA-01 (CA 21)

FREE AND SOVEREIGN STATE OF
VERACRUZ DE IGNACIO DE LA LLAVE,
Plaintiff,

v.

ACE REALTY HOLDINGS, LLC, JAVIER
DUARTE, ANA MARIA VELASQUEZ, NEXXOS
REALTY, LLC, INAKI NEGRETE
and VULCAN DYNAMIC REALTY FUND, LP,

Defendants.

**PLAINTIFF'S RESPONSE TO DEFENDANT JAVIER DUARTE'S
MOTION TO DISMISS COMPLAINT, OR, IN THE ALTERNATIVE
TO STRIKE PLAINTIFF'S CLAIM FOR PUNITIVE DAMAGES**

TO THIS HONORABLE COURT:

Plaintiff, the Free and Sovereign State of Veracruz De Ignacio De La Llave ("Veracruz"), files this Response to Defendant Javier Duarte's Motion To Dismiss Complaint and respectfully shows this Honorable Court the following:

I.

INTRODUCTION

Defendant Javier Duarte De Ochoa was the governor of the Mexican state of Veracruz from 2010 until 2016.¹ His time as governor was marked by multiple controversies, including the deaths of multiple journalists (17 in total) and reports of rampant corruption.² In fact, the international association *Reporters Without Borders* named Veracruz as one of the ten most

¹ See Exhibit A, Exhibits B-J.

² See Exhibit D, Indictment

dangerous places on earth to be a journalist. The corruption in Gov. Duarte's administration also reached dizzying heights.³ Mr. Duarte orchestrated a scheme in which hundreds of millions of dollars earmarked for social programs were diverted to an elaborate network of phantom companies – among other misdeeds.⁴ Indeed, he is alleged to have absconded with nearly \$3 billion of his state's money. This stolen money was used to make investments and purchase luxury homes and cars all over the United States. As the allegations against him grew, Mr. Duarte eventually fled Veracruz, and then Mexico. Mr. Duarte was later indicted, and then arrested in Guatemala as a fugitive. He was ultimately extradited to Mexico, where he is currently jailed.

The money used to purchase the property Duarte rightfully belong to the people of the State of Veracruz. The State thus files this and other actions in an effort to recoup those funds and to seek to recover assets purchased with such stolen funds.

II.

ARGUMENTS & AUTHORITIES

A. Service of Process was proper

Defendant objects to the sufficiency of service of process upon Defendant Javier Duarte as untimely under Florida Rule of Civil Procedure 1.070(j) because service has not been effectuated within 120 days after the filing of Plaintiff's complaint. Plaintiff has undertaken all available steps in which to serve notice on the Duarte.⁵ While Defendant accurately states the standard contained in Rule 1.070(j), he neglects to mention that the rule also contains an exception for good cause. Further Defendant contends that service is untimely despite Florida Statue 48.194(1) clearly stating, "[s]ervice of process on persons outside the United States may

³ See Exhibit A, Exhibits B-J.

⁴ See *Id.*

⁵ See Exhibits B and J.

be required to conform to the provisions of the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters.” Florida Rule of Civil Procedure 1.070(j) and Statute 48.194(1) seem to recognize that the timeliness of foreign service is often out of the plaintiff’s control and is typically a much more complex endeavor than serving process on a Defendant within the United States.

In addition to the explicit and plain meaning interpretations of Rule 1.070(j) and Statute 48.194(1) themselves, there is a wide and consistent body of case law that unequivocally establishes that the 120-day limit does not always apply in scenarios such as this one and others in which good cause is shown. The Florida Third District Court of Appeal has previously opined, “[i]n Florida, the Hague Convention applies in all cases where there is occasion to transmit a judicial or extrajudicial document for service abroad.” *Grupo Radio S.A.B. de C.V. v. Am. Merch. Banking Grp., Inc.*, 71 So. 3d 151, 151 (Fla. 3d DCA 2011). As Mr. Duarte was residing in a prison in Mexico at the time service of process was initiated, this is such an occasion to warrant good cause. The timing of service of process is completely out of Plaintiff’s hands once the summons is in the hands of the Mexican Central Authority. That process can take months. Under the Hague Convention, alternative methods of service aside from sending service through the Central Authority may be available through Article 10(a) provided that the country of destination does not object. However, Mexico does indeed object to Article 10 of The Hague Convention, thus rendering the Mexican Central Authority as an absolutely necessary party to service of process on a Mexico-based Defendant by an American-based Plaintiff and leaving plaintiff reliant on the Central Authority’s timeliness in all such matters.

In *Volkswagen v. Schlunk*, 486 U.S. 694 (1988), Justice O’Connor wrote for a unanimous court that, where the Hague Convention applies, its guidelines and strictures must be followed.

The Hague Service Convention does not impose an obligatory timeframe, but service times for Mexican defendants generally take at least six to eight (6-8) months, and sometimes much longer. <https://www.haguelawblog.com/2017/02/serve-process-mexico/>. Plaintiff had no choice but to serve process through Mexico's Central Authority and comply with any other mandatory stipulations in regard to serving process on this Defendant based in Mexico. Although Florida courts have not directly defined "good cause" in the context of Rule 1.070(j), a Florida court found that there was good case sufficient to withstand a motion to dismiss in a similar case where it took more than 120 days after the filing of the complaint to serve a defendant in Israel through the Hague Convention. *Arison v. Offer*, 669 So. 2d 1128, 1128 (Fla. 4th DCA 1996). For these reasons, service of process has been effectuated properly and Defendant's contentions regarding this issue are not sufficient to constitute grounds for dismissal.

B. The Court has personal jurisdiction over Mr. Duarte

"In Florida, the appropriateness of exercising personal jurisdiction over a nonresident defendant involves a two-part inquiry." *Banco de los Trabajadores v. Cortez Moreno*, 237 So.3d 1127, 1132 (Fla. 3d DCA 2018). That inquiry requires the Court to "first determine whether sufficient jurisdictional facts exist to bring the action within the ambit of Florida's long-arm statute (Section 48.193), and then it must determine whether the foreign [defendant] possesses sufficient 'minimum contacts' with Florida to satisfy federal constitutional due process requirements." *Id.* (citing *Reynolds Am., Inc. v. Gero*, 56 So. 3d 117, 119 (Fla. 3d DCA 2011)).

Therefore, the Court's first determination looks to "whether the complaint's allegations are sufficient to bring the action within the ambit of Florida's long-arm statute." *Id.* "If the allegations are sufficient, the burden then shifts to the defendant to contest, via affidavit or other sworn proof, the jurisdictional allegations or whether sufficient minimum contacts exist." *Id.*

There is a basis for specific personal jurisdiction.

In order to establish specific personal jurisdiction under Florida's long-arm statute, a plaintiff must allege that its cause of action arose from one of the acts specified in Florida Statute 48.193(1)(a).

Indeed, "specific jurisdiction expressly require[s] allegations both: (i) that the defendant does one of the enumerated acts within Florida, and (ii) that the plaintiff's cause of action 'arise from' one of the enumerated acts occurring in Florida. *Banco de los Trabajadores*, 237 So. 3d at 1135.

For one, Plaintiff's complaint alleges that Mr. Duarte committed conversion and Florida courts have consistently held conversion to be a tortious act, as is enumerated in 48.193(1)(a). See *Aero Int'l Corp. v. Fla. Nat'l Bank*, 437 So. 2d 156, 159 (Fla. 3d DCA 1983), *Alex Hofrichter, P.A. v. Zuckerman & Venditti, P.A.*, 710 So. 2d 127 (Fla. 3d DCA 1998), and *Int'l Mail Order, Inc. v. Cap. Nat'l Bank*, 192 So. 2d 287 (Fla. 3d DCA 1966). The same remains true for a civil conspiracy cause of action, "As for the count of civil conspiracy, we conclude it is viable, based either on the underlying tortious interference count or as an independent tort." *Walters v. Blankenship*, 931 So. 2d 137, 140 (Fla. 5th DCA 2006), see *Walter Lorenz Surgical, Inc. v. Teague*, 721 So. 2d 358, 360 (Fla. 1st DCA 1998). Florida's Third District Court of Appeal has held elements of a claim for civil conspiracy consist of "(a) an agreement between two or more parties, (b) to do an unlawful act or do a lawful act by unlawful means, (c) the doing of some overt act in pursuance of the conspiracy, and (d) damage to plaintiff as a result of the acts done under the conspiracy." *Charles v. Fla. Foreclosure Placement Ctr., LLC*, 988 So. 2d 1157 (Fla. 3d DCA 2008), *Id.* at 1159-60 (quoting *Raimi v. Furlong*, 702 So. 2d 1273, 1284 (Fla. 3d DCA 1997)). Money obtained through illicit conversion was moved to Florida by Defendant for the purpose of purchasing land in Florida. This would not have been possible without a

meeting of the minds between Mr. Duarte and co-defendants. When the money reached Florida, it was used to purchase the in rem properties listed in Plaintiff's Original Complaint.⁶ Thus, an overt act in pursuance of the conspiracy was carried out in Florida. Put simply, Defendant carried out a civil conspiracy in Florida and Plaintiff's cause of action could have not arose without the specific acts and omissions committed by Mr. Duarte in Florida. On the plain face of Plaintiff's compliant, it is clear that in agreeing with co-defendants to steal money from the State of Veracruz and use it to purchase properties throughout Florida that Defendant has subjected itself to personal specific jurisdiction in Florida. In purchasing these properties, Defendant has clearly purposefully availed itself of the benefits of Florida sufficient to establish personal jurisdiction.

Further, Plaintiff proceeds with in rem claims against the wrongfully obtained properties themselves. In purchasing these properties, Defendant has clearly purposefully availed itself of the benefits of Florida sufficient to establish personal jurisdiction.⁷

C. Plaintiff's Complaint Makes Distinct and Specific Allegations as to each Defendant.

While the authority that Defendant cites does effectively establish that causes of action cannot be commingled in such a manner where it is impossible to tell which claims are being brought against which defendants, that is not an issue that pervades Plaintiff's complaint. Paragraphs one through three of Plaintiff's Complaint clearly outline the unique role of Mr. Duarte in committing the acts and omissions that led to the claims brought by Plaintiff.⁸ Plaintiff pleads, "Mr. Duarte orchestrated a scheme in which hundreds of millions of dollars earmarked for social programs were diverted to an elaborate network of phantom companies... this stolen

⁶ Ex. A, Plaintiff's Original Complaint

⁷ Ex. A, *Id.*

⁸ Ex. A, *Id.*

money was used to make investments and purchase luxury homes and cars in the United States.”⁹

Plaintiff goes on to distinguish the role of co-defendants from that of Mr. Duarte, writing “each of the Defendants named conspired with Javier Duarte to steal government funds from the State of Veracruz”, “Duarte, together with the other Defendants, conspired with Duarte and his associates to steal and embezzle, and commit fraud on Plaintiff”, and “the money stolen by Duarte rightfully belonged to the people of the State of Veracruz.”¹⁰ Plaintiff goes to great lengths to distinguish Mr. Duarte’s unique role from that of co-Defendants in pertaining to the claims that it brings. In seeking dismissal on these grounds, Defendant Javier Duarte is taking a grand leap and making conclusory allegations without illustrating how Plaintiff has wrongfully grouped Defendants together in the context of Plaintiff’s complaint.

D. Plaintiff’s allegations are not overly vague

Defendant argues that Plaintiff’s claims alleging fraud are improper in that they are not plead with sufficient particularity to identify the actions and omissions committed by Defendant to establish the time, place, and manner that Defendant’s violations were made. Additionally, Defendant states that Plaintiff makes conclusory allegations, and internally inconsistent factual claims and summarizes Plaintiff’s Complaint as “consisting of a mere list of properties that Mr. Duarte does not own, fails to state any cognizable causes of action nor does it do anything more than a handful of conclusory statements posing as factual allegations.” Defendant’s contentions can only be described as extremely outlandish in this regard, selectively incorporating bits and pieces of Plaintiff’s Complaint while excluding others. Plaintiff’s Complaint firmly establishes that Mr. Duarte “orchestrated a scheme in which hundreds of millions of dollars earmarked for

⁹ Ex. A, *Id.*

¹⁰ Ex. A, *Id.*

social programs were diverted to an elaborate network of phantom companies”, “the stolen money was used to make investments and purchase luxury homes and cars all over the United States”, “the money stolen by Duarte rightfully belonged to the people of the State of Veracruz”, and that “each of the Defendants named conspired with Javier Duarte to steal government funds from the State of Veracruz”.¹¹ Such pleadings along with details of the actions of other entities that were cooperative in perpetuating Mr. Duarte’s scheme and a list of the addresses of specific properties that were purchased through the use of the illegally-acquired funds merge to form sufficiently plead causes of actions.

“Regarding the sufficiency of the pleadings in a complaint, it has been written that "while it is not sufficient to allege conclusions alone, 'conclusions are not objectionable if they are supported by sufficient allegations of ultimate facts.'" *Steigman v. Danese*, 502 So. 2d 463, 465 (Fla. 1st DCA 1987) (quoting Trawick, Fla. Prac. and Proc. § 6-6 (1985)); *see also Cady v. Chevy Chase Sav. & Loan, Inc.*, 528 So. 2d 136, 138 (Fla. 4th DCA 1988) ("Certainty is required when pleading . . . , and pleading conclusions of law unsupported by allegations of ultimate fact is legally insufficient." *Jaffer v. Chase Home Fin., LLC*, 155 So. 3d 1199, 1206 (Fla. 4th DCA 2015). Here Plaintiff ultimately backed up each of the conclusions it reached in asserting its causes of actions with substantive allegations of ultimate fact. Defendant’s assertion that Plaintiff’s complaint is overly vague to the extent of being an insufficient pleading does not have any support after the facts in Plaintiff’s complaint are considered as a whole.

Plaintiff also satisfies the heightened pleading requirement by successfully laying out the manner in which the fraud perpetuated by Mr. Duarte was carried out. Plaintiff’s Complaint alleges that this fraud was carried out from 2010 until 2016 by way of illicit conversion and a conspiracy between Mr. Duarte and co-Defendants. This fraud was furthered by Duarte’s actions

¹¹ Also See Exhibit C, D, E, F, G, H, I, and J.

in both Mexico and Florida through the purchase of real estate. It cannot be said that Plaintiff's allegations are overly vague when Plaintiff specifically identifies misrepresentations made by Duarte (stealing government funds for a purpose they were not intended for) as well as the time, place, and manner in which such misrepresentations were made. For these reasons, Defendant's argument fails.

E. Plaintiff's constructive trust claim is a cause of action

Florida cases conflict as to whether a constructive trust is a separate cause of action or a remedy. For instance, Fourth District and Southern District of Florida hold that a constructive trust is a separate cause of action, *See Abele v. Sawyer*, 750 So. 2d 70 (Fla. 4th DCA 1999); *Arral Industries, Inc. v. Touch Entertainment, Inc.*, 2000 U.S. Dist. LEXIS 2306 (S.D. Fla. 2000); and *Hugo Bernardele & Gelway SA v. Bonorino*, 608 F. Supp. 2d 1313 (S. D. Fla. 2009). Many cases in the Third Circuit refer to constructive trusts as a cause of action. *Staples v. Battisti*, 191 So. 2d 583 (Fla. 3d DCA 1966), *McIntosh v. Harbour Club Villas Condo. Ass'n*, 468 So. 2d 1075 (Fla. 3d DCA 1985), and *Evans v. Wall*, 542 So. 2d 1055 (Fla. 3d DCA 1989). Therefore, Plaintiff's constructive trust claim should be classified as a cause of action rather than a remedy as there is precedent within the Third Circuit of such.

F. Plaintiff's Civil Conspiracy Claim must be maintained

Once again, Defendant takes issue with Plaintiff's complaint in a manner that begs the question if Defendant ever read Plaintiff's complaint. As previously stated, Florida's Third District Court of Appeal has held that the elements of a claim for civil conspiracy consist of "(a) an agreement between two or more parties, (b) to do an unlawful act or do a lawful act by unlawful means, (c) the doing of some overt act in pursuance of the conspiracy, and (d) damage to plaintiff as a result of the acts done under the conspiracy." *Charles v. Fla. Foreclosure*

Placement Ctr., LLC, 988 So. 2d 1157 (Fla. 3d DCA 2008), *Id.* at 1159-60 (quoting *Raimi v. Furlong*, 702 So. 2d 1273, 1284 (Fla. 3d DCA 1997)). Thus, a cause of action for civil conspiracy exists... only if “the basis for the conspiracy is an independent wrong or tort which would constitute a cause of action if the wrong were done by one person. *Id.*”

Here, Plaintiff’s civil conspiracy claim meets each of the elements of the cause of action as defined by the Third District Court of Appeal. First, Plaintiff’s complaint clearly establishes that Mr. Duarte had an agreement with co-defendants to commit fraud and purchase property in Florida. In pleading that “each of the Defendants conspired with Javier Duarte to steal government funds from the State of Veracruz”, “that Duarte, together with the other Defendants, conspired with the Duarte and his associates to steal and embezzle, and to commit fraud on Plaintiff”, and that “Duarte and the other defendants had a meeting of the minds on this objective and... together, made one or more unlawful overt acts towards this objective”, Plaintiff has shown that there was an agreement by two or more parties to commit an unlawful act by unlawful means. As is obvious on the face of Plaintiff’s pleading, purchasing properties with stolen funds is an overt act done in furtherance of conversion, and the State of Veracruz suffered damages in the form of \$3 billion stolen from government funds. Fraud is undoubtedly an unlawful act if carried out solely by one individual so a conspiracy to commit fraud by way of agreement between multiple parties is certainly possible, as Plaintiff alleges in its Complaint. In seeking to have Plaintiff’s civil conspiracy claim dismissed and alleging that Plaintiff’s pleading is somehow sufficient, Defendant is completely misconstruing Plaintiff’s cause of action, once again selectively referring to only certain parts of Plaintiff’s complaint.

G. Plaintiff does not make a civil theft claim.

Florida Rule 1.110(b) states that “[a] pleading which sets forth a claim for relief, whether an original claim, counterclaim, crossclaim, or third-party claim must state a cause of action and shall contain (1) a short and plain statement of the grounds upon which the court's jurisdiction depends, unless the court already has jurisdiction and the claim needs no new grounds of jurisdiction to support it, (2) a short and plain statement of the ultimate facts showing that the pleader is entitled to relief, and (3) a demand for judgment for the relief to which the pleader deems himself or herself entitled.” Here, Plaintiff does not make a claim for civil theft on the face of its Complaint. Thus, it is not necessary to dismiss a claim that Plaintiff has never made.

E. Plaintiff’s request for punitive damages is not premature and should be allowed to proceed.

“If an award of punitive damages may be supported under any view of the evidence taking all inferences most favorable to the plaintiff, a jury issue is made and whether to award such damages is rightly decided by the jury and not by the court.” *Johns-Manville v. Jansens*, 463 So.2d at 242, 247 (Fla. 1st DCA 1984). Florida Statute 768.72 establishes that “[i]n any civil action, no claim for punitive damages shall be permitted unless there is a reasonable showing by evidence in the record or proffered by the claimant which would provide a reasonable basis for recovery of such damages. The claimant may move to amend her or his complaint to assert a claim for punitive damages as allowed by the rules of civil procedure.” Here, Plaintiff has made a reasonable showing that it is entitled to punitives as Defendant had actual knowledge of the wrongfulness of the conduct, and acted with knowledge, and intentionally pursued the actions which Plaintiff complain.¹² Duarte is currently in prison as a result of his wrongdoings and the

¹² See Exhibits A-J.

process server is seeking service in the Mexican prison.¹³ Service has been delayed as a result. Plaintiff provided evidence of the properties purchased in Florida that are the subject of this lawsuit, and the related criminal investigations related to the Defendant Duarte and his cohorts. Defendant is entitled to file a motion to bifurcate the determination of the amount of punitive damages from the remaining issues at trial. *W.R. Grace & Co.-Conn v. Waters*, 638 So.2d 502 (Fla. 1994). Alternatively, Plaintiff, requests this claim be dismissed without prejudice for leave to amend after further discovery is conducted.

III. CONCLUSION

WHEREFORE, for the foregoing reasons, Plaintiff prays that Defendant Javier Duarte's Motion to Dismiss to Dismiss Complaint, or, in the Alternative to Strike Plaintiff's Claim for Punitive Damages be denied and that Plaintiff have all other and further relieve to which it may be entitled.

Respectfully Submitted,

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¹³ See Exhibit B.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document has been duly served on all known counsel of record and pro se parties in accordance with the Florida Rules of Civil Procedure on January 18, 2019 as set forth below:

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Duarte's administration also reached dizzying heights. Mr. Duarte orchestrated a scheme in which hundreds of millions of dollars earmarked for social programs were diverted to an elaborate network of phantom companies – among other misdeeds. Indeed, he is alleged to have absconded with nearly \$3 billion of his state's money. This stolen money was used to make investments and purchase luxury homes and cars all over the United States. As the allegations against him grew, Mr. Duarte eventually fled Veracruz, and then Mexico. Mr. Duarte was later indicted, and then arrested in Guatemala as a fugitive. He was ultimately extradited to Mexico, where he is currently jailed.

2. The money stolen by Duarte rightfully belong to the people of the State of Veracruz. The State thus files this and other actions in an effort to recoup those funds stolen by Duarte and those acting in concert with him. Veracruz also seeks to recover assets purchased with such stolen funds.

3. Each of the Defendants named conspired with Javier Duarte to steal government funds from the State of Veracruz. The property listed *in rem* is just a single example of those purchased with stolen funds all across the United States and the world.

I.
Parties

4. Plaintiff Veracruz is a foreign state entity of Mexico.

5. Defendant Ace Realty Holdings, LLC, is a domestic limited liability company residing in Florida. This company can be served via personal service via its registered agent, INCORPORATING SERVICES, LTD, at 3500 S DUPONT HWY, DOVER, Kent, DE, 19901.

6. Defendant Javier Duarte is a foreign individual that will be served via the Hague Convention. He is currently jailed in Veracruz.

7. Defendant Ana Maria Velasquez is an individual residing in Florida. She may be served with personal service at 1000 Brickell Avenue # 640, Miami, FL 33131, or wherever she may be found.

8. Defendant Nexxos Realty, LLC, is a domestic limited liability company residing in Florida. This company can be served via personal service via its managing member, Ana Maria Velasquez, at 1000 Brickell Avenue # 640, Miami, FL 33131.

9. Defendant Inaki Negrete is an individual residing in Florida. He may be served with personal service at 175 SW 7th Street, Suite 1107, Miami, Florida 33131, or wherever he may be found.

10. Defendant Vulcan Dynamic Realty Fund, LP, is a domestic limited partnership residing in Florida. This company can be served via personal service via its executive officer, Inaki Negrete, at 175 SW 7th Street, Suite 1107, Miami, Florida 33131, or wherever he may be found.

In Rem Parties

11. Plaintiff makes claims against the following properties *in rem*.

12. 277 Marinero Court is a property in Coral Gables, Florida; its record owner is Ace Realty Holdings, LLC. The funds used to purchase this property were stolen from Veracruz.

13. 10550 NE 2 PL is a property in Miami Shores, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

14. 10770 NW 66 ST #511 is a property in Doral, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

15. 10800 NW 82 TER, UNIT 10-6, is a property in Doral, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

16. 1201 N LIBERTY AVE UNIT: 1201G, is a property in Homestead, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

17. 12170 SW 216 ST is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

18. 12225 N MIAMI AVE, is a property in North Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

19. 13606 NW 10 TER is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

20. 1490 NW 58 TER is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

21. 15120 JACKSON ST. is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

22. 17800 SW 113 CT is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

23. 19600 NE 18 PL is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

24. 2012 SAN REMO CIR is a property in Homestead, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

25. 20200 NE 14 AVE is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

26. 20901 SW 121 AVE is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

27. 21034 NE 34 CT is a property in Aventura, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

28. 21725 SW 120 AVE is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

29. 220 NE 45 ST is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

30. 2330 NW 11 ST. UNIT: 27 is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

31. 2353 SE 12 CT UNIT: 224 is a property in Homestead, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

32. 24987 SW 128 CT is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

33. 25000 SW 122 CT is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

34. 26650 SW 132 AVE is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

35. 2710 W 60 PL UNIT: 106 is a property in Hialeah, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

36. 2811 NW 100 ST is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

37. 2895 NW 45 ST is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

38. 3039 NW 54 ST is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

39. 3122 NW 43 ST is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

40. 368 NE 174 ST is a property in North Miami Beach, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

41. 390 NE 163 ST is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

42. 433 NW 14 ST is a property in Florida City, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

43. 4850 NW 102 AVE UNIT 104-9 is a property in Dorai, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

44. 487 NW 15 ST is a property in Florida City, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

45. 520 NW 3 AVE is a property in Homestead, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

46. 5775 SW 35 ST is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

47. 5852 SW 33 ST is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

48. 864 SW 7 PLZ is a property in Florida City, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

49. 875 SW 1 ST is a property in Florida City, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

50. 9855 MARLIN RD is a property in Cutler Bay, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

51. 20100 HIGHLAND LAKES BLVD is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

52. 20200 NE 14 AVE is a property in Miami, Florida; its record owner is Vulcan Dynamic Realty Fund, LP. The funds used to purchase this property were stolen from Veracruz.

II. Venue and Jurisdiction

53. Plaintiff seeks damages in excess of \$75,000.00, exclusive of interest and costs; however, federal courts lack subject matter over this action, as there is no federal question and there is incomplete diversity of citizenship due to the presence of a defendant who is a resident and citizen of Florida. Removal would thus be improper. No party is asserting any claims arising under the Constitution, treaties, or laws of the United States. Venue is proper in this County as at least one Defendant maintains a principal office here and most of the properties involved are here.

III.
Causes of Action

Conversion – All Defendants

54. Plaintiff incorporates the preceding paragraphs of this Petition as if set forth fully below.

55. Plaintiff owned, possessed, and had the right to the funds that were stolen by Javier Duarte and his network to invest into the above referenced assets. These funds were the property of State of Veracruz. Defendants are currently wrongfully exercising control over this property.

