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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	15-CR-252(PKC)
	:	
-against-	:	United States Courthouse
	:	Brooklyn, New York
	:	
JEFFREY WEBB, ET AL.,	:	Tuesday, November 21, 2017
	:	9:00 a.m.
Defendants.	:	

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TRANSCRIPT OF CRIMINAL CAUSE FOR JURY TRIAL  
BEFORE THE HONORABLE PAMELA K. CHEN  
UNITED STATES DISTRICT COURT JUDGE

A P P E A R A N C E S

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19 Proceedings recorded by computerized stenography. Transcript  
20 produced by Computer-aided Transcription.  
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1 (In open court.)

2 (Defendants present in open court.)

3 COURTRROOM DEPUTY: All rise. The United States  
4 District Court for the Eastern District of New York is now in  
5 session. The Honorable Pamela K. Chen is now presiding.

6 (Honorable Pamela K. Chen takes the bench.)

7 COURTRROOM DEPUTY: Calling criminal cause for jury  
8 trial in Docket No. 15-CR-252, *United States of America*  
9 *against Jeffrey Webb, et al.*

10 Counsel, please note your appearances for the  
11 record.

12 MR. NITZE: Sam Nitze, Kristin Mace and Keith  
13 Edelman for the United States. We're joined by Matt Callahan  
14 of the FBI, Steve Berryman of IRS CID.

15 THE COURT: Good morning.

16 MR. PAPPALARDO: Good morning. John Pappalardo,  
17 Elliot Scherker, and Silvia Pinera-Vazquez is here, she just  
18 stepped out, and the client is here.

19 THE COURT: Good morning to all of you.

20 MR. STILLMAN: Charles Stillman our client  
21 Mr. Marin, Mr. Mitchell, and Mr. Gershel.

22 THE COURT: Good morning.

23 MR. UDOLF: Bruce Udolf for Mr. Burga, along with us  
24 is Hulda Estma.

25 THE COURT: Good morning to everyone.

1           Ms. Pinera-Vazquez, I understand you have an issue  
2 to raise about §3500 material.

3           MS. PINERA-VAZQUEZ: Yes, your Honor. Thank you.

4           As I was preparing this morning for finishing the  
5 cross-examination, I scanned the §3500 materials again and  
6 it's about -- and this is to be for the court record it's  
7 3500-SB-4 through 3500-SB-30. And I realized that some of the  
8 information in here could actually be related to the witness  
9 that's currently on the -- some of the §3500 material of  
10 Agent Berryman may have something to do with the witness  
11 that's currently on the stand and the witness that's coming  
12 up, José Luis Chiriboga.

13           So I apologize, first of all, for telling you  
14 yesterday that you can spend Thanksgiving looking over this.  
15 I just realized it this morning when I went into it in more  
16 detail and I think it would be fruitful to just scan it. I  
17 don't think it should take too long because, like I said, it's  
18 not that many.

19           THE COURT: I've already reviewed that §3500  
20 material.

21           MS. PINERA-VAZQUEZ: That's the only thing that  
22 we're asking.

23           THE COURT: Unless my memory is faulty, and the  
24 Government can surely correct me on this, I did not see  
25 anything in the redacted information that relates to this

1 witness, Mr. Peña, or Mr. Chiriboga. And those, I think, are  
2 the two individuals you referenced. So I don't see any reason  
3 for you to delay or be concerned about my decision on the  
4 redactions before you proceed with this witness.

5 I have everything in front of me, I'll page through  
6 it again, but I'm pretty sure unless, of course, I don't  
7 understand some of the references potentially but I did not  
8 see anything that jumped out at me as relating to either of  
9 these individuals.

10 MS. PINERA-VAZQUEZ: Could I point to one that I  
11 would like the Court to. 3500-SB-10 and it's the sentence  
12 right above the big blacked out --

13 THE COURT: I can tell you that that blacked out  
14 portion --

15 MS. PINERA-VAZQUEZ: Perfect.

16 THE COURT: -- has nothing to do with it. And  
17 moreover, it is something I wouldn't unredact.

18 MS. PINERA-VAZQUEZ: Okay. All right, Judge, that's  
19 fine. The other part for Chiriboga would be at the beginning  
20 where they talk about.

21 THE COURT: No. 4? SB-4.

22 MS. PINERA-VAZQUEZ: Actually it would be SB-50 at  
23 the top and the back that one has to do with Chiriboga.

24 THE COURT: Yes. Yes. Sorry.

25 So you're just looking at the two redacted sections

1 one at the beginning and one at the very end?

2 MS. PINERA-VAZQUEZ: Yes, your Honor.

3 THE COURT: Neither have anything to do with him per  
4 se, although, let me turn to the Government for one second,  
5 since the Government will hopefully have in front of them the  
6 unredacted version of SB-5.

7 MS. MACE: Your Honor, we don't. We didn't realize  
8 that's what's being discussed this morning. We're going to  
9 try to dig one up.

10 THE COURT: Let me show you what I have. The  
11 paragraph that's on the first page of that e-mail exchange is  
12 the one I'm asking about and I'm pretty sure it doesn't, but  
13 I'll --

14 So, for the record, I'm showing the Government the  
15 two paragraphs at issue but in the unredacted version.

16 (Discussion held off the record.)

17 THE COURT: So just to go back on the record here.  
18 Like I said, I showed the Government the two paragraphs in  
19 SB-5 that have been redacted.

20 So, starting with the last one, I'm pretty confident  
21 that it has nothing to do with any substantive information  
22 relating to witnesses or the case, quite frankly. The last  
23 paragraph has more to do with some internal dynamics than  
24 dialogue between the agents themselves but there's nothing of  
25 substance in there.

1           The first paragraph makes reference to Bayan. I  
2 don't know if the Government's view is if that relates at all  
3 to Mr. Chiriboga and, quite frankly, it doesn't actually  
4 convey any information it's actually a question.

5           MS. PINERA-VAZQUEZ: We would be asking Mr. Peña.  
6 Bayan is relating to Mr. Peña, he's the one testifying  
7 regarding the --

8           THE COURT: Bayan.

9           MS. PINERA-VAZQUEZ: The account. That's in the  
10 account.

11           THE COURT: So I don't know if the Government wants  
12 to have another look at it. I don't think any substance has  
13 been redacted, but.

14           MS. MACE: Your Honor, I believe it was a question  
15 have someone else who is a non-witness, and so would not  
16 constitute §3500 and it doesn't convey any information that's  
17 a question.

18           THE COURT: That's correct. And so, the person who  
19 posed it is not actually one of the agents I gather or  
20 someone --

21           MS. MACE: An agent but not a witness.

22           THE COURT: Okay. So it's actually not  
23 Mr. Berryman's, Agent Berryman's §3500.

24           MS. MACE: Correct.

25           THE COURT: And moreover, to the extent it posed a

1 question the answer to the question or the substance is  
2 actually in the unredacted portion of the §3500 so you're not  
3 missing anything there. But with the caveat rather, rather,  
4 with the clarification that Bayan could relate to this  
5 witness, let me take one other look. Was there another §3500  
6 document that --

7 MS. PINERA-VAZQUEZ: Yes, your Honor. If I could  
8 direct your attention to §3500 SB-15.

9 THE COURT: Yes.

10 MS. PINERA-VAZQUEZ: That also starts off talking  
11 about Bayan and then there's the three quarters of the page  
12 remaining is blacked out.

13 THE COURT: Yes.

14 MS. PINERA-VAZQUEZ: And if you turn the page, well,  
15 actually the next page also has the top portion blacked out.  
16 And I apologize they have double sided, I have double sided  
17 copies.

18 THE COURT: Yes. None of this is substance that's  
19 been blacked out to has to do with internal discussions about  
20 how to proceed in creating kind of documents or spreadsheets.

21 MS. PINERA-VAZQUEZ: And then the next one would be  
22 SB-21. And SB-21 talks about, seems to, it be discussing  
23 Ciffart and that's what this witness testified to yesterday or  
24 one of the topics.

25 THE COURT: Okay. Hold on.



1           So I can tell you that the block on top has nothing  
2 to do with substance. Again really, quite frankly, it's  
3 scheduling among the agent -- between people that talk, I  
4 should say agents, I have no idea. Let me retract that as  
5 well. It has to do with conversations or scheduling  
6 conversations between the Government prosecutors and the  
7 agents. And similarly, the block at the bottom has to do with  
8 conversations between the Government and the agents regarding  
9 their review of information and their internal discussions.  
10 So none of that -- the block on the bottom in particular is  
11 not agent Berryman's §3500. Yes, okay.

12           MS. PINERA-VAZQUEZ: Okay. And I think there's just  
13 two more, Judge.

14           THE COURT: Okay.

15           MS. PINERA-VAZQUEZ: The next one would be SB-25 and  
16 it's in the back. This has to do with the next witness which  
17 is Luis Chiriboga. And this one, too, because they talk about  
18 Toyota.

19           THE COURT: Let me make one last comment about the  
20 block at the bottom on SB-21. It falls under some sort of law  
21 enforcement privilege as a deliberative process between the  
22 Government and the agent. So to the extent they're discussing  
23 their case or their analysis, I wouldn't turn that over  
24 either.

25           3500-SB --

1 MS. PINERA-VAZQUEZ: 25.

2 THE COURT: Okay.

3 MS. PINERA-VAZQUEZ: This one discusses Toyota.

4 THE COURT: Yes. Okay. The top block is nothing of  
5 substance at all and it's some internal, I don't even know  
6 what to call it. Banter, back and forth between the agents.

7 And on the second page, yes, these are also internal  
8 discussions between members of the Government team just about  
9 files and where to put them or how to organize some of their  
10 own information. Yes. So none of this has any substance in  
11 it. You have the substance, but you don't have the internal  
12 discussions between the agents and the prosecutors about  
13 organizing their own files.

14 MS. PINERA-VAZQUEZ: Okay. That's it, Judge.

15 THE COURT: Okay.

16 MS. PINERA-VAZQUEZ: Thank you very much. I  
17 appreciate it.

18 THE COURT: Yes. Let's get the witness out here and  
19 also check on our jury.

20 MS. MACE: Your Honor, just one note. We seemed to  
21 have an issue with getting a stand-by interpreter for  
22 Mr. Peña. The interpreter hasn't shown up, maybe will, but I  
23 would just ask -- maybe I'll have one moment to speak with  
24 her.

25 THE COURT: Okay. Can we go ahead and get witness?

1 MS. MACE: Yes.

2 THE COURT: If someone has coffee next to that Elmo.  
3 In fact, we don't want any coffee in the courtroom.

4 (A brief pause in the proceedings was held.)

5 THE COURT: Good morning.

6 THE WITNESS: Good morning.

7 THE COURT: How are you? Please come to the witness  
8 stand. Remain standing for just a moment while we get the  
9 jury. She's new.

10 COURTROOM DEPUTY: Raise your right hand.

11 VIVIAN GOA, having been first duly sworn by the  
12 Clerk of the court to interpret the  
13 proceedings from English to Spanish and from  
14 Spanish to English as follows:

15 COURTROOM DEPUTY: State your full name.

16 THE INTERPRETER: Vivian Goa, G-o-a.

17 (Witness takes the witness stand.)

18 **SANTIAGO PENA,**

19 called as a witness, having been previously duly  
20 sworn, was examined and testified as follows:

21 THE COURT: Let's get the jury.

22 (A brief pause in the proceedings was held.)

23 COURTROOM DEPUTY: All rise.

24 (Jury enters courtroom at 9:32 a.m.) you

25 THE COURT: Have a seat. Good morning, ladies and

1 gentlemen, I hope you had a restful evening. We're now going  
2 to continue with cross-examination of this witness by  
3 Ms. Pinera-Vazquez.

4 You may begin.

5 MS. PINERA-VAZQUEZ: Thank you, your Honor. I'm  
6 looking at the jury here and I don't think they have the  
7 binders. Are they still available.

8 MS. MACE: They were collected last night.

9 THE COURT: Do you want them to have them again?

10 MS. PINERA-VAZQUEZ: Yes. That would be good, your  
11 Honor.

12 THE COURT: Would the Government mind redistributing  
13 them? Maybe you can pass a stack to the people at the end and  
14 have them pass it down.

15 (A brief pause in the proceedings was held.)

16 THE COURT: You may proceed.

17 MS. PINERA-VAZQUEZ: Thank you, your Honor.

18 CROSS-EXAMINATION

19 BY MS. PINERA-VAZQUEZ:

20 (Continuing.)

21 Q Good morning, Mr. Peña.

22 A Good morning.

23 Q Yesterday, when we left off, we were about to get into  
24 the ledger. I'm sorry, the account.

25 A Yes.

1 Q And I'm just going to ask you a couple general questions  
2 and then some specific questions.

3 The account is contained in this  
4 Government Exhibit 601, the black notebook in front of you; is  
5 that right?

6 A Yes.

7 Q And yesterday, you testified that everything in that  
8 notebook, the notebook, Government Exhibit 601, is basically  
9 information that Mariano or Hugo Jinkis related to you?

10 A In terms of the commitments, yes. In terms of the  
11 payments, there are payments that were prepared and signed by  
12 them and later on including this accounts.

13 Q But these are -- this is information not that you  
14 independently learned, information that was given to you by  
15 either Mariano or Hugo Jinkis; right?

16 A Yes.

17 Q Let me get their picture back up here.

18 All right. So what I'd like for you to do is we're  
19 going to go through a couple of these entries. I remember.

20 You said yesterday that the work in this account  
21 represented possibly maybe one percent of the work you did at  
22 Full Play?

23 A Exactly.

24 Q So the other 99 percent of the time you spent doing what  
25 you were hired to do which is do the financial planning and

1 taking care of Full Play's finances?

2 A Reviewing contracts and dealing with commercial aspects  
3 with the commercial guys there was a lot of stuff, yes.

4 Q And I think that probably explains why there's some  
5 mistakes in here because this is not something that you  
6 particularly focused on?

7 A Exactly.

8 Q Now, if you can just open the binder, and let's just  
9 start off with Bayan which is Tab 1.

10 MS. PINERA-VAZQUEZ: Your Honor, can we get the --

11 THE COURT: Yes, go ahead. From the defense laptop.  
12 There you go.

13 Q All right. So Bayan was a company that the Jinkises used  
14 to pay bribes or send bribes through?

15 A Basically, Bayan was a company created for -- to make  
16 confidential payments and was the company and the account was  
17 created and was only known by four people.

18 Q By Mariano, Hugo, yourself, and?

19 A And Sergio.

20 Q Sergio?

21 A Yes.

22 Q Nobody else at Full Play either had access to it or even  
23 knew it existed?

24 A Exactly.

25 Q Didn't know it existed?

1 A Exactly.

2 Q And obviously you never discussed that account with my  
3 client Mr. Napout?

4 A Never.

5 Q Now, all of the entries in this Bayan tab are not related  
6 to illegal payments, right, to bribes?

7 They're not related to bribes?

8 A They are related to private payments, most of them, and  
9 there are also some payments which are related to some fees  
10 not connected to the tabs that are in the same file.

11 Q Right. So as you look at the Bayan tab which is on the  
12 screen up here and also in your notebook, it's about one page,  
13 one page filled with entries probably about 30, 35 entries.  
14 Not all these entries relate to the bribe payments; right?

15 A Exactly, yes.

16 Q In fact, you know that because you're mentioned in there  
17 a few times; right?

18 A Sorry.

19 Q You're mentioned in this part of the account three times?

20 A Yes.

21 Q And you received according to the account here it says  
22 you received about \$70,000?

23 A Yes.

24 Q And certainly, those were not bribes?

25 A Definitely not.

1 Q And you also, in this notebook, there's another tab  
2 that's labeled "Trips," trip expenses?

3 A Yes.

4 Q And obviously that's also not related to bribes; right?

5 A Definitely.

6 Q So, again, not everything in this ledger or in this  
7 account relates to bribe monies?

8 A Basically, there are some tabs related to payments to  
9 some soccer officials and there are some tabs related to some  
10 information about the business.

11 Q So let me ask you a question.

12 I think you said that you kept this account in on a  
13 pen drive in a lock box in a safe; right?

14 A Yes.

15 Q Why would payments that have nothing to do with bribes be  
16 included on this pen?

17 A That was basically to include business information that,  
18 basically, was included there for, I don't know why the  
19 reason, but it was included there. I mean, the trips. There  
20 is one tab with multiple trips made in the period between when  
21 Full Play Group was the agent of CONMEBOL and until the  
22 settlement with Traffic and Torneos. And other payments made  
23 was included here just to recuperate the money paid from the  
24 partners later.

25 But there's no reason why information about the



1 business was included here. Basically, it was a file for  
2 which includes some information. Most of the information is  
3 included -- includes payments to soccer officials.

4 Q Because this one of account the trip expenses, for  
5 example, could have been included in the legitimate account or  
6 ledger of Full Play; right?

7 A Actually, it is included in the legitimate accounting  
8 system of Full Play. All of the trips, if you will, the tab  
9 viajes, or trips, all of the expenses are included.

10 Q So it's double accounted for. It's in the secret ledger  
11 that's put in the lock box in the safe, and it's also in the  
12 real ledger. It's on both ledgers. I'm sorry, I don't  
13 understand you?

14 A I would have mentioned that one. I mean, there is an  
15 accounting system with a lot of the Full Play accounts, and  
16 the majority of the information included in this file is not  
17 included in the accounting system and audited by  
18 third-parties. A portion it is included, but the majority of  
19 the -- or the rest of the information included in this file is  
20 not included in the accounting system of the company.

21 Q How about the three payments made to you, is that in the  
22 on-the-books ledger?

23 A Yes.

24 Q It's counted for twice, on the secret ledger or account,  
25 and the real one?

1 A I would say that this is off balance sheet. But, in some  
2 cases, this information is also included in the accounting  
3 system.

4 Q And Mariano is the one who told you to put all that  
5 information on that account, the secret one; right?

6 A Yes. My bosses asked me to maintain a file with this  
7 information as a main source of accounting. If they wanted to  
8 know the difference between commitments and payments, the only  
9 source of information was this. There was no other source of  
10 information in the accounting system of the company.

11 Q So your bosses told you to put these trip expenses that  
12 have nothing to do with bribes on this secret ledger?

13 A They didn't ask me to put the trip expenses here. We put  
14 here because it was -- we decided to put here because there's  
15 no reason why.

16 Q Did you decide that or did Mariano decide that?

17 A No, I decided that.

18 Q And did you also decide to put the part on Bayan where it  
19 has your name here in the -- on the Bayan tab?

20 A Yes. Basically, I decided to put, I would say, a copy of  
21 the Bayan account in terms of all their income inflows and  
22 outflows including banking charges as a special tab of the  
23 document.

24 Let me clarify this. Basically, was made in order  
25 to double check that the expenses in the Bayan account were

1 also included in each of the tabs if corresponds.

2 Q Since the account includes both, I guess, bribe payments  
3 or payments to the federation presidents from what you said,  
4 and information that has nothing to do with that, it was  
5 commingled the information was commingled; right?

6 A I don't understand.

7 Q It was mixed up.

8 A Commingled?

9 Q Commingled is mixed.

10 MS. MACE: Objection.

11 THE COURT: Mixed together.

12 MS. PINERA-VAZQUEZ: Mixed together.

13 MS. MACE: Objection to the form of the question.

14 THE COURT: Rephrase the question and go a little  
15 slower for our court reporter and the witness.

16 Q So the information in the account action  
17 Government Exhibit 601, contains both secret information that  
18 Mariano told you not to share with other people and also  
19 information that was public because it was on the regular  
20 Full Play ledgers?

21 A I would say public, but, yes, registered in accounting  
22 system. The can company is not public, it's a private  
23 company. But, yes, it includes some information related to  
24 the business of the company.

25 Q And I don't mean public, I mean just other people than

1 you four?

2 A Yes.

3 Q Could see it like the auditors?

4 A You're right.

5 Q And obviously, this account was never audited by anybody;  
6 right?

7 A Exactly.

8 Q Okay. You could turn to the VW tab.

9 And I believe you testified that VW for Volkswagen?

10 A Yes.

11 Q And you came up, you and Sergio, came up with these  
12 names?

13 A Yes.

14 Q Any particular reason why you decided to give Chavez VW?

15 A Random.

16 Q Random?

17 A Random.

18 Q No American cars on here?

19 A (Nodding).

20 Q No Ford, GMC, Chevrolet?

21 THE COURT: Is that a serious question?

22 MS. PINERA-VAZQUEZ: Yes.

23 THE COURT: Oh, okay. Go ahead.

24 MS. PINERA-VAZQUEZ: We're talking about vehicles,  
25 cars.

1 Q There's no American cars; right?

2 A It was decided randomly.

3 Q Now, in the Chavez, which is the VW account?

4 A Yes.

5 Q It reflects several wire transfers. Could you turn  
6 to -- thank you.

7 It reflects several wire transfers; right?

8 A It reflects on the payments made on his account.

9 Q And it includes wire transfers, for example, on --

10 A It includes wire transfers, yes.

11 Q And Mariano is the one who gave you the information to  
12 wire transfer to Mr. Chavez's, whatever Mr. Chavez's account?

13 A In many cases, Mariano gave me information to  
14 wire -- where to wire him the money. In some cases,  
15 Mr. Lozada sent to me information, and then I asked my bosses  
16 what to do so and they decided when and how to pay it.

17 Q Who was Mr. Lozada again?

18 A I'm sorry.

19 Q Who was Mr. Lozada?

20 A Victor Lozada is the General Secretary of the Bolivian  
21 Federation.

22 Q And Mr. Chavez was his successor, or was also --

23 A No, I think it was his boss.

24 Q His boss?

25 A Yes.

1 Q Okay. If you can turn to Benz, which is the next tab.

2 A Yes.

3 Q And that you testified belonged to Raphael Esquivel?

4 A Yes.

5 Q Which is the of the Venezuelan Federation?

6 A Yes.

7 Q And you can also see that there's several wire transfers  
8 on this account; is that right?

9 A Right.

10 Q And, again, it was Mariano that gave you the instructions  
11 as to where to wire these funds; right?

12 A Yes.

13 Q And also how much to wire?

14 A Yes.

15 Q And one time, I believe, that you said that you actually  
16 e-mailed Mariano asked you to e-mail a portion of his account  
17 to Esquivel?

18 A Esquivel asked me to send information.

19 Q So you spoke to Esquivel about the ledger?

20 A Yes.

21 Q Was he the only federation president you spoke to?

22 A With Esquivel and with Lozada of Bolivia.

23 Q And you obviously asked -- I don't like to use the word  
24 "permission," but permission from Mariano to send it to  
25 Esquivel, isn't that right?

1 A It was permission.

2 Q Okay.

3 A You're okay.

4 Q You asked Mariano permission to send it to Esquivel;  
5 right?

6 A Exactly. I asked either Mariano or Hugo if I was able to  
7 send this information to Esquivel.

8 Q And Mariano actually told you yes, but to take out a  
9 portion of it; right?

10 A Yes.

11 Q

12 MS. PINERA-VAZQUEZ: Could you just scroll up?

13 Q That yellow portion with the red highlighting, he asked  
14 you to take all that out?

15 A No. No. No. The yellow portion is yellow, but I don't  
16 know why. But the number that was taken out is the red.

17 Q Okay. So the red that's a million dollars?

18 A Yes.

19 Q Now, according to your testimony yesterday, that was  
20 money that was allocated for Mr. Esquivel?

21 A That is money that was allocated for Mr. Esquivel in  
22 relation to the signature of the Copa America '15 contract.  
23 However, it was not sent to Mr. Esquivel.

24 Q But Mariano specifically instructed you to take that  
25 1 million out before you sent it to him?

1 A Either one.

2 Q Either one?

3 A Yes.

4 Q Now, that was kind of unusual that he asked you to take  
5 out a figure that was allocated for Mr. Esquivel and send him  
6 a document that didn't really reflect what was owed to him;  
7 right?

8 A Yeah. Basically, they mentioned to me that for the  
9 moment in time not to include that in the information sent to  
10 Esquivel; however, they mentioned to me to keep that number in  
11 this registry.

12 Q And yesterday, you testified that it was Mariano that  
13 told you?

14 A Either or both.

15 Q You don't remember which one?

16 A No, I don't remember.

17 Q So did you deal -- with Esquivel, did you deal with Hugo  
18 primarily or Mariano?

19 A In terms of Mr. Esquivel, the relationship was with  
20 Mr. Esquivel was managed by Hugo.

21 Q And how old is Mr. Esquivel?

22 A In the 70s.

23 Q So more or less a contemporary of Mr. Jinkis; right?

24 A Yes.

25 Q Now, also, I believe and I just want to clarify this.



1 I believe you said yesterday that as a favor to  
2 Mr. Esquivel, you held money, not you, Full Play held money  
3 and wired it to either players or coaches pursuant to  
4 Mr. Esquivel's instructions; is that right?

5 A That's right.

6 Q Now, that had nothing to do with the bribe payments;  
7 right?

8 A Nothing to do.

9 Q That had to do with Venezuela and the currency controls  
10 that were in place; right?

11 A That was a request of Mr. Esquivel and Hugo understood  
12 that the reason for the request was the high restrictions that  
13 in 2001, 9/11, and, of course, nowadays were imposed in the  
14 country to basically transfer dollars outside the country.

15 Q You couldn't get dollars out of Venezuela?

16 A Yes. But I understand for Venezuela it was and is very  
17 difficult to get dollars in the country and then get dollars  
18 out of the country because of the exchange rate restrictions.

19 Q So then Mr. Esquivel's page includes both payments that  
20 were meant relating to the bribes and also payments that had  
21 nothing to do with the bribes; is that right?

22 A There are payments related to his personal payments and  
23 there were some payments that had nothing to do with his  
24 personal payments.

25 Q Okay. If you could just turn to the next one which is

1 Toyota. As with the previous cars, there was also several  
2 wire transfers reflected on this account; right?

3 A Yes.

4 Q But I believe that you testified that this  
5 related -- that wire transfers were not going to Mr. Chiriboga  
6 directly, they were going to his son's account José Luis  
7 Chiriboga; is that right?

8 A Yes.

9 Q You knew that because you had actually -- actually, had  
10 spoken to José Luis Chiriboga?

11 A I did. A few times.

12 Q You spoke to him because you knew that he had some  
13 problems at the bank, at the bank he was banking at; right?

14 A Yes.

15 Q And the bank was asking why they were getting wires of a  
16 hundred thousand, 50,000. They wanted some backup  
17 documentation; is that right?

18 A Yes.

19 Q And you helped him. When I say, "You," I mean Full Play  
20 helped him resolve that problem?

21 A Yes. Basically, he needed a contract to back up the  
22 transfers that at one moment my bosses signed.

23 Q Right. And that was Mariano that asked you to create  
24 this fake contract; right?

25 A Either or both.

1 Q But?

2 A I'm referring to both my bosses.

3 Q But it certainly wasn't you?

4 A It wasn't.

5 Q You had no decision-making authority when it came to  
6 creating fake contracts or wire transferring bribe monies or  
7 anything?

8 A You're right. I was not authorized to do that.

9 Q And did you create that fake contract in your office?

10 A No.

11 Q Where did you create it?

12 A I don't remember very well who created, but I asked a  
13 third-party lawyer.

14 Q And you obviously didn't tell the third-party lawyer that  
15 it was a lie?

16 A No. I asked them basically the instructions on the  
17 service, the payments, the purpose of the payments and that's  
18 it.

19 Q And Mariano Jinkis signed that contract; right?

20 A Yes.

21 Q You didn't sign it?

22 A No.

23 Q And that contract was sent to José Luis Chiriboga to  
24 submit to the bank; is that right?

25 A That contract was sent to, yes, Chiriboga to submit to

1 the bank.

2 Q That was done twice for Chiriboga; right?

3 A I remember twice, yeah.

4 Q Okay. If you could turn to Flemik.

5 And, again, Flemik -- also, by the way, Flemik is  
6 Luis Bedoya?

7 A Yes.

8 Q Is Flemik a car?

9 A No. Flemik actually is the name of the company. Is the  
10 name of the company of Mr. Bedoya the name of the company.

11 Q Was that created by Full Play, Flemik?

12 A No, I don't know. It actually was created before I  
13 started of working for the company, so it existed before that  
14 date.

15 Q So with Mr. Bedoya, you didn't feel it necessary to  
16 create a car name?

17 A Exactly. Because we thought that Flemik itself was not  
18 linked or related to the name of Bedoya.

19 Q Even though it's his company?

20 A Nobody knew it was his company in Full Play, so we  
21 decided not to tie a car to this name because there was a name  
22 already included without saying Bedoya.

23 Q Did Mariano?

24 A And the majority, I would say, of all of the wire  
25 transfers made by my bosses were made to this account.

1 Q To Flemik's account?

2 A Yes.

3 Q And if you go to the bank and you get the signature card,  
4 you can see that it's Luis Bedoya's account; right?

5 A I would say so.

6 Q All right. And, again, in this one, there's several wire  
7 transfers reflected on the account?

8 A Yes.

9 Q And that was based on instructions given to you by  
10 Mariano to wire transfer; right?

11 A The process, just to clarify, was always the same. They  
12 decide who to pay, how to pay, they signed. They signed the  
13 wire instructions. The bank makes the call, the transfer was  
14 confirmed, and then they debit from the account. Once the  
15 transfer was debited from the account, I basically include in  
16 this registry.

17 Q Right. So the answer is, yes, Mariano told you to take  
18 all that information?

19 A Yes.

20 Q And turning now to Kia which is the next tab.

21 Kia, you testified yesterday belonged to certainly  
22 Sergio Jadue?

23 A Yes.

24 Q And, again, there's also several wire transfers reflected  
25 on this account?

1 A Yes.

2 Q And you never spoke to Sergio Jadue about this account?

3 A No.

4 Q And the next one, which is EF, you testified was related  
5 to Eugenio Figueredo?

6 A Yes.

7 Q And that also had several wire transfers?

8 A Yes.

9 Q You again decided that a secret name wasn't necessary for  
10 Eugenio Figueredo because you just labeled it EF which is not  
11 a car?