56. Plaintiff has suffered injury because of these actions.

Constructive Trust – All Defendants

57. Plaintiff incorporates the preceding paragraphs of this Petition as if set forth fully below. Plaintiff seeks a constructive trust over Mr. Duarte and his associates' interest in the subject properties. Mr. Duarte and his associates conspired together and looted government coffers and engaged in other graft that stole money from the State of Veracruz. Mr. Duarte and his associates took those funds and invested into the above referenced assets, among other things. Mr. Duarte had a fiduciary relationship with the State of Veracruz. More importantly, Mr. Duarte and his associates committed both actual and constructive fraud in obtaining these funds. These funds were then used to invest in properties in Florida.

Civil Conspiracy – All Defendants

58. Plaintiffs would show that Duarte, together with the other Defendants, conspired with Duarte and his associates to steal and embezzle, and to commit fraud on Plaintiff. The purpose of the conspiracy was move as much money as possible from the

State of Veracruz to the United States and purchase real estate for the benefit of Mr. Duarte and his family. Duarte and the other defendants had a meeting of the minds on this objective and, as shown in detail above, together, made one or more unlawful and overt acts towards this objective. As a result, Plaintiff suffered damages. Plaintiff also seeks punitive damages.

Joint and Several Liability – All Defendants

59. Duarte and the other defendants are joint and severally liable for all acts of Duarte and his associates, the conspirators as referenced above. Duarte and the other defendants planned and assisted in this conspiracy, and, as such, they are jointly and severally liable for all acts done by any member of the conspiracy in furtherance of such.

Florida Penal Code 812.014 – All Defendants

61. The previous paragraphs are incorporated herein. Defendants unlawfully appropriated property with intent to deprive the owner, the State of Veracruz, of its property. Defendants did not have the effective consent of the State of Veracruz. Additionally, the property at issue is stolen and the various actors appropriated the property knowing it was stolen by another.

**IV.
Damages**

62. As a direct and proximate result of the foregoing events, Veracruz suffered damages in the form of stolen funds, all for which Plaintiff seeks recovery herein.

V.
Exemplary Damages

63. Plaintiff seeks to recover exemplary damages against all Defendants based on their criminal conduct and resulting injuries and damages made the basis of this suit. Any caps or limits on punitive damages should not be applied because Defendants' conduct and violations of the Penal Code, including 812.014, disqualifies them from the benefit of any caps.

VI.
Demand for Jury

64. Plaintiff demands a jury trial and has tendered the appropriate fee.

VII.
Prayer

65. For these reasons, Plaintiff asks that Defendants be cited to appear and answer, and that they have judgment against Defendants for the following:

- a. Actual damages within the jurisdictional limits of this Court, but no less than \$25,000,000;
- b. Exemplary damages;
- c. Court costs;
- d. Pre and post judgment interest; and
- e. All other relief to which the Plaintiff is justly entitled.

Dated: February 19, 2018.

Respectfully Submitted,

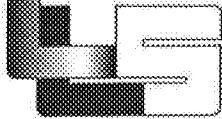
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Attorney for Plaintiffs
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By: /s/Anthony G. Buzbee, Esq.
State Bar No: 24001820
Christopher J. Leavitt
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LEGAL LANGUAGE SERVICES



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Telefax (913) 341-3168
www.legallanguage.com

August 23, 2018

Gordon Hanna
COURT RECORD RESEARCH, INC
130 Quitman Street,
Houston, TX 77009

*RE: Free and Sovereign State of Veracruz de Ignacio De La LLave v. Ace Realty Holdings LLC, et al.
International Service of Process in Mexico upon: Javier Duarte*

Dear Mr. Hanna:

I would like to inform you that the Central Authority for Mexico received your Hague Request for the above-mentioned case on August 22, 2018.

Currently, it takes about 6-12 months before proof of service is returned to the applicant. If you wish, for an additional fee, LLS can provide periodic follow up with the Central Authority and report to you on your case's progress. Such reports normally commence 6-8 weeks after the request is filed with the foreign authority.

Once service has been effected, the Certificate on page two will be completed by the Spanish authorities and returned to LLS, along with a copy of all original documents forming a part of the Request. Proof of service will be in Spanish. LLS will provide you with a bid letter for translation and certification of the proof of service. Please note, the entire packet of documents, including the final translation, is submitted to the court as proof of service.

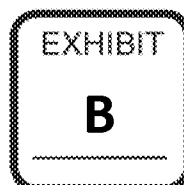
If you have any questions or concerns, please feel free to contact our office. It has been a pleasure working with you.

Sincerely,

LEGAL LANGUAGE SERVICES
A Division of ALS International, Inc.

Vicki Portuguez
International Litigation Support Services

MVP/jh



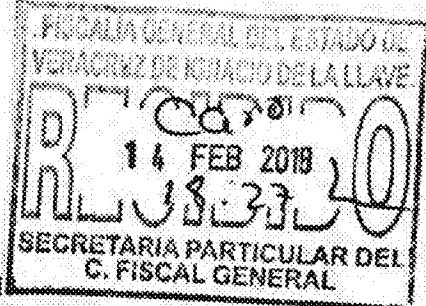
4/0086



SEGOB
ESTADO DE VERACRUZ

VER Gobierno
SECRETARÍA DE GOBIERNO

001948



SG-DGJ/0474/02/2018
Xalapa de Enríquez, Veracruz
14 de febrero de 2018

LIC. JORGE WINCKLER ORTIZ
FISCAL GENERAL DEL ESTADO DE VERACRUZ.
PRESENTE.

El que suscribe LIC. ROGELIO FRANCO CASTÁN, Secretario de Gobierno del Estado de Veracruz, con fundamento en el artículo 32 fracción II del Reglamento Interior de la Secretaría de Gobierno, vengo a solicitar información respecto a denuncias presentadas en contra ciudadanos que hayan participado en actos de corrupción, en relación con ex servidores público de la administración estatal anterior, cuyos nombres son los siguientes:

- 1.- John Castro.
- 2.- Javier Braun Burillo.
- 3.- Emilio Braun Burillo.
- 4.- Marcell Felipe.
- 5.- Ana Castillo.
- 6.- Monica M. Tubilla.
- 7.- José Antonio Bandin.
- 8.- Mónica Babayan.
- 9.- José Mansur Jr.
- 10.- Jaime Reverte.
- 11.- Julio Antimo.
- 12.- Iñaki Negrete.

La misma deberá estar descrita en los siguientes términos:

Carpeta de Investigación	Nombre del Denunciado (s)	Hechos (brevemente)	Denunciante (s)	Monto (s)	Estado que guarda.
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Dada la importancia de la información, solicito respetuosamente que la misma se nos entregue a la brevedad posible.

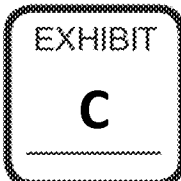
Sin otro particular reciba un cordial saludo.

ATENTAMENTE

LIC. ROGELIO FRANCO CASTÁN.
SECRETARIO DE GOBIERNO

C.c.p. Archivo y minutería:
RFCIAGC

Av. Enriquez s/n, Zona Centro
C.P. 91000 Xalapa, Veracruz
T. 01 226 841 74 00
SSGOBVER.gob.mx



Acuse



SEGOB
ESTADO DE VERACRUZ

VER Gobierno
SECRETARÍA DE GOBIERNO



SG-DGJ/0473/02/2018
Xalapa de Enríquez, Veracruz
14 de febrero de 2018

LIC. JORGE WINCKLER ORTIZ
FISCAL GENERAL DEL ESTADO DE VERACRUZ.
PRESENTE.

Por instrucciones del LIC. ROGELIO FRANCO CASTÁN, Secretario de Gobierno del Estado de Veracruz, con fundamento en el artículo 32 fracción II del Reglamento Interior de la Secretaría de Gobierno, vengo a solicitar información respecto a denuncias presentadas en contra del representante legal y/o administrador único de las empresas denominadas "fastasmas", así como de los ex servidores públicos que participaron en la contratación de la mismas, las cuales son las siguientes:

- a) CERENE S.A. DE C.V.
- b) INMOBILIARIA MANSUR S.A DE C.V.
- c) M2 CÓRDOBA, S.A DE C.V.
- d) DARAHOUIM S.A. DE C.V.
- e) M1 MÉXICO S.A. DE C.V.

La misma deberá estar descrita en los siguientes términos:

Carpeta de Investigación	Nombre del Denunciado (s)	Hechos (brevemente)	Denunciante (s)	Monto (s)	Estado que guarda.
--------------------------	---------------------------	---------------------	-----------------	-----------	--------------------

Dada la importancia de la información, solicito respetuosamente que la misma se nos entregue a la brevedad posible.

Sin otro particular reciba un cordial saludo.

ATENTAMENTE

LIC. ROGELIO FRANCO CASTÁN.
SECRETARIO DE GOBIERNO

C.c.p. Archivo y minutarío.
RFCIAGC

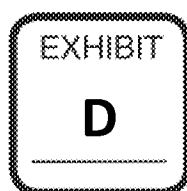
Av. Enríquez s/n, Zona Centro
C.P. 91000 Xalapa, Veracruz
T. 01 228 841 74 00
SEGOBVER.gob.mx

**ASUNTO: SE FORMULA DENUNCIA
Y/O QUERRELLA SOBRE HECHOS
PROBABLEMENTE DELICTIVOS.**

**MTRO. FERNANDO BASTOS PULIDO
FISCAL DE LA DIRECCIÓN DE INVESTIGACIONES
MINISTERIALES DE LA FISCALÍA GENERAL DE JUSTICIA
EN EL ESTADO DE VERACRUZ.
P R E S E N T E**

Lic. Armando García Cedas, en mi carácter de Director del Jurídico de la Secretaría de Gobierno del Estado de Veracruz, personalidad que acredito con la copia certificada del nombramiento respectivo, la cual anexo al presente, potestad Jurídica que me concede lo previsto en el artículos 32 fracción III del Reglamento Interior de la Secretaría de Gobierno del Estado de Veracruz de Ignacio de la Llave, publicado en la Gaceta Oficial del Estado, el día seis de diciembre del año 2016, a través del número extraordinario 486; señalando como domicilio para oír y recibir toda clase de notificaciones el ubicado en Palacio de Gobierno, Calle Enríquez s/n esquina Leandro Valle, C.P. 91000, Colonia Centro, Xalapa, Veracruz; autorizando para presentar y desahogar cuantos y tantos datos de prueba sean necesarios para demostrar la responsabilidad a quien o quienes se denuncia, siendo los C.C. Lics. Lauro Hugo López Zumaya, Armando García Cedas, Enoch Castelán Enríquez, Lilian Marisol Domínguez Gómez, Edgar Castillo Águila, Aarón Viceñas Prado, Arnulfo Condado Martínez, Heladio Yobal Yobal, José de Jesús Rodríguez Fernández, Raúl Vidal Ramos, profesionistas que se acreditaran en el momento procesal oportuno.

Que mediante el presente libelo vengo a formular DENUNCIA O QUERRELLA POR HECHOS PRESUNTAMENTE DELICTIVOS EN CONTRA DE C. JOSE BANDIN Y/O JOSE BANDIN RUIZ, MONICA BABAYAN Y/O DE QUIEN O



QUIENES RESULTEN RESPONSABLES, POR EL DELITO DE LAVADO DE DINERO, FRAUDE Y LO QUE RESULTE.

Para ello Señor Director de Investigaciones Ministeriales, en este acto jurídico invoco los artículos 1º, 8º, 14, 16, 17, 18, 19, 20 apartados "A" y "C", 21, de Nuestra Máxima Ley de Leyes en nuestro País, artículos 52 de la Constitución Estatal en nuestro Estado de Veracruz, numerales 1º, 2º, 3º, 4º, 15, 16, 17, 18, 19, 105, 106, 108, 109, 110, 127, 128, 129, 130, 131, 132, 212, 213, 214, 215, 216, 217, 221, 222, 223, 224, 230, 251, 259, 260, 261, 262, 263, 265, 272, entre otros del código Nacional de Procedimientos Penales Único de Nuestro País; artículos 1º, 2º, 3º, 4º, 6º, 9º, 1, 12, 13, 15, 18, 19, 20, 21, del Código Represivo en nuestro Estado de Veracruz, ante usted y con el debido respeto le manifiesto los siguientes:

H E C H O S:

PRIMERO.- Señor Director de Investigaciones Ministeriales, para comprobar los hechos dolosos que se denuncian, durante la administración estatal en el periodo 2010-2016, se presentó una serie de hechos relativos al uso y desvío de recursos públicos del Gobierno del Estado de Veracruz, actos en los cuales se encuentra involucrado el C. Javier Duarte de Ochoa, ex Gobernador del Estado de Veracruz, en estos hechos se ha señalado la existencia de diversas empresas fantasmas, utilizadas para la contratación de prestación obras, servicios o bienes, que jamás fueron entregados o realizados. Por estos hechos se desviaron muchos recursos pertenecientes a la administración estatal, para esto se utilizó a prestanombres.

Es el caso que dentro de las distintas personas señaladas como responsables de ser prestanombres del C. Javier Duarte de Ochoa, ex Gobernador del Estado de Veracruz, se encuentra el C. José Bandin y/o José Bandin Ruiz, así como Mónica Babayan, ello mediante la utilización de diversas empresas fantasmas.

De estos actos se tiene conocimiento que los recursos públicos desviados a esas empresas fueron trasladados a los Estados Unidos de América.

Cabe señalar que se han presentado diversas denuncias ante la Procuraduría General de la República, debido al tipo delitos y a que fueron desviados recursos de origen federal.

SEGUNDO.- Estos son hechos públicos, por lo que solicito se investiguen dado que es estado a ha sido afectado en sus recursos económicos, al ser utilizados éstos para aspectos de adquisición de diversas propiedades principalmente en Texas, Florida y Nueva York, en el País de Estados Unidos de América.

En aquel país se han localizado diversas propiedades, señalándose al C. C. José Bandin y/o José Bandin Ruiz, así como Mónica Babayan.

En diversos medios de comunicación se ha hecho públicos estos ilícitos, tal como lo señala la periodista Claudia Guerrero Martínez, en su publicación de fecha 25 de julio de 2016.

Entre lo utópico y lo verdadero
Por Claudia Guerrero Martínez
25 de julio del 2016.

Porres, Mansur y Bandín, el exclusivo Club de Javier Duarte

Conocen, inteligentes lectoras y lectores, a Jaime Porres Fernández-Cavada, José Antonio Bandín Ruiz y Moisés Mansur Cysneiros...Quizá, para la mayoría de los veracruzanos, estos nombres los han escuchado o leído en revistas de negocios, socialité o medios de comunicación afines a la administración de Javier Duarte de Ochoa...Actualmente, estas personas son investigadas por la PGR, por ser los principales prestanombres del actual Gobernador de Veracruz, Javier Duarte de Ochoa...

Los excesos de estos pillos empresarios y Javier Duarte se podrían contar en varias entregas, como por ejemplo, uno de estos hoy millonarios de Córdoba, como es Jaime Porres, quien hace unos años, es recordado por bajar de su coche con insultos a Javier Duarte de Ochoa y le realizaba un constante bulling... El antes considerado perdedor o "lúcer" y hoy, Gobernador de Veracruz, olvidó las agresiones en el pasado... En un cumpleaños de Jaime Porres, quien festejaba en su exclusivo departamento de Miami, recibió de regalo un automóvil Bentley del año, con valor en el mercado por más de \$6 millones de pesos y este fue obsequiado por el ocurrente Mandatario Estatal, Javier Duarte de Ochoa... Y pagado, no precisamente de los ahorros o bolsillos del Gobernador de Veracruz...

Y los excesos van más allá, contribuyendo a que la PGR investigue estos datos... Actualmente, Moisés Mansur es dueño de un rancho con caballos de rejoneo en Valle de Bravo y este también cuestionado empresario de Córdoba, regaló uno de sus caballos a Paulina Romero, hija del líder petrolero Carlos Romero Deschamps valuado en más de \$100 mil dólares... Mansur Cysneiros le regaló el equino a Paulina Romero, porque la conoció en Veracruz, en el primer año de gobierno de Javier Duarte. Cabe destacar, que durante los meses de enero y febrero del 2012, Carlos Romero Deschamps aún se ostentaba como "padrino" de Duarte de Ochoa y de tener buenas relaciones con Javier, hasta que un día, según fuentes cercanas a Duarte y por cuestiones de dinero, el Gobernador de Veracruz ya no le contestaba el teléfono y esa fue la razón de su distanciamiento. Debemos puntualizar, que tanto el líder petrolero y su hija Paulina Romero acudían a montar el caballo en el rancho de Moisés Mansur, ubicado en el Estado de México, mismo, cuenta con enfermería de caballos, cuando paradójicamente, en Veracruz no hay medicinas y los servicios de salud son insuficientes...

Uno más, es José Antonio Bandín Ruiz, quien se asoció en el tema de las empresas fantasmas proveedoras del Gobierno de Javier Duarte de Ochoa, facturando a nombre de su esposa, Mónica Babayan Canal, mismas, son investigadas por la PGR... Actualmente, la familia vive en Woodlands, Texas, en los Estados Unidos, junto con sus hijos y presumen, entre otras cosas, de un automóvil de lujo Rolls Royce... Buscando sus empresas financiadas con dinero de los veracruzanos, encontramos un desplegado de varias de ellas, 26 en total, curiosamente, fundadas en los años 2012, 2013, 2014 y 2015, con la liga <https://www.corporationwiki.com/Texas/The-Woodlands/jose-antonio-bandin/103669601.aspx>

También, buscando los registros en los Estados Unidos, la PGR podrá investigar todas las propiedades de estas personas, como son casas, terrenos y edificios, adquiridos principalmente en Woodlands, Texas... Además, mansiones ubicadas en Tecamachalco, en el Estado de México, una de ellas propiedad de José Antonio Bandín Ruiz, así como departamentos en Acapulco o el mencionado rancho de Moisés Mansur, con su cuadra de caballos... Como veracruzana, nos indigna conocer que estos hoy millonarios cordobeses, no tenían dinero, ni negocios antes de la administración de Javier Duarte de Ochoa y hoy, son grandes empresarios, gracias a los desvíos de recursos de las finanzas en Veracruz y para beneficio de estos ladrones...

Y cómo se conocieron estos pillos prestanombres de Javier Duarte de Ochoa. La historia entre Mansur y Bandín inicia en la juventud, cuando

José Antonio Bandín rentaba un departamento de una sola recámara y un cuarto de servicio... Él y Moisés Mansur Cysneiros eran amigos desde la preparatoria y Bandín permite a Mansur vivir en el cuarto de servicio. Luego, Moisés Mansur entra a estudiar a la Universidad Iberoamericana y ahí, conoce a Javier Duarte de Ochoa y se hacen entrañables amigos... Más adelante, José Antonio Bandín se casa con Mónica Babayan Canal, quien actualmente se ha convertido en una de las principales prestanombres de Javier Duarte y de su propio esposo, sin olvidar que Mónica es hija de "Ludy" o Ludivina Canal, quien también se incluye en la lista de prestanombres de varios lucrativos e ilegales negocios...

Si bien, se conocía la situación de insolvencia y pobredumbre de los aquí nombrados en esta entrega, cuando Javier Duarte llega de Gobernador de Veracruz, Bandín y Mansur hacen un giro impresionante con escoltas, autos de lujos, relojes costosísimos, inmuebles como el expuesto en Tecamachalco o el departamento en Acapulco, para luego, José Bandín Ruiz le dice a su esposa que en México hay mucha inseguridad y la cambia de residencia, para vivir con sus hijos en Woodlands, Texas, lugar donde compra su primera casa y ahí, siguió adquiriendo más propiedades, una de ellas a nombre de su suegra, Ludivina Canal, a quien también le pusieron a su nombre un departamento en Bosques de las Lomas... Y la familia se fue uniendo a esta injustificada fortuna, como es el caso de hermanos y familiares de José Antonio Bandín, quienes son propietarios de terrenos en Texas, en los Estados Unidos a nombre de Maricarmen y Juan Carlos Bandín Ruiz, así como de Rocío Durán...

Los excesos y excentricidades también se observan en Moisés Mansur, con la adquisición del rancho de caballos rejoneadores en Valle de Bravo, así como una mansión en Ixtapa Zihuatanejo... Moy Mansur utiliza las aeronaves del Gobierno de Veracruz para viajar a esa playa de Guerrero, así como propiedades en Texas. Existen antecedentes de que en la Ciudad de México, Moisés Mansur y Javier Duarte son socios y dueños de inversiones, como es el caso de inmuebles ubicados en la exclusiva zona de Prado Norte, en las Lomas de Chapultepec... Moisés Mansur ha escalado tanto como nuevo millonario, que se le vincula con la sobrina de Carlos Peralta Quintero, acusado de ser uno de los beneficiados en el sexenio de Carlos Salinas de Gortari... Y las excentricidades de "Moy" Mansur se han incrementado a tal grado, que cualquier evento donde acude este empresario cordobés, sus escoltas tienen que llevar la comida y el vino preferido de su jefe, porque se ostenta de ser fino su paladar y no come, ni toma cualquier cosa... Pero eso sí, a Bandín Ruiz y a Moy Mansur se les vincula con la propiedad de taquerías en la Colonia Condesa, de la Ciudad de México...

Por último, dejamos por ahí las ligas para consultar los negocios de los esposos José Antonio Bandín Ruíz y Mónica Babayan Canal, donde se muestran más de 26 compañías fundadas durante la administración de Javier Duarte de Ochoa:

<https://www.corporationwiki.com/Texas/The-Woodlands/jose-antonio-bandin/103669601.aspx>, así como otra empresa propiedad de los padres de Mónica Babayan Canal, como prestanombres y beneficiados de Javier Duarte de Ochoa, con la liga <https://bizstanding.com/directory/TX/18/3/>, la cual dicta: "Business Directory of Texas. 18 RANCH COMPANY, LLC. Members: Ludivina Canal (Manager) Juan I. Babayan (Manager) Mónica Babayan (Manager). Agent: Twofficesuites, Llc 8350 Ashlane Way, Spring, TX 77382"...

Como vemos, aportamos varios datos para que la PGR y si quiere ser autónoma, la Fiscalía General de Justicia del Estado, investiguen a estos pillos como los principales prestanombres de Javier Duarte de Ochoa. Los mismos, que en el 2010 eran unos pobres diablos y sin dinero y hoy, son grandes empresarios que se codena con la realeza empresarial mexicana e internacional, gracias a que robaron, junto con Javier Duarte, el dinero de los veracruzanos...

Por lo cual señor fiscal de investigaciones ministeriales solicito a usted respetuosamente se desahoguen las investigaciones, así como el suscrito seguirá aportando elementos de prueba que acrediten los hechos denunciados.

ÚNICO.- Ciudadano Fiscal de Investigación Ministeriales, me tenga Usted presentado mediante el presente libelo de denuncia o querrela en contra de los probables responsables toda vez que mi petición se encuentra apegada a derecho y a la letra de la Ley.

Al igual una vez que se demuestre los antisociales que hayan violentado los denunciados pido a usted respetuosamente en relación a lo advertido por el numeral 16 de nuestra Carta Magna, se solicite y se libere la orden de aprehensión en contra de los denunciados, y se les sancione a la proporcionalidad de los delitos que se tipifiquen, como también reparen los daños ocasionados al Gobierno del Estado de Veracruz.

PROTESTO LO NECESARIO.

XALAPA, VER., A 21 DE JUNIO DEL 2018

**LIC. ARMANDO GARCÍA CEDAS.
DIRECTOR DEL JURIDICO SEGOB.**

**SUBJECT: A COMPLAINT AND/OR
CLAIM IS FILED ABOUT
POTENTIALLY CRIMINAL
OFFENSES.**

**MR. FERNANDO BASTOS PULIDO
PROSECUTING ATTORNEY OF THE MINISTERIAL
INVESTIGATIONS OFFICE OF THE GENERAL
PROSECUTOR'S OFFICE OF THE STATE OF VERACRUZ.**

Lic. Armando Garcia Cedas, in my capacity as Legal Director for the Government Secretariat of the State of Veracruz, legal authority which I can establish via a certified copy of my corresponding appointment, which I attach hereto, and in accordance with Article 32 section III of the Internal Regulations of the Government Secretariat of the State of Veracruz de Ignacio de la Llave, as published in the Official State Gazette on December 6, 2016, in extraordinary issue 486; I hereby establish the address to which all notifications should be sent to be the Palacio de Gobierno, Calle Enriquez s/n esquina Leandro Valle, C.P. 91000, Colonia Centro, Xalapa, Veracruz; I hereby authorize the following professional individuals who shall demonstrate their qualifications at the appropriate proceeding, Messrs. Lauro Hugo Lopez Zumaya, Armando Garcia Cedas, Enoch Castelan Enriquez, Lilian Marisol Dominguez Gomez, Edgar Castillo Aguila, Aaron Viceñas Prado, Arnulfo Condado Martinez, Heladio Yobal Yobal, Jose de Jesus Rodriguez Fernandez, Raul Vidal Ramos, to submit and present as much evidence as is necessary to demonstrate the responsibility of those hereby being accused.

That through this accusation I hereby file a **COMPLAINT OR CLAIM OF ALLEGED CRIMINAL OFFENSES AGAINST MR. JOSE BANDIN AND/OR JOSE BANDIN RUIZ, MONICA BABAYAN AND/OR THOSE WHO END UP BEING**



RESPONSIBLE FOR THE CRIME OF MONEY LAUNDERING, FRAUD, AND THAT WHICH MAY BE UNCOVERED.

To that end, Mr. Director of Ministerial Investigations, in this legal action I hereby refer to numerals **1, 8, 14, 16, 17, 18, 19, 20 sections “A” and “C”, 21, of Our Constitution, number 52 of the State Constitution of the State of Veracruz, numbers 1, 2, 3, 4, 15, 16, 17, 18, 19, 105, 106, 108, 109, 110, 127, 128, 129, 130, 131, 132, 212, 213, 214, 215, 216, 217, 221, 222, 223, 224, 230, 251, 259, 260, 261, 262, 263, 265, 272,** inter alia, from the Sole National Code of Criminal Procedures of our Country; **numbers 1, 2, 3, 4, 6, 9, 1, 12, 13, 15, 18, 19, 20, 21, of the Penal Code in our State of Veracruz,** before you and with all due respect I hereby express the following:

FACTS:

ONE.- Mr. Director of Ministerial Investigations, to demonstrate the criminal acts herein claimed, during the 2010-2016 state administration, a number of events occurred relative to the use and embezzlement of public resources in the Government of the State of Veracruz, actions in which Mr. Javier Duarte de Ochoa, the former Governor of the State of Veracruz, is involved; in said events, the existence of various shell companies has been pointed out, which were utilized to contract construction works, services or goods, which were never delivered or performed. Through these acts, substantial state administration resources were diverted through the use of straw men.