12 A There is a car related to Figueredo, but there is a  
13 mistake in the registry. We didn't change the name of the  
14 tab.

15 Q What's the Figueredo's car?

16 A Smart.

17 Q Okay. And then the last one which is Peugeot, the next  
18 tab.

19 That was Mr. Meiszner; right?

20 A Yes.

21 Q And there's also wire transfers reflected on that  
22 account?

23 A Yes.

24 Q And the same process that you just explained a little  
25 while ago was done with all these individuals that have wire

1 transfers and going into their accounts; right?

2 A Yes.

3 (Continued on the next page.)

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1 CROSS-EXAMINATION

2 BY MS. PINERA-VAZQUEZ:

3 Q So with all these wire transfers you were able to  
4 confirm that the monies actually were received by these  
5 individuals, correct?

6 A Basically, as I stated before, once we saw the debit in  
7 the account it was a way of confirming the wire transfers.  
8 So basically we didn't ask the beneficiary whether the money  
9 was received or not. Basically the debit in the account was  
10 the simple confirmation.

11 Q Let's turn to Honda, the Honda tab. You testified  
12 yesterday that that's the name that you allocated for Hugo  
13 or the Jinkises to Mr. Napout; is that right?

14 A Yes.

15 Q Now if you look at the one-page account statement,  
16 there are no wire transfers to Mr. Napout, right?

17 A There are no wire transfers to Mr. Napout.

18 Q So you did not have his bank account, right?

19 A I don't know if he has a bank account.

20 Q And one thing I want wanted to understand because it  
21 was a little difficult, when you say commitment, and I  
22 believe it's the third row, commitments would be under F, is  
23 that right, Column F?

24 A Yes.

25 Q So when you say commitment, does that mean that it is a



1 payment that was going to be paid in the future to this  
2 individual?

3 A Yes. I mean when they refer to commitment, it is  
4 information provided to me by my bosses at some time in the  
5 future either near future or long future this payment at  
6 some point in time would be made.

7 Q So just using the first line as an example, at some  
8 point Mariano told you that \$500,000 was going to be paid  
9 to -- supposedly to Mr. Napout; is that right?

10 A Yes.

11 Q Now, obviously you have no way of knowing whether or  
12 not that was true because you're going on what Mariano is  
13 telling you?

14 A Correct.

15 Q And you have no way of knowing if Mr. Napout even knew  
16 or had a discussion with Mariano that he had \$500,000 out  
17 there?

18 A I have no idea.

19 Q You're only going on what he told you, what Mariano  
20 told you?

21 A Exactly.

22 Q And since you never discussed this with Mr. Napout, you  
23 also can't tell this jury that he had any idea about these  
24 future payments?

25 A Correct.

1 Q Now let's go to the qualifiers. Yesterday Ms. Mace was  
2 asking you about qualifiers, and just so I understand,  
3 qualifiers are the games that are played years to decide who  
4 goes to the World Cup, right?

5 A Correct.

6 Q And, obviously, these are viewed throughout the world  
7 because they follow their country teams -- you saw the  
8 qualifier --

9 A Yes, teams, basically the 10 members of CONMEBOL play  
10 World Cup qualifiers and the existing format the big players  
11 of South America, some of them are very popular, play in  
12 that games.

13 Q Well, not in South America, for instance, the  
14 United States lost to Trinidad and Tobago recently for the  
15 World Cup in Russia?

16 A There was a World Cup.

17 Q And Argentina won I believe v. Ecuador recently for the  
18 qualifiers?

19 A I'm sorry.

20 Q Did Argentina play Ecuador in the qualifiers recently?

21 A Argentina qualified for the World Cup. Argentina  
22 qualify -- beat Ecuador in the final match and qualified,  
23 yes.

24 Q And the qualifiers end up -- the qualifiers basically  
25 eliminate all the world teams but for 32; is that right?

1 A Yes. There are two qualified countries and in CONMEBOL  
2 in Latin American CONMEBOL there are four that qualifies  
3 directly, and there is a fifth national team playing a  
4 playoff this time against Argentina.

5 Q Yesterday Ms. Mace asked or the prosecutor asked you  
6 about a qualifier contract between Ciffart and Full Play, do  
7 you remember that, Full Play Group?

8 A I remember.

9 MS. PINERA-VAZQUEZ: Can we switch to the Elmo,  
10 Your Honor. You can turn off -- and I'm referring to  
11 Government Exhibit 209T.

12 THE COURT: Previously admitted.

13 MS. PINERA-VAZQUEZ: Previously admitted, yes.

14 Q Now this contract was signed in Buenos Aires on  
15 October 12th, 2011, right?

16 A Yes.

17 Q And the companies are, as I said, Ciffart and  
18 Full Play.

19 Now Ciffart you know is a legitimate company,  
20 right?

21 A Yes.

22 Q And, in fact, it broadcasts throughout Paraguay a lot  
23 of sporting events including soccer, it's a multi-visual  
24 company?

25 A I really don't know how many rights Ciffart held, but

1 what was most important for the company is what is declared,  
2 number one, is that Ciffart -- if you go down a little bit,  
3 the number one, Ciffart as acquired from the Paraguayan  
4 association the rights that Full Play wanted to buy. In  
5 this industry it is very important this what's called reps  
6 and warranties and Ciffart represented and declared that  
7 they had the rights.

8 Q Right. So if going on that number one, Ciffart, when  
9 they say acquired, they must have purchased the rights to  
10 broadcast from the Paraguayan association which owned those  
11 rights, right? The Paraguayan association --

12 A Exactly. What I meant is Ciffart had acquired before  
13 what was selling here.

14 Q So they owned the rights to televise the soccer games?

15 A They owned the rights, Ciffart.

16 Q Ciffart.

17 A Ciffart owned the rights, kept the rights to be sold in  
18 Paraguay and sold to Full Play the rest of the rights to be  
19 commercialized outside Paraguay. In exchange, Ciffart  
20 received money and also receives matches not only those that  
21 Paraguay plays away, but also the number of Paraguay matches  
22 with Colombia, Ecuador or whatever.

23 Q My point is, this is a legitimate contract, it doesn't  
24 involve a fake company with a fake contract, right?

25 A It's legitimate, it's included in the accounting system

1 of the company.

2 Q And, in fact, it was signed by -- this one doesn't have  
3 a signature because I'm referring to the translated one, but  
4 it says that it was signed by Pablo Troche from Ciffart and  
5 Hugo Victor Jinkis from Full Play, right?

6 A Yes.

7 Q Now Juan Napout has nothing to do with this contract,  
8 right?

9 A Right.

10 Q I think we're done with the black binders so we can  
11 close them.

12 What I'd like to do now is talk a little bit  
13 about the payment orders that we discussed yesterday. They  
14 are called "Orden de Pago," right?

15 A Yes.

16 Q The purpose of those payment receipts or payment -- how  
17 should I call them in English, payment orders?

18 A Yes.

19 Q The reason for those payment orders are to confirm  
20 whenever you give someone cash, right?

21 A No, the payment orders were prepared for every payment.  
22 The difference between a payment order for cash and a  
23 payment order for a wire instructions is basically when  
24 there were wire instructions we have, I would say, many  
25 pieces, three papers, the payment order, the wire

1 instruction, and the debit of the transfer in the bank,  
2 so -- and when there's a cash payment there is only one  
3 paper.

4 Q And the one paper would be the payment order?

5 A Yeah.

6 Q And those were created by you; is that right?

7 A It was created before I started working in the company.  
8 It's sort of a way of control.

9 Q That's a way to confirm that you or whoever gave the  
10 money, that you gave the cash to somebody because that way  
11 they can't accuse you of stealing, you have a receipt?

12 A Exactly.

13 Q It's like we go to the store and we return something  
14 you have to have the receipt to return it or they think you  
15 may have stolen it?

16 A Basically it was very important for us any time cash  
17 was out of the company there was a receipt, somebody  
18 receiving that.

19 Q So it protects you the person who's writing the receipt  
20 and also the person taking the money it protects them?

21 A Yes, although I always believed that my bosses trusted  
22 me. It was my style to make sure that everything was made  
23 correctly.

24 Q So yesterday you were -- the Government introduced a  
25 stack of payment orders that belonged to different people --

1 A Yes.

2 Q -- do you remember? Okay. I'm just going to focus  
3 your attention on Government Exhibit 609 and I'm going put  
4 it on the Elmo. When these are -- referring to  
5 Government Exhibit 609, let me just put it up for a second.

6 THE COURT: Previously admitted.

7 Q Admitted Exhibit 609.

8 I'm taking off the clip on top.

9 These are original documents, correct?

10 A Yes.

11 Q Let me clarify something, when you gave these documents  
12 to the Government, did you give them already clipped like  
13 the clip I just took off and stapled?

14 A Yes.

15 Q And I believe you testified yesterday when I was asking  
16 you questions before I formally did the voir dire that you  
17 decided to get these payment orders from a binder that was  
18 in the office?

19 A Yes.

20 Q And these payment orders, which are basically half a  
21 page, these payment orders were all together in a binder?

22 A Yes, they were all together but they were filed  
23 chronologically.

24 Q They weren't filed by initials or by people, they were  
25 filed chronologically?

1 A By dates I meant.

2 Q How many binders were there at Full Play?

3 A There were some, I don't know how many because we also  
4 put in binders all of the payments of Full Play in the  
5 day-to-day business.

6 Q Well, you testified that this payment order system  
7 existed before you got to Full Play, right?

8 A Yes.

9 Q So there must have been at least 10 or 20 binders  
10 because --

11 A Yes. I don't know how many, but there are many.

12 Q So if I recall correctly, you decided when you were  
13 taking documents from the Full Play office, you decided to  
14 go through the 10 or 20 binders and pick out the pieces you  
15 wanted, the pieces of paper you wanted?

16 A Well, basically what I said is that the Full Play  
17 payments were in one binder or different binders, and the  
18 Cross Trading payments were a different binders. So I went  
19 through the Cross Trading binders and took out these  
20 payments.

21 Q Did Bayan have a binder also?

22 A No, Bayan payments were in my drawer.

23 Q So you went through the binders and you picked out  
24 these half page payment receipts, right?

25 A Yes.



1 Q And now these payment receipts weren't with any sort of  
2 contract or anything, they were independent?

3 A Yes.

4 Q And it was you that went and picked out documents from  
5 other binders at Full Play and then stapled them together;  
6 is that right?

7 A Yes.

8 Q In other words, this is not the way they were  
9 originally maintained?

10 A Yes.

11 Q And you decided to do this, why?

12 A I decided to do basically after May 27 when my bosses  
13 were indicted and at that moment I personally decided that  
14 these documentation was -- I was not -- I didn't feel  
15 comfortable in having within the company this documentation.

16 Q We'll get to that in a second.

17 So I'm going to show you the first page of  
18 Government Exhibit admitted into evidence 609 and I'm not  
19 going to go through all of them, but yesterday I sat down  
20 and counted them and there is 16 payment orders under this  
21 tab Government Exhibit 609.

22 Have you had an opportunity to count how many  
23 there were there?

24 A No, I don't know, I don't know how many.

25 MS. PINERA-VAZQUEZ: Your Honor, may I approach?

1 THE COURT: Yes.

2 MS. PINERA-VAZQUEZ: I'm going to hand Mr. Pena  
3 Government Exhibit 609.

4 THE COURT: You're going to ask him to count them?

5 MS. PINERA-VAZQUEZ: Yes, I'm just going to ask  
6 him to make sure my representation is correct.

7 A You want me to --

8 Q Yes, just count the payment orders.

9 THE COURT: While he does that, can I ask you,  
10 Mr. Pena, whether -- I'm sorry, Ms. Pinera whether the order  
11 of these documents matters because I noticed that you  
12 unbinder clipped them and I don't know if anyone cares about  
13 maintaining the order or not.

14 MS. MACE: We do, Your Honor. I think they should  
15 remain in the order that they were provided by the witness.  
16 I will note that a copy has been provided to defense counsel  
17 with the pages numbered so it would be -- we would be able  
18 to recreate it if necessary, but I think it should be  
19 maintained in its original form.

20 MS. PINERA-VAZQUEZ: Actually, your Honor, I  
21 haven't touched it. I took the clip off and gave it to him  
22 how this young lady handed it to me.

23 THE COURT: Just so the witness knows, maintain  
24 the order in which they were handed to you to the extent  
25 this matters for later questions or presentation.

1 Ms. Mace, when you say numbered you mean  
2 Bates stamped numbered?

3 MS. MACE: Yes, on the copies provided to the  
4 parties there is a Bates stamp number on the page.

5 THE WITNESS: There are 16. But there are not 16  
6 cash payment orders, some of them involved some wire  
7 transfers.

8 BY MS. PINERA-VAZQUEZ:

9 Q Okay. We're going to go through them now.

10 A You asked me the 16 -- you asked me if the 16 were cash  
11 payments, my answer is no.

12 Q Right, okay. Let me ask you this: There are 16  
13 payment orders?

14 A Yes.

15 Q And now -- I'll get to that in a second. So going  
16 through the first one, which is 5286 these -- this is a  
17 payment order and it was signed by Mariano Jinkis, right?

18 A Yes.

19 Q And that's because -- I'm sorry, go ahead.

20 A Yes.

21 Q And the signature on -- right here is your signature,  
22 right, down at the bottom where it says authorized by?

23 A The one that you are pointing out is Mariano Jinkis.

24 Q Sorry, Mariano. And this one is yours, right?

25 A Yes.

1 Q And just so I understand, it's \$150,000 in cash given  
2 to Mariano, right?

3 A Given to Mariano.

4 Q And the reason that Mariano signed it is because  
5 Mariano is the one who got the cash, right?

6 A The reason why Mariano signed it the reason is because  
7 it was given to him.

8 Q Right, you gave him the cash?

9 A Yes.

10 Q And in order to make sure that they don't accuse you of  
11 stealing \$150,000, you wanted to make sure you have a  
12 receipt?

13 A I don't think that Mariano --

14 Q I don't think so either?

15 A -- should ever accuse me for stealing the \$150,000.  
16 Again it was made -- basically it was my style to keep  
17 everything in order.

18 Q And these initials up here J-A-N, Mariano told you to  
19 put that there, right?

20 A Yes.

21 Q Because certainly J-A-N, which are the initials of my  
22 client, did not receive this cash, correct?

23 A I don't know what he, Mariano, what he mentioned to me  
24 is that he needed cash because he mentioned he was going to  
25 give the cash to Mr. Napout. And to include a payment order

1 that and to include the payment in the registry.

2 Q Right. But he told you that, you don't know whether or  
3 not he actually gave it to Mr. Napout?

4 A Correct.

5 Q And the same thing with 5285, you gave the cash to  
6 Mariano, \$170,000; is that right?

7 A Right.

8 Q And not to go through all of these, but other than the  
9 wire transfers that we're going to discuss in a second,  
10 they're all cash payment orders made to -- signed by Mariano  
11 or Hugo Jinkis, right?

12 A Yes.

13 Q Actually I think they are all signed by Mariano but one  
14 of them.

15 A Basically Mariano.

16 Q Mariano. So these payment orders confirm that you gave  
17 a significant amount of cash to Mariano?

18 A Yes.

19 Q What he did with it --

20 A I don't know.

21 Q -- you don't know.

22 You mentioned a wire transfer, and I'm going  
23 to show you, I guess number 6001. Before I get to this, why  
24 would there be a payment order for a wire transfer when you  
25 don't need confirmation that it was received?

1 A Can you rephrase it.

2 Q You previously testified that when you do wire  
3 transfers a way to confirm that the wire transfer was done  
4 and the person received the money is you go to the bank, you  
5 look at the statement and confirm that it was received,  
6 right?

7 A Yes.

8 Q And that the reason that these payment receipts are  
9 done is because that doesn't exist with cash, you need to  
10 have some sort of documentation that you gave the cash to  
11 the person, right?

12 A Yes.

13 Q So why would we need a -- not we, why would Full Play  
14 need a payment order for a wire transfer?

15 A A payment order was always made for any wire transfer  
16 for Full Play during the course of business. It's the first  
17 paper created before creating the wire transfer letter.

18 So the process started with the payment order,  
19 then a wire transfer was printed out, asked to the Jinkis to  
20 sign either or both and then with the confirmation of the  
21 wire transfer, the debit of the account statement was also  
22 stapled.

23 So to answer your question, the payment order  
24 or the Orden de Pago was always prepared.

25 Q Let's go to 6001, which is the Government showed you

1 yesterday. 6001. And attached or stapled to this is some  
2 sort of what appears to be a contract called Club Sport  
3 Colombia.

4 A Yes.

5 Q Do you remember that?

6 A Yes.

7 Q Now you stapled this together, right?

8 A Yes. Me or somebody of the trading department.

9 Q I'm sorry I thought these one of the documents you took  
10 when you left Full Play after the indictment?

11 A No, yes, yes, but I thought that you were referring at  
12 that moment who stapled, I don't know who stapled.

13 Q Now this Club Sport Colombia appears to be missing a  
14 page because it starts off with clause 1.3?

15 A It's missing many pages, I don't know why.

16 Q Oh.

17 A But the only page included here, and it has a reason,  
18 is because it includes the wire instructions. So this  
19 document could have two or 20 pages, I don't know. The only  
20 page that was included in the payment order was this because  
21 if you go down you will see in yellow the wire instructions.  
22 So as to have -- go down a little bit. Go down, scroll  
23 down.

24 Q Oh, go down.

25 A Move down, sorry. You will see yellow the wire

1 instructions. So the only reason why this page was included  
2 in the payment order was to make sure that the wire  
3 instructions were made to the place the contract asked.

4 Q And the wire instructions were to Full Play to send it  
5 to this account, right?

6 A Cross Trading to this account.

7 Q Cross Trading.

8 Now just to be clear because you said that  
9 wire transfers were included in this little stack, this wire  
10 transfer has nothing to do -- is not Mr. Napout's account or  
11 has anything to do with Mr. Napout, right?

12 A No, there it says another beneficiary. It says  
13 beneficiary Hugo Galeano, which I don't know who he is.

14 Q The next page confirms that Cross Trading indeed made  
15 the wire transfer from their account to Bank Continental for  
16 the benefit of this person, Hugo Galeano, right?

17 A Yes. And this wire instruction should be the same as  
18 the previous page.

19 Q And, again, Mariano is the one who told you to -- gave  
20 you the wire instructions and gave you the information on  
21 this payment order, right?

22 A Yeah, actually in this case wire instructions was  
23 included in the contract, so it was much easier to process  
24 the payment when it was asked to do so.

25 Q But the person who told you to put Honda on top was



1 Mariano?

2 A Either -- I don't know either Mariano or Hugo, either  
3 or both, yes.

4 Q It wasn't you deciding to put Honda?

5 A No.

6 Q That's the original, I don't want to mix them up.

7 It's the same thing with the second wire  
8 transfer on receipt 6124.

9 A Correct.

10 Q This is also a wire transfer between Cross Trading and  
11 Hugo Galeano from Bank Continental at Bank Continental,  
12 right?

13 A Correct?

14 Q This has nothing to do with my client, Mr. Napout,  
15 right?

16 A As far as I know.

17 Q And the person who told you to put Honda on there, on  
18 the payment order is Mariano Jinkis or Hugo?

19 A Yes, they mentioned to me that the contracts that we  
20 saw one page that established a payment of \$100,000 in two  
21 installments. They asked me that the payments related to  
22 that contract to be included in this time.

23 Q The next one wire transfer -- I think this will be the  
24 last one because this all relates to the same subject. The  
25 third wire transfer is this Honda account is referring to

1 number 239.

2 A No, it's not a wire transfer.

3 Q No, no, this is the cash?

4 A Yes. I think it's stapled incorrectly, this page  
5 alone.

6 Q I'm just going to take off the clip just so I can show  
7 the next page and then I'll put the clip right on.

8 THE COURT: So it's not stapled it's a clip?

9 MS. PINERA-VAZQUEZ: It's a clip.

10 THE COURT: Okay.

11 Q This one which is payment received 6299, this one is  
12 stapled, right?

13 A Yes.

14 Q And who requested this wire transfer?

15 A I don't remember who. But I remember it was a wire  
16 transfer to realtor in Uruguay.

17 Q Right. But right on the page it says that someone  
18 authorized it, who was it that authorized it?

19 A This is my mine but the authorization the last  
20 signatory is Mariano.

21 Q So Mariano did, Mariano requested this wire transfer?

22 A Yes, he signed.

23 Q I'm flipping the page to the stapled document and that  
24 is -- verifies that a wire transfers from Cross Trading was  
25 done to HSBC Bank, right?

1 A Yes.

2 Q And the final beneficiary is somebody named Ignacio  
3 Ruibal, R-U-I-B-A-L?

4 A Correct. It's basically a realtor in Punte de Este.

5 Q Did Mariano tell you what this was for?

6 A They mentioned to me that this payment along with a  
7 couple of more they were related to a rental of a house in  
8 Punte de Este.

9 Q Where you want to go?

10 A Sorry?

11 Q Where you're ready to go already?

12 A I would like to go, but I didn't go.

13 Q And do you know whether or not Hugo or Mariano stayed  
14 at this rental?

15 A I don't think because they have their own houses.

16 Q So you have no idea whether the person who used this  
17 rental knew that Mariano or Hugo Jinkis or Full Play paid  
18 for it, right?

19 A According to them, the rental was paid and was going to  
20 be used by Napout.

21 Q You never discussed this with Mr. Napout, correct?

22 A Correct.

23 Q So you have no idea whether or not Mr. Napout knew that  
24 the Jinkises were paying for it, right?

25 A Correct.

1 Q All you know is whatever Mariano and Hugo Jinkis told  
2 you, right?

3 A Yes.

4 Q They are the ones who told you put it in this Honda --

5 A Yes.

6 Q -- account?

7 So just to sum up the payment orders, the  
8 payment orders that I just showed you only reflect the ones  
9 that were Honda, right?

10 A Yes.

11 Q There is also about a four-inch stack that was  
12 introduced yesterday into court, right, that belonged to the  
13 other cars?

14 A Yes.

15 Q And the ones that I just showed you, all those cash  
16 receipts were primarily for Mariano, right? In other words,  
17 you gave the money to Mariano and Mariano signed for the  
18 receipt?

19 A Exactly. I gave it to Mariano based on his requests  
20 and then he left the office.

21 Q And I think you've testified before that you -- once  
22 Mariano walks out the door with 150, \$200,000 you don't know  
23 what he does with it, right?

24 A Correct.

25 Q And you don't know if he actually is using that cash

1 for himself, right?

2 A Actually, he took some money for himself as well  
3 sometimes.

4 Q So in addition to requesting cash from this account,  
5 that Honda account he also requested other cash?

6 A At some times, yes. Both.

7 Q You have no idea --

8 A Both Jinkis.

9 Q I'm sorry, I don't want to interrupt.

10 A Both my bosses asked for some cash for personal  
11 expenses.

12 Q So he was taking out a lot of cash from the company?

13 A Yes. Basically they used -- it was their company and  
14 they used their company for to fund to afford their personal  
15 expenses.

16 Q Right. And, in fact, now you that mentioned that,  
17 Mariano could have been using this account as a slush fund  
18 for his own personal expenses, right?

19 MS. MACE: Objection calls for speculation.

20 THE COURT: Sustained.

21 THE WITNESS: Cash.

22 THE INTERPRETER: Sorry, slush fund.

23 MS. PINERA-VAZQUEZ: That's okay she sustained it.

24 Q You don't know whether or not he was using it to pay  
25 for his own lavish tastes, right?

1 MS. MACE: Objection. Same objection.

2 THE COURT: I'm going to overrule that one. I  
3 guess the question is he doesn't know.

4 Q Right, does not know. He does not know whether or not  
5 Mariano was using the hundreds of thousands of dollars that  
6 he pulled out of Full Play to go on, let's say, an expensive  
7 vacation?

8 THE COURT: I'm going to sustain it in the sense  
9 that assumes facts not in evidence, so sustained.

10 THE WITNESS: Basically --

11 THE COURT: No, no, don't answer.

12 THE WITNESS: Okay.

13 BY MS. PINERA-VAZQUEZ:

14 Q The bottom line is you don't know what he did with the  
15 money?

16 A The bottom line is that I gave -- I give the money to  
17 Mariano when he requested me to do so, because he told me  
18 that he was going to give it to Mr. Napout. And any time my  
19 bosses asked cash for their personal expenses, they also  
20 asked cash and the payment order said another thing, say,  
21 withdrawal, withdrawal Mariano or withdrawal Hugo.

22 Q The bottom line is in that account the only cash based  
23 entry was the one that was labeled Honda, correct?

24 A I didn't follow you.

25 Q The account, the ledger, the registry account?

1 A Yes.

2 Q The only entry in there that only registered cash was  
3 Honda; is that right?

4 A Yes.

5 Q Everybody else had wire transfers?

6 A No, no. There were some, as we went through yesterday,  
7 and in terms of the VW or Bolivia, you remember the son of  
8 Tico Lozada came to our office and took some cash as well.  
9 Of course, little money, less amount of money.

10 Q Right, but aside from that the only other entry was  
11 Honda, right?

12 A I would say so.

13 Q In fact, you can't -- you don't know whether or not  
14 Mariano was using this Honda account as a cover to use money  
15 for his own purpose, right?

16 THE COURT: Sustained, sustained.

17 MS. PINERA-VAZQUEZ: I'm sorry, Your Honor, there  
18 is not an objection.

19 THE COURT: Same problem as before that's why I'm  
20 sustaining it.

21 Do you want to have a sidebar?

22 MS. PINERA-VAZQUEZ: No. Thank you.

23 THE COURT: Okay.

24 Q So you can't tell this jury what he did with the cash  
25 after he walked out that door?

1 A I don't know what he did with the cash. I know what he  
2 told me that he was going to make with the cash.

3 Q And to sort of change the subject a little bit, during  
4 this time in Argentina when you were in Full Play, I think  
5 that was, what, 2009 to 2015?

6 A Yes.

7 Q The Government had imposed tight currency controls at  
8 that time, right?

9 A Right.

10 Q I think it was called Cepo Cambiari, C-E-P-0.

11 C-A-M-B-I-A-R-I, which means a currency clamp, right?

12 A Yes. It was in Argentina it was a call Cepo C-E-P-0,  
13 which basically was restrictions to buy dollars freely in  
14 the market.

15 Q Like go to the bank and exchange pesos for dollars?

16 A Yes, that's why there was two different exchange rates,  
17 one official exchange rate and the other unofficial exchange  
18 rate.

19 Q The black market? The black market rate and the  
20 legitimate rate, right?

21 A Yes.

22 Q At that time it was hard for people to accumulate a lot  
23 of cash because you couldn't go to the bank and take out  
24 whatever you wanted, you had to abide by those restrictions  
25 of the clamp, right?



1 A Correct.

2 Q And A lot of people, including yourself, decided to get  
3 paid in cash because obviously dollars don't lose their  
4 value; is that right?

5 A Yes. The dollar in Argentina is commonly used for many  
6 purposes and people think basically in dollars based on bad  
7 experiences in the past of inflation or big movements in the  
8 exchange rates.

9 Q I believe you also had stated that there was a lot of  
10 the employees at Full Play also got paid in cash for that  
11 purpose because things can be done with dollars in  
12 Argentina?

13 A Yes.

14 Q And you would agree with me that a lot of business  
15 people, executives also found ways to get around the  
16 currency clamp and buy dollars without having to go through  
17 the procedures; is that right?

18 A Yes.

19 Q And one way of doing is that to possibly create an  
20 account that appeared that it was for someone but it was  
21 really holding cash, right, like the Honda account?

22 A Can you repeat it?

23 Q One way of doing that is making pretend that all this  
24 cash was going to someone named Honda when really it was a  
25 savings to get around the currency clamp?

1 MS. MACE: Objection to form. The lead-in to the  
2 question is ambiguous I believe.

3 THE COURT: Yes. Rephrase that question.

4 BY MS. PINERA-VAZQUEZ:

5 Q The currency clamp -- am I saying that right, currency  
6 clamp, or does that sound weird?

7 A Cepo.

8 THE COURT: Cepo in English is clamp?

9 THE WITNESS: I don't know if it's clamp.

10 THE COURT: Is there a word band? I'm not sure --  
11 can we get some --

12 THE WITNESS: Currency restrictions you can say.

13 THE COURT: Currency restrictions. Okay. Use  
14 that term.

15 BY MS. PINERA-VAZQUEZ:

16 Q Uh-huh. The currency restrictions made for a very  
17 creative ideas to get cash; is that right?

18 A Yeah.

19 Q And one of those creative ideas could be that money was  
20 kept in an account or in a location under someone else's  
21 name; is that right?

22 A My bosses could have -- could have accumulated the  
23 dollars without creating a specific account.

24 Q But they also could have done it with creating it also,  
25 either one, you don't know?

1 A I don't know.

2 Q Okay, Mr. Pena, let's get to that infamous day of  
3 May 27th, 2015. I think you testified yesterday that's the  
4 day that your bosses were charged?

5 A Yes.

6 Q And obviously, it caused a lot of havoc at Full Play?

7 A Yes, of course. There are persons in the company who  
8 were very active and, as I mentioned to you yesterday, there  
9 were quite a few people, it was not a big corporation, it  
10 was not a big corporation and the absence of both of them  
11 was a big impact, yeah.

12 Q I forgot to ask you one thing before we get to May  
13 25th. I want to ask you about the New York Project. The  
14 New York Project from what I understand was a super-secret  
15 project where Full Play was selling 51 percent of its  
16 interest to a third party; is that right?

17 A Yes, and an option to sell an additional 19 percent at  
18 one moment in time.

19 Q And that was, again, very secret, very few people  
20 within Full Play knew about it.

21 A Yes.

22 Q I think it was only you, Hugo and Mariano Jinkis?

23 A And Sergio.

24 Q And Sergio. So this is more or less like the account?

25 A Yes.

1 Q And there were documents created, contracts, e-mails  
2 talking about the New York Project?

3 A Yes.

4 Q Why did you call it the New York Project?

5 A Because the sale, the sale price was 212 million, which  
6 is the prefix number of New York.

7 Q The area code.

8 And that person was buying, or you were  
9 negotiating the 51 percent, was the head of the famous  
10 soccer club in Paris Saint-Germain; is that right?

11 A Actually it was a vehicle named Qatar Investment or  
12 something like that, but I really don't know what was -- who  
13 was the interested in making on the other side because this  
14 definitely was Mariano Jinkis.

15 Q So Mariano was negotiating it. The person in charge of  
16 Qatar Investments was Nasser, N-A-S-S-E-R --

17 A Yes.

18 Q -- from Qatar? He's actually from Qatar?

19 A Yes, I think so.

20 Q And there came a point in time when you became  
21 concerned about the structure and the potential tax issues  
22 implicated by this New York Project, right, in Argentina?

23 A Not tax issue. Basically after May 27th we realized  
24 that this project that would be working before was ended.

25 Q Well, I believe that you told the agents that you were

1 worried because you didn't know where the money was coming  
2 from?

3 A The money of what?

4 Q The money for the sale of Full Play.

5 A No. I was not concerned about where the money was  
6 coming from. And basically if the sales were executed, it  
7 was something that the buyer was a vehicle and the sellers  
8 were my bosses.

9 Q So you had no concerns about whether or not there was  
10 going to be any tax evasion or -- it hadn't happened yet my  
11 issue -- my question is, you weren't concerned at all about  
12 whether this was going to be a tax avoidance or some sort of  
13 potential issues with the Argentinian tax authorities?

14 A No, basically it was at the moment May 27th arrived it  
15 was not agreed how the payment would be made.

16 Q And did you think it had to do anything with the  
17 World Cup 2022?

18 A No. I've been working for this project for more than  
19 one year and it definitely had to do with possible sale and  
20 because the sale also included the -- included the  
21 confirmation that the Jinkis will continue operating the  
22 company. So basically it was a sale of the company but the  
23 confirmation that the Jinkis would continue to operate and  
24 that's why it was asked by them that this issue could be  
25 kept confidential because if the sale were executed nobody

1 could have known.

2 Q All right. So on May 27th when the indictment comes  
3 down and it's crazy, you decided to delete some of these  
4 e-mails project New York, right?

5 A Yes.

6 Q You also deleted some other things, you deleted some of  
7 the e-mails with the federation presidents regarding their  
8 payments, right?

9 A Yes.

10 Q You did that in order to protect your bosses and  
11 Full Play, right?

12 A I did it in order to protect the company.

13 Q Mariano never told you to delete those e-mails, right?

14 A No, I did it.

15 Q And, in fact, you recruited Sergio to also delete  
16 e-mails, right?

17 A Yes.

18 Q And he also, on a separate computer, deleted e-mails  
19 between Full Play and the federation presidents?

20 A I wouldn't say that Sergio had any e-mails with the  
21 federation presidents.

22 Q Okay. So he deleted other things that you don't know  
23 about?

24 A Yes.

25 Q And also Hugo didn't tell you to delete anything

1 either, right?

2 A No.

3 Q This is something that both -- that you decided and  
4 recruited Sergio to do with you to protect the company?

5 A Yes, basically I decided to do so until one time that  
6 the company hired a U.S. lawyer, I think it was mid-July.  
7 At that moment the U.S. lawyer of Full Play requested all of  
8 the employees not to delete any e-mail and we didn't do  
9 anything afterwards.

10 Q But you didn't delete all the e-mails, right?

11 A No.

12 Q You didn't delete the account?

13 A No, the accounts would be there or I know the accounts  
14 already there.

15 Q No, I'm talking about after the indictment, the account  
16 that we saw --

17 A Oh, no, no, no, because it was not in an e-mail, it was  
18 saved in a pen drive.

19 Q Flash?

20 A Flash, yes.

21 Q You didn't destroy the flash drive though?

22 A No.

23 Q You decided to use it as an insurance policy, right?

24 A No, the account I kept separately just in case at some  
25 moment this could be useful.

1 Q Right, as an insurance policy. You made a copy of the  
2 flash drive because it might help you down the road if you  
3 needed to explain what happened at Full Play, right?

4 A To be frank with you, in 2015 I didn't think that I was  
5 going to be called by the Government to present evidence or  
6 to give my testimony. I saved it just in case but --

7 Q Just in case what?

8 A In my head, it was I had -- it was not a possibility of  
9 being called but I saved it.

10 Q You also took the documents, some of which we've seen  
11 in court, just in case you needed them, right?

12 A No. I mentioned to you that I took the documents from  
13 the company because for me it was not convenient to have  
14 those documents within the company.

15 Q You kept them for over a year before you turned them  
16 over to the Government, right?

17 A I kept them, yes, and I didn't destroy them, yeah.

18 Q Along with a pen drive?

19 A Yes.

20 Q Because that was your hopes that if anything came down  
21 that you would have that to save you basically, right?

22 A I wouldn't say save me. I kept the pen drive and I  
23 kept the documentation as I am keeping information of other  
24 jobs that I worked before.

25 Q But it did save you in this case, didn't it?



1 A I wouldn't say save.

2 Q Well, you're not charged, are you, in this case?

3 A No.

4 Q The Government didn't indict you and arrest you for  
5 agreeing to bribe federation presidents, right?

6 A No, of course, my -- I always -- I only thought my tiny  
7 involvement in this process was very little. As you are  
8 listening to me, either in the commitment side I never  
9 negotiate anything with anybody, and in the payment side I  
10 never signed a wire transfer nor even any cash to anybody.  
11 So to answer the question, I -- the word save me is so  
12 strong.

13 Q Well, your lawyer negotiated a non-prosecution  
14 agreement, right?

15 A Actually when I was called by the U.S. Government, they  
16 ask me information and my lawyers lead me to give the  
17 information and of course they negotiated by giving the  
18 information to make sure that they wouldn't charge me. Now  
19 if -- I don't know if I hadn't given the information if the  
20 Government would have charged me or not this.

21 Q Well, you didn't get the non-prosecution agreement  
22 until you gave them your insurance policy, the pen drive --

23 A Yes.

24 Q -- right?

25 A Yes, but I don't know if I hadn't given the information

1 if I would have been charged or not.

2 Q Right, we'll never know, right?

3 A We'll never know.

4 Q But we do know, referring to government  
5 Exhibit 3500-SP-2 that's been admitted into evidence, we do  
6 know that Ms. Mace and Mr. Nitze over here, the prosecutors,  
7 agreed not to prosecute you -- second page, sorry, turning  
8 to the second page, here it is, sorry. Under paragraph 2,  
9 they agreed that no criminal charges will be brought against  
10 you, the witness, for your disclosed conduct between 2009  
11 and 2015, the years you were at Full Play in relation to the  
12 conduct alleged in United States versus Hawit, which was the  
13 first indictment in this case, right?

14 A Right. So basically my lawyer negotiated this. Again,  
15 I don't know U.S. law, so basically he negotiated this  
16 obligating me to give my testimony and tell the truth and in  
17 exchange he negotiated me to make sure that no U.S. charges  
18 would be made to me.

19 Q Right. And that's what you've done, the truth is that  
20 you can't tell this jury that Mr. Napout agreed with anybody  
21 to take money, right?

22 A Can you repeat it.

23 Q That the truth, as you sit here today, is that you  
24 cannot tell this jury that Mr. Napout, my client, agreed to  
25 accept any bribe?

1 A Correct. The only thing I can say is I give money to  
2 my boss to Mr. Jinkis.

3 MS. PINERA-VAZQUEZ: I have no further questions,  
4 Your Honor.

5 THE COURT: Hold on. Your co-counsel wants you.

6 MS. PINERA-VAZQUEZ: Yes. Sorry.

7 (Pause.)

8 (Continued on the next page.)

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1 (In open court.)

2 MS. PINERA-VAZQUEZ: Thank you, Mr. Pena. I have  
3 no further questions.

4 THE COURT: Okay. Thank you.

5 MS. PINERA-VAZQUEZ: I just need to gather my  
6 things, your Honor.

7 MR. MITCHELL: Could we have a five-minute break?

8 THE COURT: Yes, we can have a five-minute break,  
9 just to allow the lawyers to set up. This will be quick.

10 THE CLERK: All rise.

11 (Jury exits.)

12 THE COURT: Everyone can be seated. We are going  
13 to let the witness set up.

14 (Recess.)

15 THE CLERK: All rise.

16 (Jury enters.)

17 THE COURT: Please be seated, everyone.

18 Mr. Udolf, you may inquire.

19 MR. UDOLF: I think the mic is off.

20 THE COURT: Yes, let me do that. Okay.

21 CROSS-EXAMINATION

22 BY MR. UDOLF:

23 Q Hello again, Mr. Pena.

24 A Good morning.

25 Q We talked briefly yesterday for the first time; is that

1 right?

2 A Yes.

3 Q And you talked many times with the Government in this  
4 case; is that right?

5 A Yes.

6 Q Let me just follow up on some of the things Ms. Pinera  
7 was asking you about before we broke.

8 THE COURT: Can you raise the microphone a little  
9 closer to you.

10 MR. UDOLF: I'm sorry.

11 THE COURT: Yes.

12 Q Now, after the Jinkises and other people were indicted  
13 in the first wave of indictments in May of 2015, you became  
14 concerned about your future at Full Play; is that a fair  
15 statement?

16 A There was a concern about the future of the company;  
17 and, therefore, there was a concern about the future of all  
18 of the employees within the company.

19 Q You determined at some point you wanted to leave?

20 A At some point I decided to leave.

21 Q In fact, you did leave in November of 2015, correct?

22 A Yes.

23 Q Now, in that first wave of indictments, Hugo and  
24 Mariano, by the way, am I pronouncing it correctly? It is  
25 Jin-KIS or HIN-kis?

1 A In Argentina, the J is hoe, HIN-kis.

2 Q I have been referring to HIN-kis all along. Just for  
3 clarity, I'm referring to the person you called HIN-kis.

4 A Yes.

5 Q Or Jin-KIS, rather.

6 Now, eventually in November of 20 -- well,  
7 actually no, that's not true. Yeah.

8 In November of 2016 you met with these  
9 prosecutors, Mr. Nitze, Ms. Mace, some of the agents in this  
10 case, Agent Kasic with the IRS, Agent Berryman with the IRS,  
11 and Agent Randall with the FBI, they all flew down to  
12 Buenos Aires to interview you at the U.S. Embassy in  
13 Buenos Aires, correct?

14 A Correct. My first meeting with the people you named in  
15 November '16.

16 Q Your lawyer actually negotiated a free passage letter  
17 for you; is that correct?

18 A Yes.

19 Q That meant that you could freely go on U.S. soil, that  
20 is the U.S. Embassy in Buenos Aires, without fear of being  
21 arrested by government authorities; is that right?

22 A Yes. This was my concern was whether -- if I go to the  
23 U.S. Embassy, I wanted to make sure that I was going to my  
24 house afterwards.

25 Q All right. And, as a matter of fact, they all flew

1 down -- not those same people, but several people, including  
2 Mr. Nitze and Ms. Mace and some other agents, flew down  
3 again in February of 2017 to meet you at the U.S. Embassy  
4 again; is that correct?

5 A Yes. Then I met Ms. Mace and attorneys in February.

6 Q All right. You also had a rider safe passage letter to  
7 protect you then as well; is that right?

8 A Yes. As advised by my U.S. lawyer, we considered to  
9 have that, this letter, and that gave me the possibility to  
10 go to the embassy and go back to my house.

11 Q At the end of the first meeting in February of 2017,  
12 they had given you a cooperation agreement or entered into a  
13 cooperation agreement with you; is that right?

14 A Yes.

15 Q By that agreement, that was basically a non-prosecution  
16 agreement; is that right?

17 A Right.

18 Q And by that non -- did they tell you that was like a  
19 grant of transactional immunity, that you would not be  
20 prosecuted as long as you cooperated with the U.S.  
21 Government?

22 A Basically my understanding of the document, allows me  
23 to come here to give me testimony, to tell the truth, and  
24 the Government is obliged not to press any charges under  
25 U.S. law to myself.

1 Q Did I understand you correctly to say earlier that you  
2 were doubtful that you should be charged both in the  
3 United States in any event; you didn't think that you would  
4 were guilty of anything? Did I understand you correctly to  
5 say that?

6 A Basically I always thought -- again, I'm not an expert  
7 in law, but I always considered myself a completely small  
8 fish in this issue. And, again, although it's repeated,  
9 since I simply wrote down the commitments based on other  
10 negotiations with my bosses and since all of the payments  
11 were not authorized by myself, I always thought it was going  
12 to be rare, if you will, to press any charges against  
13 myself.

14 Q I didn't mean to suggest otherwise, you understand. I  
15 was just asking you what was going on in your mind.

16 You lawyer got you basically a free pass in  
17 this case; in other words, you don't have to be afraid of  
18 being indicted at all?

19 A Yes, my lawyers pressed for me as well.

20 Q That's what a good lawyer does, is protects you even if  
21 you don't need it?

22 A He did it, exactly.

23 Q I want to ask you about -- maybe about a few of the  
24 discussions that you had with prosecutors when you first met  
25 them; but, before I get to that, one of the first things you



1 talked to them about was the Copa America rights, which were  
2 owned by José Hawilla's group; is that right?

3 A Yes, by Traffic.

4 Q José and his son Stefano ran Traffic Stores; is that  
5 right?

6 A They are owners, they have management rights in the  
7 company.

8 Q And they owned the rights to Copa America through -- I  
9 think it was through 2013, if you remember?

10 A It was our understanding that they owned the rights  
11 until Copa 2011, which was held in Argentina.

12 Q The reason I said 2013 -- correct me if I'm wrong --  
13 wasn't Copa America generally held every two years, and then  
14 it became an every four year event?

15 A Yeah. It changed somewhat during the year 2000, it  
16 changed; but since 2007, it was 2007, '11, '15, '19. In  
17 relation to the special edition of Copa America in 2016.

18 Q That was in Cincinnati?

19 A Yes.

20 Q Now, Copa America had always been known by -- that  
21 event had always been controlled by Traffic Sports; is that  
22 right?

23 A Copa America's first edition was 100 years ago. So I  
24 have no idea what happened. I know what happened over the  
25 last 20 years, which was held by Traffic, but before --

1 Q That's all I meant to ask you about. I'm sorry.

2 A I know for 20 years.

3 Q During the World Cup in South Africa in 2010, it became  
4 apparent that the Jinkises wanted to get involved or take  
5 over the rights that were held by Traffic; is that right?

6 A Yes. As I mentioned to you, or yesterday, they told me  
7 that there was a good possibility of growing into the  
8 business by entering into a Copa America World Cup and  
9 sponsorship rights because they considered the offer was  
10 like four times to CONMEBOL the amount of money that Traffic  
11 was paying to CONMEBOL.

12 Q CONMEBOL was paying \$18 million for the event; is that  
13 right?

14 A I remember numbers --

15 Q I'm sorry. I didn't mean CONMEBOL. I meant Traffic.

16 A I don't remember what were the numbers. I remember  
17 like they were paying like 18, and the offer was like 70 or  
18 something like that.

19 Q In fact, it was 80 or 82, do you remember that?

20 A Yeah. At the end, first of all, was the agency  
21 agreement. Basically there was a purchase agreement; but  
22 basically the information they mentioned to me is that  
23 Traffic was paying less than 20 and the offer would be four  
24 times the amount Traffic was paying.

25 Q Now, Full Play was going -- wanted to partner with

1 Torneos, is that right, specifically with Mr. Burzaco,  
2 correct?

3 A When the agency contract expired in 2010, it was signed  
4 by Full Play, but, as said yesterday, there was a hidden  
5 partner, a 50 percent hidden partner, which was Torneos.

6 Q And the reason Mr. Burzaco -- first of all, why was  
7 Mr. Burzaco brought in?

8 A Why? I'm sorry.

9 Q Why was he brought in? Why was he made a partner to  
10 the Jinkises' contract for the Copa America 2015?

11 A Because, as per my understanding, Mr. Burzaco got  
12 influenced on some countries that the Jinkises did not have.

13 Q That was specifically Argentina and Brazil; is that  
14 correct?

15 A Yes.

16 Q Okay. Now, Mr. Burzaco at the time had insisted on it  
17 being a silent partner; is that right?

18 A Basically he asked to be a silent partner for one year,  
19 until the end of Copa America 2011.

20 Q And the reason he asked to be a silent partner because  
21 he was double crossing Traffic; is that right?

22 A Because Traffic had contracted Torneos to be the TV  
23 producer of Copa America 2011 that was playing -- was being  
24 played in Argentina.

25 Q And so he was undermining, as far as I can -- Traffic

1 had brought Burzaco into that deal; is that right?

2 A Sorry?

3 Q Traffic had brought Torneos into its deal before the  
4 Argentina event, correct?

5 A Yes. Actually, Torneos is a company with a lot of  
6 employees, and Torneos does production services until today.

7 Q And Traffic, part of the reason Traffic would have  
8 brought Burzaco into that deal was Burzaco had influence  
9 with people in Argentina and Brazil, correct?

10 A No. I think Traffic brought Burzaco as a TV producer  
11 for Copa America because Traffic is a Brazilian company and  
12 does not have cameras and production service in Argentina,  
13 and they hired Torneos for that. If the Copa America had --  
14 was played in Colombia, Traffic could have contracted  
15 Caracol or RSN.

16 Q Okay. Fair enough. So Traffic had a different reason  
17 for bringing Burzaco into the Argentina event?

18 A A commercial reason.

19 Q Okay. A commercial reason.

20 But Full Play had a different reason, and that  
21 is to make sure that Argentina and Brazil went along with  
22 hiring Traffic for Copa America?

23 A From the boss' point of view, it was very important to  
24 have the confirmation or the approval of almost all the  
25 persons of CONMEBOL.

1 Q And Burzaco was only too happy to go along with the  
2 deal because there was a lot more money involved, correct?

3 A I didn't follow your question. Sorry. You asked too  
4 fast.

5 Q I'm sorry. Burzaco was very willing to go along with  
6 that deal?

7 MS. MACE: Objection to foundation.

8 THE COURT: Hold on one second. Sustained.

9 Q Well, Burzaco went along with that offer from  
10 Full Play, didn't it?

11 A Burzaco what?

12 Q Burzaco partnered up with Full Play?

13 A Yes.

14 Q And in so doing he had double crossed Hawilla, he  
15 undermined Hawilla's position from Traffic, causing Traffic  
16 to lose their contract?

17 A Basically, although there was not a written contract  
18 between Full Play and Torneos in that year, Torneos wanted  
19 to be a hidden partner. There was a commitment that after  
20 Copa America 2011 something would be created or a company or  
21 joint venture agreement or something like that.

22 Q But for the time being Burzaco did not want to be  
23 anything but a silent partner; is that right?

24 A Right.

25 Q Now, in addition to their deceit by Mr. Burzaco he

1 also, he along with the Jinkises basically lied to  
2 Mr. Hawilla about how much money was being paid for private  
3 payments, or what we have called bribes here; is that right?

4 A Yes. After reaching a deal and creating this company  
5 Datisa and, as I mentioned to you yesterday, they negotiated  
6 in a separate room, the five people I mentioned; and, yes,  
7 they mentioned some numbers.

8 Q Now, and the numbers they mentioned had to do with, as  
9 I understand it, a representation by the Jinkises and by  
10 Mr. Burzaco that they had already paid \$40 million in  
11 payments; is that right?

12 A This is right.

13 Q All right. And Mr. Burzaco and the Jinkises were lying  
14 to Mr. Hawilla and his son Stefano; is that right?

15 A Yes, yes.

16 Q How much had they paid in the private payments?

17 A At that moment I don't know how much they paid.

18 I know how much was committed. I also  
19 remember that one of the reasons by agreeing in a higher  
20 number was because since July 2010 until March 2013 the  
21 companies, the company has been working very hard in selling  
22 TV broadcasting rights, and they considered unfair that a  
23 new partner was included in the business and getting benefit  
24 out of the sales that the company had been working for over  
25 three years without paying nothing.

1 Q All right. So do you know how much they, Full Play,  
2 had committed in bribes, if it wasn't \$40 million?

3 A My understanding that was for Copa America 2015 was  
4 15.3, and for the signature of the contract 14.5 instead of  
5 the 20.

6 Q Could you repeat that.

7 A For the Copa America 2015 it was -- the commitment they  
8 mentioned to me was 15.3 million and for the signature of  
9 the contract it was 14.5 million.

10 Q Let's talk about -- was the 40 million included in that  
11 figure, or did that just include Copa America payments, not  
12 the signing payments?

13 MS. MACE: Objection to form.

14 THE COURT: Hang on one second. Let me see that  
15 question. Your question was --

16 MR. UDOLF: I will ask it again, judge.

17 THE COURT: All right.

18 Q Give that to me one more time. It was 15.3 million for  
19 the Copa America payments; is that right?

20 A Who?

21 Q How much in actuality did you commit, did the Jinkises  
22 commit and Burzaco commit to pay in bribes to the various  
23 soccer officials?

24 A For Copa America 2015 the total amount of private  
25 payments was 15.3.

1 Q How much was it for the signing, did you say?

2 A 14.5.

3 THE COURT: Was that the basis of your 40 million  
4 number?

5 THE WITNESS: This --

6 THE COURT: I'm sorry. I'm asking the lawyer.

7 MR. UDOLF: I will clear it up, judge.

8 Q So what you are saying is that actually Mr. Burzaco and  
9 the Jinkises had agreed to pay -- had committed to pay  
10 \$29.8 million in bribes, not \$40 million in bribes, as  
11 represented to Mr. Hawilla; is that right?

12 A Correct.

13 Q So it was a little over -- just a hair over \$10 million  
14 exaggeration?

15 A Yes, and one of the reasons was what I have just  
16 explained to you.

17 Q All right. I'm a little unclear about what you said  
18 about the 13.3 million.

19 Do you remember you told us that?

20 THE COURT: You mean 15.3?

21 MR. UDOLF: No, I mean 13.3. I'm going to clear  
22 all this up.

23 THE COURT: Okay. Go ahead.

24 Q Do you remember Burzaco and the Jinkises told Hawilla,  
25 Stefano, his son, that their portion for all of these



1 bribes, the \$40 million, was 13.333 million?

2 A Yes. After telling them it was 40 for both concepts.

3 Q Say that again?

4 A After telling him that there was 40 million for those  
5 for both concepts, one-third of that number is what you  
6 said, 13-point --

7 Q One-third is 13.333?

8 A Yes.

9 Q Okay. And Hawilla told them that he didn't have  
10 13.3 million, that he only had 8 million; is that right?

11 A That's correct.

12 Q And so they took his 8 million, and he based -- he  
13 basically signed a contract with Datisa for another  
14 5.3 million, to cover the balance that they wanted; is that  
15 right?

16 A At that moment he mentioned he had 8 million, and the  
17 5.3 million was a loan that Datisa made to Traffic.

18 Q Then you said Datisa then sent \$10.6 million to Cross  
19 Trading, and Cross Trading sent \$5.3 million to Producturo  
20 de Datisa, contract for Torneos; is that right?

21 A Yes.

22 MS. MACE: Objection to what he said and the way  
23 the question was formed, what he said.

24 THE COURT: "He" meaning the witness?

25 MS. MACE: Yes.

1 THE COURT: Overruled. Go ahead. The question is  
2 did you say that or testify. Is that what you are asking  
3 him?

4 MR. UDOLF: Yes.

5 Q Did you say that?

6 A I need you -- I got lost.

7 THE COURT: Hang on. Let me sustain, because I  
8 think Ms. Mace's concern is you are saying did he say it in  
9 realtime, at the moment, or did he testify to it --

10 MR. UDOLF: All right. Fair enough.

11 THE COURT: -- in this trial.

12 Q Subsequently, Full Play, the Jinkises, and Torneos,  
13 Burzaco, each received \$5.3 million from Datisa; is that  
14 right?

15 A Basically, when the shareholders agreed that Datisa  
16 would loan to Traffic 5.3 million, they had agreed that  
17 Datisa could loan the same amount to the three shareholders,  
18 totaling \$16 million. So basically that answers your  
19 question.

20 Q All right. But in this method basically Burzaco and  
21 Jinkises tricked Hawilla into paying more money, even though  
22 they were supposed to be even partners in Datisa, correct?

23 A Correct, yes.

24 Q \$9 million of that -- of those bribes were supposed to  
25 be handled by Burzaco, is that right, three sets of

1 \$3 million payments?

2 A On the Copa America '15?

3 Q Right.

4 A 9.3 would be minus by Torneos and six by Jinkis.

5 Q Right, and you don't even know if Burzaco -- Burzaco  
6 was supposed to pay that share, wasn't he?

7 (Noise in the courtroom.)

8 THE COURT: We have no idea where it's coming  
9 from.

10 MR. UDOLF: We have a bit of a problem.

11 A Can you repeat.

12 Q Yes. Burzaco was supposed to pay that \$9 million; is  
13 that correct?

14 A Correct.

15 Q As you sit here today, you don't know if Burzaco did or  
16 if he lied to the Jinkises?

17 A Exactly.

18 Q Now, you have referred to -- I don't know if you  
19 referred to -- we heard something about this Group of Six,  
20 and they were to receive \$1 million each for the 2015 Copa  
21 America; is that right?

22 A Correct.

23 Q Am I correct that Mr. Burga never received his payment  
24 for that 2015 Copa America?

25 A It is correct.

1 Q And you don't know if Mariano lied to Burzaco about  
2 paying Burga or not, do you?

3 A I don't know.

4 Q The only person that might know for sure would be  
5 Mariano; is that correct?

6 MS. MACE: Objection. Calls for speculation.

7 THE COURT: I'm sorry. Is the question the only  
8 person that might -- I see, that might know. Yes,  
9 sustained.

10 Q Do you know where Mariano and Hugo Jinkis are right  
11 now?

12 A Where are they?

13 Q Yeah.

14 A In Argentina.

15 Q They are not here in the United States?

16 A I don't think so.

17 Q Are you aware they were indicted in April of 2015?

18 A Yes, I know.

19 Q You also told us about the 2011 Copa Libertadores  
20 issue, and there was an approved \$2.4 million in bribes for  
21 that event, correct?

22 A Split among different people.

23 Q Right. And amongst those people were some federation  
24 presidents; is that right?

25 A Yes.

1 Q And among those, the federation presidents at the time  
2 was Manuel Burga, correct?

3 A Yes.

4 Q But Manuel Burga was not paid that \$400,000, was he?

5 A Correct.

6 Q Is that because the Jinkises wanted to keep the  
7 \$400,000 for themselves?

8 MS. MACE: Objection, as to what someone else  
9 wanted.

10 THE COURT: Sustained.

11 MR. UDOLF: If he knows, judge.

12 THE COURT: Fair enough. Overruled, in terms of  
13 did the Jinkises say to you why the money wasn't given to  
14 Mr. Burga.

15 Q Do you know why Mr. Burga didn't get that \$400,000, if  
16 he was supposed to get it?

17 A They only mentioned to me to keep the registry updated  
18 with those amounts with the commitments, and they told me  
19 that they would advise me or would tell me what to do later  
20 on. That never happened.

21 Q Do you know if Mr. Burga even knew about that \$400,000?

22 A No, I have no idea. He never talked to me.

23 Q He never talked to you about any of these issues,  
24 correct?

25 A Yes.

1 Q You say no. No, you never talked to him about those  
2 issues?

3 A I never talked to Mr. Burga about this issue, and I saw  
4 Mr. Burga a few times.

5 Q Now, you told us about keeping a spreadsheet. I think  
6 we have called it everything from a spreadsheet to a  
7 registry to a ledger.

8 Are we clear that we are talking about the  
9 same thing?

10 A Yes.

11 Q Okay. Prior to keeping this spreadsheet the only  
12 records for any of this information would have been in  
13 Mariano's head; is that right?

14 A Yes.

15 Q At some point in the future it was determined that you  
16 were going to keep track of these payments with some sort of  
17 code, as we have heard --

18 A Yes.

19 Q -- by automobiles?

20 Would you agree with me at one time you said  
21 here today the account that's designated as Fiat represented  
22 potential payments to Mr. Burga; is that right?

23 A Yes. Actually, there were no payments, but the  
24 potential commitments, the commitments.

25 Q Do you remember at one time that in November of 2016

1 that you told the Government that --

2 MS. MACE: Objection, your Honor.

3 MR. UDOLF: You didn't even -- I haven't asked the  
4 question yet.

5 THE COURT: Hold on a second. I think, yeah, the  
6 concern is you are not trying to refresh his memory. Are  
7 you?

8 MR. UDOLF: I'm not trying to refresh his memory.  
9 I'm trying to impeach him.

10 THE COURT: So the question before that was -- the  
11 answer rather -- actually there were no payments but the  
12 potential commitments?

13 MR. UDOLF: I will ask again.

14 THE COURT: Okay. Go ahead.

15 BY MR. UDOLF:

16 Q In fact, at one point you didn't even remember that you  
17 had kept any record of any payments that were supposedly  
18 designated for Mr. Burga; is that right?