Among the various individuals identified as responsible for being straw men for Mr. Javier Duarte de Ochoa, former Governor of the State of Veracruz, are Mr. Jose Bandin and/or Jose Bandin Ruiz, as well as Monica Babayan, who used several shell companies for this purpose.

Furthermore, it is known that the public resources diverted to those companies were transferred to the United States of America.

It is worth mentioning that several claims have been filed before the National Attorney General's Office due to the nature of the crimes, and because federal resources were embezzled.

TWO.- These are public facts, therefore I request their investigation since the state has been adversely impacted in its financial resources, given that these were used for the purchase of several properties mainly in Texas, Florida, and New York in the United States of America.

Several properties have been located in the United States, and Messrs. Jose Bandin and/or Jose Bandin Ruiz, as well as Monica Babayan have been singled out.

These crimes have been made public in various media outlets, as indicated by journalist Claudia Guerrero Martinez, in her publication dated July 25, 2016.

Between Utopia and Truth
by Claudia Guerrero Martinez
July 25, 2016.

Porres, Mansur, and Bandin, Javier Duarte's Exclusive Club.

My intelligent readers, you all know Jaime Porres Fernandez-Cavada, Jose Antonio Bandin Ruiz y Moises Mansur Cysneiros... Perhaps the majority of people in Veracruz have heard or read of these names in business magazines, social circles, or in media sources linked to the administration of Javier Duarte de Ochoa... Currently, they are under investigation by the PGR as the main straw men for the Governor of Veracruz, Javier Duarte de Ochoa...

The overly indulgent behavior of these corporate thieves and Javier Duarte could be told in several issues, like for instance, one of whom is now a millionaire from Cordoba, Jaime Porres, who is remembered for having insulted Javier Duarte de Ochoa as he was getting out of his vehicle, and for constantly bullying him a few years ago... He who in the past was considered a loser and is now the Governor of Veracruz, has forgotten past aggressions... At a birthday party for Jaime Porres, who was celebrating in his upscale Miami apartment, he was gifted a brand new Bentley, with a market value of more than \$6 million pesos. This was a gift from the clever State Governor Javier Duarte de Ochoa... And paid for, not precisely from his savings account or from the Governor of Veracruz's pocket...

The excess goes even further, which led to the PGR's investigation of this information... Moises Mansur currently owns a ranch where he has horses used in bullfighting in Valle de Bravo, and this also suspected Cordoba business man, gave one of his horses worth over \$100 thousand dollars to Paulina Romero, the daughter of the oil union leader Carlos Romero Deschamps... Mansur Cysneiros gave the horse to Paulina Romero because he met her in Veracruz during the first year of Javier Duarte's administration. It is worth highlighting that from January to February 2012, Carlos Romero Deschamps still boasted about being Duarte de Ochoa's "godfather" and about being in very good terms with Javier, until one day, according to sources close to Duarte, and due to money issues, the Governor of Veracruz would no longer answer his phone calls, and that was the reason for their rift. We should point out that both the oil union leader and his daughter Paulina Romero used to go horse-back riding in Moises Mansur's ranch in the State of Mexico, which featured a horse clinic, when ironically, there are no medications in Veracruz and health services are scarce...

Yet another is Jose Antonio Bandin Ruiz, who is linked to the subject of shell companies which were suppliers to the Javier Duarte de Ochoa Administration; said companies sent invoices under his wife's name, Monica Babayan Canal. These companies are been investigated by the PGR... The family currently lives in The Woodlands, Texas, in the United States, along with their children and they flaunt, among other things, a Rolls Royce luxury vehicle... During a search of their companies financed with money from the people of Veracruz, we found a host of them, 26 companies total, which curiously, were established in 2012, 2013, 2014, and 2015, through the link <https://www.corporationwiki.com/Texas/The-Woodlands/jose-antonio-bandin/103669601.aspx>

Moreover, by searching through the records in the United States, the PGR could investigate all of these people's properties, such as houses, land, and buildings, purchased mainly in The Woodlands, Texas... In addition to mansions in Tecamachalco, in the State of Mexico; one of which is owned by Jose Antonio Bandin Ruiz, and apartments in Acapulco or the above mentioned ranch of Moises Mansur, with its horse stable... As a citizen from Veracruz, I am outraged to know that these now millionaires from Cordoba did not have money or businesses prior to Javier Duarte de Ochoa's administration, and today, they are major business people, thanks to the embezzlement of resources from the treasury of Veracruz, which has benefitted these thieves...

And how did these straw men thieves for Javier Duarte de Ochoa meet each other? The story between Mansur y Bandin begins in their youth, when

Jose Antonio Bandin used to rent a one-bedroom apartment and a maid's room... He and Moises Mansur Cysneiros were friends from high school and Bandin would let Mansur live in the maid's room. Then, Moises Mansur went to the Universidad Iberoamericana where he met Javier Duarte de Ochoa and they became dear friends... Later, Jose Antonio Bandin married Monica Babayan Canal, who has now become one of the main straw men for Javier Duarte and even for her own husband; and let's not forget that Monica is the daughter of "Ludy" or Ludivina Canal, who is also included in the roster of straw men for several profitable and illegal businesses...

Although the poverty and insolvency situation of the individuals herein mentioned was well known, when Javier Duarte became Governor of Veracruz, Bandin and Mansur made an impressive turnaround with bodyguards, luxury vehicles, extremely expensive watches, properties like the one mentioned in Tecamachalco or the apartment in Acapulco, and then Jose Bandin Ruiz told his wife that Mexico was too crime-ridden and they moved to live with their children in The Woodlands, Texas, where he bought his first house, and then he continued to buy more properties, one of which was registered to his mother-in-law, Ludivina Canal, to whom an apartment in Bosques de las Lomas was also registered... So the family kept clustering around this unjustified wealth, as is the case of the brothers and relatives of Jose Antonio Bandin, who own land in Texas, in the United States, registered under Maricarmen and Juan Carlos Bandin Ruiz, as well as Rocío Durán...

Excess and eccentricity were also observed in Moises Mansur, with the purchase of the bullfighting horses ranch in Valle de Bravo as well as a mansion in Ixtapa Zihuatanejo... Moy Mansur uses the aircraft of the Government of Veracruz to travel to that beach in Guerrero as well as to properties in Texas. There are records in Mexico City which show Moises Mansur and Javier Duarte are partners and owners of investments, such as the real estate in the upscale area of Prado Norte, Lomas de Chapultepec... Moises Mansur has climbed so high as a brand new millionaire that he is linked to Carlos Peralta Quintero's niece, and Carlos Peralta Quintero has been accused of being one of the beneficiaries from the Carlos Salinas de Gortari Administration... And "Moy" Mansur's eccentricities have increased so much, that no matter the event he attends, his bodyguards have to take his favorite food and wine, because he boasts that his taste is so refined that he cannot eat or drink just anything... Nevertheless, Bandin Ruiz and Moy Mansur have been linked to a taco restaurant property in Colonia Condesa, Mexico City...

Finally, we have provided links verifying the businesses of Jose Antonio Bandin Ruiz and his wife Monica Babayan Canal, where more than 26 companies are shown, which were established during Javier Duarte de Ochoa's administration:

<https://www.corporationwiki.com/Texas/The-Woodlands/jose-antonio-bandin/103669601.aspx>, as well as another company owned by the parents of Monica Babayan Canal, as frontmen and beneficiaries for Javier Duarte de Ochoa, using the link <https://bizstanding.com/directory/TX/18/3/>, which reads: "Business Directory of Texas. 18 RANCH COMPANY, LLC. Members: Ludivina Canal (Manager) Juan I. Babayan (Manager) Monica Babayan (Manager). Agent: Twofficesuites, Llc 8350 Ashlane Way, Spring, TX 77382"...

As you can see, we are providing several pieces of information for the PGR and, if the General Prosecutor's Office of the State would like to be independent, to investigate these thieves as the main straw men for Javier Duarte de Ochoa. Those very people who in 2010 were nothing but poor, penniless devils are now major businessmen who mingle with Mexican and international business royalty, thanks to the money they stole, along with Javier Duarte, from the people of Veracruz...

Therefore, Mr. Attorney for Ministerial Investigations, I respectfully request that these investigations be conducted, just as the undersigned will continue to provide evidence demonstrating the facts hereby claimed.

SOLE PARAGRAPH. - Mr. Attorney for Ministerial Investigations, I request that my appearance be recorded through the complaint filed herein against those potentially responsible, in accordance with the law.

Likewise, and once the crimes perpetrated by the individuals hereby denounced are demonstrated, I respectfully ask of you, pursuant to Article 16 in our Constitution, to request and issue an arrest warrant against the accused individuals, and that they be punished in proportion to the classified crimes, and that they compensate for the damages caused to the Government of the State of Veracruz.

I AFFIRM THAT THE FOREGOING IS TRUE AND CORRECT.

XALAPA, VERACRUZ, JUNE 21, 2018

**MR. ARMANDO GARCIA CEDAS.
DIRECTOR OF THE LEGAL DEPARTMENT
SEGOB (Secretariat of Domestic Affairs)**



THE STATE OF TEXAS

AFFIDAVIT

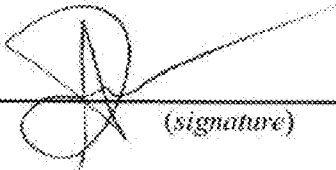
COUNTY OF HARRIS

BEFORE ME, the undersigned authority, a Notary Public in and for the State of Texas, on this day personally appeared Galina Ryabova, to me well known, and who, after being by me duly sworn, deposes and says:

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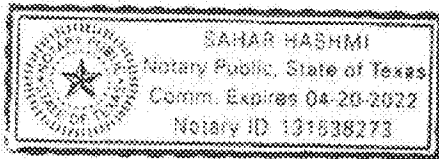
- Complaint or claim of alleged criminal offenses against Mr. Jose Bandin dated June 21, 2018

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 (signature)

SUBSCRIBED AND SWORN to before me on this 10th day of August 2018.





Notary Public in and for the State of TEXAS

Print Name: Sahar Hashmi

Comm. expires: April 20, 2022

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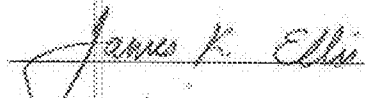
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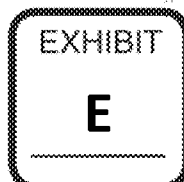
DECLARATION OF JAMES K. ELLIS

1. My name is James K. Ellis. I am over the age of twenty-one, am fully competent to make this declaration pursuant to 28 U.S.C. § 1746 and under the penalty of perjury have personal knowledge of the facts and statements in this declaration, and each of the facts and statements are true and correct.
2. I am an ex-FBI agent having spent 29 years with the Bureau. As part of my work with the FBI, I investigated claims of fraud, money laundering, and financial crimes. I am also a Certified Fraud Examiner. As part of these investigations, I received over twenty awards and commendations.
3. I know based on my training and experience as an FBI Agent and Certified Fraud Examiner that individuals who commit financial crimes frequently engage in money laundering transactions to hide the true nature of the proceeds of those crimes. In order to carry out money laundering activities a combination of associates, family members, shell companies, bank accounts and real estate transactions are typically utilized.
4. Based upon my review of the available evidence, which includes meeting with the Governor of the State of Veracruz and his staff, reviewing newspaper articles in Mexico, the indictment of Jose Bandin in Mexico, the property records of known properties, the buying and selling patterns of real estate by Mr. Bandin and his wife, the timing of these purchases and sales, the creation of and use of shell companies to make purchases, it is my expert opinion that Mr. Bandin was involved in the laundering of ill-gotten gains in the United States.
5. Moreover, based upon his relationship with the ex-Governor Javier Duarte, along with Mr. Bandin's position in the last administration, it is my expert opinion that Mr. Bandin and his wife were involved in the theft of government funds from the State of Veracruz.
6. I declare under penalty of perjury that the foregoing statements are true and correct.

FURTHER DECLARANT SAYETH NAUGHT



DATE June 26, 2018



MIÉ, 27 DE JUNIO DE 2018

¿Adquirió el Front Man for Fugitive Mexico Governor Millones en activos de los Estados Unidos?

Escrito por Patrick Corcoran -
1 DE NOVIEMBRE DE 2016

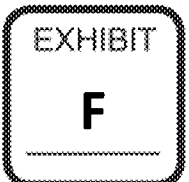
Méjico Lavado de dinero Zetas

COMPARTIR



El exgobernador de Veracruz Javier Duarte

Un presunto líder del fugitivo gobernador de Veracruz, Javier Duarte, ha adquirido una serie de propiedades en un suburbio de Houston, Texas, ofreciendo una demostración más de la importancia de los Estados Unidos en



criminal en México.

Enfrentado a docenas de denuncias penales contra él y sus subordinados, el ex gobernador Duarte tomó un permiso de ausencia de su puesto a mediados de octubre, solo un par de meses antes de que lo dejaran en el cargo, y posteriormente pasó a la clandestinidad .

Los investigadores se han centrado principalmente en el posible robo de dinero público de Duarte. El Wall Street Journal informó recientemente que no se tienen en cuenta \$ 2.6 mil millones de transferencias federales a Veracruz. Animal Político ha informado que las autoridades han identificado a 33 compañías ficticias que recibieron cientos de millones en contratos del gobierno de Duarte sin proporcionar los bienes y servicios prometidos.

Duarte también ha sido acusado de fomentar vínculos con los cárteles de la droga, presumiblemente dándoles un reinado libre en el estado a cambio de sobornos. Un supuesto comandante de los Zetas dijo a VICE News a principios de este año que Duarte originalmente llegó a un acuerdo con el notorio grupo criminal, pero los traicionó a favor del Cartel de Jalisco.

En una aparición en mayo en el estado,



control de los departamentos de policía del estado en Veracruz. El 23 de octubre, la revista Zeta informó que dos supuestos conspiradores en los supuestos esquemas de corrupción de Duarte también tenían vínculos con el crimen organizado, lo que sugiere que la infiltración criminal de su gobierno puede desempeñar un papel creciente en la investigación en curso.

Las investigaciones en Duarte han identificado a un puñado de presuntos hombres de frente, que supuestamente han sido utilizados para ocultar activos en México y Estados Unidos sin despertar la curiosidad de los periodistas, los funcionarios bancarios o las fuerzas del orden público. Según informó Reforma, un abogado anónimo testificó el mes pasado ante el Departamento de Justicia de México que participó en la creación de la red de pajareros de Duarte, lo que probablemente sea una señal de que los funcionarios se están acercando a los activos ilícitos del exgobernador.

Two such figures are Veracruz businessman José Antonio Bandín Ruiz and his wife Mónica Bayaban. While not prominent figures, Bandín Ruiz went to high school together with a Moisés Mansur, a long-time friend of Duarte and another alleged front man. This relationship was apparently



Duarte's orbit.

Anticorruption websites in Veracruz have reported that Mexican justice officials have launched investigations into the couple's holdings, which expanded enormously under the Duarte governorship. In addition to a mansion in the state of Mexico and a five-bedroom, 4,600-square-foot home in outside of Houston, public records in Texas show that Bandín Ruiz and Babayan have founded nearly 30 companies inside the state.

Many of these LLCs were set up as vehicles to own houses in The Woodlands, the subdivision outside of Houston where Bandín Ruiz and wife own a home in their own name. The companies set up for real estate have names that correspond to their addresses; for instance, 83 West Jagged Ridge LLC is the owner of a house at 83 West Jagged Ridge Circle, and 87 West Jagged Ridge LLC, which is the owner of a house at 87 West Jagged Ridge Circle. It appears that all of these LLCs were formed during the Duarte governorship, which began in 2010.

There are approximately 17 such firms that correspond to addresses in The Woodlands. Most are moderately-sized homes worth a few hundred thousand dollars each. Some documents related

Bandín Ruiz.

Bandín Ruiz's other firms appear connected to various additional economic activities. He and an associate named Jaime Riverte founded two businesses apparently dedicated to building — Reban Safety LLC and Reban Construction LLC. He and his wife have a similar series of businesses, including Banba LLC, Banba Offices LLC and Banba Land and Development LLC.

InSight Crime Analysis

Duarte's alleged front man Bandín Ruiz appears to have built a network of assets in the United States worth millions of dollars. If the suggestions that the assets comprise some portion of Duarte's allegedly ill-gotten wealth prove true, this represents one of a growing number of examples of Mexican political corruption and drug money being laundered in the United States, especially in the border region.

One of the most prominent prior cases shares many similarities with Duarte's: Prosecutors in Texas have spent much of the past several years targeting assets belonging to former Coahuila governor Humberto Moreira and his closest aides. Like Duarte, Moreira has been accused of both pilfering state money and of accepting bribes from



Moreira's mother-in-law; a shopping center and a bank account with more than \$2 million belonging to his former treasurer, Héctor Javier Villarreal Hernández; and a bank account with \$1.8 million that belonged to Rolando González Treviño, a media mogul who moved money for Moreira. Villarreal Hernández and González Treviño have both also pleaded guilty to criminal charges in the United States.

American officials have also cracked down on money connected exclusively to organized crime. In 2012, for instance, federal authorities seized a ranch in Oklahoma, the home of a stable of pricey quarter-horses that had won millions in races around the border region. The horses were the property of José Treviño Morales, the brother of Zetas leader Miguel Ángel Treviño, who is currently in custody. Authorities accused the horses of being a mechanism for laundering the Zetas' profits.

SEE ALSO: Coverage of Money Laundering

These cases, and countless less prominent ones like them, demonstrate the growing popularity of the United States as an area for laundering money through physical assets. The reasons behind the appeal are obvious: It's far from Mexican officials and journalists



the assets are denominated in dollars, protecting them from a sliding peso and offering the promise of a solid rate of return. Moreover, lax US laws allow criminal groups to make use of shell companies that help to hide the true source of the dirty money.

Major Texas cities like Houston and San Antonio are popular locales, both because of their proximity to Mexico and because of the existence of a wealthy social elite, meaning a fast-living political front man won't necessarily draw attention from his neighbors. As a result, despite these recent high-profile takedowns and increased US attention on foreign in money in real estate, such laundering schemes will likely continue.

This offers another demonstration of the interconnectedness of the United States and Mexico in terms of organized crime. Not only do drugs go north as cash and guns go south, but some of the criminal proceeds become intermingled with the licit economy through laundering schemes. Greater sharing of intelligence between the two nations could reduce gangsters' success in exploiting the United States to launder ill-gotten gains, though it is unclear if this would always be a wise use of resources. As InSight Crime has noted in the past, while cracking down



not clear that it helps reduce violence, and such work can be extremely labor-intensive.

In contrast, using better tracking of illicit financial networks to expose dirty politicians is an undeniably laudable goal that could improve Mexican governance and limit organized crime's influence over the state. And in cases like that of Duarte and Bandín Ruiz, their carelessness makes illicit assets low-hanging fruit for US officials.

What are your thoughts? Click [here](#) to send InSight Crime your comments.

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WED, JUN 27, 2018

Did Front Man for Fugitive Mexico Governor Acquire Millions in US Assets?

Written by Patrick Corcoran -
NOVEMBER 1, 2016

Mexico Money Laundering Zetas

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Former Veracruz Gov. Javier Duarte

An alleged front man for fugitive Veracruz Gov. Javier Duarte has acquired a string of properties in a suburb of Houston, Texas, offering a further demonstration of the importance of the United States in laundering the proceeds of criminal activity in Mexico.



absence from his post in mid-October, just a couple of months before he was set to leave office, and subsequently went underground.

Investigators have focused largely on Duarte's possible theft of public money. The Wall Street Journal recently reported that \$2.6 billion of federal transfers to Veracruz remain unaccounted for. Animal Político has reported that authorities have identified 33 shell companies that received hundreds of millions in contracts from Duarte's government without providing the goods and services promised.

Duarte has also been accused of fostering ties to drug cartels, presumably giving them free reign in the state in exchange for bribes. An alleged commander of the Zetas told VICE News earlier this year that Duarte originally struck a deal with the notorious crime group, but betrayed them in favor of the Jalisco Cartel.

In a May appearance in the state, former President Felipe Calderón accused Duarte of giving the Zetas control over state police departments in Veracruz. On October 23, the magazine Zeta reported that two suspected co-conspirators in Duarte's alleged corruption schemes also had

investigation.

The investigations into Duarte have identified a handful of alleged front men, who have presumably been used to stash assets in Mexico and the United States without sparking the curiosity of journalists, banking officials or law enforcement. As reported by Reforma, an unnamed lawyer testified last month before Mexico's Justice Department that he was involved in the creation of Duarte's strawman network, which is likely a sign that officials are closing in on the ex-governor's illicit assets.

Two such figures are Veracruz businessman José Antonio Bandín Ruiz and his wife Mónica Bayaban. While not prominent figures, Bandín Ruiz went to high school together with a Moisés Mansur, a long-time friend of Duarte and another alleged front man. This relationship was apparently enough to bring Bandín Ruiz into Duarte's orbit.

Anticorruption websites in Veracruz have reported that Mexican justice officials have launched investigations into the couple's holdings, which expanded enormously under the Duarte governorship. In addition to a mansion in the state of Mexico and a five-bedroom, 4,600-square-foot home

companies inside the state.

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There are approximately 17 such firms that correspond to addresses in The Woodlands. Most are moderately-sized homes worth a few hundred thousand dollars each. Some documents related to the homes' purchases are signed by Bandín Ruiz.

Bandín Ruiz's other firms appear connected to various additional economic activities. He and an associate named Jaime Riverte founded two businesses apparently dedicated to building — Reban Safety LLC and Reban Construction LLC. He and his wife have a similar series of businesses, including Banba LLC,

InSight Crime Analysis

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low-hanging fruit for US officials.

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Citará PGR a José Antonio Bandín, relacionado con empresas fantasmas

Por **Jair García** - 24 julio, 2017



La Procuraduría General de la República citará a comparecer a José Antonio Bandín Ruiz, un personaje que en menos de 10 años pasó de ser agente de bienes raíces a tener mas de 80 millones de pesos en inmuebles en Woodlands, Texas,

De acuerdo con los fiscales encargados de la carpeta de investigación contra Javier Duarte de Ochoa todavía se contemplan otra serie de testimonios, entre los cuales está este empresario veracruzanos y otros más que pudieran estar relacionados en la red des desvío de recursos de empresas fantasmas.

La participación de dichos empresarios no sólo sería como prestanombres, sino como cómplices de la banda de delincuencia organizada, así como transferencias de recursos de procedencia ilícita.

La PGR explicó que algunos empresarios a cambio de algunos pagos o "comisiones" facturaron o prestaron sus empresas para recibir pagos de diversas dependencias del Gobierno de Veracruz y posteriormente transferir esos montos a las empresas fantasmas, dos en particular Terra Inmobiliaria y Grupo Brades.

En dichas transferencias descontaban la comisión que recibían, y de acuerdo a las investigaciones, fue el propio José Antonio Bandín Ruiz quien recomendó a Javier Duarte de

Ochoa la lista de empresarios que estarían dispuestos a cooperar, entre los cuales habría personas tanto de Xalapa como de los municipios de Veracruz y Boca del Río.

Sin embargo, tales nombres se han mantenido en secrecía como parte de la propia investigación de la PGR, pero en los próximos meses podrían ser llamados a declarar en calidad de testigos o investigados.

José Antonio Bandín will be quoted by PGR, related to ghost companies

By **Jair García** - July 24, 2017



The Attorney General's Office will summon José Antonio Bandín Ruiz, a character who in less than 10 years went from being a real estate agent to having more than 80 million pesos in real estate in Woodlands, Texas,

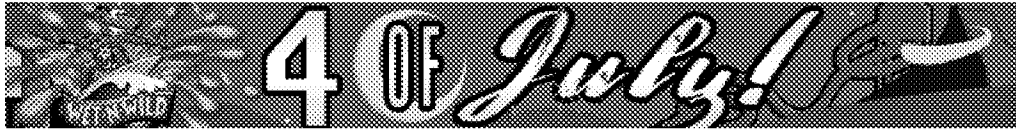
According to the prosecutors in charge of the investigative folder against Javier Duarte de Ochoa, another set of testimonies is still being considered, among which is this businessman from Veracruz and others who may be related in the network of deviation of resources from ghost companies.

The participation of these businessmen would not only be as prestanombres, but as accomplices of the organized crime gang, as well as transfers of resources of illicit origin.

The PGR explained that some entrepreneurs in exchange for some payments or "commissions" invoiced or loaned their companies to receive payments from various agencies of the Government of Veracruz and later transfer those amounts to ghost companies, two in particular Terra Inmobiliaria and Grupo Brades.

In these transfers they deducted the commission they received, and according to the investigations, it was José Antonio Bandín Ruiz himself who recommended to Javier Duarte de Ochoa the list of entrepreneurs who would be willing to cooperate, among whom there would be people both from Xalapa and from the municipalities of Veracruz and Boca del Río.

However, these names have been maintained in secrecía as part of the PGR's own investigation, but in the coming months they could be called to testify as witnesses or investigated.



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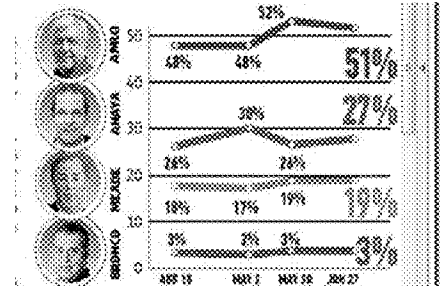
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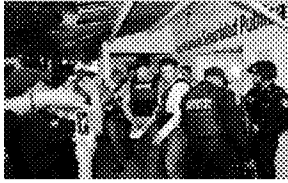
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'Presentará PGR solicitud de extradición de Duarte'

El gobernador de Veracruz, Miguel Ángel Yunes, reveló que en 2016 sostuvo reuniones con cuatro de los principales operadores de Javier Duarte y que dos de ellos le proporcionaron informes de otros cómplices de la red de corrupción.