19 A I always knew that the tab of Mr. Burga was none in  
20 terms of payments.

21 Q Say it again?

22 A I always knew that the tab of Mr. Burga had nothing in  
23 the column of payment.

24 Q I didn't ask you that, though. I asked you if you knew  
25 that a document that was designated for Fiat pertained to

1 Mr. Burga.

2 A I knew that.

3 Q You knew that. Okay.

4 MS. MACE: So I don't believe he asked whether the  
5 witness doesn't remember something.

6 MR. UDOLF: Now it's not impeachment. Now it's  
7 refresh your recollection.

8 THE COURT: Hold on a second. A, I don't think he  
9 said he didn't remember anything; and, secondly, you didn't  
10 ask him a question as to which suggesting he is being  
11 inconsistent, as far as I can tell.

12 So I'm a little concerned you are showing him  
13 something for no particular -- for no particular purpose.  
14 In other words, he just said he remembers distinctly that no  
15 money, I think, was paid to Mr. Burga. Correct?

16 THE WITNESS: I did.

17 BY MR. UDOLF:

18 Q Did you ever tell the Government that you didn't  
19 remember what designation you had in your records for  
20 Mr. Burga?

21 A At one time I may have said to them that I didn't  
22 recall the exact fantasy name for each one.

23 Q Okay. That's all I wanted to know.

24 THE COURT: Okay. Good thing to ask from back  
25 there then. That's all.



1 Q Mr. Pena, at one time you deleted certain e-mails with  
2 respect to a person named Rafael Esquivel; is that correct?

3 A Yes.

4 Q The reason you did that was because those records  
5 related to these personal payments, what we are now  
6 referring to as bribes, correct?

7 A Yes.

8 Q Now, as I understand your testimony yesterday, you said  
9 that you never showed any of these spreadsheets to any of  
10 the people that had been designated to receive bribes; is  
11 that right?

12 A Can you repeat it?

13 Q Did you say that you never showed any of these  
14 spreadsheets to any of the people that had received bribes?

15 A I did send directly the -- their tab to the Venezuelan  
16 president and to the Bolivia General Secretary.

17 Q Okay. That's where I was going.

18 You did send those to Mr. Esquivel, didn't  
19 you?

20 A I did.

21 Q Why did you send them to him particularly?

22 A Because he requested to do so, and I had the  
23 authorization from my bosses to do so.

24 Q Do you know why he requested that?

25 A I don't know.

1 Q But you didn't show these tabs or these ledgers to  
2 anyone else, other than Mr. Esquivel?

3 A No. Basically to Mr. Esquivel -- that we sent to  
4 Mr. Esquivel only the part of Mr. Esquivel.

5 Q Now, you testified yesterday about this ring that was  
6 bought by Mr. Tamborini for Mr. Burga; is that right?

7 A Yes.

8 Q And how did you find out about this ring?

9 A Basically, let me explain the steps just to clarify.  
10 Mr. Daniel asked me \$2,000 because he was flying to Peru  
11 and, according to him, Manuel Burga, Mr. Burga, was wanted  
12 to buy a ring for his wife.

13 Q Did he tell you that Mr. Burga wanted to buy it from a  
14 duty-free store because it was cheaper than it was  
15 elsewhere?

16 A Yes, exactly.

17 Q Right. Did he also tell you that Mr. Burga tried to  
18 buy it when he left Buenos Aires to go back to Peru, but the  
19 duty-free store was closed at the time?

20 A That I don't remember.

21 Q Okay.

22 A But could have been. I mean, I remember that Daniel  
23 mentioned to me, I need to buy a ring at Manuel Burga's  
24 request for his wife, and, Santiago, please give me the  
25 money and I will get back to you.

1 Q When you say "Daniel," you are talking about  
2 Mr. Tamborini?

3 A Yes, the same person.

4 Q And so did Mr. Burga -- Mr. Burga, as far as you know,  
5 didn't ask Mr. Tamborini to borrow the money from anyone  
6 else, did he?

7 A No, I don't know what was the conversation between  
8 them.

9 Q Mr. Tamborini, as far as you knew, just asked you for  
10 the money so he could -- because he didn't have the money  
11 himself to lay out for the ring; is that right?

12 A No. He is a great guy, and basically he -- a great  
13 professional and great guy, and basically he has the money  
14 of the company with the commitment that he was going to  
15 bring back the money.

16 Q Who was the great guy?

17 A Daniel.

18 Q So you gave Daniel the money?

19 A Yes.

20 Q Whose decision was it to put it on that ledger as a  
21 debit to this supposed account for Mr. Burga?

22 A It was my decision.

23 Q It was your decision?

24 A Yes.

25 Q And you -- did you ever change that notation or

1 eliminate it?

2 A I -- when Daniel came back, he came back with the  
3 money, we received the money, but I forgot to either delete  
4 the number or to put it on the correct side. So basically  
5 this ring issue should have not existed.

6 Q So in any event, you later learned, though, that  
7 Mr. Tamborini was reimbursed by Mr. Burga?

8 A He was -- sorry?

9 Q You later learned that Manuel Burga paid back  
10 Mr. Tamborini for the money that he had paid on the ring?

11 A Yes.

12 Q Did Mr. Tamborini pay back the money to Full Play that  
13 he had borrowed?

14 A The same person that came to take the money, Daniel,  
15 came back with the money, one week later.

16 Q All right. Now, there was another thing that was noted  
17 on your ledger that you prepared.

18 Did you prepare that ledger yourself, by the  
19 way?

20 A Yes.

21 Q Okay. There was another thing that was on there that  
22 seemed to suggest that \$250,000 was paid to Mr. Burga and  
23 then it was cancelled out.

24 Could you explain that to us again, how that  
25 happened?

1 A Yes, I do. In December of -- I don't have --

2 Q December 3rd, 2010?

3 A 2010. Thank you. In December 2010 I was asked by -- I  
4 was asked by my bosses to make a payment to a vehicle of  
5 Mr. Esquivel but to debit the amount, instead of debiting  
6 the amount of Mr. Esquivel, to debit the amount of  
7 Mr. Burga; and we did so. Five months later, in May 2011,  
8 my bosses told me to reverse that operation. So it was an  
9 accountingwise issue.

10 So what was debited in Burga account, that  
11 should be debited in Esquivel account. So at that moment I  
12 could have made either the following, either deleting from  
13 Mr. Burga the \$250,000 or input in a credit; and I did the  
14 second.

15 Q As you sit here today, do you know if -- do you know  
16 whether or not Mr. Burga even knew of any of those moneys  
17 that were put in there?

18 A No, I have no idea.

19 Q As you sit here today -- well, you have shown us lots  
20 of Orden de Pago forms, correct?

21 A Yes.

22 Q And those are like receipts or invoices to show  
23 payment; is that right?

24 A Correct.

25 Q That was for both cash payments and for wire transfers,

1 correct?

2 A Correct.

3 Q Am I correct that there is not one Orden de Pago for  
4 any of those things that you attributed to Mr. Burga in that  
5 one-page register that you showed the jury yesterday?

6 A Correct.

7 Q Now, a couple of things. How well did you know  
8 Mariano?

9 A How old?

10 THE COURT: How well.

11 THE WITNESS: How well. Thank you.

12 A (Continuing) I knew him for the first time in 2009.  
13 Both Mariano and I get along very well. Mariano is more of  
14 my age. Hugo more like my father, if you will; but I have  
15 very good relation with both of them.

16 Q I think you said yesterday you had a little more  
17 distant relationship with Mariano.

18 A Maybe, yes. With Hugo it was more -- it was closer.  
19 He was more in the office than Mariano. Mariano traveled a  
20 lot, but it was not a distant relationship with Mariano. It  
21 was a good, very good relationship, but --

22 Q Mariano liked to travel, didn't he?

23 A Yes.

24 Q And when traveling he, when doing so, he often used  
25 cash; is that right?

1 A Often what?

2 Q Used cash.

3 A Yes.

4 Q And he liked to -- when he traveled he liked to play  
5 golf?

6 A Yes.

7 Q He also liked to go to gambling destinations, correct?

8 A He liked?

9 Q Did he go to Vegas?

10 A I think he went. I don't know, once, but yeah, I think  
11 he went.

12 Q Do you know anything about Mariano's gambling  
13 activities?

14 A No.

15 MR. UDOLF: Okay. Judge, I'm almost finished. If  
16 I can just have a minute.

17 THE COURT: All right. Why don't we take a  
18 one-second stretch break while they look for their  
19 materials.

20 (Pause.)

21 THE COURT: Let us know when you are ready,  
22 Mr. Udolf.

23 MR. UDOLF: I want the jury to have a good  
24 stretch. I'm almost ready.

25 THE COURT: All right. Go ahead.

1 BY MR. UDOLF:

2 Q Mr. Pena, you are almost finished.

3 A Thank you.

4 Q That's the good news.

5 So, as you sit here today you have no evidence  
6 that Mr. Burga even knew of any of these moneys being kept  
7 for him, correct?

8 A Exactly.

9 Q Right. You don't know if he ever agreed to get money  
10 but to have somebody hold it for him, do you?

11 A Correct.

12 Q You don't know if he even knew of any of this as to  
13 him, correct?

14 A Correct.

15 MS. MACE: Objection as to form.

16 THE COURT: Sustained. Yes. Go ahead.

17 Q You knew of any of the payments that were supposedly  
18 credited to him, you don't have any evidence that he knew  
19 that, you have no reason to know that?

20 MS. MACE: Objection to the use of "any evidence."

21 THE COURT: Sustained, sustained.

22 Q You don't know of your own knowledge whether or not  
23 Mr. Burga even knew of the existence of this account that  
24 you were holding for him, correct?

25 A Correct.



1 Q But what you do know is that you have no records before  
2 you that he was ever paid for any of the items that are  
3 contained in that ledger; is that right?

4 A Right, correct.

5 MR. UDOLF: That's all I have?

6 THE COURT: All right. Thank you, Mr. Udolf.

7 Mr. Mitchell?

8 MR. MITCHELL: Your Honor, we have no questions  
9 for Mr. Pena.

10 THE COURT: Thank you very much.

11 Oh, I'm sorry. Redirect?

12 MS. MACE: Your Honor, no questions, no redirect.

13 THE COURT: You are free to go, Mr. Pena. Thank  
14 you very much.

15 Ladies and gentlemen, let's take our morning  
16 break. So let's make it shorter. So we will start again at  
17 five of noon with our next witness. We'll give the  
18 Government a chance to set up.

19 THE CLERK: All rise.

20 (Jury exits.)

21 (Continued on the next page.)

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1 THE COURT: All right, folks. Wait just a minute  
2 to allow the witness to leave. I just want to put one  
3 comment on the record. Everyone can sit down, please.

4 MS. PINERA-VAZQUEZ: Your Honor, I'm just going to  
5 step over here for a second.

6 THE COURT: Yes.

7 (Pause.)

8 THE COURT: The interpreter, if you want to step  
9 out, you can.

10 THE INTERPRETER: Thank you.

11 THE COURT: You know, folks, since it's going to  
12 take a minute, everyone take their break. Be back at five  
13 of, and I will make my comment before we bring in the jury.

14 (Recess.)

15 THE COURT: So, folks, I just wanted to put on the  
16 record one thing before we bring in the jury. That is to  
17 explain more fully why it is I sustained spontaneously an  
18 objection to one of Ms. Pinera-Vazquez' questions, which was  
19 in a string of questions using the formula to the witness,  
20 Mr. Pena, you don't know whether Mariano Jinkis used the  
21 money to, and then there were a number of questions that  
22 filled in that blank with to lead a lavish lifestyle, to, I  
23 think, travel, or to go on vacation, I think, was one of the  
24 other questions.

25 The reason I sustained the objection at some

1 point, because there were a few that were answered, was that  
2 it to me was suggesting answers when it was clear that the  
3 witness was saying and had said early on that he didn't know  
4 what Mr. Jinkis did with the money, and that rather than  
5 actually asking the question to elicit an answer from the  
6 witness, it seemed to me more of a vehicle to suggest  
7 different answers to the jury for which there was no  
8 foundation laid. For example, that Mr. Jinkis liked to  
9 travel, which did come up later through questioning from  
10 Mr. -- from Mr. Udolf, I believe, or that he led a lavish  
11 lifestyle, which was another suggestion.

12           So while I understand that some of these  
13 questions may be relevant to show, as was, I think, asked  
14 repeatedly, that the last witness, Mr. Pena, didn't know  
15 what happened to the money after he gave it to Mr. Jinkis or  
16 whether or not Mr. Jinkis actually delivered it to its  
17 purportedly intended recipient, namely Mr. Napout, I think  
18 the various iterations of it improperly suggested to the  
19 jury information that's not established by any other  
20 evidence or, quite frankly, can be argued in summation and  
21 really is more in the vein of summation.

22           So I don't want the jury to speculate about  
23 what Jinkis did, if there is no basis for them to do so.  
24 That's why at some point I cut it off by sustaining an  
25 objection on my own, when there had been several questions

1 in this vein.

2 So I recognize it was a fine line between  
3 saying you don't know what happened to the money or you have  
4 no reason to believe that the money or -- I take that  
5 back -- you don't know whether or not the money went to  
6 Mr. Napout and saying you don't know if it was spent on  
7 vacation, but I think the latter formulation or the last  
8 formulation is not proper when it isn't based on anything in  
9 the record.

10 MS. PINERA-VAZQUEZ: If I could, your Honor, just  
11 to respond, to put on the record. Actually, the questions  
12 that I asked of Mr. Pena before at the very initial -- maybe  
13 it was yesterday -- that he liked to travel and they had  
14 houses in Uruguay; and we went into a little bit about what  
15 their lifestyles was like. So there was a foundation for  
16 the question.

17 THE COURT: Well, you asked the question about  
18 vacation, and I think that one went through; but then you  
19 asked you don't know if he used it to support his lavish  
20 lifestyle, and at that point I thought you had asked one  
21 question too many. Go ahead.

22 MS. PINERA-VAZQUEZ: If I could, having a house in  
23 Argentina and having a beautiful house in Uruguay,  
24 Montevideo, on the beach, and going on nice vacations all  
25 around the world, to me, is a lavish lifestyle. There was a

1 foundation for that question, but I understand what the  
2 court's concern is and I will keep it in mind for future  
3 witnesses.

4 THE COURT: That's fine. You can ask whatever  
5 question you want; but I have said to the jury that the  
6 questions are not evidence, and at some point that  
7 instruction gets overwhelmed or rather meaningless if there  
8 can be a series of questions to ask the witness what he  
9 doesn't know, which is really what the formulation is, and  
10 then it becomes just suggesting to him information that he  
11 just doesn't know for a different purpose.

12 Now, you asked and there was no objection and  
13 it was allowed in, questions about the Jinkises' personal  
14 habits or lifestyle. So, again, I recognize that there is  
15 some line drawing going on here, but I wanted to explain why  
16 at some point I did cut that off.

17 Did you want to say something else,  
18 Mr. Udolf? I didn't cut you off?

19 MR. UDOLF: No. I was just concerned that your  
20 Honor was thinking about or toying with the idea of  
21 explaining your rulings to the jury, but if that's not the  
22 case.

23 THE COURT: No. That's why I'm doing it to you  
24 guys.

25 MS. MACE: Just to add to the record, since we are

1 doing this to make the record clear, I think it's also an  
2 issue of asked and answered. So it was established very  
3 early on, even in direct, and then multiple times on  
4 cross-examination that Mr. Pena didn't know what was done  
5 with the money. To ask an infinite number of you don't know  
6 questions that just essentially is getting to the same  
7 question, it's an issue of asked and answered. He answered  
8 it many, many times; and so, to cut it off at some point, I  
9 think, is absolutely reasonable.

10 THE COURT: Right.

11 MS. PINERA-VAZQUEZ: There was no objection, your  
12 Honor.

13 THE COURT: Again, but, as I said before, I do  
14 view my role as a gatekeeper to prevent unnecessary or  
15 repetitive or potentially prejudicial information from  
16 coming in. So that's what I did, was exercise that  
17 prerogative.

18 All right. So let's get the jury.

19 (Continued on the next page.)  
20  
21  
22  
23  
24  
25

1 (In open court; 12:02 p.m.)

2 THE COURT: Right.

3 MS. PINERA-VAZQUEZ: But there was no objection,  
4 your Honor.

5 THE COURT: As I said before I do view my role as a  
6 gatekeeper to prevent unnecessary or repetitive or potential  
7 prejudicial information from coming in. So that's what I did  
8 was exercise that prerogative. All right. Let's get the  
9 jury.

10 (A brief pause in the proceedings was held.)

11 COURTROOM DEPUTY: All rise.

12 (Jury enters courtroom at 12:05 p.m.)

13 THE COURT: Have a seat, everyone. Welcome back,  
14 ladies and gentlemen. The Government will call their next  
15 witness.

16 MR. EDELMAN: Thank you, your Honor.

17 Before we call in our next witness, based on the  
18 business records certification marked 518-A, the Government  
19 will offer into evidence Exhibits 518-B, 518-C, 518-D-1 and  
20 518-D-2.

21 THE COURT: Any objection?

22 MS. PINERA-VAZQUEZ: No objection.

23 MR. MITCHELL: No objection.

24 MR. STILLMAN: No objection.

25 THE COURT: Mr. Udolf, any objection?

1 MR. UDOLF: No.

2 THE COURT: 518-A, B, C, D-1 and D-2 are admitted.

3 MR. EDELMAN: Your Honor.

4 THE COURT: The certification was A. 518-B, C, D-1  
5 and D-2 are admitted.

6 (Government's Exhibits 518-B, 518-C, 518-D1 and  
7 518-D-2 were received in evidence as of this date.)

8 MR. EDELMAN: Thank you. The Government calls James  
9 Haggerty.

10 MS. PINERA-VAZQUEZ: The certification is coming in  
11 with the records?

12 THE COURT: That's the thing. You said no  
13 objection. At the request of the defendants, is that correct,  
14 all defendants are requesting this; is that right? Mr.  
15 Stillman and Mr. Udolf?

16 MR. STILLMAN: Yes.

17 THE COURT: Mr. Udolf?

18 MR. UDOLF: Correct.

19 THE COURT: 518-A will come in.

20 (Government's Exhibit 518-A was received in  
21 evidence as of this date.)

22 MR. EDELMAN: Your Honor just note the previous  
23 conversation we had about our objection to the certification  
24 coming in to potentially be resolved later.

25 (Witness takes the witness stand.)



1 THE COURT: Sir, remain standing for one moment.

2 COURTROOM DEPUTY: Please raise your right hand.

3 JAMES HAGGERTY, called by [!CALLING PARTY], having been first  
4 duly sworn, was examined and testified as follows:

5 THE WITNESS: Yes.

6 COURTROOM DEPUTY: Thank you. Please have a seat.  
7 State your full name for the record.

8 THE WITNESS: James, J-a-m-e-s. Last name is  
9 Haggerty, H-a-g-g-e-r-t-y.

10 COURTROOM DEPUTY: Thank you.

11 THE COURT: You may inquire.

12 MR. EDELMAN: Thank you, your Honor.

13 DIRECT EXAMINATION

14 BY MR. EDELMAN:

15 Q Good afternoon, Mr. Haggerty.

16 A Good afternoon.

17 Q Where do you work?

18 A Bank of America.

19 Q What's your title at the bank?

20 A Operations manager.

21 Q And what are your duties and responsibilities in that  
22 position?

23 A I manage a team of wire investigations. I handle three  
24 different groups: One involving fraud, one regulatory, and  
25 one being Dodd-Frank.

1 Q How long have you been in that position at Bank of  
2 America.

3 A I've been in similar positions since 2013.

4 Q Have you held similar positions at other banks?

5 A Yes, I have.

6 Q For how long?

7 A I'm not sure of the exact amount of time, but I was a  
8 manager of fraud and AML for operational risk at another  
9 larger firm. I then, previous to that, I was involved with  
10 sanction screening for Bank of America as well.

11 Q Just to be clear, have you been involved in the  
12 investigation in this case or no?

13 A No.

14 Q Based on your position at Bank of America, are you  
15 familiar with the bank's records that document wire transfers?

16 A Yes.

17 Q And, to your knowledge, has Bank of America provided  
18 documents in response to requests by the Government in this  
19 case?

20 A Yes.

21 Q Do you know when those documents were first provided or  
22 not?

23 A No, I don't know.

24 MR. EDELMAN: Can I have the Elmo for just the  
25 witness, please?

1 Q Mr. Haggerty, I'm showing you what is been marked, it's  
2 in evidence, but it's been marked Government Exhibit 518-D-2.

3 Do you recognize this?

4 A Sorry, there's nothing on my screen. Okay, it flashed  
5 and it's gone again.

6 THE COURT: Give it a second. It's very  
7 temperamental.

8 MR. EDELMAN: Your Honor, this is in evidence so  
9 maybe we can publish and the witness can look at the big  
10 screen.

11 THE WITNESS: I see it right now. It just appeared.

12 THE COURT: 518-D-2. Go ahead if you want to  
13 publish it. Previously admitted.

14 MR. EDELMAN: Thank you.

15 Q Mr. Haggerty, do you recognize the CD?

16 A Yes.

17 Q How do you recognize this particular CD?

18 A My name and date is located on the front.

19 Q And did you review the contents of this CD prior to your  
20 testimony here today?

21 A Yes.

22 Q Switch to the laptop and pull up  
23 Government Exhibit 518-D-2.

24 Can you see that on your screen, Mr. Haggerty?

25 A Yes.

1 Q What is this document?

2 A This document is a document containing wire transfers.

3 Q And do you know for which accounts these wire transfers  
4 relate to?

5 A Yes.

6 Q How can you tell?

7 A The search criteria, if you go down to five right there,  
8 that is the account number in question.

9 Q And somewhere on the spreadsheet is the account holder's  
10 name listed?

11 A Yes.

12 Q If I scroll over to Column N, can you now tell us what  
13 the account holder for this account is?

14 A Cross Trading, S.A.

15 Q And looking over at Column M, what's that number that we  
16 see here?

17 A That is Cross Trading 's account number held with Bank of  
18 America.

19 Q Mr. Haggerty, there's a number of rows on this  
20 spreadsheet. What does each row represent?

21 A Each row represents in Column M the account number that  
22 was debited for said wire transaction.

23 Q So does each row detail a specific wire transfer?

24 A Each row, yes.

25 Q And do all these rows relate to wire transfers either

1 going in or out of Cross Trading's account?

2 A Yes.

3 Q I would like to direct your attention to Column K. What  
4 do we see here?

5 A This is a bank identifier for Cross Trading's account  
6 held at Bank of America.

7 Q And at least looking at Row 7 there is an entry "MIA."  
8 What does that mean?

9 A That is the entity in which the account is held. It  
10 stands for Miami.

11 Q Now, for all of the wire transfers on  
12 Government Exhibit 518-D-2, have they all either originated or  
13 ended in the United States?

14 A Yes.

15 Q I'd like to look at one particular transfer going down to  
16 Row 136.

17 What do we see in Column A relating to this  
18 transaction?

19 A This is the payment direction to mention that it is an  
20 outgoing payment.

21 Q Outgoing from where?

22 A From Cross Trading's account.

23 Q And what is the -- there are two dates listed in Column B  
24 and Column D.

25 What do we see here?

1 A This has the date that the payment, and I should say, in  
2 Column B, this has the date that the payment was entered. And  
3 then, in Column D, this is the date that the payment has been  
4 effected.

5 Q And so, for this transaction, they're both the same; is  
6 that right?

7 A That's correct.

8 Q And what is the date of this wire transfer?

9 A 1/6/2015.

10 Q Is that January 6th?

11 A That's correct, yes.

12 Q If we go over it Column E, it says, "FTR." What does FTR  
13 mean?

14 A This stands for funds transfer.

15 Q And from Columns F, G, and H, there's a number of numbers  
16 and USD what is represented here?

17 A Column F is going to denote the currency in which the  
18 transaction is sent. And then you'll look at Columns G and L  
19 both are matching which would mean that this is a U.S. dollar  
20 wire.

21 Q Moving over to Column I it says, "CPO." What is CPO?

22 A This is the system in which the transaction was sent. It  
23 refers to Cash Pro.

24 Q What is Cash Pro?

25 A Cash Pro is how the bank, I should say, how the bank has

1 the interface with the client similar to an online banking  
2 platform.

3 Q Okay. So if a customer wants to effectuate a wire  
4 transfer using the Cash Pro system, how would they do that?

5 A They could go online and enter the credentials to send  
6 the information.

7 Q In Column J, you see an abbreviation, "WIR." What does  
8 that mean?

9 A This is the method of payment. This would indicate that  
10 this specific payment was sent through the Swift System.

11 Q What is the Swift System?

12 A It is a system in which banks participated where they  
13 could share payment details and/or messages.

14 Q And how are those messages sent across the Swift  
15 platform?

16 A Electronically.

17 Q And just looking up one row, you see "CHP." Looking down  
18 one row, you see "FED." What do those represent?

19 A These represent the method of payment. CHP stands for  
20 Chip, it is a type of clearinghouse for wires. Similarly, FED  
21 stands for the Federal Reserve, another way that wires can  
22 clear. And WIR would denote that this is done through Swift.

23 Q Moving over to Column N. Again, you see Cross Trading  
24 here. What does that represent with respect to this  
25 transaction?

1 A This would represent the name of the account that was  
2 debited.

3 Q So, in other words, that's sending the money?

4 A That's correct, yes.

5 Q Moving to Column O there's a number of words and I think  
6 the last one is Seychelles. What is that?

7 A This would be the account address that is tied to  
8 Cross Trading.

9 Q Moving across to Column AA and BB, again, we see CPOP and  
10 Cash Pro Online.

11 What does that mean?

12 A Both refer to the same system Cash Pro as we had  
13 mentioned.

14 Q The same web-based system you described earlier?

15 A That is correct.

16 Q If we scroll over to AG we see HSBC bank Uruguay.

17 What does that represent?

18 A This is the next party in the payment, meaning, that this  
19 was the next entity that these funds were passed to.

20 Q And if we keep going across over to AR, we see the  
21 Ignacio Ruibal under beneficiary name.

22 What does that mean?

23 A This would be the entity that received the specific wire  
24 transfer.

25 Q It says beneficiary. What does beneficiary mean?



1 A The person that benefitted from these funds. The person  
2 who received them.

3 Q Just looking over one more column, Column AS, it says  
4 Montevideo, Montevideo.

5 What does that mean?

6 A This was the address that the sender would need to input.  
7 It is tied to the beneficiary.

8 Q Ignacio Ruibal?

9 A Correct.

10 Q We'll go through one more transfer in Row 168.

11 MR. EDELMAN: Is that 168?

12 MS. MACE: 58.

13 MR. EDELMAN: Thank you.

14 Q Starting back at Column A. What kind of transfer is this  
15 again?

16 A This, again, is also an outgoing transfer.

17 Q And what's the date of this transfer?

18 A March 3, 2015.

19 Q Going across what is the amount of this transfer?

20 A \$2,350.

21 Q And, again, we see CPO here. What does that mean again?

22 A Cash Pro.

23 Q And, again, there's the WIR entry?

24 A Indicating that this was sent through the Swift Network.

25 Q And under debit I.D., we again see Cross Trading. What

1 does that mean?

2 A This was the entity that sent this payment.

3 Q Moving all the way across in Column AB, again, we see  
4 Cash Pro Online?

5 A Correct. Again, this is how the wire was sent.

6 Q Moving across to Column AG, we see credit I.D. name this  
7 time Banco Itau in Uruguay.

8 What does that mean?

9 A This is the next entity in the payment chain. This is  
10 the bank that received the funds next after Bank of America.

11 Q Moving over to Column AR. In the beneficiary name, it  
12 says Inmobiliaria Ruibal SRL.

13 What does that mean?

14 A This is the beneficiary that received this transfer.

15 Q And, again, we have Montevideo, Montevideo in Column AS.  
16 What is that?

17 A This is what the sender put for the beneficiary's  
18 address.

19 MR. EDELMAN: I have no further questions, your  
20 Honor.

21 THE COURT: Thank you very much, Mr. Edelman.  
22 Any cross-examination.

23 MR. PAPALARDO: None on behalf Mr. Napout.

24 MR. STILLMAN: None. Thank you, your Honor.

25 MR. UDOLF: None, your Honor.

1 THE COURT: Thank you very much. You're excused.  
2 (Witness leaves the witness stand.)

3 THE COURT: The Government will call their next  
4 witness.

5 MR. EDELMAN: Thank you, your Honor. Again,  
6 pursuant to the certification marked 750-A, we would offer  
7 750-B and 750-C.

8 THE COURT: Okay. Any objection.

9 MS. PINERA-VAZQUEZ: No objection.

10 MR. STILLMAN: No objection.

11 MR. MITCHELL: No objection.

12 MR. UDOLF: None.

13 THE COURT: Again, I guess as per before, the  
14 defense would like the certification also admitted.

15 MS. PINERA-VAZQUEZ: Yes, your Honor.

16 THE COURT: Subject to the Government's objection  
17 that has been previously voiced and discussed. So 750-A  
18 through C will come in.

19 (Government's Exhibits 750-A through C were  
20 received in evidence as of this date.)

21 MR. EDELMAN: Your Honor, now the Government calls  
22 Daniel Huntley to the.

23 THE COURT: Mr. Huntley, please come forward and  
24 approach the witness stand and remain standing for one moment.

25 (Witness takes the witness stand.)

1           COURTROOM DEPUTY: Raise your right hand.

2 DANIEL HUNTLEY, called by [!CALLING PARTY], having been first  
3 duly sworn, was examined and testified as follows:

4           THE WITNESS: I do.

5           COURTROOM DEPUTY: Thank you. Please have a seat.  
6 State and spell your name for the record.

7           THE WITNESS: Dan Huntley.

8           COURTROOM DEPUTY: Spell your name.

9           THE WITNESS: D-a-n. H-u-n-t-l-e-y.

10          COURTROOM DEPUTY: Thank you.

11          THE COURT: You may inquire.

12 DIRECT EXAMINATION

13 BY MR. EDELMAN:

14 Q Thank you, your Honor. Good afternoon, Mr. Huntley.

15 Where do you work?

16 A Hilton Hotel Corporation.

17 Q What's your position at Hilton?

18 A Director and database operations.

19 Q What does it mean to have that title?

20 A That means I maintain the customer marketing database for  
21 our loyalty program. Just making sure that the Hilton  
22 databases are running correctly.

23 Q How long have you had that position at Hilton?

24 A 17 years.

25 Q And how long have you worked at Hilton overall?

1 A 27.

2 Q Where is your office located?

3 A Dallas, Texas.

4 Q Now, based on your position at Hilton, are you familiar  
5 with the customer records maintained by Hilton?

6 A I am.

7 Q And did Hilton provide documents to the Government in  
8 response to a request in this case?

9 A We did.

10 MR. EDELMAN: Can I have the Elmo to publish? Thank  
11 you.

12 Q This is Government Exhibit 750-B.

13 And I'll zoom in on this in a second, but to show  
14 you each of the pages on this exhibit, all six pages.

15 Mr. Huntley, do you recognize this document?

16 A I do.

17 Q And what is it?

18 A It's stay transactions for a guest named Juan Angel  
19 Napout.

20 Q To be clear, do you know who that person is?

21 A I do not.

22 Q Zooming in a bit under the heading in yellow, there are a  
23 number of different rows.

24 What does each row represent?

25 A Each row represents a separate booking or stay for the

1 guest.

2 Q I would just like to ask you about some of the columns  
3 here.

4 Column C, it says Prop CD. What is represented in  
5 these columns?

6 A These are unique hotel codes to Hilton. Identifies  
7 properties that the guest booked.

8 Q So we see a number of entries where it says BUEHI. What  
9 does that mean?

10 A That's the Hilton Buenos Aires in Argentina.

11 Q We also see, looks like an entry on Row 15 of GYEHI.  
12 What does that represent?

13 A That's a Hilton in Guayaquil, Ecuador.

14 Q In Row 16, we have LONME. What does that mean?

15 A I'm sorry the LON?

16 Q Yes.

17 A LONME. That's the Hilton London Metropol.

18 Q In Row 17, we have NGMHS. What does that represent?

19 A That's a Hampton property in Montgomery, Alabama.

20 Q And is Hampton under the Hilton umbrella, if you will?

21 A It is. It's one of our brands.

22 Q Rows 18 and 19 we have XEBHI. What does that mean?

23 A That is a property in France. It's the Evian les Bains  
24 property.

25 Q And in Row 20 it's ZRHHI. What does that represent?

1 A That's the Hilton Zurich Airport.

2 Q Moving across in Column D, we see many entries that say  
3 HH. What does that mean?

4 A That is referring to the brand of the hotel. HH is a  
5 Hilton brand. HI is a Hilton International brand. And HA is  
6 a Hampton brand.

7 Q Moving across to Columns G and H after arrival date and  
8 departure date. What do these mean?

9 A The arrival date is the date that the guest arrived at  
10 the hotel. The departure date is the date that the guest  
11 left.

12 Q And Column I, it says "RM type." What does that mean?

13 A This is room type. This is room type that was booked for  
14 the stay. Somewhat intuitive. A code that starts with Q is a  
15 queen bed. DD is a double bed, two double beds. Codes that  
16 start with a K is a king bed. Each hotel has their own unique  
17 set of codes to identify the room type.

18 Q Okay. And in Column J, we have adults and I think it  
19 says either one or two.

20 What does that mean?

21 A That means when the reservation was booked they indicate  
22 on how many adults are in the room so this just shows how many  
23 people adults over 18 were in the room.

24 Q Okay. And so in Column K it says, "Children," and those  
25 are all zeros what does that mean?

1 A That means there were no children booked for that room.

2 Q Column L, it says, "Y/N cancelled," and then the rows  
3 either have either Y or N.

4 What does that mean?

5 A That means that a reservation was made, but if the value  
6 is Y that means the reservation was cancelled before the guest  
7 arrived at the hotel. They did not stay. If it's N that  
8 means that the reservation wasn't cancelled and the member  
9 stayed or the guest stayed.

10 Q Okay. Turning to the second page of 750-B.

11 In Column M, we have "Y/N no show," and all Ns, as  
12 in Nancy. What does that mean?

13 A That's a little different from a cancelled. This means  
14 that the guest did not show and did not cancel. As you can  
15 see in this, all of the bookings here have a no, so there were  
16 no no-shows for this guest.

17 Q And Column O and P, we have "RM rate," and "TOT rate,"  
18 and various numbers.

19 What do those mean?

20 A This is the total room revenue that was booked for the  
21 stay. This includes tax. It's also based upon the currency  
22 of the hotel.

23 Q And, again, moving over to S and T. What is this name?

24 A Yes, this is the guest that the stay was booked for.

25 Last name, Napout and first name is Juan Angel.



1 Q Turning to the third page of Government Exhibit 750-B.  
2 And looking in Column Z where it says "e-mail."

3 What would be represented here?

4 A This was a -- this would be the e-mail that was given at  
5 the time of booking. It's not a required field, so sometimes  
6 it's captured, sometimes it's not. But it would be the e-mail  
7 address of either the guest or the travel agent booking the  
8 reservation.

9 Q Just, for example, we have in Column 6 `juan@google.com`?

10 A Correct.

11 Q Again, looking at Column AA we have "BKSRC," and the word  
12 either "property" or "Internet."

13 What does that mean?

14 A This means the source of the reservation. So if it says  
15 property, that means the reservation was directly booked by  
16 the property that the guest was staying at. If it's Internet,  
17 that means that either the travel agent or the guest booked it  
18 via the Internet and not directly with the property.

19 Q Turning to the fourth page of the same exhibit. In  
20 Column AJ, to says "multiname," and then "Ns."

21 And what does that mean?

22 A That means that at the time of booking of the stay, a  
23 second name was added. It's somewhat common to add a spouse  
24 on there. So only the primary name was given for all of these  
25 stays, and a second name was not added to the reservation

1 record.

2 Q Moving over to Column AS. What is represented in this  
3 column?

4 A This is the currency that the stay was booked in. USD is  
5 U.S. Dollars. We have GBP which is British Pounds. EUR is  
6 Euros. And CHF is the code for Swiss Francs. And this is  
7 defined by the hotel's native currency.

8 Q Turning to the fifth page. In Column BB and Column BC we  
9 have "CC type," "CC ex date," "EXP date," and nothing in these  
10 columns.

11 What does that mean?

12 A This refers to Column AZ, as in zebra, advance purchase.  
13 If an advance purchase was made for the room prior to arrival,  
14 then the credit card time and the credit card expiration date  
15 would be listed here. No advance purchases were made through  
16 any of these bookings.

17 MR. EDELMAN: I have no further questions, your  
18 Honor.

19 THE COURT: Thank you Mr. Edelman.

20 Any cross-examination?

21 MR. PAPALARDO: Briefly, your Honor.

22 THE COURT: All right. Do you need the exhibit.

23 MR. PAPALARDO: No.

24 ///

25 ///

1 CROSS-EXAMINATION

2 BY MR. PAPALARDO:

3 Q Good afternoon, Mr. Huntley.

4 A Good afternoon.

5 Q You have been employed by Starwood or Hilton for quite  
6 some time?

7 A Actually Hilton, yes. For 27 years.

8 Q And you're familiar with the document that you just  
9 provided information about?

10 A That's correct.

11 Q Those records basically reflect that rooms were reserved  
12 or stayed in the name of one individual, isn't that right?

13 A That's correct.

14 Q Do you know whether or not there was any corporate  
15 account that Hilton had with CONMEBOL?

16 A I have no idea.

17 Q Do you know what CONMEBOL is?

18 A No.

19 Q Did the Government provide any information to you to  
20 search gore records of CONMEBOL?

21 A No.

22 Q You do have shall corporate accounts, don't you?

23 A We do.

24 Q And you have no idea whether or not any of these  
25 documents or any of these entries refer to corporate accounts?

1 A There was a column on the exhibit that had a corporate  
2 number on it, but I can't tell you if that referred to the  
3 company you're speaking of.

4 Q Do you know that there were corporate relationships, for  
5 instance -- first do you know what CONMEBOL is?

6 A No, I don't know.

7 Q Do you know if there were -- if I suggested to you that  
8 CONMEBOL was the South American federation for soccer would  
9 that rephrasing your memory?

10 MR. EDELMAN: Objection.

11 THE COURT: Sustained. Sustained. Please don't do  
12 that.

13 THE WITNESS: No, I wouldn't.

14 THE COURT: No, no. You don't have to answer the  
15 question.

16 THE WITNESS: I'm sorry.

17 EXAMINATION BY

18 MR. PAPALARDO:

19 (Continuing.)

20 Q Do you know whether or not with respect to the hotel in  
21 Argentina, there was a special relationship between CONMEBOL  
22 and that hotel?

23 MR. EDELMAN: Objection.

24 THE COURT: Sustained based on the last question.

25 Based on a prior answer.

1 Q The rooms indicated a certain name, isn't that correct?

2 A That's correct.

3 Q You don't know who actually stayed in those rooms, do  
4 you?

5 A I do not.

6 Q You have no idea?

7 A No.

8 Q You don't know if a certain name was used to make  
9 reservations for a room, and yet, somebody else from the same  
10 company stayed in that room?

11 A No, but I can tell you that it is Hilton policy when a  
12 guest checks in that they check I.D. at check-in to make sure  
13 that the name matches on the reservation record to the I.D.  
14 provided.

15 Q And do you think your policy was followed in each and  
16 every one of those cases?

17 A I can't confirm or deny that.

18 Q How about is there anything on that sheet that can tell  
19 you -- can tell us who paid for the room?

20 A No. There's not.

21 Q Wouldn't that be important to determine who stayed in the  
22 room?

23 MR. EDELMAN: Objection.

24 THE COURT: Overruled. If you can answer that  
25 question.

1 THE WITNESS: Yeah, I can't.

2 EXAMINATION BY

3 MR. PAPPALARDO:

4 (Continuing.)

5 Q So, basically, all you can tell us today, based upon your  
6 review of that documentation, is that rooms were reserved and  
7 sometimes cancelled in the name of one person?

8 A That's correct.

9 Q You can't tell us anything else?

10 A No. Not with that data that I provided.

11 Q Does that data exist?

12 A It still does, yes.

13 Q But you weren't asked for that?

14 A For which?

15 Q By the Government?

16 THE COURT: I think you should be a little clearer.  
17 I think you've confused him as to what data you're both  
18 talking about.

19 Q The data that I just asked you about: Who paid for the  
20 room, when it was paid, with what kind of a credit card. That  
21 sort of thing.

22 A That was never requested.

23 MR. PAPPALARDO: Thank you.

24 THE COURT: Any.

25 MR. STILLMAN: No questions.

1 MR. PAPALARDO: I have further no questions.

2 THE COURT: Any redirect?

3 MR. EDELMAN: No, your Honor.

4 THE COURT: Thank you very much, sir, you're  
5 excused.

6 (Witness leaves the witness stand.)

7 THE COURT: So does this make sense in terms of  
8 breaking for lunch earlier?

9 MR. NITZE: We have one brief witness. If he's  
10 here, we can do it. Otherwise, it would make sense to break  
11 for lunch.

12 THE COURT: Okay. Have a seat, everyone.

13 MR. NITZE: No witnesses. Now it would make sense  
14 to break a little early for lunch.

15 THE COURT: We're going to break early for lunch,  
16 folks. Unfortunately, I think your lunch might not arrive  
17 until 1:00, but we're going to have you come back, though,  
18 into the courtroom at about 1:35. So you may have to eat a  
19 little quicker. We'll try to get you your lunch earlier  
20 rather than have you sit here if we don't have a witness.

21 So have a good lunch. Do not talk about the case.  
22 Don't do any research. Enjoy your lunch. Keep an open mind.  
23 We'll see you soon.

24 COURTROOM DEPUTY: All rise.

25 (Jury exits courtroom at 12:37 p.m.)

1 THE COURT: All right. Every we're going to start  
2 at 1:35.

3 Thank you.

4 (Luncheon recess taken; 12:38 p.m.)

5 (Continued on the next page.)  
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## AFTERNOON SESSION

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COURTROOM DEPUTY: All Rise.

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THE COURT: Ms. Pinera-Vazquez wants to note something to the record, an objection to the process of have the witnesses for whom there are security issues come in through the back door.

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MS. PINERA-VAZQUEZ: Yes, your Honor, thank you. First of all, as far as on behalf of Mr. Napout there has been no evidence throughout the last two-and-a-half years that Mr. Napout has threatened any witness. And every time that a witness comes in the back door it gives the impression that these defendants have somehow either threatened or endangered the witness. There is no reason for this trial not to be like every other trial in this country, for a witness to come in the front door. It gives the impression that they've done something that they haven't done. I object to the process.

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THE COURT: Go ahead Ms. Mace.

MS. MACE: Thank you, your Honor. As your Honor is aware, it is common in this courthouse to take steps, where appropriate, where there is potential risk to a witness, to bring them in through the back door. In this case, as is the custom in the courthouse, we've only done it when the jury is not present. There is no prejudice to

1 anyone. The jury does not see what door the witness comes  
2 in. We have not done this for every witness, only for  
3 witnesses where we have a concern of potential concern of  
4 their safety.

5 Mr. Burzaco, there is much documentation about the  
6 danger to him. With regard to Mr. Pena, I refer  
7 Ms. Pinera-Vazquez to I believe it's number three in the  
8 3500 the entry, that refers to specific risk. And we can do  
9 that for the individual witnesses, if necessary.

10 But I would just inform the Court, that we are  
11 doing this sparingly and only when it's necessary. And the  
12 Court is taking the appropriate procedure by bringing the  
13 witness in when the jury is not present, I think that that  
14 guards against any potential prejudice.

15 THE COURT: Have a seat. For the reasons that  
16 Ms. Mace made, both specific and general, I have made a  
17 finding and continue to make the finding that there is a  
18 need to protect the safety of certain witnesses as  
19 identified by the Government. I have seen many submissions  
20 under seal, which point to some genuine security risks. And  
21 unfortunately I will note the recent event after the trial  
22 started that relate I believe directly to the testimony of  
23 Mr. Burzaco, which re-enforced for me the need to ensure the  
24 safety of the witnesses. And as well, as it turns out,  
25 others who were of part of, allegedly, a part of the alleged

1 scheme in this case or perhaps had dealings with the  
2 witnesses.

3 So for all those reasons, I think there is an  
4 appropriate measure to ensure the safety of the witnesses.  
5 And it doesn't, or rather, the prejudice is substantially  
6 mitigated to the defense in terms of inferences --

7 Sir, could we have you step out for one second.

8 -- because we have followed procedure where the  
9 jury does not see where the witnesses are coming from.  
10 Obviously, I recognize that the jury can see that some  
11 witnesses managed to get here without them seeing them enter  
12 through the front door and perhaps might infer something.  
13 However, it seems to me that they could equally infer that  
14 these are individuals that are somehow brought in by the  
15 Government or escorted in. Perhaps they think it's because  
16 these people are under arrest. I think it's equivocal in  
17 terms of what they might actually conclude.

18 If any side wants a curative instruction, I  
19 certainly will consider that, but I don't think one is  
20 necessary.

21 MS. PINERA-VAZQUEZ: Thank you, Judge.

22 (Jury enters the courtroom.)

23 THE COURT: Good afternoon, ladies and gentlemen.  
24 Everyone have a seat, please.

25 Mr. Edelman.

1 MR. EDELMAN: Thank you, your Honor. Before the  
2 Government calls the next witness, it will move to admit  
3 Government's Exhibits 506B, C, D, E, F, and 506FT based on  
4 the certification marked 506A.

5 THE COURT: Let's swear in the witness then you  
6 can do that.

7 MR. EDELMAN: The Government calls as a witness,  
8 José Luis Chiriboga.

9 (Witness takes the witness stand.)

10 José LUIS CHIRIBOGA, called as a witness, having been first  
11 duly sworn/affirmed, was examined and testified as follows:

12 THE WITNESS: Yes.

13 COURTROOM DEPUTY: Have a seat. State and spell  
14 your name.

15 THE WITNESS: José Luis Chiriboga, J-O-S-E,  
16 L-U-I-S, C-H-I-R-I-B-O-G-A.

17 THE COURT: You can proceed.

18 MR. EDELMAN: Thank you, your Honor. Based on the  
19 certification marked 506A, the Government offers 506B, 506C,  
20 506D, 506E, 5E6F, the translation of that exhibit, 506FT.

21 THE COURT: Any objection?

22 MS. PINERA-VAZQUEZ: No, along with long with the  
23 506A certification coming in.

24 THE COURT: Any objection from Mr. Marin?

25 MR. STILLMAN: No, your Honor.

1 MR. UDOLF: No, your Honor.

2 THE COURT: 506A through F are admitted, and then  
3 also Exhibit 506FT. You may inquire.

4 (Government Exhibit 506A-F, were received in  
5 evidence.)

6 (Government Exhibit 506FT, was received in  
7 evidence.)

8 MR. EDELMAN: Thank you, your Honor.

9 DIRECT EXAMINATION

10 MR. EDELMAN:

11 Q Good afternoon.

12 A Good afternoon.

13 Q What is your native language, Mr. Chiriboga?

14 A Spanish.

15 Q Do you also speak and understand English?

16 A Yes.

17 Q Are you comfortable testifying here in English text  
18 message today?

19 A Yes.

20 Q If you have any difficulty understanding any of my  
21 questions, let me know and I'll rephrase, okay?

22 A Okay.

23 Q Where are you from?

24 A From Quito, Ecuador.

25 Q Is Quito the capital city in Ecuador?

1 A Yes.

2 Q Where do you live now?

3 A Quito.

4 Q Were you raised in Ecuador as well?

5 A Yes, I was born and raised in Quito.

6 Q Where did you go to school?

7 A I went to elementary and middle and high school in  
8 Quito Ecuador, and college in Durango, Colorado.

9 Q What year did you graduate from college?

10 A 2002.

11 Q What did you do for work after you graduated?

12 A After I graduated I went back to Ecuador, and shortly  
13 after I got a license to be a agent for soccer players.

14 THE COURT: Can I have you pull the microphone  
15 closer to you?

16 THE WITNESS: Is that okay?

17 THE COURT: Better.

18 BY MR. EDELMAN:

19 Q Briefly, what does it mean to be an agent for soccer  
20 players?

21 A Well, I manage careers of players. Finding better  
22 contracts, transfer them from clubs to clubs, that's pretty  
23 much it.

24 Q Are you still an agent today?

25 A Yes.

1 Q How old are you?

2 A I'm 39.

3 Q Do you have a family?

4 A Yes, I have a wife and two kids, two boys.

5 Q Where do you live?

6 A Quito.

7 Q Mr. Chiriboga who is your father?

8 A Luis Chiriboga, the former president of the Soccer  
9 Federation of Ecuador.

10 MR. EDELMAN: May I show the witness and jury what  
11 is in evidence as Government's Exhibit 20?

12 THE COURT: Yes.

13 Q Mr. Chiriboga, do you recognize the person in  
14 Government's Exhibit 20?

15 A Yes, this is my father.

16 Q Is your father presently working, or no?

17 A No.

18 Q What did he do while he was working?

19 A He was the president of the Federation of Ecuador.

20 Q When did he first become the president of the Ecuador  
21 Soccer Federation?

22 A January 1998.

23 Q When did he stop being president of the Federation?

24 A December 2015.

25 Q Can you describe how popular soccer is in Ecuador?

1 A Soccer is the most important sport in Ecuador. It's  
2 very, very popular. It's a way of living. Soccer is the  
3 most important thing for many, many people in the country.

4 Q So based on that, was your father a public figure in  
5 your country?

6 A Yes. He was president for a long time and he helped  
7 Ecuador qualify for the first time in the history of the  
8 country to the World Cup in 2002, for the 2006 and 2013 --  
9 2014. So he was a very public, political figure in the  
10 country.

11 Q Qualifying for the World Cup, was that a big deal in  
12 your country?

13 A Yes, it was a very big deal.

14 Q Mr. Chiriboga, did there come a time when your father  
15 asked you to receive money on his behalf?

16 A Yes.

17 Q Approximately when was that?

18 A Approximately 2008.

19 Q Where were you at that time?

20 A Me and my father were both in Chile for the South  
21 American tournament, the youth tournament.

22 Q What did your father say to you?

23 A He said, I have recognized or I've noticed that you  
24 have an account in the U.S., is it okay if you can receive  
25 some money in this account.



1 Q Did you agree to do so?

2 A I did.

3 Q Why is that?

4 A It was my father asking. I couldn't say no. I just  
5 agreed.

6 Q Can you describe your relationship with your father?

7 A Well, we are still very close. I was raised by him and  
8 my mother, and in our culture we are very close. My  
9 relationship with my father is very, very close.

10 Q Who did your father say would be sending the money on  
11 his behalf?

12 A Mariano Jinkis.

13 Q Did you know Mariano /KEUS at that time?

14 A I first met Mariano Jinkis in 1999 in Monterey, Mexico.

15 Q What company, if any, did Mariano Jinkis work for?

16 A He worked for Full Play.

17 Q What is Full Play, based on your understanding?

18 A My understanding is Full Play is a company that, a  
19 company that works to produce futbol matches and broadcast  
20 games. They have the rights for the TV rights to broadcast  
21 the games around the world.

22 Q Where was Full Play based?

23 A Buenos Aires, Argentina.

24 Q Were there any other owners of Full Play, to your  
25 knowledge?

1 A I believe the owner of Full Play was Hugo Jinkis,  
2 Mariano's father.

3 Q At the time that your father asked to you receive this  
4 money had you met Mariano Jinkis before?

5 A Yes, I met him in 1999 in the Monterey, Mexico.

6 Q Generally, what was your relationship like with him  
7 over that period of time?

8 A We saw each other a couple times a year, a few times,  
9 we watched some futbol matches together. We shared some  
10 lunch, dinner. We see each other from time to time. He was  
11 my friend.

12 Q Showing you what is already in evidence as Government's  
13 Exhibit 48, do you recognize this person?

14 A Yes, this is Mariano Jinkis.

15 Q I'm showing you what is in evidence as Government's  
16 Exhibit 47, do you recognize this person?

17 A Yes, this is Hugo Jinkis.

18 Q When your father first asked you to receive this money  
19 on his behalf, did your father tell you why he was going to  
20 be receiving money from Mariano Jinkis?

21 A He said something like, you know, Mariano is doing  
22 really good business, his company is doing really well,  
23 we're going to have a share of that. He's going to give me  
24 something for that.

25 Q Did you in fact receive money on behalf of your father

1 at that time?

2 A Yes, I did receive money on behalf of my father.

3 Q Was that the only time you did so, or no?

4 A No.

5 Q Approximately what period of time did you receive money  
6 on behalf of your father?

7 A It stopped in 2014, so maybe around six years.

8 Q During that period of time, who would actually be  
9 sending you the money?

10 A One of Mariano's companies.

11 Q Do you recall the name?

12 A Cross Trading.

13 Q What was your understanding of what Cross Trading was?

14 A Cross Trading was the holding company of Full Play, so  
15 the owner of Full Play.

16 Q During this period of time that you received money on  
17 behalf of your father, did you ever receive money on behalf  
18 of your father from anyone else other than Full Play?

19 A No.

20 Q During that period of time, approximately how much  
21 money did you receive on behalf of your father in total?

22 A 2.8 million.

23 Q To your knowledge, was that money ever included in any  
24 contract?

25 A Can you repeat the question, please?

1 Q Sure. To your understanding, were those payments  
2 accurately described in any contract?

3 A No.

4 Q Why not?

5 A It was secret money. It was hidden money.

6 Q During the period of time that you received money on  
7 behalf of your father, what, if any, business did Full Play  
8 have with the Ecuadorian Soccer Federation?

9 A Full Play had the rights for the games that Ecuador  
10 played at home for the Qualifiers of the World Cup. And  
11 they also had the rights for the games, the games of Ecuador  
12 to be played around the world.

13 Q During that period of time, to your knowledge, did your  
14 father have any business with Full Play outside of his  
15 position as the president of Ecuadorian Federation?

16 A No, not that I know.

17 Q During that period of time that you received money on  
18 behalf of your father, to what extent, if at all, did your  
19 father tell you about the political dynamics at CONMEBOL?

20 A Well, we always used to talk about dynamics and  
21 political things at CONMEBOL. And especially what he wanted  
22 to achieve, what he wanted to get, what were his goals, what  
23 was his goal. His main goal was to get to achieve the FIFA  
24 -- to gain more weight, more power in the CONMEBOL. We did  
25 speak sometimes about this.

1 Q Can you describe what your father said, if anything,  
2 about how the dynamics changed overtime?

3 A Well, things were changing in the CONMEBOL overtime.  
4 Some the of presidents were there for a long time. And the  
5 smaller countries wanted to stay closer and to gain a little  
6 bit more of weight in the confederation, so that many  
7 aspects of the game can change, not only for national but  
8 all sports, the scheduling, and stuff like this. We were  
9 always speaking about that.

10 Q When you mentioned smaller Federations or smaller  
11 countries, what do you mean?

12 A Historically the power nations of confederations were  
13 always Brazil, Argentina, Paraguay; and you know, with the  
14 smaller countries I mean Peru, Ecuador, Venezuela, Colombia,  
15 Bolivia.

16 Q During those discussions, what, if anything, did you  
17 your father say about trying to gather the majority in  
18 CONMEBOL?

19 A Well, since they were trying to make some changes and  
20 he was trying to achieve his goals, they were always seeking  
21 to get a majority. You know that there is ten countries in  
22 the CONMEBOL, so ten presidents. So with more than  
23 50 percent you can become a majority, you will have more  
24 power decisions.

25 Q Did your father tell you whether he was able to gather

1 that majority?

2 A Well, it was pretty clear to me through our  
3 conversations that he was very close with Peru, Colombia,  
4 and Bolivia Federations. And I don't know in time when, but  
5 they gathered with Colombia and Paraguay and they got a  
6 majority.

7 Q What were the ultimate members of that majority of the  
8 Federations?

9 MS. PINERA-VAZQUEZ: Objection. Foundation.

10 THE COURT: Repeat your question.

11 MR. EDELMAN: What were the members of that  
12 majority that you discussed earlier?

13 THE COURT: You mean what were or who?

14 MR. EDELMAN: Either what Federations or who were  
15 the members of that majority.

16 THE COURT: Overruled.

17 A Colombia, Peru, Venezuela, Bolivia, Paraguay, Colombia.

18 Q I think you mentioned Colombia twice.

19 A Peru, Bolivia, Venezuela, Ecuador, Colombia, Paraguay.

20 Q What about Venezuela?

21 A Venezuela.

22 Q Showing what you what is in evidence as Government's  
23 Exhibit 59, do you recognize that person?

24 A Yes. This is Juan Angel Napout, former president of  
25 the Federation of Paraguay, President of CONMEBOL, and

1 member of FIFA.

2 Q Showing you what is in evidence as Government's Exhibit  
3 10, do you recognize that person?

4 A Yes. This is Manuel Burga, the president of the  
5 Federation of Soccer of Peru.

6 Q Showing you what is already in evidence as Government's  
7 Exhibit 30, do you recognize this person?

8 A Yes. This is Mr. Rafael Esquivel, former president of  
9 the Venezuela Federation.

10 Q Showing you Government's Exhibit 6, do you recognize  
11 this person?

12 A Yes. This is Mr. Luis Bedoya, the former president of  
13 the Colombian Federation.

14 Q Showing you Government's Exhibit 18 already in  
15 evidence, do you recognize this person?

16 A Yes. This is Mr. Carlos Chavez, former president of  
17 the Bolivian Federation.

18 Q Mr. Chiriboga, during the period of time in which you  
19 had agreed to receive money on behalf of your father and  
20 based on discussions you had with your father, did you come  
21 to have an understanding as to whether or not the other five  
22 members of the majority ever received money from Full Play?

23 MS. PINERA-VAZQUEZ: I'm going to object. What is  
24 an understanding?

25 THE COURT: Overruled.

1 MR. UDOLF: I didn't hear the question.

2 THE COURT: I'll read it since I have it.

3 "Mr. Chiriboga, during the period in time in which  
4 you had agreed to receive money on behalf of your father and  
5 based on discussions you had with your father, did you come  
6 to have an understanding as to whether or not the other five  
7 members of the majority ever received money from Full Play?"

8 MR. UDOLF: I will object to that as quadruple or  
9 triple hearsay.

10 THE COURT: Overruled.

11 MR. UDOLF: Can I have a standing objection?

12 THE COURT: Yes.

13 MS. PINERA-VAZQUEZ: On behalf of Mr. Napout  
14 objection.

15 THE COURT: Overruled. Go ahead.

16 THE WITNESS: Over this period of time Full Play  
17 grew a lot in the region. Full Play started with Ecuador.  
18 Ecuador was the first country to work with Full Play. After  
19 a couple of years or a few years they started working with  
20 Paraguay, with Peru, with Colombia. They were getting more  
21 popular in the region, Full Play.

22 In my understanding, you know, I was, I was part  
23 of a system. And these other countries were part of a  
24 system as well. The system that Full Play was managing in  
25 order to achieve what Full Play wanted, which was to gain



1 the CONMEBOL rights for their competitions.

2 Q When you say a system, what do you mean?

3 A The system that they were, that we were going through.  
4 You know, we receive some payments, or I received payments  
5 on behalf of my father, and it was pretty clear to me that  
6 this was a system.

7 Q So the other Federation presidents were part of that  
8 same system of receiving money from Full Play?

9 MS. PINERA-VAZQUEZ: Objection.

10 THE COURT: Sustained.

11 Why don't you ask another foundational question.

12 Q You mentioned based on your understanding was that  
13 these other Federation presidents were part of the same  
14 system; is that right?