En entrevista, el mandatario veracruzano aseguró que, producto de sus negociaciones, cabildos y hasta presiones, algunos de los presuntos cómplices devolvieron al Gobierno del Estado dos bienes inmuebles de alta plusvalía y más de 421 millones de pesos.

El gobernador dijo que sus encuentros ocurrieron en México y Canadá con José Juan Janeiro Rodríguez, Moisés Mansur Cysneiros, José Antonio Bandín Ruiz y el empresario cañero José Francisco García González, conocido como "El Franky". Con los dos primeros precisó que las reuniones fueron antes de que fueran prófugos de la justicia.

"Sí, claro que me reuní con ellos, me reuní con Janeiro, fue el primero con el que me reuní y él nos dio elementos para recuperar muchos recursos y él mismo le devolvió al Gobierno del Estado cuando menos dos bienes inmuebles muy caros, que fue el rancho El Faunito en Veracruz, que estaba a nombre de él y hoy está a nombre del Gobierno del Estado, está inscrito en el Registro Público de la Propiedad.

"Y también el propio Janeiro devolvió una tercera parte del rancho Las Mesas (en Valle de Bravo, Edomex) que estaba a nombre de él", comentó del inmueble donde las otras dos terceras partes, hoy

aseguradas por la PGR, están a nombre de Mansur y Rafael Gerardo Rosas Bocardo.

Yunes dijo que viajó hasta Canadá para encontrarse con Mansur, quien en un principio facilitó información para que en enero pasado se devolvieran al Gobierno estatal 421 millones 600 mil pesos, a través de un acuerdo entre la PGR y dos empresas receptoras de los recursos. Sin embargo, Mansur poco después renunció a seguir colaborando.

"En el caso de Mansur me entrevisté con él en Toronto, le hice ver la situación en que se encontraba, no tenía ninguna denuncia penal en ese momento procesada en Veracruz porque ya la PGR había atraído todas las denuncias que yo presenté y los elementos de prueba que presenté.

"Y logré, a base de insistir, que devolviera 420 millones de pesos que tenía invertidos en dos empresas que se llamaban Hidrosina Plus e Hidromezclas, las tenía a nombre de su papá estas empresas; yo hasta allí supe, ya no supe si la inversión llegaba más arriba, pero eran dos empresas donde aparecían el papá de Moisés Mansur (Nissim Mansur Cohen) como propietario de las mismas.

Yunes detalló que la colaboración lograda con Mansur se dio cuando él aún no era gobernador y la justicia veracruzana no estaba detrás del colaborador de Duarte.

"Colaboró devolviendo 420 millones de pesos y después ya se retrajo, ya no quiso seguir, tenía que haber devuelto bienes inmuebles y tenía que haber aportado información importante, pero yo espero que Mansur sea extraditado a México y muy probablemente pueda aportar información", agregó.

Comentó que la cita con José Antonio Bandín Ruiz tuvo lugar en un hotel de la Ciudad de México y que en ella se había comprometido a devolver las propiedades que compró en Woodlands, Texas como prestanombres de Duarte. Sin embargo, huyó del país sin concretar su promesa.

"Tengo entendido que está en Austria", dijo Yunes.

En relación a José Francisco García González "El Franky", el gobernador comentó que no sólo no colaboró con información contra Duarte, sino que rechazó estar implicado en la red de corrupción que investiga tanto la PGR como la Fiscalía de Veracruz.

"Me entrevisté también con Frankie García, que es otro de los cómplices, quien manifestó que él no tenía nada que ver, que estaba totalmente fuera del tema, aunque sabemos que está muy comprometido en el tema", señaló.

Por ahora, Bandín y García sólo son investigados y no tienen orden de aprehensión en su contra.



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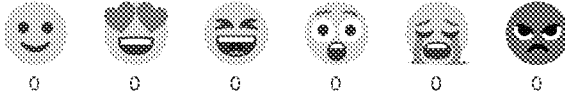
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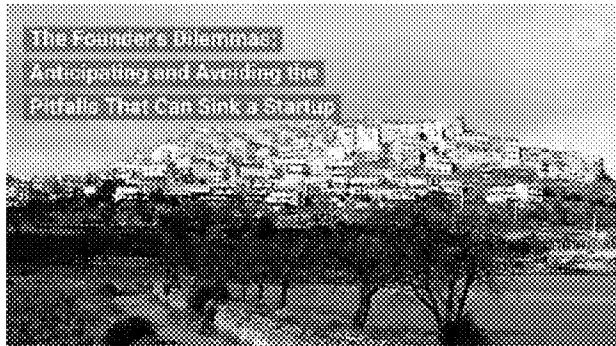
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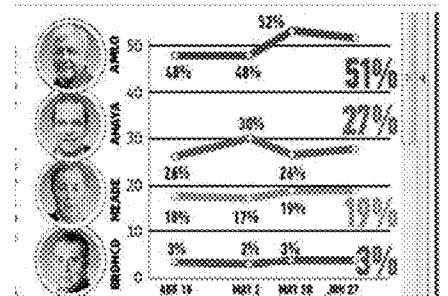
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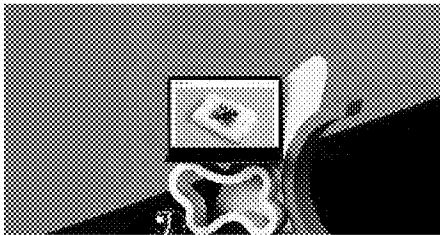
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'PGR will present extradition request from Duarte'

The governor of Veracruz, Miguel Ángel Yunes, revealed that in 2016 he held meetings with four of Javier Duarte's main operators and that two of them provided him with reports of other accomplices in the corruption network.

In an interview, the Venezuelan president said that, as a result of their negotiations, lobbying and even pressure, some of the alleged accomplices returned to the State Government two immovable properties of high added value and more than 421 million pesos.

The governor said his meetings took place in Mexico and Canada with José Juan Janeiro Rodríguez, Moisés Mansur Cysneiros, José Antonio Bandín Ruiz and sugarcane entrepreneur José Francisco García González, known as "El Franky". With the first two, he specified that the meetings were before they were fugitives from justice.

"Yes, of course I met with them, I met with Janeiro, he was the first one I met and he gave us elements to recover many resources and he himself returned to the State Government at least two very expensive real estate, which The ranch El Faunito in Veracruz, which was in his name and today is in the name of the State Government, is registered in the Public Registry of Property.

"And also the own Janeiro returned a third part of the ranch Las Mesas (in Valle de Bravo, Edomex) that was in his name, "said the property where the other two thirds, now insured by the PGR, are in

the name of Mansur and Rafael Gerardo Rosas Bocardo.

Yunes said he traveled to Canada to meet with Mansur, who initially provided information so that last January 421 million 600 thousand pesos would be returned to the state government, through an agreement between the PGR and two companies receiving the resources. However, Mansur soon resigned to continue collaborating.

"In the case of Mansur I interviewed him in Toronto, I made him see the situation he was in, he had no criminal complaint at that time processed in Veracruz because the PGR had already attracted all the complaints that I presented and the elements of proof that I presented.

"And I managed, on the basis of insisting, to return 420 million pesos that I had invested in two companies called Hidrosina Plus and Hydromezclas, had them in the name of their father these companies, I even knew, I did not know if the investment He arrived at the top, but they were two companies where the father of Moisés Mansur (Nissim Mansur Cohen) was the owner of the same. "

Yunes explained that the collaboration with Mansur occurred when he was not yet governor and the Veracruz justice was not behind the collaborator of Duarte.

"He helped by returning 420 million pesos and then he retreated, he did not want to continue, he had to have returned real estate and he had to have provided important information, but I hope that Mansur will be extradited to Mexico and most likely can provide information," he added. .

He said that the appointment with José Antonio Bandín Ruiz took place in a hotel in Mexico City and that he had promised to return the properties he bought in Woodlands, Texas as Duarte's names. However, he fled the country without realizing his promise.

"I understand that he is in Austria," said Yunes.

In relation to José Francisco García González "El Franky", the governor commented that not only did he not collaborate with information against Duarte, but he refused to be implicated in the corruption network that investigates both the PGR and the Prosecutor's Office of Veracruz.

"I also interviewed Frankie García, who is another of the accomplices, who said that he had nothing to do with, that he was totally out of the question, although we know he is very committed to the issue," he said.

For now, Bandín and García are only investigated and have no arrest warrant against them.



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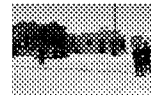
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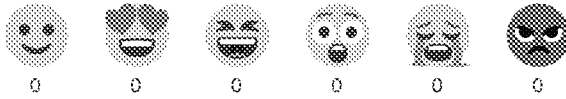
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Porres, Mansur y Bandín, el exclusivo Club de Javier Duarte



El exclusivo club de Javier Duarte / Foto: Periódico Veraz

Por *Claudia Guerrero Martínez* (http://libertadbajopalabra.com/autor/claudia_guerrero/) - 24 julio, 2016 en *Opinión* (<http://libertadbajopalabra.com/category/opinion/>)

Claudia Guerrero Martínez / Conocen, inteligentes lectoras y lectores, a Jaime Porres Fernández-Cavada, José Antonio Bandín Ruiz y Moisés Mansur Cysneiros...Quizá, para la mayoría de los veracruzanos, estos nombres los han escuchado o leído en revistas de negocios, socialité o medios de comunicación afines a la administración de Javier Duarte de Ochoa...**Actualmente, estas personas son investigadas por la PGR, por ser los principales prestanombres del actual Gobernador de Veracruz, Javier Duarte de Ochoa...**

Los excesos de estos pillos empresarios y Javier Duarte se podrían contar en varias entregas, como por ejemplo, uno de estos hoy millonarios de Córdoba, como es Jaime Porres, quien hace unos años, es recordado por bajar de su coche con insultos a Javier Duarte de Ochoa y le realizaba un constante bulling... El antes considerado perdedor o "lúcer" y hoy, Gobernador de Veracruz, olvidó las agresiones en el pasado... **En un cumpleaños de Jaime Porres, quien festejaba en su exclusivo departamento de Miami, recibió de regalo un automóvil Bentley del año, con valor en el mercado por más de \$6 millones de pesos y este fue obsequiado por el ocurrente Mandatario Estatal, Javier Duarte de Ochoa...** Y pagado, no precisamente de los ahorros o bolsillos del Gobernador de Veracruz...

Y los excesos van más allá, contribuyendo a que la PGR investigue estos datos... Actualmente, Moisés Mansur es dueño de un rancho con caballos de rejoneo en Valle de Bravo y este también cuestionado empresario de Córdoba, regaló uno de sus caballos a Paulina Romero, hija del líder petrolero Carlos Romero Deschamps valuado en más de \$100 mil dólares... Mansur Cysneiros le regaló el equino a Paulina Romero, porque la conoció en Veracruz, en el primer año de gobierno de Javier Duarte. Cabe destacar, que durante los meses de enero y febrero del 2012, Carlos Romero Deschamps aún se ostentaba como "padrino" de Duarte de Ochoa y de tener buenas relaciones con Javier, hasta que un día, según fuentes cercanas a Duarte y por cuestiones de dinero, el Gobernador de Veracruz ya no le contestaba el teléfono y esa fue la razón de su distanciamiento. Debemos

puntualizar, que tanto el líder petrolero y su hija Paulina Romero acudían a montar el caballo en el rancho de Moisés Mansur, ubicado en el Estado de México, mismo, cuenta con enfermería de caballos, cuando paradójicamente, en Veracruz no hay medicinas y los servicios de salud son insuficientes...

Uno más, es José Antonio Bandín Ruiz, quien se asoció en el tema de las empresas fantasmas proveedoras del Gobierno de Javier Duarte de Ochoa, facturando a nombre de su esposa, Mónica Babayan Canal, mismas, son investigadas por la PGR... Actualmente, la familia vive en Woodlands, Texas, en los Estados Unidos, junto con sus hijos y presumen, entre otras cosas, de un automóvil de lujo Rolls Royce... Buscando sus empresas financiadas con dinero de los veracruzanos, encontramos un desplegado de varias de ellas, 26 en total, curiosamente, fundadas en los años 2012, 2013, 2014 y 2015, con la liga <https://www.corporationwiki.com/Texas/The-Woodlands/jose-antonio-bandin/103669601.aspx> (<https://www.corporationwiki.com/Texas/The-Woodlands/jose-antonio-bandin/103669601.aspx>)

También, buscando los registros en los Estados Unidos, la PGR podrá investigar todas las propiedades de estas personas, como son casas, terrenos y edificios, adquiridos principalmente en Woodlands, Texas... Además, mansiones ubicadas en Tecamachalco, en el Estado de México, una de ellas propiedad de José Antonio Bandín Ruiz, así como departamentos en Acapulco o el mencionado rancho de Moisés Mansur, con su cuadra de caballos... **Como veracruzana, nos indigna conocer que estos hoy millonarios cordobeses, no tenían dinero, ni negocios antes de la administración de Javier Duarte de Ochoa y hoy, son grandes empresarios, gracias a los desvíos de recursos de las finanzas en Veracruz y para beneficio de estos ladrones...**

Y cómo se conocieron estos pillos prestanombres de Javier Duarte de Ochoa. La historia entre Mansur y Bandín inicia en la juventud, cuando José Antonio Bandín rentaba un departamento de una sola recámara y un cuarto de servicio... Él y Moisés Mansur Cysneiros eran amigos desde la preparatoria y Bandín permite a Mansur vivir en el cuarto de servicio. Luego, Moisés Mansur entra a estudiar a la Universidad Iberoamericana y ahí, conoce a Javier Duarte de Ochoa y se hacen entrañables amigos... **Más adelante, José Antonio Bandín se casa con Mónica Babayan Canal, quien actualmente se ha convertido en una de las principales prestanombres de Javier Duarte y de su propio esposo, sin olvidar que Mónica es hija de "Ludy" o Ludivina Canal, quien también se incluye en la lista de prestanombres de varios lucrativos e ilegales negocios...**

Si bien, se conocía la situación de insolvencia y pobredumbre de los aquí nombrados en esta entrega, cuando Javier Duarte llega de Gobernador de Veracruz, Bandín y Mansur hacen un giro impresionante con escoltas, autos de lujos, relojes costosísimos, inmuebles como el expuesto en Tecamachalco o el departamento en Acapulco, para luego, José Bandín Ruiz le dice a su esposa que en México hay mucha inseguridad y la cambia de residencia, para vivir con sus hijos en Woodlands, Texas, lugar donde compra su primera casa y ahí, siguió adquiriendo más propiedades, una de ellas a nombre de su suegra, Ludivina Canal, a quien también le pusieron a su nombre un departamento en Bosques de las Lomas... Y la familia se fue uniendo a esta injustificada fortuna, como es el caso de hermanos y familiares de José Antonio Bandín, quienes son propietarios de terrenos en Texas, en los Estados Unidos a nombre de Maricarmen y Juan Carlos Bandín Ruiz, así como de Rocío Durán...

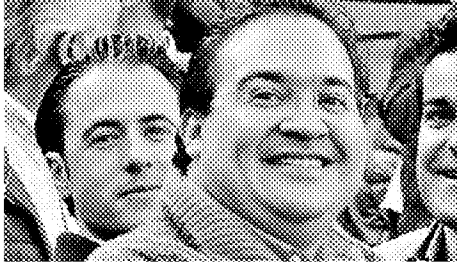
Los excesos y excentricidades también se observan en Moisés Mansur, con la adquisición del rancho de caballos rejoneadores en Valle de Bravo, así como una mansión en Ixtapa Zihuatanejo... Moy Mansur utiliza las aeronaves del Gobierno de Veracruz para viajar a esa playa de Guerrero, así como propiedades en Texas. Existen antecedentes de que en la Ciudad de México, Moisés Mansur y Javier Duarte son socios y dueños de inversiones, como es el caso de inmuebles ubicados en la exclusiva zona de Prado Norte, en las Lomas de Chapultepec... **Moisés Mansur ha escalado tanto como nuevo millonario, que se le vincula con la sobrina de Carlos Peralta Quintero, acusado de ser uno de los beneficiados en el sexenio de Carlos Salinas de Gortari...** Y las excentricidades de "Moy" Mansur se han incrementado a tal grado, que cualquier evento donde acude este empresario cordobés, sus escoltas tienen que llevar la comida y el vino preferido de su jefe, porque se ostenta de ser fino su paladar y no come, ni toma cualquier cosa... Pero eso sí, a Bandín Ruiz y a Moy Mansur se les vincula con la propiedad de taquerías en la Colonia Condesa, de la Ciudad de México...

Por último, dejamos por ahí las ligas para consultar los negocios de los esposos José Antonio Bandín Ruiz y Mónica Babayan Canal, donde se muestran más de 26 compañías fundadas durante la administración de Javier Duarte de Ochoa:

<https://www.corporationwiki.com/Texas/The-Woodlands/jose-antonio-bandin/103669601.aspx> (<https://www.corporationwiki.com/Texas/The-Woodlands/jose-antonio-bandin/103669601.aspx>), así como otra empresa propiedad de los padres de Mónica Babayan Canal, como prestanombres y beneficiados de Javier Duarte de Ochoa, con la liga <https://bizstanding.com/directory/TX/18/3/> (<https://bizstanding.com/directory/TX/18/3/>), la cual dicta: "Business Directory of Texas. 18 RANCH COMPANY, LLC. Members: Ludivina Canal (Manager) Juan I. Babayan (Manager) Mónica Babayan (Manager). Agent: Twofficesuites, Llc 8350 Ashlane Way, Spring, TX 77382"...

Como vemos, aportamos varios datos para que la PGR y si quiere ser autónoma, la Fiscalía General de Justicia del Estado, investiguen a estos pillos como los principales prestanombres de Javier Duarte de Ochoa. Los mismos, que en el 2010 eran unos pobres diablos y sin dinero y hoy, son grandes empresarios que se codena con la realeza empresarial mexicana e internacional, gracias a que robaron, junto con Javier Duarte, el dinero de los veracruzanos...

Relacionado



(<http://libertadbajopalabra.com/2017/04/02/javier-duarte-amigos-socios/>)

Javier Duarte, sus amigos y socios

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Registro Civil, PGR y los Duarte

(<http://libertadbajopalabra.com/2016/08/22/registro-civil-pgr-los-duarte/>)

22 agosto, 2016

En "Opinión"



(<http://libertadbajopalabra.com/2017/04/18/duarte-no-actuo-solo-carcel-tambien-complices-familiares/>)

Duarte no actuó solo; cárcel también a cómplices y familiares

(<http://libertadbajopalabra.com/2017/04/18/duarte-no-actuo-solo-carcel-tambien-complices-familiares/>)

18 abril, 2017

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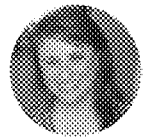
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¿Se derrumba el hijo del gobernador! (<http://libertadbajopalabra.com/2018/06/14/se-derrumba-hijo-del-gobernador/>)



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Morena, ante el fracaso culpar al de junto; «lloran como mujeres lo que no pudieron defender como hombres» (<http://libertadbajopalabra.com/2018/06/24/morena-ante-fracaso-culpar-al-junto-lloran-mujeres-lo-no-pudieron-defender-hombres/>)



¿Y a quién se le ocurrió un cierre de campaña en el día y la hora del juego de la selección?; está comprobado que Cuitláhuac no es AMLO (<http://libertadbajopalabra.com/2018/06/23/quien-se-le-ocurrio-cierre-campana-dia-la-hora-del-juego-la-seleccion-esta-comprobado-cuitlahuac-no-amlo/>)



Atanasio y Cuitláhuac García, usurpadores de Doctorados patito (<http://libertadbajopalabra.com/2018/06/24/atanasio-cuitlahuac-garcia-usurpadores-doctorados-patito/>)



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Porres, Mansur and Bandín, the exclusive Club of Javier Duarte



The exclusive club of Javier Duarte / Photo: Veraz Newspaper

By *Claudia Guerrero Martínez* (http://libertadbajopalabra.com/author/claudia_guerrero/) - July 24, 2016 in *Opinion* (<http://libertadbajopalabra.com/category/opinion/>)

Claudia Guerrero Martínez / You know, smart readers and readers, Jaime Porres Fernández-Cavada, José Antonio Bandín Ruiz and Moisés Mansur Cysneiros ... Perhaps, for most of the people of Veracruz, these names have been heard or read in business magazines, socialite or media related to the administration of Javier Duarte de Ochoa ... **Currently, these people are investigated by the PGR, for being the main names of the current Governor of Veracruz, Javier Duarte de Ochoa ...**

The excesses of these pillos businessmen and Javier Duarte could be counted in several deliveries, as for example, one of these millionaires today of Cordoba, as is Jaime Porres, who a few years ago, is remembered for getting off his car with insults to Javier Duarte Ochoa and performed a constant bullying ... The formerly considered loser or "lúcer" and today, Governor of Veracruz, forgot the aggressions in the past ... **On a birthday of Jaime Porres, who was celebrating in his exclusive Miami apartment, received a gift a Bentley car of the year, with a market value of more than \$ 6 million pesos and this was presented by the State President, Javier Duarte de Ochoa ...** And paid, not exactly from the savings or pockets of the Governor of Veracruz ...

And the excesses go further, contributing to the PGR investigate these data ... Currently, Moisés Mansur owns a ranch with rejoneo horses in Valle de Bravo and this also questioned businessman from Córdoba, gave one of his horses to Paulina Romero, daughter of oil leader Carlos Romero Deschamps valued at more than \$ 100 thousand dollars ... Mansur Cysneiros gave the equine to Paulina Romero, because he met her in Veracruz, in the first year of the government of Javier Duarte. It should be noted that during the months of January and February 2012, Carlos Romero Deschamps was still showing off as "godfather" to Duarte de Ochoa and having good relations with Javier, until one day, according to sources close to Duarte and for reasons of money, the Governor of Veracruz no longer answered the phone and that was the reason for his estrangement.

One more, is José Antonio Bandín Ruiz, who was associated in the matter of ghost companies suppliers of the Government of Javier Duarte de Ochoa, billing on behalf of his wife, Monica Babayan Canal, they are investigated by the PGR ... Currently, the family lives in Woodlands, Texas, in the United States, along with their children and boasts, among other things, of a luxury Rolls Royce car ... Looking for their companies financed with money from Veracruz, we find a

display of several of them, 26 in total, curiously, founded in the years 2012, 2013, 2014 and 2015, with the league
<https://www.corporationwiki.com/Texas/The-Woodlands/jose-antonio-bandin/103669601.aspx>
(<https://www.corporationwiki.com/Texas/The-Woodlands/jose-antonio-bandin/103669601.aspx>)

Also, looking for records in the United States, the PGR will be able to investigate all the properties of these people, such as houses, land and buildings, acquired mainly in Woodlands, Texas ... In addition, mansions located in Tecamachalco, in the State of Mexico, a of them owned by José Antonio Bandín Ruiz, as well as apartments in Acapulco or the aforementioned ranch of Moisés Mansur, with his stable of horses ... **As a citizen of Veracruz, we are outraged to know that these today millionaires from Cordoba had no money or business before the administration of Javier Duarte de Ochoa and today, they are great entrepreneurs, thanks to the diversion of resources from the finances in Veracruz and for the benefit of these thieves ...**

And how did they meet these predators of Javier Duarte de Ochoa. The story between Mansur and Bandin begins in youth, when José Antonio Bandín rented a one-bedroom apartment and a maid's room ... He and Moisés Mansur Cysneiros were friends from high school and Bandín allows Mansur to live in the service room. Then, Moisés Mansur enters to study at the Universidad Iberoamericana and there, he meets Javier Duarte de Ochoa and they become close friends **Later, José Antonio Bandín married Mónica Babayan Canal, who has now become one of the main names of Javier Duarte and his own husband, not forgetting that Monica is the daughter of "Ludy" or Ludivina Canal, who also included in the list of names of several lucrative and illegal businesses ...**

Although, the situation of insolvency and poverty of those named here in this installment was known, when Javier Duarte arrives as Governor of Veracruz, Bandín and Mansur make an impressive turn with escorts, luxury cars, very expensive watches, real estate as the one exhibited in Tecamachalco or the department in Acapulco, then, José Bandín Ruiz tells his wife that in Mexico there is a lot of insecurity and he changes his residence, to live with his children in Woodlands, Texas, where he buys his first house and there, he continued Acquiring more properties, one of them in the name of his mother-in-law, Ludivina Canal, who was also given a department in his name in Bosques de las Lomas ... And the family was joining this unjustified fortune, as is the case of brothers and sisters. relatives of José Antonio Bandín, who own land in Texas, in the United States, in the name of Maricarmen and Juan Carlos Bandín Ruiz, as well as Rocío Durán ...

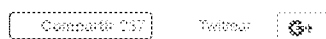
The excesses and eccentricities are also observed in Moisés Mansur, with the acquisition of the ranch of rejoneadores horses in Valle de Bravo, as well as a mansion in Ixtapa Zihuatanejo ... Moy Mansur uses the aircraft of the Government of Veracruz to travel to that beach in Guerrero, as well like properties in Texas. There is a history that in Mexico City, Moisés Mansur and Javier Duarte are partners and owners of investments, as is the case of real estate located in the exclusive area of Prado Norte, in Lomas de Chapultepec ... **Moisés Mansur has climbed as much as new millionaire, who is linked to the niece of Carlos Peralta Quintero, accused of being one of the beneficiaries in the presidency of Carlos Salinas de Gortari ...** And the eccentricities of "Moy" Mansur have increased to such an extent that any event where this businessman from Cordoba comes, his escorts have to bring the food and wine preferred by his boss, because he flaunts his palate and does not eat , or take anything ... But yes, Bandín Ruiz and Moy Mansur are linked to the ownership of taquerias in Colonia Condesa, Mexico City ...