15 MS. PINERA-VAZQUEZ: Objection.

16 THE COURT: Rephrase that again.

17 Q Based on your conversations with your father, did you  
18 come to have an understanding as to whether or not the other  
19 members of the majority of this -- the other Federation  
20 presidents that made up that majority, whether they were  
21 also receiving money from Full Play?

22 A Yes.

23 MS. PINERA-VAZQUEZ: Objection, your Honor.

24 THE COURT: Overruled.

25 A Yes, that was my understanding.

1 Q Did you ever discuss those other payments with the  
2 other Federation presidents directly?

3 A No, never.

4 Q You mentioned that Full Play had business with the  
5 Ecuadorian Soccer Federation, what other business did  
6 Full Play acquire in CONMEBOL based on your conversations  
7 with your father?

8 A Well, later on Full Play got the rights for the Copa  
9 America and I believe for the Copa Libertadores.

10 Q Mr. Chiriboga, you mentioned that you received  
11 approximately I think \$2.8 million on behalf of your father;  
12 is that right?

13 A Yes.

14 Q What bank account did you first receive that money?

15 A Biscayne Bank in Miami.

16 THE COURT: Biscayne.

17 THE WITNESS: Biscayne Bank.

18 Q B-I-S-C-A-Y-N-E?

19 A Yes.

20 Q Did you open the bank account for the purpose of  
21 receiving money for your father, or no?

22 A No, I had the bank account before.

23 Q The first time you received money into that account on  
24 behalf of your father, what did you do with the money?

25 A I transferred it to him.

1 Q Where?

2 A At that moment he had an account in Citibank in New  
3 York.

4 Q Again, this money that you were receiving from  
5 Full Play. How would you receive it, cash or wire transfer?

6 A Wire transfer.

7 Q This transfer you sent to your father, was that also a  
8 wire transfer?

9 A Yes.

10 Q Did you continue to receive money into your Biscayne  
11 bank account on behalf of your father?

12 A Yes.

13 Q Did there ever come a time that Biscayne Bank ever  
14 asked any questions about the money you were receiving?

15 A Yes. The bank officer asked me what was this money for  
16 and that I needed to support these transactions.

17 Q What did you do after receiving those inquiries?

18 A I called my father and I said the bank is asking me  
19 questions and that I need to support this money. He said he  
20 will speak to Mariano Jinkis and they will find a solution.

21 Q What happened after that?

22 A Mariano had me speaking with someone from his company,  
23 Santiago Pena, and he asked me some questions and then he  
24 produced a contract.

25 Q Showing you what is already in evidence as Government's

1 Exhibit 64, do you recognize this person?

2 A Yes, this is Santiago Pena.

3 Q What was your understanding of who Santiago Pena was at  
4 Full Play?

5 A He was the lawyer at Full Play.

6 Q Did you speak with Mr. Pena about the questions that  
7 the bank had raised?

8 A Yes, we spoke a couple of times.

9 Q What happened after you spoke about that?

10 A He sent me a contract.

11 Q I'm going to show you what is already in evidence as  
12 Government's Exhibit 506F, pages six through ten. I'll  
13 start with the Spanish language version first. This being  
14 page six, seven, eight, nine, and ten. I can give you a  
15 copy, if you would like. Do you recognize this document?

16 A Yes.

17 Q What is that?

18 A It was the contract that I sent to the bank.

19 Q Who did you receive this contract from?

20 A From Santiago Pena.

21 Q What was the purpose of this contract?

22 A To support my transactions in the bank.

23 Q Staying with the Spanish language version, turning to  
24 the last page, page ten of the document, there are what  
25 appear to be two signatures. Looking at the signature on

1 the right, do you recognize that signature?

2 A Yes, this is my signature.

3 Q Turning to the left, a little faint, do you see the  
4 name listed there?

5 A I can't read it well here, but it says Hugo Jinkis.

6 Q What does that contract say that it is for?

7 A It says that Cross Trading was interested in investing  
8 in younger players. I would do some scouting for them.

9 Q Specifically looking at the English language  
10 translation 506FT, page six, who are the parties to this  
11 contract?

12 A Cross Trading and my company.

13 Q Mr. Chiriboga, did you do any legitimate work for  
14 Full Play?

15 A Not really. I did, I had done something for Full  
16 Players. It was part, a smaller company they created for  
17 the management of players. But not for Full Play.

18 Q So for this contract, does this contract accurately  
19 describe what the money for your father was for?

20 A No.

21 Q Turning to the second page of the English language  
22 translation, which is page seven of the document. Directing  
23 your attention to the paragraph 2.1, how much money does  
24 this contract say you would were to receive under the  
25 contract?

1 A \$950,000.

2 Q Mr. Chiriboga, was this the only time that a fake  
3 contract was used to support the money that your father was  
4 receiving, that you were receiving on behalf of your father?

5 A No.

6 Q How many times would you say?

7 A Two or three.

8 Q I believe you testified that you provided this contract  
9 to Biscayne Bank; is that right?

10 A Yes.

11 Q What happened after you provided this contract to the  
12 bank?

13 A Biscayne Bank closed my account.

14 Q In addition to your account at Biscayne Bank in Miami,  
15 did you ever receive money on behalf of your father to any  
16 other accounts?

17 A Yes, I received in HSBC Miami and Chase Miami.

18 Q Focusing on the HSBC account, why did you open that  
19 account?

20 A Well, in the summer of 2010 I sold one of my players to  
21 Belgium and I was going to get a good commission with the  
22 contract with the Belgium club. And I decided to open an  
23 account for myself to keep my money separate from this money  
24 I was getting for my father.

25 Q Were you able to keep that money separate, or no?

1 A No.

2 Q You also mentioned Chase Bank that you received money  
3 on behalf of your father, where was that account located?

4 A In Miami; I only received one time.

5 Q Why did you open that account?

6 A Because Biscayne had been closed, and Chase is a big  
7 bank that has branches everywhere. It was more  
8 user-friendly, convenient.

9 Q You said that you received money on behalf of your  
10 father just one time into that account?

11 A Yes.

12 Q Do you recall when that was?

13 A It was early 2014.

14 Q What happened that time?

15 A The wire transfer came from a different company I never  
16 heard of before.

17 Q Do you recall that company name now?

18 A Yes, Bayan Group.

19 Q What was your reaction upon seeing a transfer coming  
20 from Bayan?

21 A At this point of time I was really scared. I was not  
22 comfortable. And I immediately called Santiago and asked  
23 what was this Bayan Group.

24 Q Santiago Pena?

25 A Yes.

1 Q What did he say to you?

2 A He said that for tax purposes they had opened a new  
3 account and new company. And this company will be sending  
4 the money from then on.

5 Q Did Mr. Pena tell you where that company was  
6 incorporated?

7 A Not that I can remember. I don't think he gave me any  
8 details. I saw, I can see where it was coming from in the  
9 details of the account.

10 Q Based on looking at the details in the account, what  
11 did it say it was coming from?

12 A Panama.

13 Q You said that's the last time you received money on  
14 behalf of your father?

15 A Yes.

16 Q Generally speaking, during that period of time, after  
17 receiving the money on behalf of your father, what would you  
18 do with the money?

19 A Try to give it to him in some different ways. He had  
20 two different credit cards linked to my account. I will try  
21 to bring him some cash, sometimes. We purchased an  
22 apartment for the family for holidays in Miami.

23 Q You mentioned bringing cash to your father, how would  
24 you obtain that cash?

25 A If I will go to the bank and withdraw some cash and



1 bring it home or meet him somewhere around the world. Or  
2 when he was in this the U.S. I will give him a check so he  
3 can go to the bank and cash it.

4 Q So what country would you be withdrawing the cash?

5 A In the U.S., in the bank.

6 Q Did you ever take that cash outside the United States?

7 A Yes.

8 Q Typically how much would you bring at a time?

9 A Always below 10,000.

10 Q Why always below 10,000?

11 A So that I don't have to fill out the form and declare  
12 it in the airport.

13 Q Why didn't you want to want to fill out the form?

14 A Just because this was like a money I didn't want to  
15 speak about.

16 Q You also mentioned that you purchased an apartment with  
17 some of that money; is that right?

18 A Yes.

19 Q Where was that apartment located?

20 A Miami.

21 Q What was that apartment to be used for?

22 A For the family for holidays.

23 Q Approximately how much money did that apartment cost?

24 A 400 plus expenses, and like filling the apartment.

25 Q 400,000?

1 A Yes, 400,000.

2 Q Just to be clear, all the amounts we've been talking  
3 about is that always U.S. dollars?

4 A Yes, sir.

5 Q You also mentioned I believe -- how else did you send  
6 the money for your father's behalf?

7 A How else?

8 Q How else did you send to your father or on someone  
9 else's on his behalf?

10 A If he asked me, I will send to third-parties.

11 Q What types of third-parties?

12 A Sometimes artists for musical shows, or to payments,  
13 smaller payment to like sister or brother, small things.

14 Q Are these all wire transfers typically?

15 A Typically, yes.

16 Q You mentioned musical artists, why musical artists?

17 A My father did this for 30 years in Ecuador, musical  
18 shows at home. So there were like a few times that I had to  
19 pay the entrepreneur for the show to be played.

20 Q What was your father actually doing?

21 A He would produce the show at home, yes.

22 Q Do you recall some of the artists for whom your father  
23 produced musical shows?

24 A Enanitos Verdes, David Getta, Juan Luis Guerra, José  
25 Luis Rodriguez.

1 THE COURT: We'll need some spelling. Start with  
2 the first one. Spell all the people whom you mentioned. I  
3 know, it's like a spelling bee.

4 THE WITNESS: E-N-A-N-I-T-O-S, V-E-R-D-E-S;  
5 D-A-V-I-D, G-E-T-T-A, I'm not sure of that one; J-U-A-N,  
6 L-U-I-S, G-U-E-R-R-A; J-O-S-E, L-U-I-S R-O-D-R-I-G-U-E-Z.

7 THE COURT: Thank you.

8 MR. EDELMAN: Thank you.

9 Q Mr. Chiriboga, I want to direct your attention to  
10 May 27, 2015, where were you that day?

11 A That morning I was in Amsterdam. I was flying back  
12 from Stolberg, Germany. I had a player with a contract in  
13 Stolberg, I was flying back connecting in Amsterdam to go  
14 back home.

15 Q What, if anything, happened that morning?

16 A Well, I was reading the newspaper or the Internet the  
17 news, like I do every day. And there had been some FIFA  
18 officials and CONMEBOL officers that had been, that had been  
19 gotten by the police by the Baur au Lac Hotel in  
20 Switzerland.

21 Q What was your reaction upon seeing the news?

22 A I'm screwed, because I saw that Mariano and Hugo were  
23 being accused ed and these were all familiar faces. And my  
24 reaction was I need to do something.

25 Q Did you learn after the first news whether or not an

1 Indictment had been issued?

2 A Yes.

3 Q Were you or your father named in that first Indictment?

4 A No.

5 Q After learning of the news in Amsterdam, where did you  
6 go?

7 A I took the flight, straight flight, 13 hours, I went to  
8 Quito.

9 Q What did you do after returning to Ecuador?

10 A I tried to speak to my father as soon as possible. And  
11 you know, I tried to see what we can do, and immediately to  
12 start looking for a lawyer.

13 Q What was your father's reaction?

14 A He was more calm. He was like, he don't understand  
15 English or speak or anything, read much. He said he had  
16 spoken to Hugo, Hugo Jinkis, and he is not named, and stay  
17 calm. He doesn't have an account in the U.S. He was a bit  
18 more calm. I knew that I had to take some action.

19 Q In the period after May 27, 2015, did you continue to  
20 speak with your father about the situation?

21 A Yes.

22 Q Was this one conversation or multiple conversations?

23 A No, multiple conversations, maybe small conversations  
24 when we had the chance, but multiple, more than before  
25 because I was worried.

1 Q Would you have these conversations over-the-phone or in  
2 person?

3 A In person.

4 Q Was anyone else in those conversations?

5 A No, just me and him.

6 Q Why just you two?

7 A This was between me and him, nobody else.

8 Q In those series of conversations, what, if anything,  
9 did you and your father discuss as a result of your  
10 concerns?

11 A We were trying to discuss, to see who are the unnamed  
12 co-conspirators, what could be the situation of all and  
13 where we are standing.

14 Q In that context, what, if anything, did your father  
15 tell you about the status or situation of other CONMEBOL  
16 officials?

17 A We discussed pretty much all the names and what were  
18 their situations. He mentioned that Luis Bedoya might have  
19 a bigger problem. He heard from Mariano that Bedoya had an  
20 account opened in Switzerland under his name. He said that  
21 Mr. Chavez might have a circumstance or like that his  
22 General Secretary, Mr. Lozada, knew about this, and probably  
23 both of them would be in problems.

24 He mentioned that Mr. Napout would probably  
25 not be so worried, or would not be so worried because he

1 never used the banking system of the U.S. That whenever if  
2 he did the cash, he got it in person or his driver used to  
3 go to from Asuncion to Buenos Aires to get it.

4 He mentioned that Manuel Burga could never  
5 receive money. That he always had like save it for later  
6 for some point. He believed that Manuel could not have  
7 received any money.

8 And he also believed that Rafael Esquivel  
9 could have a bigger problem because of the political  
10 situation of Venezuela at that time. The accounts of the  
11 Federation and his own personal accounts were mixed, or  
12 something like that, in the U.S.

13 Q A couple of follow up questions on that. With respect  
14 to what your father said about Mr. Napout, you said he was  
15 not, your father, he said Mr. Napout was not worried, what  
16 do you mean by that?

17 A He said --

18 MS. PINERA-VAZQUEZ: Objection. How can he know  
19 what his father was worried about?

20 THE COURT: Sustained as to form. Just be sure  
21 that you're having him recount a conversation.

22 Q During those series of conversations, what, if  
23 anything, did your father say about whether or not  
24 Mr. Napout was worried?

25 A I can't recall him saying exactly, like, I don't

1 believe, I don't believe Angel is worried because he never  
2 used the banking system of the U.S., worried about the  
3 Indictment or worried about the case in the U.S.

4 Q When you said worried about the case in the U.S., what  
5 do you mean?

6 A You know, the Indictment. There were unnamed  
7 co-conspirators who were speaking about these, and he  
8 believed that he was not worried about this.

9 THE COURT: The first "he," is your father?

10 THE WITNESS: Yes.

11 THE COURT: And the second "he" is?

12 THE WITNESS: Mr. Napout.

13 Q So we're on the same page, Mr. Napout was not worried  
14 about the U.S. investigation?

15 MS. PINERA-VAZQUEZ: Objection. Leading.

16 MR. EDELMAN: Just trying to clarify.

17 THE COURT: Overruled. Go ahead.

18 A Repeat please?

19 Q Just to clarify, your father was saying that Mr. Napout  
20 was not worried about the U.S. investigation?

21 MS. PINERA-VAZQUEZ: Your Honor, objection.

22 Leading.

23 THE COURT: Overruled.

24 A Well, it was, just like I said, you know, we discussed  
25 like several aspects or like the different situations of

1 all. And my father believed that the Angel was not worried  
2 because he never used the banking system of the U.S.

3 Q He mentioned something with respect to Mr. Lozada; is  
4 that right?

5 A Yes. Mr. Lozada was the General Secretary of the  
6 Bolivian Federation.

7 Q Do you know if Mr. Lozada when by any nickname?

8 A Tico.

9 Q Mr. Chiriboga, after May 27, 2015, when is the next  
10 time you traveled to the United States?

11 A June 15 of the following month.

12 Q Why did you come to United States?

13 A I had plan that some, a few, a couple of weeks of  
14 vacation with my wife and my kid, she was pregnant with the  
15 second one. I also wanted to go meet the lawyer that I have  
16 hired; so it was a multi-purpose.

17 Q Backtrack one quick second. With respect to what your  
18 father told you about Mr. Napout, what did, if anything, did  
19 he say about whether the funds for Mr. Napout were  
20 traceable?

21 A He said that he wasn't worried, you know, that he  
22 believed that he was not worried because he had never used  
23 the banking system of the U.S. So you know, probably funds  
24 were not traceable or he cannot use the banking system of  
25 the U.S. never received a wire.



1 Q Fast forwarding again, you mentioned that you came to  
2 the United States for holidays then to meet with your  
3 lawyer; is that right?

4 A Yes.

5 Q What did you do after meeting with your lawyer?

6 A I meet with this lawyer I hired in Houston, then I went  
7 to Las Vegas for a couple of days. I had to go to Leon to  
8 sign the contract for one of my players.

9 Q Leon?

10 A Leon, Mexico.

11 Q How did you get from Las Vegas to Mexico?

12 A Airplane, I have to transfer in Los Angeles, then to  
13 will Leon.

14 Q What, if anything, happened in the airport in Los  
15 Angeles?

16 A It was an overnight flight. It was late. I remember  
17 clearly I was sitting in the last row so I came off the  
18 airplane at the end. And as soon as I approach the airport  
19 an IRS agent stop me. He wanted to, he said, are you  
20 Mr. Chiriboga? He showed me a plaque. He said, I want to  
21 ask you some questions, can I ask you some questions. I  
22 said yes. He started asking me some questions. I was  
23 scared. I was, I didn't know really know what the plan of  
24 my lawyer was, so unfortunately, I was not completely  
25 honest. I lied to him in a couple of questions he made.

1 When the questions started getting confusing, I handed him  
2 the paper that my lawyer had given to me. Because my lawyer  
3 had advised to me if I get stopped or somebody ask me  
4 anything, to hand the paper with my lawyer. When the agent  
5 stopped me, I did the opposite, I started answering some  
6 questions. Like I said, I wasn't completely honest with  
7 him. I was not. Then I hand him the paper. And he hand me  
8 a subpoena.

9 Q Before you handed the agent that piece of paper from  
10 your lawyer, what was the agent asking you about?

11 A The agent was asking me about -- his first question  
12 was.

13 MS. PINERA-VAZQUEZ: Objection. Hearsay. Calls  
14 for a hearsay response, your Honor.

15 THE COURT: The question was what did the agent  
16 ask you?

17 MR. EDELMAN: Yes.

18 THE COURT: Overruled.

19 A His first question was, do you know who Mariano Jinkis  
20 is. I said yes. He then he asked me, have you ever done  
21 business with him? I said yes. Then he said, can you  
22 recognize this contract? Did you perform this? Then, you  
23 know, when I lied I started getting confused. I said,  
24 please speak to my lawyer.

25 Q After you told the agent to please speak with your

1 lawyer, did the agent stop asking you questions?

2 A Yes.

3 Q You said that agent then handed you a subpoena; is that  
4 right?

5 A Yes.

6 Q Not to go back and forth too much, but to be clear,  
7 during those conversations with your father that you  
8 testified about after the Indictment, did you ever tell him  
9 that you had been subpoenaed?

10 A No.

11 Q Did you ever tell him that you wanted information in  
12 order to give it to the U.S. Government?

13 A No.

14 Q Mr. Chiriboga, what did you decide to do with respect  
15 to the U.S. Government's investigation?

16 A I decided to answer the subpoena and to cooperate with  
17 the U.S. Government and answer truthfully to all the  
18 questions they will ask me.

19 Q Did you ultimately meet with agents and prosecutors?

20 A Yes.

21 Q After meeting with agents and prosecutors, did you  
22 enter into an agreement?

23 A Yes.

24 MR. EDELMAN: Can I have the Elmo for just the  
25 witness, please?

1 THE COURT: Yes.

2 Q Can you see that in front of you, Mr. Chiriboga?

3 A No.

4 Q I can hand up and give him a copy?

5 THE COURT: That might be necessary. Yes, it's  
6 not working. Here we go.

7 Q Mr. Chiriboga, I'm showing you what is marked for  
8 identification as Government's Exhibit 3500JLC3. Do you  
9 recognize this document?

10 A Yes.

11 Q Flipping to the last page, do you recognize your  
12 signature?

13 A Yes, this is my signature.

14 Q Did your lawyer also sign this document?

15 A Yes.

16 Q Did the prosecutors from my office sign this document?

17 A Yes.

18 Q Is this your agreement with the Government in this  
19 case?

20 A Yes.

21 MR. EDELMAN: Your Honor, the Government offers  
22 3500JLC3.

23 THE COURT: Any objection?

24 MS. PINERA-VAZQUEZ: No objection.

25 MR. UDOLF: None.

1 MR. STILLMAN: None.

2 THE COURT: JLC3 is admitted. Would you like to  
3 publish it?

4 MR. EDELMAN: Yes.

5 (Government Exhibit 3500JLC3, was received in  
6 evidence.) \*

7 Q Mr. Chiriboga, when did you sign this document?

8 A March 17, 2016.

9 Q What is required of you under this document?

10 A First and most, important to always say the truth, to  
11 be available upon request of the U.S. Government, to forfeit  
12 the apartment.

13 Q You say forfeit the apartment, what apartment do you  
14 mean?

15 A The apartment that I had purchased with this money from  
16 Miami.

17 Q Have you forfeited that apartment?

18 A Yes.

19 Q What does the Government agree to do under this  
20 agreement?

21 A The Government has agreed not to take any legal action  
22 against me for my behavior within 2007 and 2015 on soccer  
23 contracts and FIFA payments on behalf of my father.

24 Q In addition to this document, what, if anything, has  
25 the Government agree to do with respect to your immigration

1 status in the United States?

2 A The Government has agreed that if I have any safety  
3 problems at home, they will apply for visa so I can stay  
4 here.

5 Q To be clear, do you think any of the defendants here  
6 pose any threat to you?

7 A No.

8 Q So if there is a safety risk upon your return to  
9 Ecuador, what does the Government agree to do for you?

10 MS. PINERA-VAZQUEZ: Objection. Asked and  
11 answered.

12 THE COURT: Overruled.

13 A Excuse me, can you repeat?

14 Q If there is a threat to you upon your return to  
15 Ecuador, what has the Government agreed to do for you?

16 A To apply for a S-Visa.

17 Q What is understanding of what an S-Visa allow you to  
18 do?

19 A Stay in the U.S. and be able to work.

20 Q Has that process started, or no?

21 A No.

22 Q What is your understanding as to whether or not the  
23 U.S. Attorney's Office has the authority to grant you a  
24 visa?

25 A I am pretty clear that the U.S. Government does not

1 have that decision. They can just apply. There is other  
2 entities that will finish it. It's not depending on you  
3 guys.

4 THE COURT: You may want to clarify that. I think  
5 part of the answer got cut off. He said U.S. Government.

6 Q To be clear, between United States Attorney's Office  
7 for the Eastern District of New York versus some other  
8 entity in the Government, what is your understanding of who  
9 makes the final decision of whether you get one of those  
10 visas?

11 A Not the U.S. Department of Justice.

12 Q Mr. Chiriboga, what is your understanding what would  
13 happen if you were to lie here today?

14 A I would lose my agreement.

15 Q Then would what happen.

16 A I could get prosecuted.

17 MR. EDELMAN: No further questions.

18 THE COURT: Thank you very much.

19 Cross-examination.

20 CROSS-EXAMINATION \* HEADING CHIRIBOGA - CROSS - PINERAVAZQUEZ

21 BY MS. PINERA-VAZQUEZ:

22 Q Good afternoon, Mr. Chiriboga.

23 A Good afternoon. Excuse me, I don't know your last  
24 name.

25 Q I'm going to introduce myself. My name is Silvia

1 Pinera. I'm the attorney, one of the attorneys, for Juan  
2 Angel Napout.

3 A Good afternoon.

4 Q We never met.

5 A No.

6 Q This is our first time?

7 A Yes.

8 Q I'm just going to ask you a couple of questions about  
9 your background first, but I want to make something very  
10 clear to the jury. Everything that you just testified on  
11 direct examination is something that your father told you,  
12 right?

13 A Yes, pretty much.

14 Q And I'm talking about the part where he was asking you  
15 about what happened at CONMEBOL, and what happened with the  
16 other Federation presidents, that was not based on your own  
17 personal knowledge, right?

18 A No, I've never discussed anything with these guys.

19 Q You never had a conversation with Mr. Napout --

20 A No.

21 Q -- about the Jinkises, right?

22 A No.

23 Q Have you ever met Mr. Napout?

24 A Yes, we have met informally stadiums, and hi, always  
25 very gentleman. But I've never spoken to him.



1 Q So when you were talking about Mr. Napout, I think you  
2 said something about a driver and cash, that was all based  
3 on something that your father, conversations you had with  
4 your father?

5 A Yes.

6 Q And your father is Luis Chiriboga?

7 A Yes.

8 Q And he was the president of the Ecuadorian Federation I  
9 think from '98 to 2014; is that about right?

10 A 2015, yes.

11 Q Before that, he was the president of the Club Quito,  
12 the local club?

13 A Yes, I think he was the president of the Quito for  
14 twelve years.

15 Q The after that he was the president of the Federation?

16 A Yes.

17 Q I think you mentioned that he was the president when  
18 Ecuador for the first time qualified to go to the World Cup,  
19 right?

20 A Yes.

21 Q I want to get this right, the prosecutor actually said  
22 it's a big deal to qualify for the World Cup in your  
23 country, isn't it a big deal to qualify the World Cup all  
24 over south Central America?

25 A It is a big deal. But for us, I grew up listening to

1 my grandfather say, 'I will die and I will never see Ecuador  
2 in the World Cup,' this is how I grew up. To qualify for  
3 the first time, it was a huge deal. You know, you saw what  
4 recently happened with Peru. They gave two days off to all  
5 the nation because they qualify after 36 years. In our  
6 country it is a very big deal.

7 Q And what happened to Italy when it didn't qualify last  
8 week, right, since 1958. They were mourning, right?

9 A Yes.

10 Q So --

11 A They are in crisis.

12 Q The point of this conversation is basically that soccer  
13 is a really big deal in almost the entire world?

14 A It is.

15 Q I think you even said that in Ecuador people live for  
16 soccer?

17 A Yes. I mean, you know, how it is. You know, not  
18 everyone, but it's like the most popular sport. It's a way  
19 of living more than life.

20 Q Did you play soccer when you were little?

21 A Yes.

22 Q Did you ever make it to the --

23 A I was --

24 Q -- semi-professional?

25 A I played in the youth divisions of Quito and won the

1 national tournament. Then played in college, college  
2 scholarship.

3 Q Here in the United States?

4 A Yes, Colorado.

5 Q Your father, did he ever coach you when you were  
6 little?

7 A No, no.

8 Q He was more involved in the administration?

9 A Yes.

10 Q Now just a little bit about your family. You grew up  
11 in Quito, you have three brothers and sisters; is that  
12 right?

13 A Two.

14 Q Two or three?

15 A Yes. I have my sister and my brother from my same  
16 father and mother, and my father has another brother --  
17 another son, who is my younger brother.

18 Q And are your parents married?

19 A Yes.

20 Q How long have they been married?

21 A Like 45 years.

22 Q So fair to say that you're a close family?

23 A Very close.

24 Q In fact I, think you said that on direct that you and  
25 your Dad are particularly close. Is that because both of

1 you are in the same field, I guess, soccer sports field?

2 A We are all really close, the five of us are very close.  
3 I'm probably the closet, but we are all really close.

4 Q When your father became the Federation president in  
5 '98, that's a prestigious position in Ecuador, correct?

6 A Yes.

7 Q And I think, I'm not sure if you said this on direct,  
8 but his goal was to become the president of CONMEBOL; is  
9 that right, as any other Federation president?

10 A I think his main goal was to get to the FIFA Executive  
11 Committee, there were two positions for that.

12 Q Did he ever get on the Executive Committee?

13 A No.

14 Q Now, a little about your employment, you said you are a  
15 soccer agent; is that right?

16 A Yes.

17 Q Is a soccer scout and a soccer agent the same thing?

18 A It's related, because I first got to do my scouting to  
19 scout the player I want to represent. It is related.

20 Q You have your own company?

21 A Yes.

22 Q And that's Global Soccer Management, is that your  
23 company?

24 A Yes, it was just kind of like a commercial name. Now  
25 it is.

1 Q Is the company still alive?

2 A In Ecuador it is, yes, an employee for that company.

3 Q You still scout?

4 A I'm still an agent, yes. Lately I've not been scouting  
5 any new players, I just represent the players I have.

6 Q Now, you testified that, I think you said, sometime in  
7 2008 your father approached you about using one of your bank  
8 accounts?

9 A Yes.

10 Q You had a bank account at Biscayne Bank, right, the  
11 branch in Coconut Grove, Florida?

12 A Yes.

13 Q You when you vacationed in Florida in the United States  
14 you actually vacationed in South Florida, right.

15 A Yes.

16 Q For the most part, that's where you bought the  
17 apartment?

18 A Yes.

19 Q You had a relationship with the bank, Biscayne Bank?

20 A Excuse me?

21 Q You had a business, professional relationship with the  
22 bank?

23 A Yes. I opened the an account in Biscayne in Ecuador  
24 sometime years before, like a lady visit me in my office  
25 saying there is this program for savings. I opened an

1 account there years before. And when I started having the  
2 account there and everything I dealt with a couple of people  
3 from this banker.

4 Q When was it that you opened the account?

5 A I can't recall exactly, maybe 2005 or 2006.

6 Q Okay. But eventually in 2008 your father knew you had  
7 an account and he just asked you if he could use your  
8 account to accept some funds, some money.

9 A Yes.

10 Q And he didn't tell you this was dirty money or that it  
11 was related to any sort of criminal activity, right?

12 A No.

13 Q What he told you was that the Jinkises, Mariano Jinkis,  
14 was doing really well and that he needed someplace to accept  
15 some money, right?

16 A Not even that specific. He just said, you know,  
17 Mariano is doing well, I'm going to get a part of it.

18 Q Did you find anything odd about that or basically --  
19 let me ask one question at a time.

20 Did you had find anything odd about that?

21 A I mean, probably find it not so ethical, you know, like  
22 whatever. But unfortunately, it's a common practice in  
23 South American countries, to do business you get a part of  
24 it.

25 Q And because you're a close family, it's actually quite

1 normal in South America, or even Ecuador, to let your  
2 father, your mother, your sister use the account if they  
3 want to accept or deposit funds; is that what you're telling  
4 us?

5 A No, not really. That's different from what I'm telling  
6 you.

7 I'm just saying, I say that it's a common  
8 practice to like give someone who doing good business and  
9 you're helping, to get a part of it.

10 Q Oh.

11 A I'm speaking on behalf of my father. That's what I  
12 said. Not that it's common that I can let anybody else use  
13 my account.

14 Q So let me clarify. So what you're saying is that it  
15 was common for the Jinkises to -- can you explain what you  
16 mean? I don't understand. Sorry.

17 A I am saying that it is common that if you make  
18 business -- I never mentioned the Jinkises at that moment --  
19 I said, if I help someone sell insurance broker or someone,  
20 you know, they usually pay a commission or like that. I  
21 understood more like a commission, that was my first  
22 understanding.

23 Q That you were getting a commission or your father?

24 A My father.

25 Q The wire transfers started in 2009 and they continued

1 until 2014, right?

2 A Yes.

3 Q I think you testified on direct that it totaled  
4 \$2.8 million is that about, right?

5 A Yes.

6 Q There came a time that you realized this was not  
7 commission, right?

8 A Yes.

9 Q In fact, you had those conversations with your father?

10 A We had conversations often.

11 (Continued following page.)

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1 (In open court.)

2 CROSS-EXAMINATION

3 BY MS. PINERA-VAZQUEZ (continuing):

4 Q Now, the bank started out -- I think you testified on  
5 direct that the Biscayne Bank started asking questions and  
6 two contracts were produced to the bank?

7 A Yes.

8 Q And really the purpose of those contracts -- which I  
9 think you admitted they were fake, they were not real  
10 contracts, right, the Cross Trading and Global contracts?  
11 Let me get it. Hold on a second. Thank you.

12 It's Government Exhibit that's been admitted  
13 into evidence 506F. I will just put it --

14 MS. PINERA-VAZQUEZ: Can I get the ELMO, your  
15 Honor?

16 THE COURT: There you go.

17 Q This contract that Mr. Edelman showed you before, this  
18 is a contract between Cross Trading and Global Soccer  
19 Management that Mr. Burga prepared, right?

20 A Yes.

21 Q That was done at the request of your father, who called  
22 Mr. Burga first?

23 A No. I told my father I needed a sport for the bank,  
24 and he said I would speak to Mariano; and I can't recall  
25 exactly how it was, but I ended up with speaking with

1 Santiago Pena.

2 Q And the result of that conversation was that he sent  
3 you a fake contract, to substantiate the dirty money to give  
4 to the bank?

5 A Yes.

6 MS. PINERA-VAZQUEZ: Thank you, your Honor.

7 Q You did that one at a time, one or two times, I think  
8 you said?

9 A Yes, before.

10 Q Before that one?

11 A Yes.

12 Q Now, throughout this time, the years that you were  
13 basically agreeing to accept this money for your father and  
14 moving your bank accounts from bank to bank, did you ever at  
15 any time consider reporting your father to the authorities,  
16 like to any law enforcement in Ecuador and say, hey, my dad  
17 is doing this?

18 A No.

19 Q No, right?

20 A No.

21 Q But on May 27 when the indictment -- when you were  
22 sitting in Amsterdam at the airport and you heard about the  
23 indictment, you sort of freaked out, right?

24 A Yes.

25 Q Not to use the other word, but you flew 13 hours, 13

1 hours to Quito from -- I think you said Amsterdam to Quito,  
2 right?

3 A Yes.

4 Q When you got to Quito the thirist thing you did was get  
5 a car, either an Uber or a taxi, and go to your dad's house?

6 A No, it was not the first thing I did. I went to my  
7 house first and went over to -- hello to my parents, my wife  
8 and kids, and probably my father was not at the city at the  
9 time, so when I saw him I spoke.

10 Q Where would he be? Do you know where he was?

11 A Probably in Guayaquil, the federation. The  
12 headquarters of the federation was in Guayaquil. So he was  
13 like five days in Guayaquil, two days in Quito.

14 Q Do you know where your dad is today?

15 A Yes.

16 Q Where is he?

17 A In Quito.

18 Q In Ecuador, right?

19 A Yes.

20 Q And when you returned from Amsterdam, when was it that  
21 you finally spoke with your father?

22 A What was it what?

23 Q When. When did you finally speak with your father?

24 A I can't say exactly which day, but shortly after, as  
25 soon as I could, I said, you know, we have an issue here.

1 We need to do something about it.

2 Q Right. I think you expressed on direct that you were  
3 scared.

4 A I was scared even before, yes.

5 Q But now, now you were really scared because now there  
6 was an indictment, right?

7 A It was a reality.

8 Q It was a reality check, right?

9 A Yes.

10 Q And I assume that during that time -- please correct me  
11 if I'm wrong -- that you and your father had a very  
12 difficult conversation?

13 A It was difficult to have conversations at all because  
14 there were always like people around or he was still a busy  
15 man, you know, he was like traveling. So we had like a  
16 variety of smaller conversations.

17 Q I guess when I mean difficult, I mean you are sitting  
18 with your father, one on one, and he is looking at you and  
19 he must be thinking, look what I got my son into, I have  
20 been using his account for four years. I mean, that was --  
21 that must have been a difficult thing for your father.

22 MR. EDELMAN: Objection, your Honor.

23 THE COURT: Sustained.

24 Q You spoke to him about the situation, about the  
25 indictment, about the money going to your account; is that

1 right?

2 A Well, some things were to speak and some others not.  
3 He knew exactly and I knew exactly, you know, but we spoke.  
4 I said, you know, that I'm worried and that I need to take  
5 some action about this.

6 Q And your father's reaction was what?

7 A Like I said in my testimony, at the beginning he wasn't  
8 so worried. He was like still in denial, I believe. You  
9 know, he was like -- kind of like waiting to see what  
10 happens.

11 Q Could it be because his \$2.8 million did not go through  
12 his account, do you think that's why he was worried?

13 A Probably.

14 Q So he wasn't worried for you then you are saying?

15 A I am sure he was worried for me, but I'm saying at this  
16 point, exact point when you are saying, like right after I  
17 came back from Amsterdam, the first conversations, he was,  
18 you know, he was not named. He was hoping or I'm saying  
19 hoping his name will not come out.

20 Me, on the other hand, I came to school here.  
21 I, right from the beginning, and I knew exactly that this  
22 was not going to go away. He was hoping that they could  
23 work it out like they worked out so many other things.

24 Q I believe you testified that you flew back. Your next  
25 trip back to the United States was sometime in June, is that

1 right, June of 2015?

2 A Yes.

3 Q So between what -- was it June 2015?

4 A Yes.

5 Q So you spent about two weeks in Quito, Ecuador?

6 A Yes.

7 Q And during those two weeks is it fair to say that a  
8 larger portion of that time was trying to find out what was  
9 going on with the indictments, what was going on with the  
10 big FIFA-gate arrest, is that fair enough to say?

11 A It is fair enough to say because not only in those two  
12 weeks, ever since May 27 of 2015 FIFA-gate has been in my  
13 head 23 hours of my days.

14 Q As your father's head also, right?

15 A I cannot say what's in his head, you know, I can only  
16 assume.

17 Q But he told you since then how concerned he is, right?

18 A He told me that he is concerned, and I can see that he  
19 is concerned.

20 Q I mean you are a close family. You just told us a  
21 little while ago that you were very close to your parents.  
22 So this is something that would logically sort of rock a  
23 family, it would shake it, right?

24 THE COURT: Sustained as to what's logical.

25 MS. PINERA-VAZQUEZ: Take out the word "logical."

1 Q This is something that would shake any family?

2 THE COURT: Sustained.

3 Q This is something that shook your family?

4 A Yes.

5 Q Do you understand what I mean by shook, affected?

6 A Of course. It affected us all.

7 Q So where were you going in June when you were in the  
8 United States? Where were you going?

9 A To Miami.

10 Q And how long were you in Miami?

11 A I think I was in Miami that time for like five days or  
12 something.

13 Q Did you go back -- I want to -- where were you coming  
14 from for the first time when you arrived in Los Angeles? I  
15 want to get to the first time the IRS stopped you.

16 THE COURT: Are we talking about 2015?

17 THE WITNESS: Yes?

18 MS. PINERA-VAZQUEZ: Yes. I think he understands.

19 THE COURT: I want to make sure the jury  
20 understands. June 2015?

21 MS. PINERA-VAZQUEZ: Right, after the indictment.

22 THE COURT: Okay. Go ahead.

23 A Yes. That particular time I was flying from Las Vegas  
24 to Los Angeles to Leon in Mexico.

25 Q So Las Vegas, LA, then Leon, right?

1 A Yes.

2 Q I just want to go for that stop in the airport. Let me  
3 get this right.

4 You arrived in LA, Los Angeles Airport --

5 A Yes.

6 Q -- at about midnight, after midnight, right?

7 A Yes. Probably 1:00 a.m. or something.

8 Q 1:00 a.m. You are at the back of the plane, last seat  
9 on the plane, I think you said.

10 A Last seat of the plane. People kept coming into the  
11 bathroom and that stuff. I did not get one minute of sleep  
12 during that flight. I remember exactly.

13 Q So by the time you got off the plane at 1:30 in the  
14 morning, you come across an agent waiting for you, right?

15 A Two of them.

16 Q Two of them. Were they waiting for you like outside  
17 the plane door, like as you walked out of the plane were  
18 they waiting for you right there?

19 A When you walk out of the plane, yeah, as soon as you  
20 come out they were right there.

21 Q They approached you when you came out?

22 A Yes, two of them.

23 Q Were you alone or with your family?

24 A Alone.

25 Q Do you see the agents that approached you in



1 Los Angeles here in the courtroom today? You can stand up  
2 and look around. I think it was Rudy, Rodolfo Mendoza and  
3 Anton Chu?

4 A I see one of them, Rudy.

5 Q Can you just point him out?

6 A He is right there.

7 Q You can stand up.

8 A He is right there, with a gray suit and a blue --

9 Q This gentleman right here that's bald?

10 A Yes.

11 MS. PINERA-VAZQUEZ: Sorry.

12 THE COURT: You know, I don't think you can do  
13 that on the record.

14 MS. PINERA-VAZQUEZ: For the record, he has  
15 identified IRS Agent Rodolfo Mendoza.

16 THE COURT: Wait. I don't know that to be true.  
17 Is there any dispute about this from the Government?

18 MR. EDELMAN: No, your Honor.

19 THE COURT: All right. Fine. Let the record so  
20 reflect.

21 By the way, you just can't do that.

22 MS. PINERA-VAZQUEZ: What?

23 THE COURT: You shouldn't be saying that.

24 MS. PINERA-VAZQUEZ: I'm sorry. Can we go to  
25 sidebar, please?

1 THE COURT: No. Fine. Let's just continue.

2 Fine. Let's go.

3 BY MS. PINERA-VAZQUEZ:

4 Q So what did the IRS agents do? Did they take you  
5 somewhere, or did they question you right there in front of  
6 the airplane?

7 A No, no. He said take a seat.

8 Q Like in the waiting area?

9 A Yeah, in the waiting area. And I remember him saying,  
10 you know, I'm an IRS agent, can I ask you some questions. I  
11 said yes.

12 Q And I assume -- and you must have been, at that point,  
13 really concerned because you knew your worst fears had  
14 probably now come true, right?

15 A Yes.

16 Q And they told you they were there to ask you questions  
17 about it?

18 A Well, he started asking questions.

19 Q About? About the accounts that you had at Biscayne  
20 Bank, and things like that.

21 A I can't remember specifically. He first asked me if I  
22 knew the Jinkises, if I had done some business with them,  
23 and then he showed me an exhibit.

24 Q He showed you those fake contracts that we saw, right?

25 A Yes.

1 Q When he showed you those contracts, you lied and said  
2 that it was for something legitimate, right?

3 A Yes.

4 Q And that's because you were nervous?

5 A Yes.

6 Q Now, you also didn't say anything about your father  
7 there, right, to the agents?

8 A I can't recall exactly. I answered some questions to  
9 him; and as soon as I, you know, I didn't know what else to  
10 do. I hand him the paper of -- the letter of my attorney  
11 that I had with me. That was it.

12 Q You sort of blocked it out after that, right?

13 A Excuse me?

14 Q You blocked it out, like it's something you don't want  
15 to remember?

16 A No, not blocked it out. I have been speaking about it.

17 Q I'm sorry. I thought you didn't remember what they  
18 asked you.

19 A I said I didn't remember exactly what he asked me. I  
20 said I didn't remember if he asked me about my father. He  
21 asked me if you know the Jinkises. I said yes. He asked me  
22 have you done business with the Jinkises. I said yes.

23 THE COURT: Slow down.

24 THE WITNESS: Excuse me.

25 THE COURT: It's okay. Where did we leave off?

1 Let's get the full answer. Okay.

2 The last thing you said, he said have you  
3 done business with the Jinkises. I said yes. Was there  
4 something else you wanted to say?

5 THE WITNESS: He then provided me with an exhibit.  
6 He said is this your signature. I said yes. Then he said,  
7 I believe he said, did you receive all of this money. I  
8 said no. And then he answered -- he asked me something  
9 else, did you -- did these -- did you do this work for them.  
10 I think that's when I lied, I said yes or something.

11 Then I was confused and I was like hand him  
12 the paper because my lawyer had said to me if anybody  
13 stopped me don't answer any questions, just hand the paper.  
14 I just like -- I don't know for which reason I just. When I  
15 stopped, my first reaction was to like be honest and answer  
16 some questions and, you know, that was it.

17 Q That meeting lasted about 30 minutes?

18 A No.

19 Q Less?

20 A Eight, probably. I don't know.

21 Q Eight minutes?

22 A I don't know, but it was short.

23 Q And once you finished with the questions you eventually  
24 went back to Quito, Ecuador?

25 A No. I went through -- Rudy said, here, you are going

1 to go through, you are going to keep your flight.

2 Q Because were you worried that they were going to detain  
3 you here in the United States?

4 A No, no. That was the first thing he said.

5 Q Now --

6 A Just one thing.

7 Q Yes?

8 A If I would have been really worried about that, I would  
9 not have been in the United States. I never decided. I  
10 came to the United States.

11 Q Like your father was in the United States, right?

12 A True.

13 Q That's why you are saying everything that your dad  
14 supposedly told you, right?

15 MR. EDELMAN: Objection, your Honor.

16 THE COURT: Sustained. Rephrase that.

17 MS. PINERA-VAZQUEZ: I will move on.

18 Q So after that meeting when did you eventually go back  
19 to Quito?

20 A Like two or three days later.

21 Q When you got to Quito, you obviously told your father.

22 A The situation at home was really sketchy at that  
23 moment. I told him that -- I didn't tell them that I was  
24 stopped and that I had been subpoenaed. I told them that  
25 the situation was really critical than, you know, that we

1 need a defense.

2 Q Let's get this right. You had been having  
3 conversations with your dad right after the indictment about  
4 FIFA-gate and how people were getting arrested, including  
5 the Jinkises. He knew or you told him how worried you were,  
6 and when you actually get stopped in the United States by  
7 federal agents you do not tell him anything?

8 A I cannot recall exactly what I told him, but I did not  
9 tell him that I got subpoenaed. I didn't want to add up to  
10 the load of -- to the load of worries, especially for my  
11 mom, you know. I told him that, you know, that there was a  
12 serious problem, but I didn't tell him about the subpoena.

13 Q What did you tell him?

14 A I can't remember exactly what I told him. I said, you  
15 know, we have a problem. That's what I told him, we have a  
16 problem I need to talk to him.

17 Q Is that the only time you told him we have a problem?

18 A The whole time we have a problem and then I asked him  
19 to get a lawyer also, we had a lawyer for both. So we were  
20 speaking about this.

21 Q Right. Oh, so your father also got a lawyer and all of  
22 you, because of the problem, obviously met and talked about  
23 it?

24 A Yes. My father got a lawyer also in the United States.

25 Q So this was not something that you just didn't talk

1 about and called it a problem, you actually discussed what  
2 the problem was, right?

3 A I mean it's a big problem.

4 Q And it's such a big problem that your lawyer was able  
5 to get you a safe passage letter to meet with these  
6 prosecutors and agents here, right?

7 A Yes.

8 Q Do you know what a safe passage letter is?

9 A So that I can travel safe to the United States.

10 Q Well, would you agree that a safe passage letter is so  
11 you can come in to the United States and you won't be  
12 arrested and you can go back to your country?

13 A Yes, but for the reason that I was coming for, not to  
14 like come and, you know, it was for a reason. The safe  
15 passage only works for one reason, to come and meet, and  
16 then I can go back to my country.

17 Q Right, to discuss the problem, right?

18 A Yes.

19 Q The first time you got a safe passage letter was  
20 October 20, 2005. Do you remember that?

21 A Yes.

22 Q That was five months after the date of the problem,  
23 right, May 27, 2015?

24 A Yes.

25 Q And you didn't come to the United States even though

1 you had a safe passage letter, right, that first time?

2 A I did come.

3 Q On October 20, when did you come to the United States?

4 A Yes, I did come.

5 Q When was that?

6 A Houston, I went to my lawyer's office.

7 Q Under a safe passage letter?

8 A Yes.

9 Q Did you meet with law enforcement authorities on  
10 October 26 and 27?

11 A No.

12 Q What happened?

13 A I was in Houston and I was about to come to the --  
14 to -- to New York, but we didn't. I had to go back home,  
15 and the meeting was postponed. So I went back.

16 Q Why did you have to go back home?

17 A Just a personal problem.

18 Q Did it have to do anything with the case?

19 A Not really.

20 Q Well, what part really? What part? If it's something  
21 personal, please do not tell us. It's just if it has  
22 something with the case is the only thing I'm asking about.

23 A No, I didn't come that time. I went back to Ecuador.

24 Q You went back, you said, because there was a problem;  
25 and I asked you if it had something to do with the case.



1 That's all I want to know: Does the problem have anything  
2 to do with the case?

3 A No.

4 Q So you did not make it to meet with the prosecutors  
5 here in the Eastern District in October, right?

6 A No.

7 Q But you were given a second opportunity in January,  
8 right?

9 A Yes.

10 Q And that was after your father had been actually  
11 indicted, right, December 2nd -- I mean November 29, 2015?

12 A Yes.

13 Q Your father was indicted, Luis Chiriboga; my client,  
14 Mr. Napout; and Mr. Burga were all indicted at that time,  
15 right, along with other people, right?

16 A Yes.

17 Q That was also a bad day of problems, right?

18 A You know better. Yes.

19 Q Worse than the one in May?

20 A Yes.

21 Q And after that indictment came down I believe that your  
22 father surrendered to Ecuadoran authorities in Ecuador; is  
23 that right?

24 A Surrender as in?

25 Q Surrender for potential issues he may have had in

1 Ecuador, surrender to the court?

2 A Yes. He went to the law enforcement.

3 Q Voluntarily?

4 A Yes.

5 Q And you went to the U.S. Attorney's Office to have a  
6 meeting with these prosecutors in January?

7 A Yes.

8 Q And you were given a safe passage letter that nothing  
9 would happen to you while you were here and you could return  
10 back to Quito, right?

11 A Yes, I think so.

12 Q During your meeting on January 12, 2016, it was right  
13 next door at the U.S. Attorney's office?

14 A Yes.

15 Q What floor was it on?

16 A I don't know where. Eighth, sixth. I can't remember.

17 Q But the meeting was in a big conference room, right?

18 A Yes.

19 Q And at the meeting were Agent Mendoza that you had  
20 previously met in Los Angeles, Ms. Mace, another prosecutor,  
21 Tanya Hajjar, and your attorney, correct?

22 A Yes.

23 Q And at that time they asked you many questions, right?

24 A Yes.

25 Q About many things, related to the whole soccer issue;

1 is that right?

2 A Yes.

3 Q And that meeting lasted about five and a half hours, do  
4 you remember that?

5 A I can't recall exactly. There were more meetings.

6 Q At that time they asked you about Mr. Napout, didn't  
7 they?

8 A I believe so. I'm not sure in which meeting, but I  
9 think in that meeting they probably asked me about Napout.

10 Q You, as you previously said, had never had  
11 conversations with Mr. Napout, right?

12 A No.

13 Q You never had conversations with, aside from your  
14 father, about Mr. Napout, right?

15 A No.

16 Q So the only person that you had any conversations  
17 regarding this case was with your dad?

18 A You are correct.

19 Q And at that time you told the prosecutors that during  
20 those conversations you were having after the indictment  
21 that your dad told you that Napout never received the wire  
22 transfers, right?

23 A Yes.

24 Q And they asked you not only about Mr. Napout, they  
25 asked you about other people, right?

1 A Yes.

2 Q They asked you about Sergio Jadue, what your dad said  
3 about Sergio Jadue, right?

4 A Yes.

5 Q They asked you about the Chilean Federation president,  
6 Mr. Chavez, right?

7 A Mr. Chavez is not Chilean Federation.

8 Q Bolivia?

9 A Yes.

10 Q Chile is Jadue.

11 They asked you about Mr. Chavez?

12 A Yes.

13 Q So they asked you about several individuals, not just  
14 Mr. Napout, right?

15 A Yes.

16 Q Now, let me ask you a little bit about the end of the  
17 meeting.

18 You went back to Quito, right, after the  
19 meeting?

20 A I think so, yes.

21 Q And at that time you still did not have a  
22 non-prosecution agreement, right?

23 A Yes.

24 Q At that time you were just working under what's called  
25 a proffer agreement, meaning anything that you can say

1 couldn't be used against you in the future, right?

2 A Yes.

3 Q You met with them again in March, three months later;  
4 is that right?

5 A Yes, two.

6 Q You had two meetings, two back-to-back days, right?

7 A Yes. I'm saying yes two months, January to March.

8 Q At that time they gave you a non-prosecution agreement,  
9 which basically is that they are not going to prosecute you,  
10 as long as you tell the truth, right, and cooperate?

11 A To tell the truth and to be available, yes.

12 Q It's then that you started talking more, after you had  
13 the non-prosecution agreement, which is Government Exhibit  
14 3500-JLC-3, that's when you started giving more information;  
15 isn't that right?

16 A Ever since I met with them I always give them good  
17 information, or whatever they asked me I answered my honest  
18 questions.

19 Q Right. You lied the first time though, right?

20 A I didn't know who this agent was, and I was nervous. I  
21 didn't know what the game plan of the lawyer is, you know,  
22 your lawyer. So your client sometimes has to see what you  
23 do, so.

24 Q And between the first meeting on January -- January 4  
25 and March 16, you were in Quito during that time, right?

1 A Yes, I assume.

2 Q And --

3 A What year is this, 2016?

4 Q 2016, a year ago, when you met with the prosecutors  
5 between January 4, 2016 and March 2016?

6 A Yeah. Due to work I always travel some places. So I  
7 can't say I was in Quito the whole time.

8 Q Well, not the whole time. That's your home?

9 A Just to live there, yes.

10 Q During that time your father was also in Quito, right?

11 A Yes.

12 Q And you obviously spoke to him about what had happened?

13 A Yes.

14 Q And he was concerned, expressed his concern to you,  
15 right?

16 A Yes.

17 Q And he told you that he felt bad that he used your  
18 accounts and got you into this problem, right?

19 A He didn't tell me that way, yeah, but I know he feels  
20 bad about it.

21 Q How did he tell you? How did he tell you?

22 A Just recently he said, sorry, son, I destroyed your  
23 life.

24 Q And to help you?

25 A To help me what? What?

1 Q He gave you some information, told you something that  
2 the Government wanted to hear; isn't that right?

3 A He doesn't know what the Government wants to hear. We  
4 just had conversations to see where we are standing, to see  
5 what, you know, to see what I can do.

6 Q Did your father ever offer to come in to the  
7 United States and talk to the Government and tell them what  
8 he thought, to save you?

9 A Just when it was too late.

10 Q Does your father know that you are here today?

11 A Yes. And just for you to know, he doesn't know exactly  
12 what I'm saying here today.

13 Q No, and he didn't destroy your life completely, did he?

14 A That's how he feels.

15 Q But he didn't because you are here today and you are  
16 not getting prosecuted for these crimes for accepting  
17 \$2.8 million into your bank account, right?

18 A Yes.

19 Q You could continue to travel the world and work without  
20 a problem?

21 A We will see about that.

22 Q So he didn't destroy you. He actually saved you by  
23 giving you information, didn't he?

24 MR. EDELMAN: Objection, your Honor.

25 THE COURT: Overruled. Can you answer that

1 question?

2 A Well, if you believe just getting an agreement is just  
3 like just walk away and doing nothing, I mean you can also  
4 think about what I have been through all this time, you  
5 know, meeting with prosecutors, doing this, doing that,  
6 answering all sorts of questions, trying to be as accurate  
7 as possible every single time, never lie, never say, you  
8 know, just be like this. It's not so easy as you are  
9 portraying it.

10 Q No, I know.

11 A It's, you know, my father is going through a really  
12 hard situation also; and, as a matter of fact, I feel it for  
13 everyone. I grew up next to these guys. I feel it for  
14 Mr. Napout, for his family, for his wife, for his kids. I  
15 feel it for Mr. Burga, for his wife, for his kids. I feel  
16 for Carlos Chavez, who is in jail since May of 2015.

17 It's not like, you know, our lives changed  
18 dramatically. It's not just like this. I got an agreement.  
19 It's not like tomorrow I can walk out the door in Ecuador  
20 and go to the shopping mall with my kids. I don't know  
21 about that. Travel the world? Let's see.

22 One thing is for sure, you know, I took a gray  
23 shadow off my back, and now I'm hoping to continue to see  
24 what's on; but it's not like I don't care for anyone, I got  
25 my agreement and I don't care for the other people. Trust



1 me when I say I do care for everyone. I grew next to these  
2 people. I never spoke to them, I never did any deals with  
3 them, but I grew up with them. I, you know, I got a  
4 hand-shake, at some point I got a -- like, a ticket, a game,  
5 memories together.

6 So my father was a president of Ecuador for 18  
7 years. So since I was like 20 to 38. It's a lifetime.  
8 It's not so simple, Silvia.

9 Q No.

10 A Just to let you know. Just to let you know. This is  
11 the hardest moment of my life, to be here accepting and  
12 doing things and recognizing things; and this has not only  
13 been one day, for this day, you know. This has been in my  
14 mind forever, for all the time.

15 Q So can you imagine how hard it's been for Mr. Napout?

16 MR. EDELMAN: Objection.

17 THE COURT: Sustained. Don't --

18 A Of course.

19 THE COURT: You don't have to answer that  
20 question. Sustained.

21 Q So just to recapture what it is that you have testified  
22 to today, everything that you said today regarding  
23 Mr. Napout was what your father told you, right?

24 A Yes.

25 Q And, more importantly, your father never told you that

1 my client accepted any cash, right? He never told you that?

2 A My father said that in his recollection, Juan Angel's  
3 driver used to go from Asuncion to Buenos Aires to collect  
4 the money.

5 Q Right, but he never said that Mr. Napout collected any  
6 money or was given any money, right?

7 A Yeah.

8 Q You don't know where that money was coming from, right?

9 A Excuse me?

10 Q You don't know where that money was coming from, if at  
11 all?

12 A Where that money was coming from? I'm pretty sure I  
13 know where it was coming from.

14 Q Did your father tell you where it was coming from?

15 A Yeah, from Full Play.

16 Q Did you ever talk to the driver?

17 A No.

18 Q To see if he picked up money?

19 A No. This is just conversations.

20 Q Oh, like conversations having a glass of wine?

21 A No, no. We don't drink wine.

22 Q A beer?

23 A No. We don't drink really.

24 Q Rum?

25 THE COURT: Okay. We don't need to go through the

1 entire bar menu. I think he said he doesn't drink. Go  
2 forward. Please move on.

3 A I don't drink with my father.

4 Q You don't drink with your father?

5 A No. Especially not in the last two and a half years.

6 Q So when he told you about the driver, he didn't tell  
7 you any specific dates or times, did he?

8 A No.

9 Q It was sort of like a rumor he had heard because he  
10 never saw the driver, right?

11 MR. EDELMAN: Objection.

12 THE COURT: Overruled. Do you know what the word  
13 "rumor" means?

14 THE WITNESS: Yes.

15 MS. PINERA-VAZQUEZ: He went to school here in the  
16 United States.

17 A I don't think he was speaking about a rumor.

18 Q Well, he wasn't present when the driver was there,  
19 right, supposedly; is that right?

20 A No.

21 THE COURT: Overruled.

22 Q So at best, he was speculating, correct?

23 A I don't believe he was speculating. I think he just  
24 like knew from maybe from Mariano or someone, but it's not  
25 like a rumor. We also didn't go in detail, no dates, no

1 nothing.

2 Q Right. So you don't know -- you can't tell this jury  
3 that he learned from Mariano, that your father learned from  
4 Mariano that a driver for Juan picked up some sort of money,  
5 right?

6 A Yeah.

7 Q You can't, right?

8 A I can't. I just know what I know. I say what I know  
9 when they ask me. I answer to questions.

10 MS. PINERA-VAZQUEZ: Can I have a moment, your  
11 Honor?

12 THE COURT: Yes. Folks, we are going to break  
13 after this, so hold tight for a second.

14 (Pause.)