Finally, we leave the leagues out there to consult the businesses of the spouses José Antonio Bandín Ruiz and Mónica Babayan Canal, where more than 26 companies founded during the administration of Javier Duarte de Ochoa are shown:

<https://www.corporationwiki.com/Texas/The-Woodlands/jose-antonio-bandin/103669601.aspx>
(<https://www.corporationwiki.com/Texas/The-Woodlands/jose-antonio-bandin/103669601.aspx>) , as well as another company owned by the parents of Mónica Babayan Canal, as prestanombres and beneficiaries of Javier Duarte de Ochoa, with the league <https://bizstanding.com/directory/TX/18/3/> (<https://bizstanding.com/directory/TX/18/3/>) , which dictates: "Business Directory of Texas. 18 RANCH COMPANY, LLC. Members: Ludivina Canal (Manager) Juan I. Babayan (Manager) Mónica Babayan (Manager). Agent: Twofficesuites, Llc 8350 Ashlane Way, Spring, TX 77382 " ...

As we can see, we provide various information so that the PGR and if it wants to be autonomous, the Attorney General of the State, investigate these pillos as the main names of Javier Duarte de Ochoa. The same, who in 2010 were poor devils and without money and today, are big businessmen that coexists with the Mexican and international business royalty, thanks to the fact that they stole, together with Javier Duarte, the money of the Veracruzans ...

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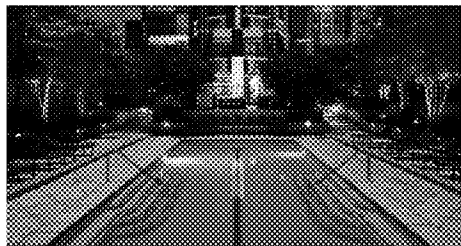
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Duarte did not act alone; jail also to accomplices and relatives

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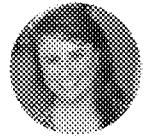
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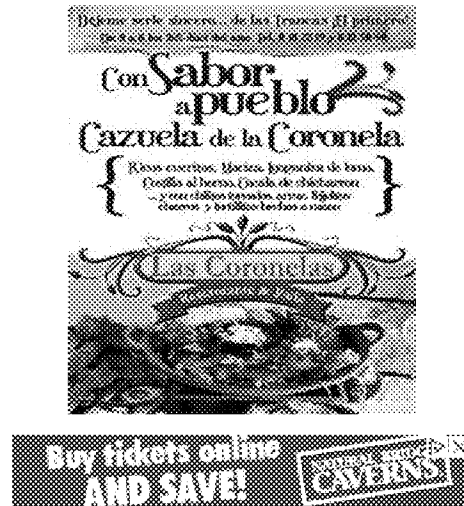
Between utopia and true

Claudia Guerrero Martínez



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Brunette, in the face of failure to blame the one together; «They cry like women what they could not defend as men» (<http://libertadbajopalabra.com/2018/06/24/morena-ante-fracaso-culpar-al-junto-lloran-mujeres-lo-no-pudieron-defender-hombres/>)



And who came up with a campaign closure on the day and time of the national team game? it is proven that Cuitláhuac is not AMLO (<http://libertadbajopalabra.com/2018/06/23/quien-se-le-ocurrio-cierre-campana-dia-la-hora-del-juego-la-seleccion-esta-comprobado-cuitlahuac-no-amlo/>)



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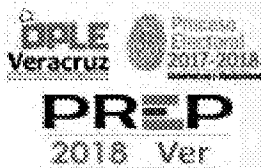
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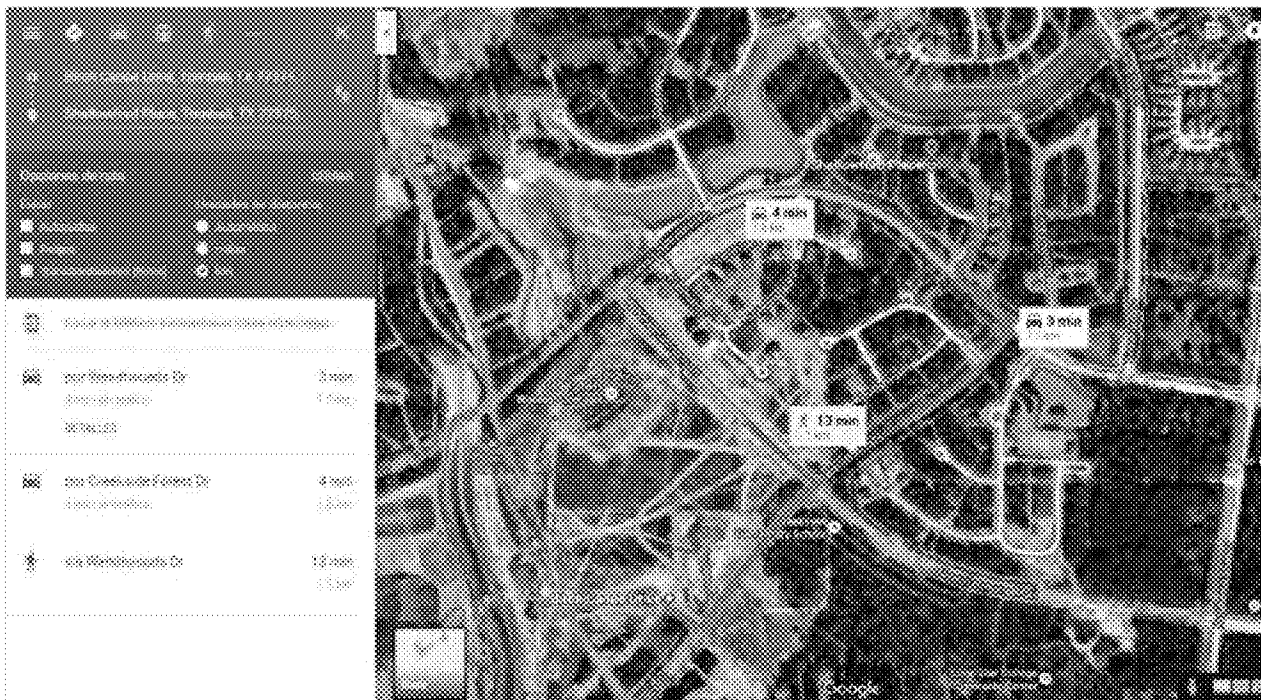
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Consulta la Convocatoria en [WWW.OPLEVER.ORG.MX](http://www.oplever.org.mx)

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Otro prestanombres de Duarte compró otra residencia y opera más de 8 empresas en Texas



En esta residencial y exclusiva zona de Texas, José Antonio Bandín Ruíz ubicado como prestanombres de Javier Duarte, compró otra residencia

Compartir con WhatsApp ([whatsapp://send?text=Otro prestanombres de Duarte compró otra residencia y opera más de 8 empresas en Texas - http://plumaslibres.com.mx/2016/07/21/prestanombres-duarte-compro-otra-residencia-opera-mas-8-empresas-texas/?utm_source=WhatsApp%26utm_medium=IM%26amp;utm_campaign=share%20button](https://www.whatsapp.com/send?text=Otro%20prestanombres%20de%20Duarte%20compro%20otra%20residencia%20y%20opera%20mas%20de%208%20empresas%20en%20Texas%20-%20http://plumaslibres.com.mx/2016/07/21/prestanombres-duarte-compro-otra-residencia-opera-mas-8-empresas-texas/?utm_source=WhatsApp%26utm_medium=IM%26amp;utm_campaign=share%20button))

Xalapa, Ver.- Jose Antonio Bandín Ruiz y su esposa Monica Babayan, presuntos prestanombres de Javier Duarte de Ochoa, gobernador de Veracruz, aparecen como nuevos propietarios de otra residencia ubicada en la dirección 38 Shallowford Place, de Texas, ubicada a solo 1 kilómetro de la casa en 83 Birch Canoe Drive donde su cuñada Mónica Ghihan Macías Tubilla, aparece según publicación de El Financiero, como nueva dueña de otra residencia.

Esta casa fue adquirida a un costo de medio millón de dólares

AFFIDAVIT OF PROPERTY VAI Unofficial Document

PROPERTY: 38 SHALLOWFORD PLACE, DALLAS, TEXAS 75219

OWNER: JOSE ANTONIO BANDIN RUIZ, MONICA BABAYAN

DATE OF PURCHASE: 12/19/2014

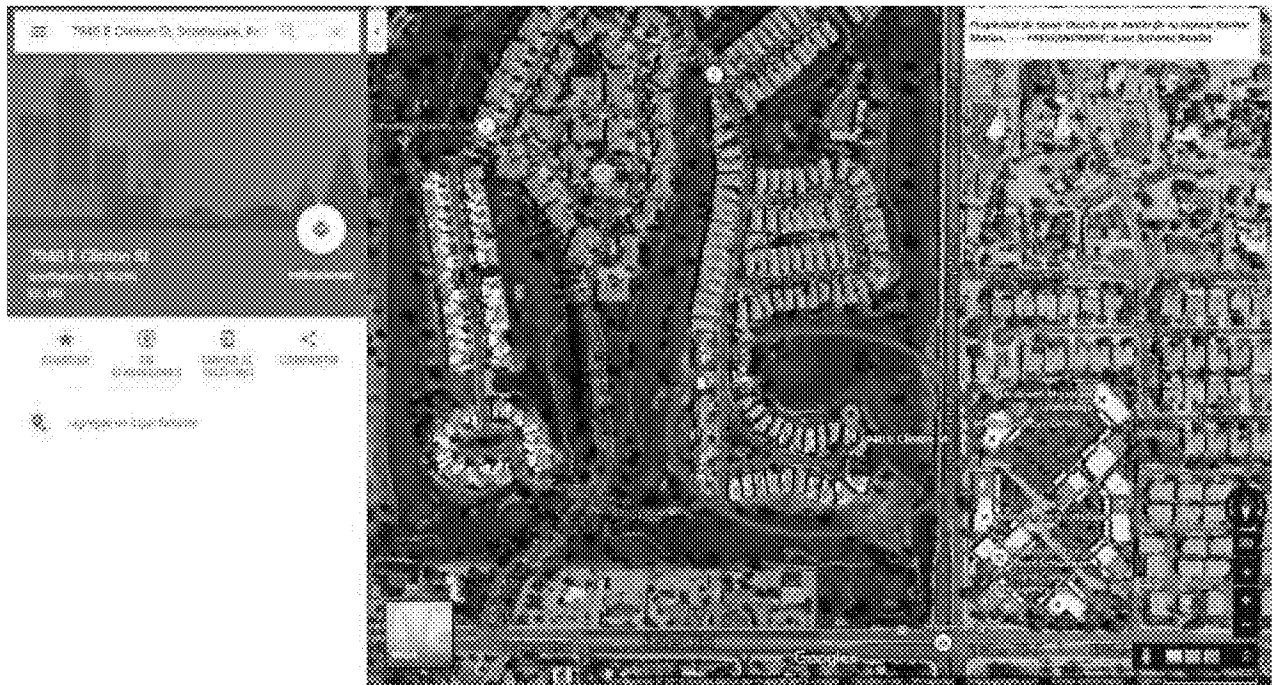
PROPERTY VALUE: \$500,000

DECLARATION: I, the undersigned, certify that the above information is true and correct to the best of my knowledge and belief.

SIGNATURES: Jose Antonio Bandin Ruiz, Monica Babayan

Uno de los documentos de compraventa de la residencia en Texas

Documentos en poder de Plumas Libres revelan que la firma de esta compra se realizó el 19 de Diciembre del año de 2014, solo un par de meses después de que Mónica Macías Tubillas, hermana de Karime Macías, esposa de Javier Duarte, compró otra residencia, en la misma zona. ¿Casualidad o causalidad?.



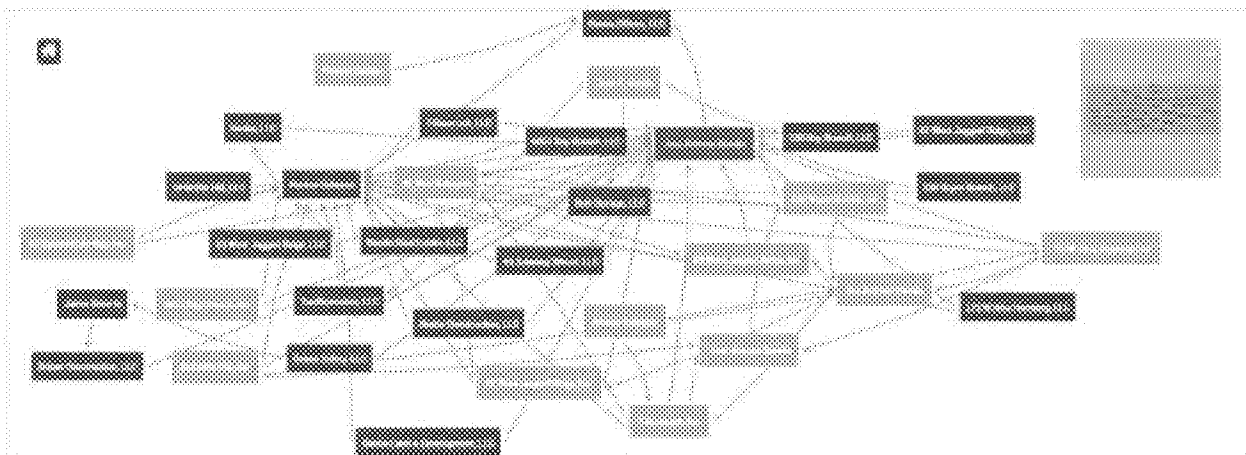
Gracias a Google Maps, se ubica la zona donde los presuntos prestanombres tienen sus residencias en Texas..

Otra casualidad, el notario que firmo ambas compras de las dos residencias en Texas se llama **Jessica Yolanda Taylor**.

Jose Antonio Bandín es la persona que le vendió la casa en Arizona a Karime Macias.

Este personaje junto con su esposa, crearon en Estados Unidos las siguientes empresas:

- Banba construction LLC
- Banba LLC
- Banba Office LLC
- Bull Storage LLC
- Bandin Real State LLC
- Banba Land & Development LLC
- Twofficesuites LLC
- Reban Safety LLC



Red de empresas que opera José Antonio Bandín Ruíz

DIRECCIONES EN LAS QUE OPERAN LAS EMPRESAS DEL PRESTANOMBRES EN TEXAS.

- 83 West jagged Ridge
- 87 West jagged Ridge
- 18 Griffin Hill
- 43 Spinning Wheel

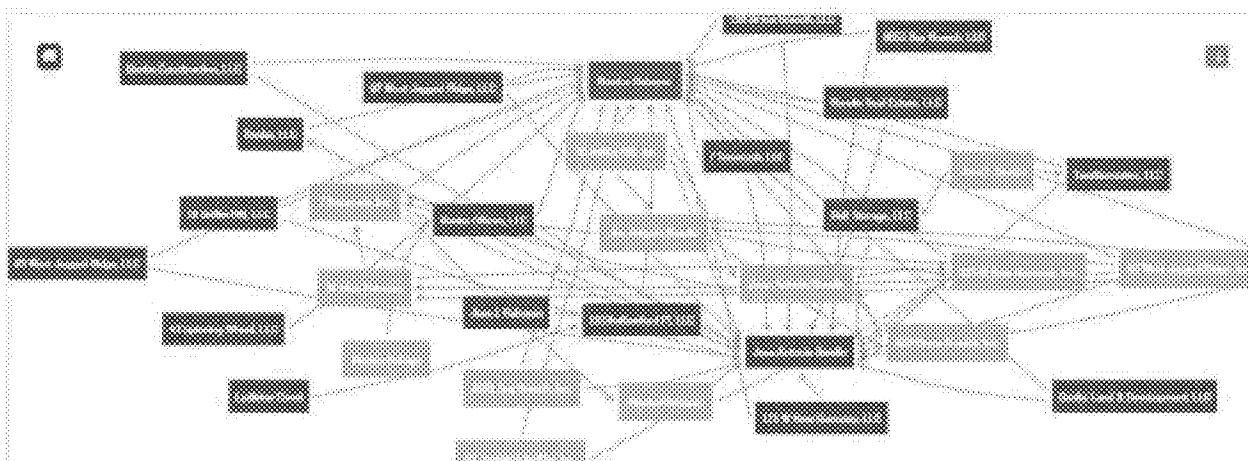
- 18 Shallowford Place
- 7 Roserush.
- 8051 Baybranch.
- 42 Spotted Loly way.
- 175 West New Harmony
- 138 Bryce Branch.

Recientemente el Financiero publicó que Mónica Ghihan Macías Tubilla, cuñada del gobernador de Veracruz, Javier Duarte es dueña de otra residencia en Texas, con un valor de 720 mil 875 dólares.

Se encuentra en el mismo lugar donde el gobernador reconoció que tiene acciones como miembro del Country Club, en el que hace unos días se le dio la bienvenida junto a su esposa, Karime Macías.

El inmueble, a nombre de Mónica Macías, está ubicado en el número 83, de Birch Canoe Dr. 7735, L 17, BLK 1, The Woodlands Creekside Park, West, sección 20, con el número de cuenta 134-429-001-0017, para el pago de impuestos en el Condado de Harris, Texas.

El documento, del que El Financiero tiene copia, es parte de la denuncia que presentó el gobernador electo, Miguel Ángel Yunes, en contra de Javier Duarte por enriquecimiento ilícito, en la que lo acusa además de utilizar 40 diferentes prestanombres como su cuñada y su concuño José Armando Rodríguez Ayache, empleado del Club Tiburones Rojos.



Red de las empresas en las que opera la esposa de José Antonio Bandín

De acuerdo con el documento de pago de impuestos de 2015, que ascendió a cinco mil 659.97 dólares, Mónica Macías es la dueña de esta propiedad además la cuñada de Javier Duarte es dueña de tres departamentos ubicados en la Torre Pelicano, situada en Boulevard Manuel Ávila Camacho número 741, del Fraccionamiento Costa de Oro, en Boca del Río, Veracruz.

De acuerdo con la denuncia que presentó Miguel Ángel Yunes y que no fue desmentida por ella, Mónica Macías es dueña del departamento 6-B, en el séptimo nivel del edificio, que fue adquirido el 30 de enero de 2007, con un valor de cuatro millones 460 mil pesos.

También es dueña del departamento 9-A, en el décimo nivel de la misma torre, adquirido el 2 de abril de 2012, por 5 millones quinientos mil pesos.

Y del 6-A, que adquirió la misma Mónica Macías el 14 de marzo de 2013 que compró en cuatro millones cuatrocientos mil pesos.

Esto significa que en 6 años adquirió tres departamentos de la Torre Pelicano.

En 2007 cuando Mónica Ghihan Macías Tubilla adquirió el primer departamento, Javier Duarte era subsecretario de Finanzas del gobierno de Veracruz y los otros tres inmuebles los compró cuando ya era gobernador del estado.

De acuerdo con las investigaciones que llevó a cabo el equipo del gobernador electo, el mandatario de Veracruz contaría con alrededor de 25 bienes inmuebles adquiridos a través de prestanombres, con un valor superior a los tres mil millones de pesos.

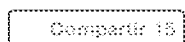
Vincula también 13 propiedades más en Woodlands en Houston, Texas, adquiridas por el delegado de la secretaría de Economía, José Antonio Manzur Beltrán, a quien califica como prestanombres del gobernador.

Como Yunes lo anunció, seguirá con las investigaciones para encontrar cómo se compone la red de prestanombres y las empresas y bienes inmuebles que tienen, no sólo Javier Duarte, sino también los funcionarios del primer nivel de su gobierno.

Lo más sorprendente es que la PGR a cargo de Arely Gómez tiene en el archivo todas y cada una de las denuncias que la misma Auditoría Superior de la Federación (ASF), ha presentado contra Javier Duarte por desvíos millonarios de recursos. Tantas pruebas y rastros de dónde se ha invertido mucho de ese dinero que no se invirtió en beneficio de los veracruzanos, y las más altas autoridades de justicia del país se encuentran cruzados de brazos.

.....

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(<http://plumaslibres.com.mx/2016/10/22/la-cunada-duarte-solo-fue-sometida-interrogatorio-la-policia-federal-pgr/>)
Que la cuñada de Duarte sólo fue sometida a interrogatorio por la Policía Federal: PGR
(<http://plumaslibres.com.mx/2016/10/22/la-cunada-duarte-solo-fue-sometida-interrogatorio-la-policia-federal-pgr/>)
22 Oct 16
En "Sucesos"




(<http://plumaslibres.com.mx/2016/04/05/157460/>)
Revela Reforma que Duarte adquirió 25 inmuebles a través de 36 prestanombres, con valor de 3 mil mdp
(<http://plumaslibres.com.mx/2016/04/05/157460/>)
5 Abr 16
En "Transparencia y corrupción"



(<http://plumaslibres.com.mx/2016/08/05/ah-exhiben-propiedad-duarte-2-5-millones-dolares-texas/>)
Ahora exhiben propiedad de Duarte de 2.5 millones de dólares en Texas
(<http://plumaslibres.com.mx/2016/08/05/ah-exhiben-propiedad-duarte-2-5-millones-dolares-texas/>)
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21 Jul 16 a las 11:37 AM (<http://plumaslibres.com.mx/2016/07/21/prestanombres-duarte-compro-otra-residencia-opera-mas-8-empresas-texas/#comment-256685>)

DE QUE SIRVEN LAS PUBLICACIONES SI NO SE HACE JUSTICIA NO ES POSIBLE QUE SE LE ROBEN AL ERARIO PÚBLICO Y CONTINÚEN QUE HACEN LAS AUTORIDADES COMPETENTES DENUNCIEN Y QUE PROCEDAN CONFORME A DERECHO LAS CUENTAS BANCARIAS DICEN TODO EL ORIGEN Y DESTINO DE RECURSOS

Responder (<http://plumaslibres.com.mx/2016/07/21/prestanombres-duarte-compro-otra-residencia-opera-mas-8-empresas-texas/?replytocom=256685#respond>)



Jeremías C dice:

21 Jul 16 a las 5:09 PM (<http://plumaslibres.com.mx/2016/07/21/prestanombres-duarte-compro-otra-residencia-opera-mas-8-empresas-texas/#comment-256693>)

Ya hay bastantes pruebas para detener a este malnacido Duarte y a su familia. ¿QUE ESPERAN PARA METER A LA CÁRCEL A ESTA MARRANA DESINFLADA???

Responder (<http://plumaslibres.com.mx/2016/07/21/prestanombres-duarte-compro-otra-residencia-opera-mas-8-empresas-texas/?replytocom=256693#respond>)



CESAR DEL DIABLO dice:

20 Feb 17 a las 10:50 PM (<http://plumaslibres.com.mx/2016/07/21/prestanombres-duarte-compro-otra-residencia-opera-mas-8-empresas-texas/#comment-262035>)

SEGURAMENTE LOS 400 PUEBLOS Y EL HIJO CAGON DE CESAR DEL DIABLO IRAN A PROTESTAR PORQUE NO SE CONSIGNA A JAVIER DUARTE, DIGO CON ESO DE QUE LUCHAN POR CAUSAS NOBLES SEGURAMENTE IRAN A ENSEÑAR LAS TECLAS Y TRUZAS VIEJAS, PONIENDOSE DE TAPA RABO LA FOTO DE FIDEL HERRERA. IRAN SEGURAMENTE A HACER PRESION AL D.F. A LA PGR Y A CUALQUIER LUGAR QUE LES PAREZCA DIGNO DE ENCUERARSE.

Responder (<http://plumaslibres.com.mx/2016/07/21/prestanombres-duarte-compro-otra-residencia-opera-mas-8-empresas-texas/?replytocom=262035#respond>)

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- Xalapeños sufren el pase a octavos de México del mundial de Rusia (<http://plumaslibres.com.mx/2018/06/27/xalapenos-sufren-pase-octavos-mexico-del-mundial-rusia/>)
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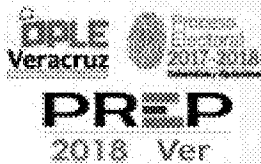
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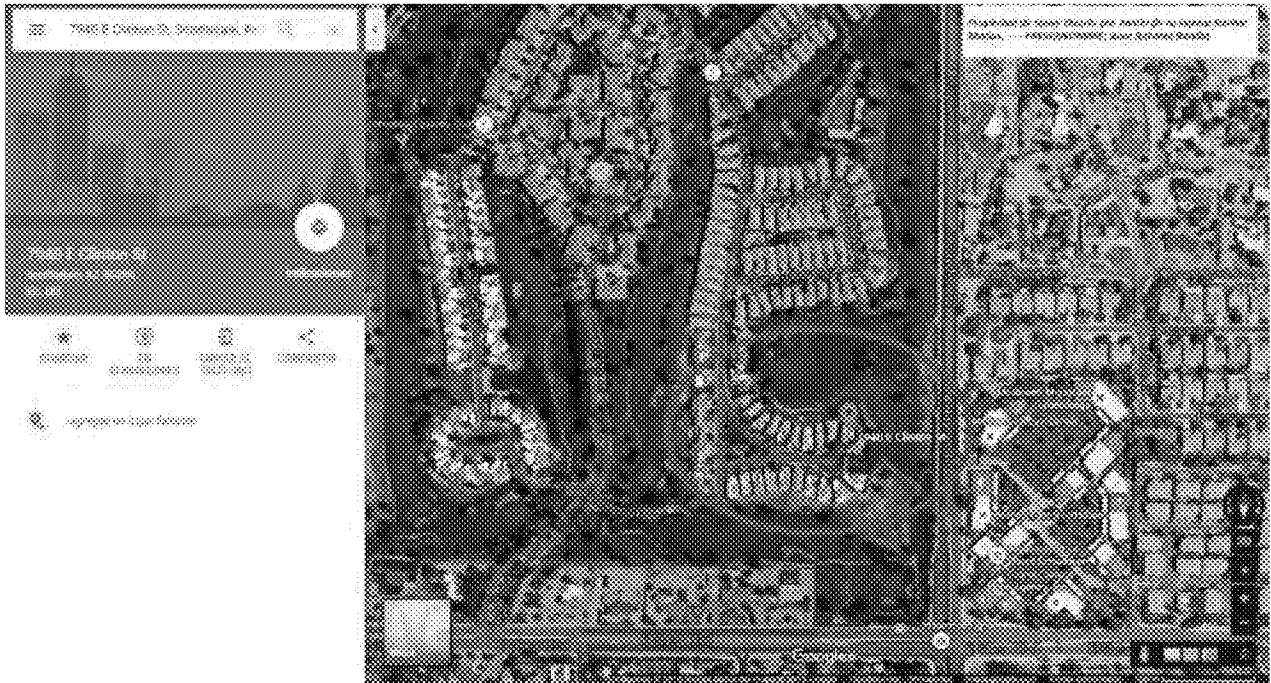
Consulta la Convocatoria en: [WWW.OPLEVER.ORG.MX/](http://www.oplever.org.mx/)

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Another foreman of Duarte bought another residence and operates more than 8 companies in Texas



In this exclusive residential area of Texas, José Antonio Bandín Ruíz, located as a foreman of Javier Duarte, bought another residence



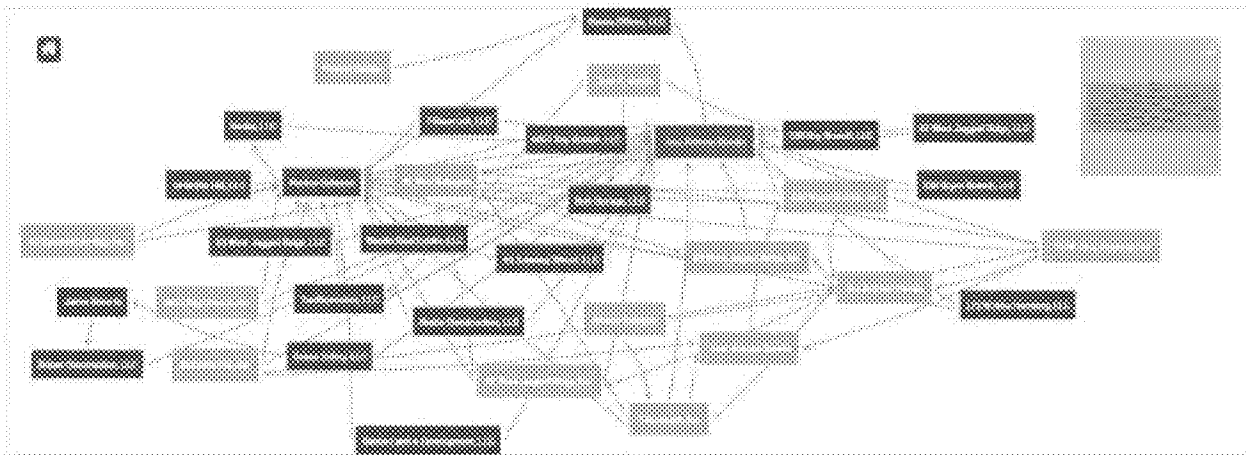
Thanks to Google Maps, it is located the area where presumed presidents have their residences in Texas.

Another coincidence, the notary who signed both purchases of the two residences in Texas is called **Jessica Yolanda Taylor**.

Jose Antonio Bandín is the person who sold the house in Arizona to Karime Macias.

This character, together with his wife, created the following companies in the United States:

- Banba construction LLC
- Banba LLC
- Banba Office LLC
- Bull Storage LLC
- Bandin Real State LLC
- Banba Land & Development LLC
- Twofficesuites LLC
- Reban Safety LLC



Network of companies operating José Antonio Bandín Ruíz

ADDRESSES IN WHICH THE BANKING ENTERPRISES OPERATE IN TEXAS.

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- 87 West jagged Ridge
- 18 Griffin Hill
- 43 Spinning Wheel

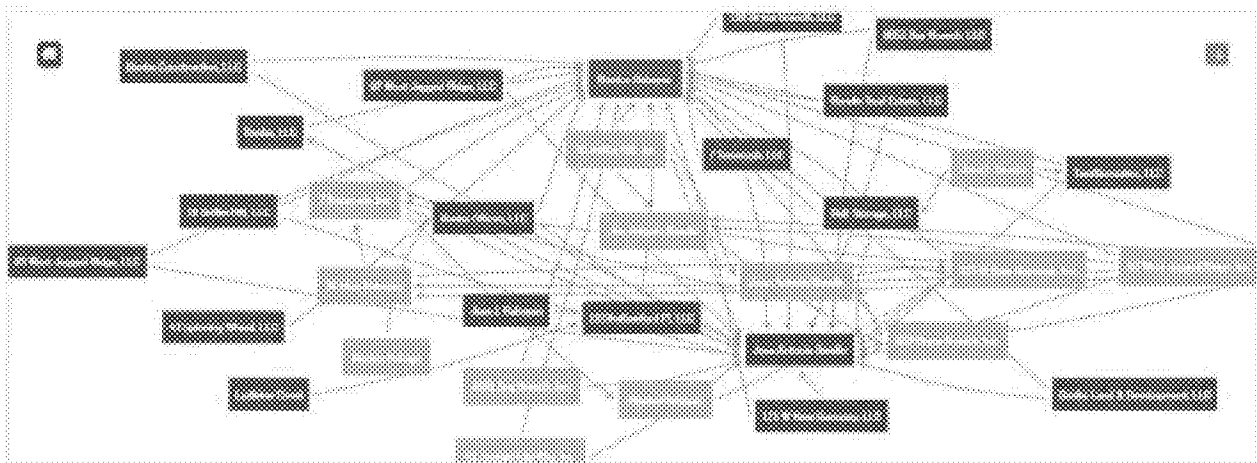
- 18 Shallowford Place
- 7 Roserush.
- 8051 Baybranch.
- 42 Spotted Loly way.
- 175 West New Harmony
- 138 Bryce Branch.

Recently the Financiero published that Monica Ghihan Macias Tubilla, sister-in-law of the governor of Veracruz, Javier Duarte, is the owner of another residence in Texas, with a value of 720 thousand 875 dollars.

He is in the same place where the governor acknowledged that he has shares as a member of the Country Club, where he was welcomed a few days ago along with his wife, Karime Macías.

The property, in the name of Mónica Macías, is located at number 83, Birch Canoe Dr. 7735, L 17, BLK 1, The Woodlands Creekside Park, West, section 20, with account number 134-429-001- 0017, for the payment of taxes in Harris County, Texas.

The document, of which El Financiero has a copy, is part of the complaint filed by the governor-elect, Miguel Ángel Yunes, against Javier Duarte for illicit enrichment, in which he also accuses him of using 40 different prestanombres as his sister-in-law and José Armando Rodríguez Ayache, employee of Club Tiburones Rojos.



Network of companies in which the wife of José Antonio Bandín operates

According to the **2015 taxpayer document, which amounted to five thousand 659.97 dollars, Mónica Macías is the owner of this property. Javier Duarte's sister-in-law owns three departments located in Torre Pelicano, located on Boulevard Manuel Ávila Camacho number 741, of the Costa de Oro subdivision, in Boca del Río, Veracruz.**

According to the complaint presented by Miguel Ángel Yunes and that was not denied by her, Mónica Macías is the owner of department 6-B, on the seventh level of the building, which was acquired on January 30, 2007, with a value of four million 460 thousand pesos.

She also owns department 9-A, on the tenth level of the same tower, acquired on April 2, 2012, for 5 million five hundred thousand pesos .

And of the 6-A, that acquired the same Mónica Macías on March 14, 2013 that she bought in four million four hundred thousand pesos.

This means that in 6 years he acquired three departments of the Pelican Tower.

In 2007, when Monica Ghihan Macias Tubilla acquired the first department, Javier Duarte was undersecretary of Finance of the Veracruz government and the other three properties he bought when he was already governor of the state.

According to the investigations carried out by the team of the governor-elect, the president of Veracruz would have about 25 real estate properties acquired through lending parties, with a value of more than three billion pesos.

It also links 13 more properties in Woodlands in Houston, Texas, acquired by the delegate of the Economy Ministry, José Antonio Manzur Beltrán, whom he qualifies as the governor's presidents.

As announced by Yunes, he will continue with the investigations to find out how the network of prestanombres and the companies and real estate that Javier Duarte has, is composed, as well as the officials of the first level of his government.

The most surprising thing is that the **PGR in charge of Arely Gómez has in the file each and every one of the denunciations that the same Superior Audit of the Federation (ASF), has filed against Javier Duarte for millionaire detours of resources. So many proofs and traces of where much of that money has been invested that was not invested in the benefit of the Veracruzans, and the highest justice authorities of the country are crossed arms.**

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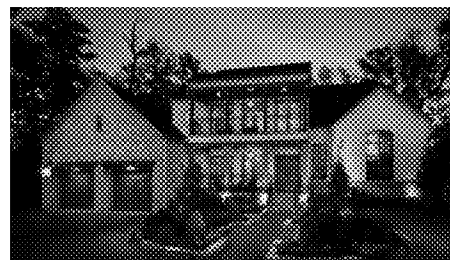
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Marcelo says:

21 Jul 16 at 11:37 AM (<http://plumaslibres.com.mx/2016/07/21/prestanombres-duarte-compro-otra-residencia-opera-mas-8-empresas-texas/#comment-256685>)

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Answer (<http://plumaslibres.com.mx/2016/07/21/prestanombres-duarte-compro-otra-residencia-opera-mas-8-empresas-texas/?replytocom=256685#respond>)



Jeremiah C says:

21 Jul 16 at 5:09 PM (<http://plumaslibres.com.mx/2016/07/21/prestanombres-duarte-compro-otra-residencia-opera-mas-8-empresas-texas/#comment-256693>)

There is already enough evidence to stop this bastard Duarte and his family. WHAT ARE YOU EXPECTING TO PUT THE JAIL TO THIS DEFLATED MARRIA ???

Answer (<http://plumaslibres.com.mx/2016/07/21/prestanombres-duarte-compro-otra-residencia-opera-mas-8-empresas-texas/?replytocom=256693#respond>)



CESAR DEL DIABLO says:

20 Feb 17 at 10:50 PM (<http://plumaslibres.com.mx/2016/07/21/prestanombres-duarte-compro-otra-residencia-opera-mas-8-empresas-texas/#comment-262035>)

SEGURLY THE 400 PEOPLES AND THE SON CAGON DE CESAR OF THE DEVIL WILL GO TO PROTEST BECAUSE JAVIER DUARTE IS NOT SET, I SAY THAT THEY FIGHT FOR NOBLE CAUSES THEY WILL SURELY GO TO TEACH THE OLD KEYS AND TRUZAS, PUTING THE COVER OF THE FIDEL PHOTO HERRERA. THEY WILL SAFELY GO TO PRESS THE DF TO THE PGR AND ANY PLACE THAT LOOKS LIKE TO MEET THEMSELVES.

Answer (<http://plumaslibres.com.mx/2016/07/21/prestanombres-duarte-compro-otra-residencia-opera-mas-8-empresas-texas/?replytocom=262035#respond>)

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- Xalapeños suffer the pass to the second round of the World Cup in Mexico (<http://plumaslibres.com.mx/2018/06/27/xalapeños-sufren-pase-octavos-mexico-del-mundial-rusia/>)
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1	<p>CAUSE NO. 2018-06745</p> <p>FREE AND SOVEREIGN STATE OF) IN THE DISTRICT COURT OF VERACRUZ DE IGNANCIO DE LA) LLAVE,) 334 JUDICIAL DISTRICT</p> <p>vs.)) HARRIS COUNTY, TEXAS</p> <p>18 SHALLOWFORD PL., LLC) JAVIER DUARTE DE OCHOA, JOSE) A. BANDIN, and MONICA BABAYAN,)</p> <p>Defendants.)</p> <hr/> <p>DEPOSITION OF JOSE BANDIN</p> <p>Taken on behalf of Plaintiff</p> <p style="text-align: center;">* * *</p> <p>August 7, 2018 Calle de Moratin, 53 28014, Madrid, Spain</p>	3												
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2	<p>1 APPEARANCES:</p> <p>2 On behalf of the Plaintiff:</p> <p>3 CHRISTOPHER J. LEAVITT, ESQUIRE</p> <p>4 THE BUZBEE LAW FIRM</p> <p>5 600 Travis Street</p> <p>6 Suite 7300</p> <p>7 Houston, Texas 77002</p> <p>8 (713)223-5393</p> <p>9 cleavitt@txattorneys.com</p> <p>10 On behalf of the Defendant:</p> <p>11 JAS BRAR, ESQUIRE</p> <p>12 FOGLER, BRAR, FORD, O'NEIL & GRAY, LLP</p> <p>13 909 Fannin Street</p> <p>14 Suite 1640</p> <p>15 Houston, Texas 77010</p> <p>16 (713)481-1010</p> <p>17 fbfog@fbfog.com</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	4
2	<p>1 MADRID, SPAIN, MONDAY, AUGUST 7, 2018</p> <p>2 9:00 a.m.</p> <p>3 * * *</p> <p>4 THE VIDEOGRAPHER: Good morning. This is</p> <p>5 the beginning of Media number 1, Volume 1 in the</p> <p>6 video deposition of Jose A. Bandin being held at</p> <p>7 the offices of Radisson Blu Prado, Plaza</p> <p>8 Plateria de Martinez, 53, 28014, Madrid in Spain.</p> <p>9 This is being taken on the 7th of August, 2018 at</p> <p>10 9:02 a.m. as indicated on the video screen. This</p> <p>11 deposition is being taken in the matter of Free</p> <p>12 and Sovereign State of Veracruz De Ignacio La</p> <p>13 Llave against 18 Shallowford, P.L, dot, comana,</p> <p>14 LLC, Javier Duarte De Ochoa, Jose Bandin and</p> <p>15 Monica Babayan. Case number 2018-06745 being</p> <p>16 heard before the District Court of the 334th</p> <p>17 Judicial District, Harris County, Texas.</p> <p>18 The court reporter today is Rachel McRoy</p> <p>19 of Ross Reporting Services. My name is David</p> <p>20 Erdos, and I'm the official videographer here</p> <p>21 also on behalf Ross Reporting Performances. The</p> <p>22 standby interpreter is Stephen Carlin of</p> <p>23 Transatlantic Video Deposition Services.</p> <p>24 Would Counsel now please introduce</p> <p>25 themselves and who they represent?</p>	4



5

1 plaintiff.

2 MR. BRAR: Jas Brar on behalf of the

3 defendants.

4 THE REPORTER: Do you swear or affirm the

5 testimony you will give will be the truth, the

6 whole truth and nothing but the truth?

7 Thereupon,

8 Deposition taken before Rachel M. Mcroy,

9 Notary Public, in the above cause.

10 THE WITNESS: I do.

11 THE REPORTER: I need to swear in the

12 Interpreter. Do you swear or affirm to translate from

13 English to Spanish and from Spanish to English to the

14 best of your ability?

15 Thereupon,

16 The Interpreter, STEPHEN CARLIN, was sworn to translate

17 from English to Spanish and from Spanish to English.

18 THE INTERPRETER: I do.

19 DIRECT EXAMINATION

20 BY MR. LEAVITT:

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

22 the Jury your name, please.

23 A. My name is Jose Antonio Bandin.

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

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

6

1 Spain zip code 46004.

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

3 right?

4 A. Yes.

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

6 because you have been indicted in Mexico, correct?

7 MR. BRAR: Objection. I instruct my

8 witness that any answer by you to this question

9 could possibly permit someone to use and to

10 misuse your answer or combined your answer with

11 something else in a way that would violate your

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

13 Constitution and the Supreme Court's decision in

14 Ohio v. Reiner under certain laws of your country

15 or under certain international conventions. I,

16 therefore, advise and instruct you, as your

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

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

19 and understand my advice and instruction and that

20 you will follow my instruction and will not

21 answer the question.

22 THE WITNESS: I refuse to answer that

23 question under the counsel of my lawyer, and I

24 take the Fifth Amendment to protect my rights.

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

7

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

2 MR. BRAR: Same as when you ask the

3 question every time --

4 MR. LEAVITT: I will stipulate it if you

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

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

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

8 law and all that.

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

10 the same running instruction throughout the

11 deposition every time, yeah, I will shorten it

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

13 MR. LEAVITT: Understood. This is not

14 trickery. I have a limited number of hours to

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

16 hurry through this, especially since we know what

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

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

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

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

21 talking to say I take the Fifth.

22 THE WITNESS: Correct, yes.

23 BY MR. LEAVITT:

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

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

8

1 MR. BRAR: I instruct my client not to

2 answer this question because it violates his

3 rights of the Fifth Amendment certain laws and

4 international conventions, so I advise you not to

5 answer his question.

6 THE WITNESS: So I refuse to answer the

7 question under the counsel of my lawyer to

8 protect my rights under the Fifth Amendment.

9 BY MR. LEAVITT:

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

11 after negotiating a plea bargain with the government of

12 Veracruz you fled from Mexico to Spain, correct?

13 MR. BRAR: I instruct my client not to

14 answer the question because it would violate his

15 rights of the Fifth Amendment and other laws of

16 his country or international conventions; I,

17 therefore, advise him not to answer this

18 question.

19 THE WITNESS: So I refuse to answer this

20 question under counsel of my lawyer under the

21 Fifth Amendment.

22 BY MR. LEAVITT:

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

24 Mexico City and agreed return the properties that you had

25 purchased with stolen money, correct?

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

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

10 BY MR. LEAVITT:

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

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

25 THE WITNESS: I refuse to answer the

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

3 BY MR. LEAVITT:

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

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

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

16 BY MR. LEAVITT:

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

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

25 THE WITNESS: I refuse to answer the

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

3 BY MR. LEAVITT:

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

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

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

16 BY MR. LEAVITT:

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

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

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

1 constitutional rights under the Fifth Amendment.

2 BY MR. LEAVITT:

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

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

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

13 BY MR. LEAVITT:

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

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

22 BY MR. LEAVITT:

23 Q. When is the last time you saw -- I'm sorry.
24 THE WITNESS: I refuse to answer that
25 question under counsel of my lawyer to protect my

13

1 constitutional rights under the Fifth Amendment.
 2 BY MR. LEAVITT:
 3 Q. When is the last time you saw Mr. Duarte?
 4 MR. BRAR: I instruct my client not to
 5 answer this question because it would violate his
 6 rights under the Fifth Amendment of certain laws
 7 of his country or international conventions; I,
 8 therefore, advise him and instruct him not to
 9 answer this question.
 10 THE WITNESS: I refuse to answer that
 11 question under counsel of my lawyer to protect my
 12 constitutional rights under the Fifth Amendment.
 13 BY MR. LEAVITT:
 14 Q. When was the last time you spoke to Mr. Duarte?
 15 MR. BRAR: I instruct my client not to
 16 answer that question because it would violate his
 17 rights under the Fifth Amendment of certain laws
 18 of his country or international conventions; I,
 19 therefore, advise him and instruct him not to
 20 answer this question.
 21 THE WITNESS: I refuse to answer that
 22 question under counsel of my lawyer to protect my
 23 constitutional rights under the Fifth Amendment.
 24 BY MR. LEAVITT:
 25 Q. What did you and Mr. Duarte talk about last?

14

1 MR. BRAR: I instruct my client not to
 2 answer this question because it would violate his
 3 rights under the Fifth Amendment of certain laws
 4 of his country or international conventions; I,
 5 therefore, advise and instruct him not to answer
 6 this question.
 7 THE WITNESS: I refuse to answer that
 8 question under counsel of my lawyer to protect my
 9 constitutional rights under the Fifth Amendment.
 10 BY MR. LEAVITT:
 11 Q. You and Mr. Duarte were part of a conspiracy to
 12 steal money from the city of Veracruz, correct?
 13 MR. BRAR: I instruct my client not to
 14 answer this question because it would violate his
 15 rights under the Fifth Amendment certain laws in
 16 his country or international conventions; I,
 17 therefore, instruct my client not to answer this
 18 question.
 19 THE WITNESS: I refuse to answer that
 20 question under counsel of my lawyer to protect my
 21 institutional rights under the Fifth Amendment.
 22 BY MR. LEAVITT:
 23 Q. This conspiracy to steal money was done by both
 24 theft and grand corruption?
 25 MR. BRAR: I instruct my client not to

15

1 answer this question because it would violate his
 2 rights under the Fifth Amendment certain laws of
 3 his country for international convention,
 4 therefore I advise and instruct my client not to
 5 answer this question.
 6 THE WITNESS: I refuse to answer that
 7 question upon counsel of my lawyer to protect my
 8 rights under the Fifth Amendment.
 9 BY MR. LEAVITT:
 10 Q. Sir, you organized a group of businessman that
 11 were implicit in this theft and corruption, correct?
 12 MR. BRAR: I instruct my client not to
 13 answer this question because it would violate his
 14 rights under the Fifth Amendment of certain laws
 15 of his country or international conventions; I,
 16 therefore, advise and instruct my client not to
 17 answer this question.
 18 THE WITNESS: I refuse to answer that
 19 question under counsel of my lawyer to protect my
 20 constitutional rights under the Fifth Amendment.
 21 BY MR. LEAVITT:
 22 Q. Sir, you organized this group of business people
 23 such that they were willing to invoice various agencies of
 24 the Veracruz government for fraudulent sums, correct?
 25 MR. BRAR: Object to the form. But also I

16

1 instruct my client not to answer this question
 2 because it violates his rights under the Fifth
 3 Amendment and of certain laws of his country or
 4 international conventions; I, therefore, advise
 5 and instruct, him as his lawyer, not to answer
 6 this question.
 7 THE WITNESS: I refuse to answer that
 8 question upon counsel of my lawyer to protect my
 9 constitutional rights under the Fifth Amendment.
 10 MR. LEAVITT: What was the form?
 11 MR. BRAR: It was vague and ambiguous. I
 12 think you said group of individuals, and that's
 13 vague and ambiguous.
 14 BY MR. LEAVITT:
 15 Q. Sir, this group of business people you
 16 organized -- let me start over.
 17 Sir, this group of business people that you
 18 organized for Mr. Duarte sent fraudulent invoices to the
 19 state of Veracruz, correct?
 20 MR. BRAR: Object to the form. Also
 21 instruct my client not to answer this question
 22 because it would violate his rights under the
 23 Fifth Amendment certain laws of his country of
 24 international convention; I, therefore, advise
 25 him and instruct him not to answer this question.

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

5 BY MR. LEAVITT:

6 Q. And it's your direction that these group of
7 people did send fraudulent invoices to the state of
8 Veracruz, correct?

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

16 THE WITNESS: I refuse to answer this
17 question based on counsel of my lawyer. My
18 institutional rights including those under the
19 Fifth Amendment.

20 BY MR. LEAVITT:

21 Q. And Mr. Duarte made sure those invoices got paid,
22 correct?

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

1 Fifth Amendment and certain laws of his country
2 of international conventions; I, therefore,
3 advise and instruct him not to answer the
4 question.

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

9 BY MR. LEAVITT:

10 Q. Those invoices were for things like road
11 construction, right?

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

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

22 BY MR. LEAVITT:

23 Q. Not all the roads got built, correct?

24 MR. BRAR: Object to the form. I also
25 instruct my client not to answer the question

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

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

9 BY MR. LEAVITT:

10 Q. But the invoices were paid in full, correct?

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

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

21 BY MR. LEAVITT:

22 Q. Like the roads, there were contracts or invoices
23 to purchase medicine, correct?

24 MR. BRAR: Object to the form. I also
25 instruct my client not to answer this question

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

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

10 BY MR. LEAVITT:

11 Q. There were contracts or invoices to pay for
12 medicine like chemotherapy and insulin but not all the
13 medicines were actually purchased, correct?

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

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

24 BY MR. LEAVITT:

25 Q. Instead of actually delivering medicine what was

1 actually delivered was saline, correct?
2 MR. DRAR: Object to the form. I also instruct
3 my client not to answer those question because it
4 would violate his rights of the Fifth Amendment,
5 certain laws of his country are international
6 conventions; I, therefore, advise and
7 instruct my client not to answer this question.

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

12 BY MR. LEAVITT:

13 Q. And then you and your co-conspirators, including
14 Mr. Duarte, would kept the proceeds of this, correct?

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

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

25 BY MR. LEAVITT:

1 Q. And after these invoices were paid these business
2 people would keep a commission and give the rest to you
3 and Mr. Duarte, correct?

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

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

14 BY MR. LEAVITT:

15 Q. Sir, these payments you made to companies set up
16 by you and Mr. Duarte to receive these funds, correct?

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

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

1 under the Fifth Amendment.

2 BY MR. LEAVITT:

3 Q. And these companies set up to receive these
4 stolen funds would include Terra Inmobiliaria, Grupo
5 Brades, Inmobiliara Cartujano, Boydar, Valkany,
6 Controladora Prado Norte and Inmobiliara 135 Prado Norte,
7 correct?

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

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

18 BY MR. LEAVITT:

19 Q. And Mr. Duarte would make sure you get some of
20 these funds for organizing this fraud, correct?

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

1 and instruct him not to answer this question.

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

6 BY MR. LEAVITT:

7 Q. Your wife would also get a share of some of these
8 funds, correct?

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

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

19 BY MR. LEAVITT:

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

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

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

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

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

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

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1 BY MR. LEAVITT:
 2 Q. And these entities did, in fact, receive and then
 3 invest stolen funds from the state of Veracruz, correct?
 4 MR. BRAR: Object to the form. I also advise my
 5 client not to answer this question because it would
 6 violate his rights under the Fifth Amendment certain
 7 laws of his country or international conventions; I,
 8 therefore, advise and instruct him not to answer this
 9 question.
 10 THE WITNESS: I refuse to answer that
 11 question based on the counsel of my lawyer, my
 12 constitutional rights including those protected
 13 under the Fifth Amendment.
 14 BY MR. LEAVITT:
 15 Q. Someone else who participated in this conspiracy
 16 with you was Alejandro Ortiz Carpintero, correct?
 17 MR. BRAR: Object to the form. I also
 18 instruct my client not to answer this question
 19 because it would violate his rights under the
 20 Fifth Amendment, certain laws of his country or
 21 international conventions; I, therefore, advise
 22 and instruct my client not to answer this
 23 question.
 24 THE WITNESS: I refuse to answer that
 25 question based on the counsel of my lawyer, my

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

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1 THE WITNESS: I refuse to answer that
 2 question based on the counsel of my lawyer, my
 3 constitutional rights including those protected
 4 under the Fifth Amendment.
 5 BY MR. LEAVITT:
 6 Q. And this entity did, in fact, receive and invest
 7 stolen funds from the state of Veracruz, correct?
 8 MR. BRAR: Object to the form. I also
 9 instruct my client not to answer this question
 10 because it would violates his rights under the
 11 Fifth Amendment, certain laws of his country or
 12 international conventions; I, therefore, advise
 13 and instruct my client not to answer this
 14 question.
 15 THE WITNESS: I refuse to answer that
 16 question based on the counsel of my lawyer, my
 17 constitutional rights including those protected
 18 under the Fifth Amendment.
 19 BY MR. LEAVITT:
 20 Q. Jorge Ramirez was also somebody who participated
 21 in this conspiracy with you and Mr. Duarte, correct?
 22 MR. BRAR: Object to the form. I also
 23 instruct my client not to answer this question
 24 based on it would violate his rights under the
 25 Fifth Amendment, certain laws of his country or

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

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

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

11 BY MR. LEAVITT:

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

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

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

25 BY MR. LEAVITT:

1 each.

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

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

8 MR. LEAVITT: Feel free, sir.

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

13 BY MR. LEAVITT:

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

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

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

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

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

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

12 MR. LEAVITT: You pick.

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

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

17 MR. BRAR: Yeah.

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

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

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

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

1 under the Fifth Amendment.

2 BY MR. LEAVITT:

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

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

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

15 BY MR. LEAVITT:

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

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

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

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

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

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

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

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

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

11 BY MR. LEAVITT:

12 Q. Mr. Zurita received money from the state of
13 Veracruz for these invoices, correct?

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

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

24 BY MR. LEAVITT:

25 Q. He then shared that money with both you and

1 Mr. Duarte, correct?

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

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

12 BY MR. LEAVITT:

13 Q. Sergio Ortiz also sent fraudulent invoices to the
14 state of Veracruz under your direction, correct?

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

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

1 BY MR. LEAVITT:

2 Q. You received money from the state of Veracruz
3 after submitting these fraudulent invoices, correct?

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

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

15 BY MR. LEAVITT:

16 Q. You then shared some of his money with both you
17 and Mr. Duarte, correct?

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

25 THE WITNESS: I refuse to answer that

1 question based on the counsel of my lawyer, my
2 constitutional rights including those protected
3 under the Fifth Amendment.

4 THE VIDEOGRAPHER: This is the end of
5 Media 1, Volume 1 in the video deposition of Jose
6 Antonio Bandin. Going off the record at
7 10:40 a.m. as indicated on the video screen.

8 (Recess taken at 10:40 a.m.)

9 THE VIDEOGRAPHER: This is the beginning
10 of Media 2, Volume 1 in the video deposition of
11 Jose Antonio Bandin, going back on the record at
12 10:22 a.m. as indicated on the video screen.

13 Thank you, Counsel.

14 BY MR. LEAVITT:

15 Q. Sir, we're back after a short break. Are you
16 prepared to continue?

17 A. Yes.

18 Q. Sir, you would agree with me, would you not, that
19 you were not sued because you filed property deeds or any
20 other public document, right?

21 MR. BRAR: Object to the form. I also
22 instruct -- sorry. I interrupted you, sorry.
23 Object to the form. I also instruct my client
24 not to answer this question because it would
25 violate his rights under the Fifth Amendment,

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

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

8 BY MR. LEAVITT:

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

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

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

22 BY MR. LEAVITT:

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

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

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

11 BY MR. LEAVITT:

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

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

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

25 BY MR. LEAVITT:

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

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

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

13 BY MR. LEAVITT:

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

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

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

1 under the Fifth Amendment.

2 BY MR. LEAVITT:

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

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

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

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

18 BY MR. LEAVITT:

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

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

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

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

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

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

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1 groups, that is true, correct?
 2 MR. BRAR: Object to the form. I also
 3 instruct my client that answering this question
 4 would violate his rights under the Fifth
 5 Amendment, certain laws of his country or
 6 international conventions; I, therefore, advise
 7 and instruct my client not to answer this
 8 question.
 9 THE WITNESS: I refuse to answer that
 10 question based on counsel from my lawyer, my
 11 constitutional rights including those protected
 12 under the Fifth Amendment.
 13 BY MR. LEAVITT:
 14 Q. Mr. Cedas swore that you set up shell companies
 15 to receive these stolen funds, that is true, correct?
 16 MR. BRAR: Object to the form. I also
 17 instruct my client that answering this question
 18 violates his rights under the Fifth Amendment,
 19 certain laws of his country or international
 20 conventions; I, therefore, advise and instruct
 21 him not to answer this question.
 22 THE WITNESS: I refuse to answer that
 23 question based on counsel from my lawyer, my
 24 constitutional rights including those protected
 25 under the Fifth Amendment.

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1 BY MR. LEAVITT:
 2 Q. Mr. Cedas swore that you took that stolen money
 3 and used it to purchase real estate in the United States,
 4 correct?
 5
 6 MR. BRAR: Object to the form. I also
 7 instruct my client that answering this question
 8 violates his rights under the Fifth Amendment,
 9 certain laws of his country or international
 10 conventions; I, therefore, advise and instruct
 11 him not to answer this question.
 12 THE WITNESS: I refuse to answer that
 13 question based on counsel from my lawyer, my
 14 constitutional rights including those protected
 15 under the Fifth Amendment.
 16 BY MR. LEAVITT:
 17 Q. Mr. Cedas sworn testimony is accurate, isn't it?
 18 MR. BRAR: Object to the form. I also
 19 instruct my client that answering this question
 20 violates his rights under the Fifth Amendment,
 21 certain laws of his country or international
 22 conventions; I, therefore, advise and instruct
 23 him not to answer this question.
 24 THE WITNESS: I refuse to answer based on
 25 counsel from my lawyer, my constitutional rights

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1 including those protected under the Fifth
 2 Amendment.
 3 BY MR. LEAVITT:
 4 Q. Mr. Cedas provided sworn testimony that you and
 5 Mr. Duarte were involved in corruption for government
 6 contracts, Mr. Cedas sworn testimony is correct; isn't it?
 7 MR. BRAR: Object to the form. I also
 8 instruct my client that this question violates
 9 his rights under the Fifth Amendment, certain
 10 laws of his country or international conventions;
 11 I, therefore, advise and instruct him not to
 12 answer this question.
 13 THE WITNESS: I refuse to answer this
 14 question based on counsel from my lawyer, my
 15 constitutional rights including those protected
 16 under the Fifth Amendment.
 17 BY MR. LEAVITT:
 18 Q. Mr. Cedas provided sworn testimony that you were
 19 involved in the theft of more than of \$100 millions from
 20 the state of Veracruz, Mr. Cedas' sworn testimony is
 21 correct; isn't it?
 22 MR. BRAR: Object to the form. I also
 23 instruct my client that this question violates
 24 his rights under the Fifth Amendment, certain
 25 laws of his country or international conventions;

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1 I, therefore, advise and instruct him not to
 2 answer this question.
 3 THE WITNESS: I refuse to answer based on
 4 counsel from my lawyer, my constitutional rights
 5 including those protected under the Fifth
 6 Amendment.
 7 BY MR. LEAVITT:
 8 Q. Mr. Duarte, with signed government contracts, to
 9 entities that you controlled or had conspired with to
 10 steal money, correct?
 11 MR. BRAR: Object to the form. I also
 12 instruct my client that this question violates
 13 his rights under the Fifth Amendment or certain
 14 laws of his country or international conventions;
 15 I, therefore, advise and instruct him not to
 16 answer this question.
 17 THE WITNESS: I refuse to answer based
 18 upon counsel from my lawyer, my constitutional
 19 rights including those protected under the Fifth
 20 Amendment.
 21 BY MR. LEAVITT:
 22 Q. These entities would either overcharge the
 23 government or not do the work at all, correct?
 24 MR. BRAR: Object to the form. I also
 25 instruct my client that this question violates

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

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

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

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

1 BY MR. LEAVITT:

2 Q. You and Mr. Duarte agreed that the object was to
3 take money from the state of Veracruz, correct?

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

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

14 BY MR. LEAVITT:

15 Q. And you agree with me the way in which this
16 conspiracy was accomplished was by submitting fraudulent
17 invoices to various agencies of the government of
18 Veracruz, correct?

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

25 THE WITNESS: I refuse to answer this

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

5 BY MR. LEAVITT:

6 Q. And this money was taken from the state of
7 Veracruz in conjunction with the conspiracy -- strike
8 that.

9 38 Shallowford Place, Tomball, Texas, is a
10 property that you own, correct?

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

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

21 BY MR. LEAVITT:

22 Q. This is a property that you purchased with funds
23 stolen from the state of Veracruz, right?

24 MR. BRAR: Object to the form. I also
25 instruct my client that this question violates

1 question based upon counsel from my lawyer, my
2 constitutional rights including those protected
3 under the Fifth Amendment.

4 BY MR. LEAVITT:

5 Q. 8976 Chatsworth Drive, Houston, Texas 77024 is a
6 property that you own, correct?

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

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

17 BY MR. LEAVITT:

18 Q. This was a property that was purchased by you
19 with funds stolen from the state of Veracruz, correct?

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

1 his Fifth Amendment rights or certain laws of his
2 country or international conventions; I,
3 therefore, advise and instruct him not to answer
4 this question.

5 THE WITNESS: I refuse to respond based on
6 counsel from my lawyer, my constitutional rights
7 including those protected under the Fifth
8 Amendment.

9 BY MR. LEAVITT:

10 Q. These funds were stolen in a conspiracy with
11 Javier Duarte, correct?

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

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

22 BY MR. LEAVITT:

23 Q. 18 Shallowford Place in Spring, Texas is a
24 property owned by you, correct?

25 MR. BRAR: I also instruct my client that

1 this question violates his rights under the Fifth
2 Amendment or certain laws of his country or
3 international conventions; I, therefore, advise
4 and instruct him not to answer this question.

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

9 BY MR. LEAVITT:

10 Q. This property is owned by an entity named 18
11 Shallowford Place, LLC, correct?

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

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

22 BY MR. LEAVITT:

23 Q. This is an entity that you and your wife created
24 and still control, correct?

25 MR. BRAR: Object to this question. I

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

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

11 BY MR. LEAVITT:

12 Q. 8350 Ashlane Way, Suite 8 in The Woodlands, Texas
13 is a property owned by you, correct?

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

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

23 BY MR. LEAVITT:

24 Q. This property is held by a company named 18
25 Shallowford Place, LLC, right?

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

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

10 BY MR. LEAVITT:

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

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

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

22 BY MR. LEAVITT:

23 Q. And you agree with me this property was in fact
24 purchased with funds stolen from the state of Veracruz,
25 correct?

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

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

11 BY MR. LEAVITT:

12 Q. This is an entity -- strike that.

13 This is an entity that you and your wife created
14 in order to receive stolen funds from the state of
15 Veracruz, correct?

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

22 THE WITNESS: I refuse to respond based on
23 counsel from my lawyer, my constitutional rights
24 including those protected by the Fifth Amendment.

25 BY MR. LEAVITT:

1 Q. This property was, in fact, purchased with stolen
2 funds from the state of Veracruz, correct?

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

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

14 BY MR. LEAVITT:

15 Q. 8350 Ashlane Way, Suite 4, in The Woodlands,
16 Texas is another property that you own, correct?

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

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

1 under the Fifth Amendment.

2 BY MR. LEAVITT:

3 Q. This property is held by an entity named Bamba
4 Offices, LLC, correct?

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

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

15 BY MR. LEAVITT:

16 Q. This is an entity that you and your wife created
17 in order to receive stolen funds from the state of
18 Veracruz, right?

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

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

5 BY MR. LEAVITT:

6 Q. This property was, in fact, purchased with funds
7 stolen from the state of Veracruz, correct?

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

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

18 BY MR. LEAVITT:

19 Q. 8350 Ashlane Way, Suite 3 in The Woodlands, Texas
20 is also owned by you, correct?

21 MR. BRAR: I instruct my client that any
22 answer to this question violates his rights under
23 the Fifth Amendment or certain laws of his
24 country or international conventions; I,
25 therefore, advise and instruct my client not to

1 answer this question.

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

6 BY MR. LEAVITT:

7 Q. This office is also held by Bamba Offices, LLC,
8 correct?

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

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

19 BY MR. LEAVITT:

20 Q. Sir, and this property was also purchased with
21 funds stolen from the state of Veracruz, correct?

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

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

4 THE WITNESS: I refuse to answer based on
5 counsel from my lawyer, my constitutional rights
6 including those protected by the Fifth Amendment.
7 BY MR. LEAVITT:

8 Q. Sir, 43 North Spinning Wheel Circle in the
9 Woodland Circle is also owned by you, correct?

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

16 THE WITNESS: I refuse to answer this
17 question based upon counsel from my lawyer, my
18 constitutional rights including those protected
19 under the Fifth Amendment.

20 BY MR. LEAVITT:

21 Q. This property is owned by 43 Spinning Wheel, LLC,
22 correct?

23 MR. BRAR: I will instruct my client not
24 to answer this question. It violates his rights
25 under the Fifth Amendment or certain laws of his

1 country or international conventions; I,
2 therefore, advise and instruct him not to answer
3 this question.

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

8 BY MR. LEAVITT:

9 Q. And that is an entity you and your wife created
10 in order to receive stolen funds from the state of
11 Veracruz, correct?

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

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

22 BY MR. LEAVITT:

23 Q. This property was in fact purchased with funds
24 stolen from the state of Veracruz, correct?

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

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

6 THE WITNESS: I refuse to answer based
7 upon counsel from my lawyer, my constitutional
8 rights including those protected under the Fifth
9 Amendment.

10 BY MR. LEAVITT:

11 Q. Sir, 138 Bryce Branch Circle in The Woodlands,
12 Texas is another property owned by you, correct?

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

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

23 BY MR. LEAVITT:

24 Q. This property is held by a company named 138
25 Bryce Branch, LLC, correct?

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

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

11 BY MR. LEAVITT:

12 Q. This property is held by a company named 138 Bay
13 Branch, LLC, correct?

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

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

24 BY MR. LEAVITT:

25 Q. Both of these entities were created to receive

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

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

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

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

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1 question based on counsel from my lawyer, my
 2 constitutional rights including those protected
 3 by the Fifth Amendment.
 4 BY MR. LEAVITT:
 5 Q. This entity is -- I'm sorry -- strike that.
 6 This property is held by an entity named 175 West
 7 New Harmony, LLC, correct?
 8 MR. BRAR: I instruct my client that any
 9 answer to this question would violate his rights
 10 under the Fifth Amendment or certain laws of his
 11 country or 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 counsel from my lawyer, my
 16 constitutional rights including those protected
 17 by the Fifth Amendment.
 18 BY MR. LEAVITT:
 19 Q. This property was, in fact, purchased with funds
 20 stolen from the state of Veracruz, correct?
 21 MR. BRAR: Object to the form. I also
 22 instruct my client that this question violates
 23 his rights under the Fifth Amendment or certain
 24 laws of his country or international conventions;
 25 I, therefore, advise and instruct my client not

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1 to answer this question.
 2 THE WITNESS: I refuse to answer based
 3 upon counsel from my lawyer, my constitutional
 4 rights including those protected by the Fifth
 5 Amendment.
 6 BY MR. LEAVITT:
 7 Q. You also own a property at the address 83 West
 8 Jagged Ridge Circle in Woodlands, Texas, correct?
 9 MR. BRAR: I instruct my client not to
 10 answer this question because violates his rights
 11 under the Fifth Amendment or certain laws of his
 12 country or international conventions; I,
 13 therefore, advise and instruct my client not to
 14 answer this question.
 15 THE WITNESS: I refuse to answer based
 16 upon counsel from my lawyer, my constitutional
 17 rights including those protected by the Fifth
 18 Amendment.
 19 BY MR. LEAVITT:
 20 Q. This property is held by an entity named 83 West
 21 Jagged Ridge, LLC, correct?
 22 MR. BRAR: I instruct my client that any
 23 answer to this question would violates his rights
 24 under the Fifth Amendment or certain laws of his
 25 country or international conventions; I,

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1 therefore, advise and instruct my client not to
 2 answer this question.
 3 THE WITNESS: I refuse to answer based
 4 upon counsel from my lawyer, my constitutional
 5 rights including those protected by the Fifth
 6 Amendment.
 7 BY MR. LEAVITT:
 8 Q. This property was, in fact, purchased with funds
 9 stolen from the state of Veracruz, correct?
 10 MR. BRAR: Object to the form. I also
 11 instruct my client that any answer to this
 12 question would violate his rights under the Fifth
 13 Amendment or certain laws of his country or
 14 international conventions; I, therefore, advise
 15 and instruct my client not to answer.
 16 THE WITNESS: I refuse to answer based
 17 upon counsel from my lawyer, my constitutional
 18 rights including those protected by the Fifth
 19 Amendment.
 20 BY MR. LEAVITT:
 21 Q. You also own property at 87 West Jagged Ridge
 22 Circle in The Woodlands, Texas, correct?
 23 MR. BRAR: I instruct my client that any
 24 answer to this question would violate his rights
 25 under the Fifth Amendment or certain laws of his

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1 country or international conventions; I,
 2 therefore, advise and instruct my client not to
 3 answer this question.
 4 THE WITNESS: I refuse to answer based
 5 upon counsel from my lawyer, my constitutional
 6 rights including those protected by the Fifth
 7 Amendment.
 8 BY MR. LEAVITT:
 9 Q. Sir, this property is held by an entity 38 West
 10 Jagged Ridge, LLC, correct?
 11 MR. BRAR: I instruct my client that any
 12 answer to this question would violate his rights
 13 under the Fifth Amendment or certain laws of his
 14 country or international conventions; I,
 15 therefore, advise and instruct my client not to
 16 answer this question.
 17 THE WITNESS: I refuse to answer based
 18 upon counsel from my lawyer, my constitutional
 19 rights including -- and including those protected
 20 by the Fifth Amendment.
 21 BY MR. LEAVITT:
 22 Q. Excuse me -- strike that.
 23 This is an entity you and your wife created to
 24 receive stolen funds from the state of Veracruz, correct?
 25 MR. BRAR: Objection to the form. I also

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

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1 Q. You also own a property at 7940 East Clinton
 2 Street in Scottsdale, Arizona, correct?
 3 MR. BRAR: Objection. Form. I also
 4 instruct my client not to answer this question
 5 because it violates his rights under the Fifth
 6 Amendment or certain laws of his country or
 7 international conventions; I, therefore, instruct
 8 my client not to answer this question.
 9 THE WITNESS: I refuse to answer this
 10 question based upon counsel from my lawyer, my
 11 constitutional rights including those protected
 12 by the Fifth Amendment.
 13 BY MR. LEAVITT:
 14 Q. And this property was in fact purchased with
 15 stolen funds from the state of Veracruz, right?
 16 MR. BRAR: Objection. Form. I also
 17 instruct my client that any answer to this
 18 question violates his rights under the Fifth
 19 Amendment or certain laws of his country or
 20 international conventions; I, therefore, advise
 21 and instruct my client not to answer this
 22 question.
 23 THE WITNESS: I refuse to answer this
 24 question based upon counsel from my lawyer, my
 25 constitutional rights including those protected

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1 by the Fifth Amendment.
 2 BY MR. LEAVITT:
 3 Q. And you were responsible for stealing this money
 4 from the state of Veracruz, correct?
 5 MR. BRAR: Objection. Form. I also
 6 instruct my client that any answer to this
 7 question violates his rights under the Fifth
 8 Amendment or certain laws of his country or
 9 international conventions; I, therefore, advise
 10 and instruct my client not to answer this
 11 question.
 12 THE WITNESS: I refuse to answer this
 13 question based upon counsel from my lawyer, my
 14 constitutional rights including those protected
 15 by the Fifth Amendment.
 16 BY MR. LEAVITT:
 17 Q. You were, in fact, responsible for stealing all
 18 of the money from the state of Veracruz that you used to
 19 purchase all the properties that we talked about today,
 20 correct?
 21 MR. BRAR: Objection. Form. I also
 22 instruct my client that any answer to this
 23 question violates his rights under the Fifth
 24 Amendment or certain laws of his country or
 25 international conventions; I, therefore, advise

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1 and instruct my client not to answer this
 2 question.
 3 THE WITNESS: I refuse to answer based
 4 upon counsel from my lawyer, my constitutional
 5 rights including those protected by the Fifth
 6 Amendment.
 7 BY MR. LEAVITT:
 8 Q. You also own a property located at 307 Bloom Hill
 9 Place, Magnolia, Texas, correct?
 10 MR. BRAR: I instruct my client not to
 11 answer this question as it violates his rights
 12 under the Fifth Amendment or certain laws of his
 13 country or international conventions; I,
 14 therefore, advise and instruct my client not to
 15 answer.
 16 THE WITNESS: I refuse to answer this
 17 question based upon counsel from my lawyer, my
 18 constitutional rights including those protected
 19 by the Fifth Amendment.
 20 BY MR. LEAVITT:
 21 Q. This property was purchased with funds stolen
 22 from the state of Veracruz, correct?
 23 MR. BRAR: Objection. Form. I also
 24 instruct my client not to answer to this question
 25 because violates his rights under the Fifth

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

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

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

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

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

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

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

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

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

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

13 BY MR. LEAVITT:

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

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

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

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

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

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

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

16 BY MR. LEAVITT:

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

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

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

5 BY MR. LEAVITT:

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

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

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

19 BY MR. LEAVITT:

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

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

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

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

8 BY MR. LEAVITT:

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

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

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

22 BY MR. LEAVITT:

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

25 MR. BRAR: Objection. Form. I also

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

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

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

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

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

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1 as it would violate his rights under the Fifth
 2 Amendment or certain laws of his country or
 3 international conventions; I, therefore, advise
 4 and instruct my client not to answer this
 5 question.
 6 THE WITNESS: I refuse to answer this
 7 question on the basis of counsel from my lawyer,
 8 my constitutional rights including those
 9 protected by the Fifth Amendment.
 10 BY MR. LEAVITT:
 11 Q. Other than the ones discussed today, what other
 12 entities inside the United States do you own or have
 13 control over?
 14 MR. BRAR: I also instruct my client not
 15 to answer this question as it would violate his
 16 rights under the Fifth Amendment or certain laws
 17 of his country or international conventions; I,
 18 therefore, advise and instruct my client not to
 19 answer this question.
 20 THE WITNESS: I refuse to answer this
 21 question on the basis from my lawyer, my
 22 constitutional rights including those protected
 23 by the Fifth Amendment.
 24 BY MR. LEAVITT:
 25 Q. What bank accounts do you currently have set up,

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1 sir?
 2 MR. BRAR: Objection. Form. I also
 3 instruct my client not to answer to this question
 4 because it would violate his rights under the
 5 Fifth Amendment or certain laws of his country or
 6 international conventions; I, therefore, advise
 7 and instruct my client not to answer this
 8 question.
 9 THE WITNESS: I refuse to answer this
 10 question on the basis of counsel from my lawyer,
 11 my constitutional rights including those
 12 protected by the Fifth Amendment.
 13 BY MR. LEAVITT:
 14 Q. Sir, what trust funds or broker accounts do you
 15 currently own or have control over?
 16 MR. BRAR: Objection. Form. I also
 17 instruct my client that any answer to this
 18 question because it would violate his rights
 19 under the Fifth Amendment or certain laws of his
 20 country or international conventions; I,
 21 therefore, advise and instruct my client not to
 22 answer this question.
 23 THE WITNESS: I refuse to answer this
 24 question on the basis of counsel from my lawyer,
 25 my constitutional rights including those

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

1 question.
 2 THE WITNESS: I refuse to answer this
 3 question based upon counsel received from my
 4 lawyer, my constitutional rights including those
 5 protected by the Fifth Amendment.
 6 MR. LEAVITT: Let's take a quick break.
 7 (Off-the-record discussion.)
 8 THE VIDEOGRAPHER: This is the end of
 9 Media 3, Volume 1 in the video deposition of Jose
 10 Antonio Bandin. Going off the video record at
 11 12:22 p.m. as indicated on the video screen.
 12 (Recess taken at 12:22 p.m.)
 13 THE VIDEOGRAPHER: Going back on the
 14 record to continue Media 3, Volume 1 in the video
 15 deposition of Jose Antonio Bandin at 12:23 p.m.
 16 as indicated on the video screen.
 17 BY MR. LEAVITT:
 18 Q. Sir, have you understood all my questions today?
 19 MR. BRAR: I instructed my client not to
 20 answer his question because it would violate his
 21 rights under the Fifth Amendment or certain laws
 22 of his country or international conventions; I,
 23 therefore, instruct my client not to answer this
 24 question.
 25 THE WITNESS: I refuse to answer this

1 against you in that document, correct?
 2 MR. BRAR: Objection. Form. I also
 3 instruct my client that any answer to this
 4 question would violate his rights under the Fifth
 5 Amendment or certain laws of his country or
 6 international conventions; I, therefore, advise
 7 and instruct my client not to answer this
 8 question.
 9 THE WITNESS: I refuse to answer this
 10 question based upon counsel from my lawyer, my
 11 constitutional rights including those protected
 12 by the Fifth Amendment.
 13 MR. LEAVITT: It's nice to meet you, sir.
 14 MR. BRAR: We reserve our right to read.
 15 THE VIDEOGRAPHER: This concludes the end
 16 of Media unit 3, Volume 1 and the end of the
 17 video deposition of Jose Antonio Bandin. Going
 18 off the record of this continuous file at
 19 12:26 p.m. as indicated on the video screen.
 20 (Deposition concluded at 12:26 p.m.)
 21
 22
 23
 24
 25

1 question on the basis of counsel from my lawyer,
 2 my constitutional rights and those protected
 3 under the Fifth Amendment.
 4 BY MR. LEAVITT:
 5 Q. Sir, this has been marked as Exhibit 3.
 6 (Exhibit No. 3 was marked for identification.)
 7 BY MR. LEAVITT:
 8 Q. This is a document that demonstrates that you're
 9 under investigation in Mexico for the theft of funds from
 10 the state of Veracruz, correct?
 11 MR. BRAR: Objection. Form. I also
 12 instruct my client that any answer to this
 13 question would violate his rights under the Fifth
 14 Amendment or certain laws of his country or
 15 international conventions; I, therefore, advise
 16 and instruct my client not to answer this
 17 question.
 18 THE WITNESS: I refuse to answer this
 19 question based upon counsel from my lawyer, my
 20 constitutional rights including those protected
 21 by the Fifth Amendment.
 22 BY MR. LEAVITT:
 23 Q. You have no ability to dispute that you were
 24 under investigation in the state of Veracruz as reflected
 25 in Exhibit 3 or the substance of the allegations made

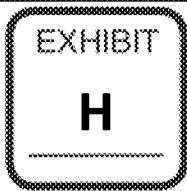
1 DEPOSITION ERRATA SHEET
 2 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____
 3 _____
 4 REASON FOR CHANGE: _____
 5 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____
 6 _____
 7 REASON FOR CHANGE: _____
 8 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____
 9 _____
 10 REASON FOR CHANGE: _____
 11 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____
 12 _____
 13 REASON FOR CHANGE: _____
 14 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____
 15 _____
 16 REASON FOR CHANGE: _____
 17 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____
 18 _____
 19 REASON FOR CHANGE: _____
 20 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____
 21 _____
 22 REASON FOR CHANGE: _____
 23 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____
 24 _____
 25 REASON FOR CHANGE: _____

1 DEPOSITION ERRATA SHEET
 2 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____
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 4 REASON FOR CHANGE: _____
 5 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____
 6 _____
 7 REASON FOR CHANGE: _____
 8 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____
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 10 REASON FOR CHANGE: _____
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 13 REASON FOR CHANGE: _____
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 15 _____
 16 REASON FOR CHANGE: _____
 17 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____
 18 _____
 19 REASON FOR CHANGE: _____
 20 PAGE NO. _____ LINE NO. _____ CHANGE TO: _____
 21 _____
 22 REASON FOR CHANGE: _____
 23 SIGNATURE: _____ DATE: _____
 24
 25

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

1	3
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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

1 husband with the governor of Veracruz to return the sum of
2 the money that you two stole, correct?

3 MR. BRAR: Objection. Form. I will also
4 instruct my client that any answer to this
5 question, it would violate her Fifth Amendment
6 rights or certain laws of your country and
7 international convention I, therefore, advise my
8 client not to 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. You agreed to return these properties because
15 they have been purchased with money from the state of
16 Veracruz, correct?

17 MR. BRAR: Objection. Form. I will also
18 instruct my client not to answer this question
19 because her answer would violate her right under
20 the Fifth Amendment rights or certain laws of
21 your country and international convention and I,
22 therefore, advise 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 constitutional rights including those protected
2 by the Fifth Amendment.

3 BY MR. LEAVITT:

4 Q. You and your husband had previously agreed to
5 return over \$20 million worth of property and assets in
6 cash to the government of Veracruz, correct?

7 MR. BRAR: Objection. Form. I will also
8 instruct my client that any answer to this
9 question, it would violate her Fifth Amendment
10 rights or certain laws of her country and
11 international convention, therefore I advise her
12 and instruct her not to answer this 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. After reaching this agreement with the government
19 of Veracruz, you and your husband decided not to return
20 the money and have since fled to Spain, correct?

21 MR. BRAR: Objection. Form. I will also
22 instruct my client that any answer to this
23 question, it would violate her Fifth Amendment
24 rights or certain laws of her country or
25 international conventions, I, therefore, advise

1 and instruct her 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. You understand your husband is a childhood friend
8 of Moises Mansur, correct?

9 MR. BRAR: Objection. Form. I will also
10 instruct my client that any answer to this
11 question, it would violate her Fifth Amendment
12 rights or certain laws of her country and
13 international conventions, I, therefore, advise
14 and instruct her 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 understand that Mr. Mansur was a college
21 friend of Governor Javier Duarte, correct?

22 MR. BRAR: I instruct my client that any
23 answer to this question, it would violate her
24 Fifth Amendment rights or certain laws of her
25 country and international conventions, I,

1 therefore, advise and instruct my client not to
2 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. And through Mr. Mansur you and your husband
9 became good friends with Javier Duarte, correct?

10 MR. BRAR: I instruct my client that any
11 answer to this question, it would violate her
12 rights under the Fifth Amendment, certain laws of
13 her country and international conventions, I,
14 therefore, advise and instruct my client not to
15 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. You, your husband and Mr. Duarte eventually
22 became business partners, correct?

23 MR. BRAR: I instruct my client that any
24 answer to this question, it would violate her
25 rights under the Fifth Amendment, certain laws of

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?

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

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.

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

17

1 and instruct my client not to answer that
 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. Along with your husband, you organized and
 9 directed a group of business people to submit fraudulent
 10 invoices for fraudulent sums to be paid by the government
 11 of 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. And you and your husband and Mr. Duarte made sure
 24 those invoices were paid, correct?
 25 MR. BRAR: Objection. Form. I instruct

18

1 my client that any answer to this question, it
 2 would violate her rights under the Fifth
 3 Amendment, certain laws of her country and
 4 international conventions, I, therefore, advise
 5 and instruct her 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. All of this conspiracy was lead by Javier Duarte
 12 who played a major roll in it, correct?
 13 MR. BRAR: Objection. Form. I instruct
 14 my client that any answer to this question, it
 15 would violate her rights under the Fifth
 16 Amendment, 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. Some of these -- strike that.
 25 Some of the members of this conspiracy would

19

1 submit invoices for things like road construction at your
 2 direction, 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, certain laws of her country and
 7 international conventions, I, therefore, advise
 8 and instruct her not to 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. But it's your direction that not all of the roads
 15 got built, 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, certain laws of her country and
 20 international conventions, I, therefore, advise
 21 and instruct her 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.

20

1 BY MR. LEAVITT:
 2 Q. At your direction the invoices included amounts
 3 for materials that were never used, correct?
 4 MR. BRAR: Objection. Form. I also
 5 instruct my client not to answer to this
 6 question, it would violate her rights under the
 7 Fifth Amendment, certain laws of her country and
 8 international conventions, I, therefore, advise
 9 and instruct her 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. But you and your husband and Mr. Duarte would
 16 make sure those invoices were paid full, 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, certain laws of her country and
 21 international conventions, I, therefore, advise
 22 and instruct her not to answer this 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

21

1 by the Fifth Amendment.
 2 BY MR. LEAVITT:
 3 Q. There were also invoices sent for things like
 4 medications for sick people in the state of Veracruz,
 5 correct?
 6 MR. BRAR: Objection. Form. I also
 7 instruct my client not to answer this question,
 8 it would violate her rights under the Fifth
 9 Amendment, certain laws of her country and
 10 international conventions, I, therefore, advise
 11 and instruct her not to answer this 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. These invoices for medicine would include a
 18 certain amount of medicine such as chemotherapy or insulin
 19 but not all were actually purchased, correct?
 20 MR. BRAR: Objection. Form. I also
 21 instruct my client not to answer 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 her not to answer this question.

22

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. Not all of the medicine that was paid for was
 7 actually delivered to the sick people in Veracruz,
 8 correct?
 9 MR. BRAR: Objection. Form. I also
 10 instruct my client not to answer this question,
 11 it would violate her rights under the Fifth
 12 Amendment, 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. Instead of receiving medicine, the sick people
 22 would receive instead saline, correct?
 23 MR. BRAR: Objection. Form. I also
 24 instruct my client not to answer this question,
 25 it would violate her rights under the Fifth

23

1 Amendment, 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. But the invoices were paid in full, 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, 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. And you and your husband and Mr. Duarte would
 22 keep most of the profits from these fraudulent invoices,
 23 correct?
 24 MR. BRAR: Objection. Form. I also
 25 instruct my client not to answer this question,

24

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 her not to 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. And after these invoices were paid, the people
 11 that submitted the invoices they would receive a
 12 commission for doing so, correct?
 13 MR. BRAR: Objection. Form. I also
 14 instruct my client that an answer to this
 15 question, it would violate her rights under the
 16 Fifth Amendment, 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. After taking commission, these people who
 25 submitted the fraudulent invoices would send the rest of

1 the profits to you and Mr. Duarte and your husband,
2 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, certain laws of her country and
7 international conventions, I, therefore, advise
8 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. 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?

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

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.

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. Then you and your husband directed these funds to
12 be sent to Texas where they were then invested in real
13 estate, correct?

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.

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 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. And you would eventually receive money from these
8 shell companies for your involvement in this conspiracy in
9 fraud, correct?

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.

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. Mr. Duarte would also receive some of the funds
23 from this fraud and conspiracy, correct?

24 MR. BRAR: Objection. Form. I also
25 instruct my client not to answer this question,

1 Q. The real estate these funds were invested in
2 were those that are named in the lawsuit pending against
3 you, correct?

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.

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. Jaime Roberte also participated in this scheme to
17 unlawfully take money from the state of Veracruz, correct?

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.

25 THE WITNESS: I refuse to answer that

29

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 and he created Reban Construction, LLC,
 6 correct?
 7 MR. BRAR: I instruct my client that any
 8 answer to this question, it would violate her
 9 rights under the Fifth Amendment, certain laws of
 10 her country and international conventions, I,
 11 therefore, advise and instruct her not to answer
 12 this 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. He also created Reban Safety, LLC, correct?
 19 MR. BRAR: I instruct my client that any
 20 answer to this question, it would violate her
 21 rights under the Fifth Amendment, certain laws of
 22 her country and international conventions, I,
 23 therefore, advise and instruct he not to answer
 24 this question.
 25 THE WITNESS: I refuse to answer that

30

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 created these entities with the intention
 6 that they would receive stolen funds from the state of
 7 Veracruz, 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, 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. And these entities did in fact receive funds
 21 stolen from the state of Veracruz, correct?
 22 MR. BRAR: Objection. Form. I also
 23 instruct my client that any answer to this
 24 question, it would violate her rights under the
 25 Fifth Amendment or certain laws of her country

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1 and international conventions, I, therefore,
 2 advise and instruct 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. Both Mr. Roberte and you received funds stolen
 10 from the state of Veracruz, correct?
 11 MR. BRAR: Objection. Form. I also
 12 instruct my client that any answer to this
 13 question, it would violate her rights under the
 14 Fifth Amendment or certain laws of her country
 15 and international conventions, I, therefore,
 16 advise and instruct her 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 and Alejandro Ortiz Carpintero created
 24 TwoOffice Suites, LLC, correct?
 25 MR. BRAR: Objection. Form. I also

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1 instruct my client that any answer to this
 2 question, it would violate her rights under the
 3 Fifth Amendment or certain laws of her country
 4 and international conventions, I, therefore,
 5 instruct and advise her 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 Mr. Carpintero created this with the
 13 intention that it would receive stolen funds from the
 14 state of Veracruz, correct?
 15 MR. BRAR: Objection. Form. I instruct
 16 my client that any answer to this question, it
 17 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:

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

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

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

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?

1 MR. BRAR: Objection. Form. I also
 2 instruct my client not to answer this question.
 3 It would violate her rights under the Fifth
 4 Amendment or 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. As a result of those fraudulent invoices, both
 13 you and Jorge Ramirez received funds that were stolen from
 14 the state of Veracruz, correct?
 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 her 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 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. As a result of those fraudulent invoices, both
 6 you and Mr. Inake received funds that were unlawfully
 7 obtained from the state of Veracruz?
 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 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. Monica Tubeya was also someone who participated
 21 in this conspiracy along with you and your husband and
 22 Javier Duarte, correct?
 23 MR. BRAR: Objection. Form. I also
 24 instruct my client that any answer to this
 25 question because it would violate her rights

1 BY MR. LEAVITT:
 2 Q. Negretti Inake was also someone who participated
 3 in the conspiracy along with you and your husband and
 4 Javier Duarte, correct?
 5 MR. BRAR: Objection. Form. I also instruct my
 6 client that any answer to this question, it would
 7 violate her rights under the Fifth Amendment or
 8 certain laws of her country and international
 9 conventions, I, therefore, advise and instruct my
 10 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. It's your direction that Mr. Inake send
 17 fraudulent invoices to the city of Veracruz, correct?
 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 or certain laws of her country
 22 and international conventions, I, therefore,
 23 advise and instruct my client not to answer this
 24 question.
 25 THE WITNESS: I refuse to answer that

1 under the Fifth Amendment or certain laws of her
 2 country and international conventions, I,
 3 therefore, advise and instruct 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. It's your direction Monica Tubeya send fraudulent
 11 invoices to the state of Veracruz, 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.
 23 BY MR. LEAVITT:
 24 Q. As a result of these fraudulent invoices, both
 25 Monica Tubeya and you received money unlawfully obtained

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1 from the state of 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. Arturo Zurita was also someone who participated
 15 in this conspiracy with both you and your husband and
 16 Javier Duarte, 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 or
 21 international conventions, I, therefore, advise
 22 and instruct my client not to answer this
 23 question.
 24 THE WITNESS: I refuse to answer that
 25 question based on the counsel of my lawyer and my

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1 constitutional rights including those protected
 2 by the Fifth Amendment.
 3 BY MR. LEAVITT:
 4 Q. It's your direction Arturo Zurita sent fraudulent
 5 invoices to 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. As a result of these fraudulent invoices both you
 19 and Mr. Zurita received funds unlawfully obtained by the
 20 state of Veracruz, correct?
 21
 22 MR. BRAR: Objection. Form. I also
 23 instruct my client that any answer to this
 24 question, it would violate her rights under the
 25 Fifth Amendment or certain laws of her country

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1 and international conventions, I, therefore,
 2 advise and instruct my client not to answer 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. Sergio Ortiz was also someone who participated in
 10 this conspiracy along with you, 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 her 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 Mr. Ortiz send fraudulent
 25 invoices to the state of Veracruz, correct?

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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 or certain laws of her country
 5 and international conventions, I, therefore,
 6 advise and instruct her 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. As a result of these fraudulent invoices both you
 14 and Mr. Ortiz received funds unlawfully obtained from the
 15 state of Veracruz, correct?
 16 MR. BRAR: Objection. Form. I also
 17 instruct my client that any answer to this
 18 question, it would violate her rights under the
 19 Fifth Amendment or certain laws of her country
 20 and international conventions, I, therefore,
 21 advise and instruct my client not to answer this
 22 question.
 23 THE WITNESS: I refuse to answer that
 24 question based on the counsel of my lawyer and my
 25 constitutional rights including those protected

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1 by the Fifth Amendment.
 2 BY MR. LEAVITT:
 3 Q. You agree with me that you were not sued in this
 4 case or any of your cases because you filed property deeds
 5 or invested in real estate, 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 agree with me you were not sued because any
 19 of your First Amendment rights were infringed, correct?
 20 MR. BRAR: Objection. Form. I also
 21 instruct my client not to answer 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 her not to answer this question.

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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 agree with me, do you not, that none of your
 7 First Amendment rights have ever been infringed by the
 8 lawsuit, 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 agree with me that you were not sued because
 22 you exercised any constitutional right, correct?
 23 MR. BRAR: Objection. Form. I also
 24 instruct my client not to answer this question,
 25 it would violate her rights under the Fifth

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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. This lawsuit has nothing to do -- strike that.
 10 This lawsuit has nothing to do with your right to
 11 free speech, 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. You agree with me that this lawsuit does not
 25 implicate your right by association, correct?

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1 MR. BRAR: Objection. Form. I also
 2 instruct my client that any answer to this
 3 question because it would violate her rights
 4 under the Fifth Amendment or certain laws of her
 5 country and international conventions, I,
 6 therefore, instruct and advise my client not to
 7 answer this question.
 8 THE WITNESS: I refuse to answer that
 9 question based on the counsel of my lawyer and my
 10 constitutional rights including those protected
 11 by the Fifth Amendment.
 12 BY MR. LEAVITT:
 13 Q. You agree with me you are not getting sued
 14 because you filed property deeds, property records or
 15 taxation and appraisal information, correct?
 16 MR. BRAR: Objection. Form. I also
 17 instruct my client not to the answer question it
 18 would violate 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 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

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

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

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

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

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

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:

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

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,

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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,

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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

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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.

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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

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>

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.

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,

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

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

1 Ashlane Way, correct?
 2 MR. BRAR: Objection. Form. I also
 3 instruct my client not answer to 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. You also own property at 43 North Spinning Wheel
 15 Circle in The Woodlands, Texas, correct?
 16 MR. BRAR: Object to the form. I instruct
 17 my client not answer to this question, it would
 18 violate her rights under the Fifth Amendment or
 19 certain laws of her country and international
 20 conventions, I, therefore, advise and instruct my
 21 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.

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. This entity did in fact receive funds unlawfully
 6 obtain from the state of Veracruz, correct?
 7 MR. BRAR: Object to the form. I also
 8 instruct my client not answer to 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. And this property was in fact purchased with
 20 funds unlawfully obtained by the state of Veracruz,
 21 correct?
 22 MR. BRAR: Object to form. I also
 23 instruct my client not answer to this question.
 24 It would violate her rights under the Fifth
 25 Amendment or certain laws of her country and

1 BY MR. LEAVITT:
 2 Q. This property is held by an entity named 43
 3 Spinning Wheel, LLC, correct?
 4 MR. BRAR: Object to the from. 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. This is an entity that you created to receive
 17 funds unlawfully obtained from the state of Veracruz,
 18 correct?
 19 MR. BRAR: Object to the form. I also
 20 instruct my client not answer to 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, instruct
 24 and advise her not to answer this question.
 25 THE WITNESS: I refuse to answer that

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 MR. LEAVITT: We need to take a quick
 9 break.
 10 THE VIDEOGRAPHER: This is the end of
 11 Media 2, Volume 1 of the video deposition Monica
 12 Babayan at 15:32 p.m. as indicated on the video
 13 screen.
 14 (Recess taken at 15:32 p.m.)
 15 THE VIDEOGRAPHER: This is the beginning
 16 of Media 3, Volume 1 in the video deposition of
 17 Monica Babayan. Going back on the record at
 18 15: 46 p.m. as indicated on the video screen.
 19 Thank you, Counsel.
 20 BY MR. LEAVITT:
 21 Q. Ma'am, you also own property located at 138 Bryce
 22 Branch Circle in The Woodlands, Texas, correct?
 23 MR. BRAR: Object to the form. I instruct
 24 my client not answer to this question, it would
 25 violate her rights under the Fifth Amendment or

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

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.

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.

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

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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

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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:

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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.

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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

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1 constitutional rights including those protected
 2 by the Fifth Amendment.
 3 BY MR. LEAVITT:
 4 Q. This property was purchased with funds unlawfully
 5 obtained by you from the state of Veracruz, correct?
 6 MR. BRAR: Objection. 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, instruct
 11 and advise my client not to answer this 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. You also own property at 83 West Jagged Ridge
 18 Circle in The Woodlands, Texas, correct?
 19 MR. BRAR: I instruct my client not answer
 20 to this question, it would violate her rights
 21 under the Fifth Amendment or certain laws of her
 22 country and international conventions, I,
 23 therefore, instruct and advise my client not to
 24 answer this question.
 25 THE WITNESS: I refuse to answer that

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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. This property is held by an entity named 83 West
 6 Jagged Ridge, correct?
 7 MR. BRAR: Instruct my client not answer
 8 to this question, it would violate her rights
 9 under the Fifth Amendment or certain laws of her
 10 country and international conventions, I,
 11 therefore, instruct and advise my client not to
 12 answer this 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. This entity was created by you to receive funds
 19 unlawfully obtained from the state of Veracruz, correct?
 20 MR. BRAR: Objection. Form. I also
 21 instruct my client not answer to this question
 22 because it violate her rights under the Fifth
 23 Amendment or certain laws of her country and
 24 international conventions, I, therefore, instruct
 25 and advise my client not to answer this question.

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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. This entity did, in fact, receive funds
 7 unlawfully obtained from the state of Veracruz, correct?
 8
 9 MR. BRAR: Objection. 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, 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. This property was purchased with funds unlawfully
 21 obtained from the state of Veracruz by you, correct?
 22 MR. BRAR: Objection. Form. I also
 23 instruct my client not answer to this question,
 24 it would violate her rights under the Fifth
 25 Amendment or certain laws of her country and

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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. You purchased this property with the funds that
 9 you unlawfully obtained from the state of Veracruz,
 10 correct?
 11 MR. BRAR: Object to the 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, instruct
 16 and advise my client not to answer.
 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 property 87 West Jagged Ridge Circle
 23 in The Woodlands, Texas, correct?
 24 MR. BRAR: Instruct my client not answer
 25 to this question, it would violate her rights

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 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 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 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 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 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 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 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, 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 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?

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 and advise 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. And you were the one responsible for unlawfully
13 obtaining these funds 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 because it violates her rights under the Fifth
17 Amendment or certain laws of her country and
18 international conventions, I, therefore, instruct
19 her 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 also own an entity named Bamba Land and

1 BY MR. LEAVITT:

2 Q. This entity did, in fact, receive funds
3 unlawfully obtained from the state of Veracruz, right?

4 MR. BRAR: Object to the form. I also
5 instruct my client not answer to this question
6 because it violates her rights under the Fifth
7 Amendment or certain laws of her country and
8 international conventions, I, therefore, instruct
9 and advise my 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. And you were the one responsible for unlawfully
16 obtaining these funds from the state Veracruz, correct?

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 this 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 Development, LLC, correct?

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, instruct
7 and advise my client not to answer.

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. That was an entity that you created to receive
14 funds unlawfully 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, instruct
21 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.

1 by the Fifth Amendment.

2 BY MR. LEAVITT:

3 Q. And this entity currently has possession of funds
4 unlawfully obtained from the state of Veracruz, correct?

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, 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. You also own an entity named Bandin Real Estate,
17 correct?

18 MR. BRAR: Object to the form. I also
19 instruct my client not answer to this question
20 because it violates 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

1 constitutional rights including those protected
2 by the Fifth Amendment.

3 BY MR. LEAVITT:

4 Q. This was an entity that you created to receive
5 funds unlawfully obtained from the state of Veracruz,
6 correct?

7 MR. BRAR: Object to the form. I also
8 instruct my client not answer to this question
9 because it violates her rights under the Fifth
10 Amendment or certain laws of her country and
11 international conventions, I, therefore, instruct
12 and advise my client not to answer this 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. This entity did, in fact, receive funds
19 unlawfully obtained from the state of 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 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. You also own an entity named Bull Business and
11 Storage, LLC, 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 rights of certain laws of her
16 country and international conventions, I,
17 therefore, instruct and advise my client not to
18 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. This is an entity that you created to receive
25 funds to unlawfully obtained from the state of Veracruz,

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. And you were the one responsible for lawfully
8 obtaining these funds 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 because it violates her rights under the Fifth
12 Amendment, international conventions or certain
13 laws of her country, I, therefore, instruct and
14 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. And this entity currently is in possession of
21 funds unlawfully obtained from the state of Veracruz,
22 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 correct?

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. And entity did in fact receive funds unlawfully
15 obtained from the state of Veracruz, 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, 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.

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>

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?

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.

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

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

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

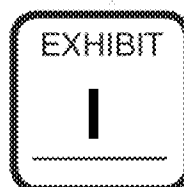
1 CERTIFICATE
 2
 3 I, Rachel McRoy, do hereby certify that I
 4 reported all proceedings adduced in the foregoing matter
 5 and that the foregoing transcript pages constitutes a
 6 full, true and accurate record of said proceedings to the
 7 best of my ability.
 8
 9 I further certify that I am neither 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 Rachel Mcroy
 23 Notary Public No: 962493
 24 My Commission Expires: May 16, 2021
 25 _____

DECLARATION OF

1. My name is ARMANDO GARCÍA CEDAS. I am over the age of twenty-one, am fully competent to make this declaration pursuant to 28 § 1746 and under the penalty of perjury have personal knowledge of the facts and statements in this declaration, and each of the facts and statements are true and correct.
2. I am the Director General Jurídico de la Secretaría de Gobierno del Estado de Veracruz, for the State of Veracruz. As part of my role, I am involved in the investigation of corruption and graft involving the State of Veracruz. As part of this investigation, Jose Bandin was identified as someone who was part of this corruption and graft. Mr. Bandin was a childhood friend of the ex-Governor Javier Duarte, Monica Babayan is the wife of Jose Bandin.
3. Based upon information and belief, and this State's investigation, it is believed that Mr. Bandin and Mrs. Babayan participated in a conspiracy with Javier Duarte to steal money from the State of Veracruz.
4. The nature of these various conspiracies was to divert monies meant for social programs in the State of Veracruz to Jose Bandin and his wife. Additionally, Mr. Bandin and his wife would set up a series of shell companies to receive these funds. From there, the money was sent to Houston, Texas in the United States. The money was used to buy properties and other investment products in the United States. The amount of money believed to have been stolen by Mr. Bandin and his wife exceeds \$100,000,000. These stolen funds were used to purchase the property in question.
5. Another form of graft was to obtain government contracts for public works from Mr. Duarte's administration. During the duration of the contract, Mr. Bandin and Monica Babayan would overcharge the government for the work being done, or not do the work at all, while diverting these ill-gotten gains for their personal use.
6. These individuals and their various shell companies are under investigation in the State of Veracruz.
7. I declare under penalty of perjury that the foregoing statements are true and correct.

FURTHER DECLARANT SAYETH NAUGHT



27/06/2018
DATE



AFFIDAVIT OF CAROLINE ADAMS

1. My name is Caroline Adams. I am over the age of twenty-one, am fully competent to make this affidavit, have personal knowledge of the facts and statements in this affidavit, and each of the facts and statements are true and correct.
2. I am counsel for the State of Veracruz.
3. Attached hereto as Exhibit B is true and correct copy of the status and effort to obtain service on Javier Duarte which was requested in August of 2018, and is still pending.
3. Attached hereto as Exhibit C is true and correct copy of the statement of investigation from the State of Veracruz.
4. Attached hereto as Exhibit D is a true and correct copy of the 'indictment' of Mr. Bandin from the State of Veracruz.
5. Attached hereto as Exhibit F are true and correct copies of various articles published in the Mexican press, and translated copies.

FURTHER AFFIANT SAYETH NAUGHT

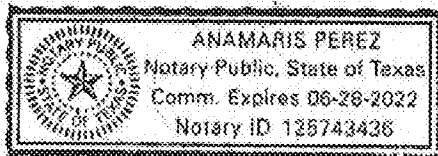


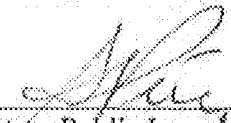
Caroline Adams

January 18, 2019

DATE

SUBSCRIBED AND SWORN TO ME BEFORE ON January 19, 2019





Notary Public In and For the
State of Texas