15 MS. PINERA-VAZQUEZ: I have no further questions,  
16 your Honor.

17 Thank you very much. Mr. Chiriboga.

18 THE WITNESS: Thank you, Silvia.

19 THE COURT: Okay. Ladies and gentlemen, we are  
20 going to take our afternoon break. Let's make it a quick  
21 one. So we will want you back in here roughly a quarter of  
22 4:00.

23 THE CLERK: All rise.

24 (Jury exits.)

25 THE COURT: Everyone else can have a seat. You

1 have a little less than ten minutes.

2 (Recess.)

3 (Jury enters.)

4 THE COURT: All right. Please be seated,  
5 everyone.

6 Mr. Udolf, you may inquire.

7 MR. UDOLF: Thank you, your Honor.

8 HEADER Chiriboga - Cross/Udolf

9 CROSS-EXAMINATION

10 BY MR. UDOLF:

11 Q Good afternoon, Mr. Chiriboga.

12 A Good afternoon.

13 Q My name is Bruce Udolf. I represent Mr. Burga.

14 THE COURT: Pull the microphone closer to you.

15 Q I just have a few questions for you. I appreciate what  
16 you said about your relationship with these men here in the  
17 courtroom today. I just wanted to talk a little bit to you  
18 about the conversation that you had with your dad.

19 Now, as I understand it, when you first went  
20 to talk to the U.S. Government you did not inform your  
21 father. Is that right?

22 A I did inform my father that I was going to go speak or  
23 that I had a meeting.

24 Q You did or you didn't?

25 A I did inform him.

1 Q Did you tell him what took place at the meeting?

2 A I never -- I have never told him in detail, like of all  
3 the meetings that I have had.

4 Q All right. I would imagine you wanted to spare him the  
5 details of the meeting.

6 A Well, as others, he is also going through a very rough  
7 time. So I never wanted to overload him. I feel like --

8 Q You didn't want to make it worse?

9 A That's the exact word.

10 Q Now, but eventually you did talk to the agents and gave  
11 them evidence against your father; is that right?

12 A Yes. I spoke about, you know, myself, which is  
13 evidence against my father.

14 Q All right. So whatever you told them, you told them  
15 the truth, correct?

16 A Yes.

17 Q And the truth has necessarily implicated your father in  
18 criminal conduct, correct?

19 A Yes.

20 Q All right. Now, you love your father very much, true?

21 A Yes.

22 Q And you would never do anything to hurt your father?

23 A No, not on purpose.

24 Q And you would not do anything to hurt your father, even  
25 to help yourself, to save your own self, correct?

1 A Well, I have already done it.

2 Q Well, your father is still at home, in Ecuador, is he  
3 not?

4 A Yes.

5 Q And you are not testifying against your father, are  
6 you?

7 A No.

8 Q But -- and your father, as Ms. Pinera indicated, your  
9 father did provide you with information that you could tell  
10 the prosecutors to help yourself out, correct?

11 A Well, not in that sense. We had conversations, and we  
12 spoke about things, you know, and I viewed this information.

13 Q Right. You never talked to Mr. Burga, Mr. Napout, or  
14 anyone else in the courtroom today about any of the facts  
15 that you testified about, correct?

16 A No, never.

17 Q And the only information you had was from your father,  
18 correct?

19 A Yes, sir.

20 Q And the information that your father had was from  
21 Mr. Jinkis, correct?

22 A Yes.

23 Q Now, and basically what you told us today was you were  
24 laundering money through your father in the amount of  
25 \$2.8 million over a period of years, correct?

1 A I have answered questions and, you know, whatever  
2 question I have answered with the truth, is what it is.

3 Q But you never were prosecuted for money laundering,  
4 correct?

5 A No.

6 Q You haven't been prosecuted for making a false  
7 statement to a federal agent, correct?

8 A Correct.

9 Q And basically, what's happened is you -- the Government  
10 has agreed to not prosecute you in exchange for your  
11 truthful testimony and for your forfeiture of the condo you  
12 bought with these laundered funds; is that correct?

13 A That's correct.

14 MR. UDOLF: I believe that's all.

15 THE COURT: All right. Thank you very much,  
16 Mr. Udolf.

17 Mr. Stillman or Mr. Mitchell.

18 MR. STILLMAN: I have no questions.

19 THE COURT: All right. Thank you very much.

20 Redirect then?

21 MR. EDELMAN: Thank you, your Honor.

22 HEADER Chiriboga - Redirect/Edelman

23 REDIRECT EXAMINATION

24 BY MR. EDELMAN:

25 Q Mr. Chiriboga, you testified that your father did not



1 try to speak to the Government until it was too late.

2 Do you recall saying that?

3 A Yes.

4 Q What did you mean by "too late"?

5 A Well, not too long ago, you know, a couple of months  
6 ago, two, three months ago, he asked me, you know, what if I  
7 go and speak with them. But I told my lawyer about this. I  
8 posed this situation, but it was too late. I mean he cannot  
9 leave home. He is under arrest and, you know. So I believe  
10 it was too late.

11 Q You said your father is -- cannot leave home and is  
12 under arrest.

13 Do you know for how long?

14 A He has been committed for ten years.

15 Q Mr. Chiriboga, you were asked on cross-examination  
16 about why you didn't come to that first meeting with the  
17 Government.

18 Do you recall being asked that?

19 A Yes.

20 Q And around that time was there a family medical issue  
21 that you had to tend to?

22 MS. PINERA-VAZQUEZ: Objection, leading.

23 THE COURT: Overruled, under this circumstance.

24 Go ahead.

25 A I mentioned it was a personal matter, yeah. My second

1 kid, my second boy, was born in December of that year; and  
2 we had some complications before, but thanks that he came to  
3 birth well.

4 Q Mr. Chiriboga, when is the last time you spoke to  
5 Santiago Pena?

6 A When was the last time I spoke with Santiago Pena?

7 Q Yes.

8 A I can't recall exactly, but I think I talked to him one  
9 time after May 27, but he barely picked up the phone or  
10 something. So we didn't really speak, and before that I  
11 can't recall. Maybe 2014.

12 Q So when you say after May 27 do you mean sometime in  
13 2015?

14 A Yes, yes. I tried to call to see what was up, but.

15 Q Do you know where Mr. Pena is right now?

16 A No.

17 Q Has the Government told you who any of the other  
18 witnesses are in this case?

19 A No.

20 Q Has the Government told you what the other evidence it  
21 has in this case?

22 MR. UDOLF: Objection, your Honor. This is not  
23 redirect. This is not anything that was brought out.

24 MS. PINERA-VAZQUEZ: Beyond the scope.

25 THE COURT: Overruled.

1 THE WITNESS: Excuse me?

2 Q Has the Government told you what other evidence it has  
3 in this case?

4 A No.

5 Q Has the Government ever told you what evidence it  
6 wanted from you as part of this case?

7 A No.

8 MR. EDELMAN: Nothing further.

9 MR. UDOLF: Judge, if I can have one thing on  
10 recross.

11 THE COURT: Sure.

12 MR. UDOLF: I will do it from here.

13 HEADER Chiriboga - Recross/Udolf

14 RE-CROSS-EXAMINATION

15 BY MR. UDOLF:

16 Q Mr. Chiriboga, your dad is under house arrest right now  
17 as I understand. Is that right?

18 A Yes.

19 THE COURT: Anything further from anyone else?

20 MS. PINERA-VAZQUEZ: No, your Honor.

21 HEADER USA v. Webb, et al.

22 THE COURT: Ladies and gentlemen, let's take a  
23 two-minute break here so I can talk to the parties for a  
24 minute. I just apologize. I didn't realize it was going to  
25 go that quick, a lightning round, but we will come and get

1 you in a few minutes.

2 THE CLERK: All rise.

3 (Jury exits.)

4 THE COURT: Please be seated, everyone. I just  
5 want to know if the Government has another witness.

6 MS. MACE: Yes.

7 THE COURT: All right. Who is offering up the  
8 next witness, Mr. Nitze?

9 MR. NITZE: Yes, Jack Tamburello.

10 THE COURT: Coming in?

11 MR. NITZE: Yes. There were two more witnesses  
12 for today.

13 THE COURT: Let me pose for you folks one  
14 possibility in terms of a curative instruction, which I have  
15 been considering on the issue raised by Ms. Pinera of  
16 potential prejudice from the jury perhaps wondering why some  
17 witnesses magically appear when they come out as opposed to  
18 those who walk through the front door.

19 One possibility is I could obviously note  
20 that to the jury, that some witnesses obviously are on the  
21 witness stand at the time that they are brought out. I  
22 don't want them to speculate as to why some come through the  
23 door, why some are already in the courtroom. However, I  
24 will note, as you heard through the testimony, that the  
25 witnesses who are in the jury box already are foreign

1 citizens or not citizens of the United States and are here  
2 for a very limited purpose or allowed into the country, as  
3 per one of the witnesses, for a limited purpose and that  
4 therefore their movements are restricted.

5 MR. STILLMAN: Can I be helpful?

6 THE COURT: Yes.

7 MR. STILLMAN: I don't want that.

8 MS. PINERA-VAZQUEZ: Neither do I, judge. We are  
9 fine.

10 MR. UDOLF: I definitely don't want that.

11 THE COURT: All right. I was just offering it up  
12 as a suggestion. Let's get the jury back out.

13 (Pause.)

14 THE CLERK: All rise.

15 (Jury enters.)

16 THE COURT: Please have a seat, everyone. See,  
17 ladies and gentlemen, you probably barely had a chance to  
18 sit down in the jury room.

19 The Government is ready with its next  
20 witness.

21 MR. NITZE: Thank you, judge. The Government  
22 calls Jack Tamburello.

23 While the witness is coming to the stand, we  
24 offer, pursuant to 8036 --

25 THE COURT: Come up here, sir. Go ahead.

1 MR. NITZE: -- and 90211 and pursuant to a  
2 declaration marked 752A, we move to admit exhibits marked  
3 for identification as 752B, 752C, 752D, and the  
4 corresponding translated documents, which just have a T  
5 after the exhibit number.

6 THE COURT: Any objection?

7 MS. PINERA-VAZQUEZ: No objection, as long as 752A  
8 comes in, your Honor.

9 MR. STILLMAN: No objection.

10 MR. UDOLF: No objection.

11 THE COURT: So 752A, B, C, D, and the  
12 corresponding translations are admitted.

13 (Government Exhibits 752A, 752B, 752C, 752D,  
14 752A-T, 752B-T, 752C-T, and 752D-T so marked.)

15 THE CLERK: Please raise your right hand.  
16 JACK TAMBURELLO, called as a witness, having been first duly  
17 sworn/affirmed, was examined and proceeded to testify as  
18 follows:

19 THE CLERK: Thank you. Please have a seat. State  
20 and spell your name for the record.

21 THE WITNESS: Jack Tamburello. J-A-C-K  
22 T-A-M-B-U-R-E-L-L-O.

23 THE COURT: Okay. You may inquire, Mr. Nitze.

24 MR. NITZE: Thank you, your Honor.

25 ///

1 DIRECT EXAMINATION

2 BY MR. NITZE:

3 Q Good afternoon, Mr. Tamburello.

4 A Good afternoon.

5 Q Where do you work?

6 A Marriott International, Inc.

7 Q How long have you worked for Marriott?

8 A A little bit over a year and a half.

9 Q Before that, where did you work?

10 A I worked for Starwood Hotels and Resorts Worldwide,  
11 Incorporated; and they were acquired by Marriott  
12 International, Inc.

13 Q Okay. And the Sheraton brand of hotels, does that also  
14 fall under the Starwood umbrella?

15 A It was originally Starwood. It is now under the  
16 Marriott brand.

17 Q What was your title with Starwood?

18 A For two years I was in records department, and after  
19 those two years I'm a litigation paralegal.

20 Q And as part of your duties and responsibilities with  
21 Starwood did you become familiar with the customer records  
22 maintained by Starwood and Sheraton?

23 A Yes.

24 Q Did Starwood produce certain hotel records to the  
25 Government in response to a request in this case?

1 A Yes.

2 MR. NITZE: I'm going to publish, if I may, your  
3 Honor, 752B-T, in evidence.

4 THE COURT: Yes.

5 Q So, first off, what are we looking at here?

6 A This is a computer printout from our reservation  
7 system.

8 Q All right. And at the top it says, "Third stay  
9 confirmed through Turismo Sabita and paid directly by the  
10 guest."

11 What's the significance, if any, of that  
12 heading?

13 A Turismo Sabita would be the company, and paid directly  
14 by the guest would be Juan Angel Napout.

15 Q So where I'm pointing my pen to, the top of the screen  
16 shot, where it says "name," is that where you just mentioned  
17 the name Juan Angel Napout, is that where that appears?

18 A Correct.

19 Q What -- is that the guest or what is the significance  
20 of that?

21 A That is the guest.

22 (Continued on the next page.)

23

24

25



1 (In open court; 4:03 p.m.)

2 EXAMINATION BY

3 MR. NITZE:

4 (Continuing.)

5 Q And then on the right-hand side at the top again I'm  
6 pointing with my pen, there's a box that says, "Agent," and it  
7 looks like this name "Turismo Sabita." What's the  
8 significance of that entry?

9 A That would be the company.

10 Q When you say --

11 A The company that the reservation is under.

12 Q Okay. And could that be a tourism agency or whoever made  
13 the booking?

14 A Correct.

15 Q And then there's a box that says, "Arrival," and it looks  
16 as though there's a date there. What is that?

17 A Yes.

18 Q What is the date?

19 A July 23, 2011. Arrival and departure is July 24, 2011.

20 Q Okay.

21 THE COURT: Mr. Nitze, I just want to note that  
22 there appears to be a typo at the top of the document. But  
23 you had said to says "third stay," right, I'm just noticing  
24 it's misspelled; is that correct?

25 THE WITNESS: That is a typo.

1 THE COURT: But it's meant to say third.

2 THE WITNESS: Third.

3 THE COURT: Fair enough. If that's what you're  
4 testifying.

5 MR. NITZE: Thrid (sp) stay. I see what you mean.

6 THE COURT: It takes a while to stare at it. But I  
7 want to make sure that's what you meant.

8 Go ahead.

9 EXAMINATION BY

10 MR. NITZE:

11 (Continuing.)

12 Q There is a box that has the letters CURR right here, and  
13 then it says "USD."

14 What, if anything, does that signify?

15 A That would be currency used, United States currency.

16 Q Turning to the second page of this document, there's a  
17 printout first. I'm going to zoom in to this black box at the  
18 top.

19 THE COURT: Can you identify the exhibit or is it  
20 the same.

21 MR. NITZE: Same exhibit, second page, I'm on  
22 752-BT, and reading from this box at the top it looks like it  
23 says Park Tower and I got to squint to see it.  
24 Luxury Collection Hotel.

25 Q And then can you make out the words on the bottom here?

1 A Buenos Aires.

2 Q Buenos Aires, okay. What is the Luxury Collection if you  
3 know?

4 A That is a brand of hotels it was formerly under Starwood.

5 Q And what is this page that we're looking at here, Page 2  
6 of the exhibit.

7 What's reflected here?

8 A That is what we call a folio but it would inevitably is  
9 the guest receipt.

10 Q All right. And turning to Government Exhibit 752-CT in  
11 evidence and I'll publish that.

12 And here again it says, "First and second stay as  
13 part of groups."

14 Do you know what that signifies?

15 A That would be under the group Torneos, and the second  
16 part of the name got cut off. It's longer than that.

17 Q Okay. So are you referring then there's an entry here on  
18 the side under company where it says Torneos and there's a  
19 COMP.

20 Do you see that?

21 A Correct.

22 Q Does the group have the same name?

23 A Correct.

24 Q All right. And who is the guest indicated on this top  
25 screenshot?

1 A Juan Angel Napout.

2 Q Is there an arrival date?

3 A July 1, 2013. Departure of July 32013.

4 Q All right. And then, on the bottom of this page, there's  
5 a second screenshot. And here, again, what is the company and  
6 group listed?

7 A Torneos and comp A.

8 Q And who is the guest on this day?

9 A Juan Angel Napout.

10 Q Is there an arrival date and departure date?

11 A May 18, 2014, to May 21, 2014.

12 Q All right. And here I'm turning to the third page of  
13 this exhibit. And if I could ask you here to read off of the  
14 guest block at the top on the left of this printout.

15 What is written there?

16 A Torneos and competencias.

17 Q And going down the left left-hand side, there are a  
18 series of dates.

19 And are these written in month, day, year, format?

20 A Correct.

21 Q I just want to briefly put on the Spanish language  
22 version of this page. And are those day, month, year.  
23 Flipped?

24 A Day, month, year. Correct.

25 Q Now, there's a departure date in the top-right corner on

1 the English language version, the T version, there's an  
2 arrival date.

3 Do you see the arrival date?

4 A Correct.

5 Q What is the date listed there?

6 A July 2, 2013.

7 Q And then here there is a departure that says 7/8/2013?

8 A Correct.

9 Q And on the Spanish language version, I think I may have  
10 just found a transcription error in the translation is why I'm  
11 asking the departure date here on the version that is day and  
12 month, it's 7/8/13 as well.

13 So reading this on the original Spanish language,  
14 this indicates that the arrival date is which day?

15 A July 2, 2013.

16 Q But the departure is what date?

17 A July 8, 2013.

18 Q Well, wouldn't this be August?

19 A Well, that would be August correct.

20 Q And I want to go to the end of the English language  
21 version where it appears that this line here I'm reading it's  
22 got 7/8, but I'll go to the Spanish in a moment. To says,  
23 "In-House payment, payment on account." And then there's a  
24 total amount written. Can you read that total amount?

25 A \$49,804.48.

1 Q And on the original Spanish language version where it's  
2 day and month, does that indicate that, in fact, the account  
3 was settled on August 7th?

4 A August 7, 2013.

5 Q Okay. And just to be clear, which version, if you know,  
6 was produced to the Government, the Spanish language or the  
7 translated version?

8 A I believe it was the Spanish language.

9 Q Okay. Now, returning again to 752-CT, the English  
10 translation. I'm on Page 3 of the document.

11 There are, starting halfway down the page, there are  
12 a series of entries that say, "Room Charge," followed by "VAT  
13 room" with a percentage.

14 What is indicated where there is a room charge?

15 A I think that would be tax the VAT room charge, you mean?

16 Q Well, no, I'm pointing --

17 A The room charge. That would be for one night's stay.

18 Q And then associated with the room charge there's a line  
19 underneath each room charge that says "VAT room, 21 percent."  
20 What is that if you know?

21 A I believe it would be the tax.

22 Q Okay. And there are a series of names Manuel Burga and  
23 then an arrow, and it says, "Torneos y competencias." What  
24 does that entry mean, if you know?

25 A That would be the guest name, Manuel Burga, staying under

1 the grown Torneos y competencias.

2 Q So going down to an entry for July 21, 2013, this may be  
3 six lines up from the bottom.

4 What is the name that you see written here?

5 A Juan Angel Napout.

6 Q Okay. Now, publishing Government Exhibits 752-DT in  
7 evidence the translation of 752-D.

8 So in this top screenshot at the bottom here, there  
9 are two entries here. The first has a name. Do you know what  
10 that name signifies?

11 A Juan Angel Napout.

12 Q And is that a hotel guest or what is that?

13 A That is a hotel guest.

14 Q Is there a date of stay listed and arrival and departure  
15 dates on that line?

16 A January 7, 2013. Wait, no. July 1, 2013. I'm sorry.

17 Q All right. And then departing?

18 A July 3, 2013.

19 Q Okay. On the second line?

20 A May 18, 2014.

21 Q Departing?

22 A May 21, 2014.

23 Q Turning to the second page of the translation, although I  
24 see under "Guest" there's this phrase, "Sorteo

25 Copa Sudamericana?

1 A Yes.

2 Q If you know, what's significance of that entry?

3 A I believe that would be a company.

4 Q But you're not certain?

5 A Not certain.

6 Q All right. Here, again, there are a series of room  
7 charges and names. And actually, just directing your  
8 attention to the bottom-right corner of this page, the  
9 document says "Sheraton Buenos Aires Hotel." And if you know,  
10 why is Sheraton indicated there?

11 A Can I see the top of the page again.

12 Q Yes. I believe it's still that Park Tower?

13 A The hotel probably changed hands at some point. It was  
14 robbery originally a Luxury Collection and then went to a  
15 Sheraton or vice versa.

16 Q Okay. But the Luxury Collection, is that a part of  
17 Starwood?

18 A That is a part of Starwood. They're both a part of  
19 Starwood.

20 Q Whether it's the Luxury Collection or Sheraton fall under  
21 the Starwood umbrella?

22 A They're Starwood brands, correct.

23 MR. NITZE: No further questions.

24 THE COURT: Thank you very much, Mr. Nitze.

25 Cross-examination.



1 MR. PAPALARDO: Very briefly.

2 CROSS-EXAMINATION

3 BY MR. PAPALARDO:

4 Q Good afternoon, Mr. Tamburello.

5 A Good afternoon.

6 Q Mr. Tamburello, you were shown --

7 MR. PAPALARDO: Above my pay grade, your Honor. I'm  
8 sorry.

9 Q Mr. Tamburello, you were shown this document which is  
10 752-B on direct examination, isn't that right?

11 A Yes.

12 Q Showing you the second page. Do you see the amount  
13 there?

14 A Yes.

15 Q This is the Spanish version, isn't that right?

16 A Yes.

17 Q The figure of 543208. What does that signify?

18 A The total amount spent.

19 Q Is that in pesos Argentinian pesos, or is that in  
20 U.S. Dollars?

21 A That I do not know.

22 Q Well, if it's a Spanish version, isn't it likely to be  
23 pesos?

24 A I can't say for sure.

25 Q Okay. You will agree with me, wouldn't you, that the

1 Spanish pesos, I'm sorry, the Argentinian pesos were,  
2 depending upon what point in time, had a much higher number  
3 than the equivalent in U.S. Dollars?

4 A I don't really know the exchange rate.

5 Q Would it surprise you to learn that we've had --

6 MR. NITZE: Objection.

7 THE COURT: Sustained. Sustained.

8 Q Let's move ahead here. And I'm showing you Page 3 from  
9 752-C that I believe was shown to you again on direct  
10 examination.

11 Do you see that, sir?

12 A Yes.

13 Q Do you see that? You see these names here: Manuel  
14 Burga, Luis Bedoya, Sergio Jadue, Gorca Villar, Juan Angel  
15 Napout, Luis Chiriboga.

16 Do you know who they are?

17 A I know one of them is the defendant.

18 Q Well, actually, that's not accurate.

19 But you know at least one these names is the  
20 defendant. Do you know what this group signifies?

21 A I do not.

22 Q Have you ever heard of CONMEBOL?

23 A Excuse me.

24 Q Have you ever heard of CONMEBOL?

25 A No.

1 Q Do you know whether or not this group is the Executive  
2 Committee of CONMEBOL?

3 A No.

4 THE COURT: Sustained.

5 Q Do you know whether or not there was an Executive  
6 Committee meeting on July 2nd of 2013?

7 MR. NITZE: Objection.

8 THE COURT: Sustained. Of CONMEBOL?

9 MR. PAPALARDO: Of CONMEBOL.

10 THE COURT: Sustained. He said he doesn't even know  
11 what it is.

12 Q Again, I'll show you the English version of this.

13 Do you know the under the amount here that whether  
14 those are Argentinian pesos or U.S. Dollars?

15 A No.

16 Q No?

17 A No.

18 Q Let me direct your attention to the entry of 7/2 -- I'm  
19 sorry. July 2, 2013, of bar service for nonalcoholic  
20 beverages under Juan Napout.

21 Do you see that?

22 A Yes.

23 Q Do you see where it says 52?

24 A Yes.

25 Q Do you think that's \$52?

1 A If it's a Luxury Collection Hotel, it can be.

2 Q For nonalcoholic beverages?

3 A Yes.

4 Q How about --

5 THE COURT: Some sort of rare fruit juice.

6 COURTROOM DEPUTY: What exhibit number was that.

7 MR. PAPALARDO: That was 752-CT.

8 Q Sir, did you check the dates of these entries to  
9 determine what, if anything, was going on at the hotel at that  
10 time?

11 A No.

12 Q What you can testify to is that there are names here on  
13 this sheet; right?

14 A Yes.

15 Q Do you know if they actually stayed there?

16 A According to our records, they stayed at the hotel.

17 Q According to your records?

18 A Yes.

19 Q These records?

20 A Correct.

21 Q And do you know, again, you don't know what, if any,  
22 official business was being conducted there, do you?

23 A No.

24 MR. PAPALARDO: Thank you.

25 THE COURT: Are you done?

1 MR. PAPALARDO: Yes, your Honor.

2 THE COURT: Okay.

3 MR. PAPALARDO: I said it would be brief.

4 THE COURT: That's okay. I just thought you were  
5 wandering.

6 Mr. Mitchell.

7 MR. MITCHELL: No, Judge.

8 THE COURT: Mr. Udolf?

9 MR. UDOLF: No questions.

10 THE COURT: Thank you very much.

11 Redirect?

12 MR. NITZE: No, your Honor.

13 THE COURT: You may step down, sir. Thank you very  
14 much.

15 (Witness leaves the witness stand.)

16 THE COURT: The Government will call their next  
17 witness.

18 MR. EDELMAN: Thank you, your Honor. The Government  
19 calls Sean O'Malley.

20 (Witness takes the witness stand.)

21 THE COURT: Come forward, sir, and stand by the  
22 witness box and remain standing for a moment.

23 COURTROOM DEPUTY: Please raise your right hand.

24 SEAN O'MALLEY, called by [!CALLING PARTY], having been first  
25 duly sworn, was examined and testified as follows:

1 THE WITNESS: Yes.

2 COURTROOM DEPUTY: Thank you. He's have a seat.

3 State and spell your name for the record.

4 THE WITNESS: Sean O'Malley. S-e-a-n.

5 O-'-M-a-l-l-e-y.

6 THE COURT: You may inquire.

7 MR. EDELMAN: Thank you, your Honor.

8 Before I do so, the Government moves pursuant to  
9 18 U.S.C. 3505 to admit Government Exhibits 513-B, C, D, E,  
10 and F as well as the corresponding translations.

11 THE COURT: Any objection?

12 MS. PINERA-VAZQUEZ: No objection as long as the  
13 certificate is also admitted, your Honor.

14 THE COURT: Are any of those documents with a  
15 certificate?

16 MR. EDELMAN: 513-A is.

17 THE COURT: So with the same objection from the  
18 Government 513-A through F are admitted.

19 (Government's Exhibits 513-A through 513-F were  
20 received in evidence as of this date.)

21 THE COURT: I assume there's no objection from the  
22 defense?

23 MR. PAPALARDO: No objection.

24 THE COURT: Yes, you may proceed.

25 MR. EDELMAN: Thank you, your Honor.

1 DIRECT EXAMINATION

2 BY MR. EDELMAN:

3 Q Good afternoon, Mr. O'Malley.

4 A Good afternoon.

5 Q Where do you work?

6 A I work at the Federal Reserve Bank of New York in lower  
7 Manhattan.

8 Q What's your position at the Federal Reserve Bank of  
9 New York?

10 A I'm a vice president and a chief investigator in the  
11 Financial Intelligence and Investigations Unit.

12 Q How long have you been in that position?

13 A In this particular position, about seven years.

14 Q And in this position, what are your duties and  
15 responsibilities?

16 A Well, I'm one of the senior people in the Enforcement  
17 Unit at the Federal Reserve Bank of New York and the  
18 investigative -- the investigators in a that unit tier up to  
19 me. So I'm the most senior investigator in that enforcement  
20 unit in the legal department of the New York Fed.

21 Q Have you held positions at the Federal Reserve Bank of  
22 New York previously?

23 A Yes. I was employed in 1999 started as a special  
24 investigator and received various promotions until my current  
25 title.

1 Q Generally speaking, what do you do day to day?

2 A It's a very varied responsibility. I would say,  
3 primarily, most of the work in my unit relates to making sure  
4 that banks that are supervised by the Federal Reserve Bank of  
5 New York are safe and sound. Primarily, in my area, it more  
6 relates to what they call Bank Secrecy Act, anti-money  
7 laundering, and also sanctions evasion. So the core of that  
8 is the USA Patriot Act and making sure the banks are adhering  
9 to the regulations that are expected of them related to those  
10 issues.

11 THE COURT: Mr. O'Malley, can you pull the  
12 microphone closer to you. You can move the whole unit. There  
13 you go.

14 THE WITNESS: Thank you.

15 Q What did you do before working at the New York Federal  
16 Reserve?

17 A Immediately prior to coming to the New York Fed, I worked  
18 as a managing director in an investigative consulting firm  
19 called Kroll Associates. I was in the financial  
20 investigations group.

21 Q What did you do there?

22 A Corporate investigations. A lot of larcenies,  
23 embezzlements. We did a lot of work in the real estate  
24 industry, kickbacks, things like that.

25 Q How long did you work at Kroll for?



1 A Approximately seven and a half years.

2 Q What did you do before Kroll?

3 A Before that, I was with the New York State Attorney  
4 General's Office. I had spent seven and a half years there as  
5 well fighting Medicaid fraud.

6 Q Do you do any teaching as part I don't have work now?

7 A Yes.

8 Q What do you teach?

9 A I teach international money movements. I teach various  
10 prosecutors and agents how the U.S. financial system works,  
11 how money flows internationally and, you know, how if they're  
12 investigating these types of cases what they need to  
13 understand and how to subpoena information to get proper  
14 records to make their case go further.

15 Q Can you tell us a bit about your educational background?

16 A Yeah. I have a Bachelors of Accounting Degree from Long  
17 Island University in the Post Center which is in Long Island.  
18 I'm a Certified Public Accountant in New York State since  
19 1987. And I'm also a Certified Fraud Examiner.

20 Q What does it mean to be a certified fraud examiner?

21 A Well, a certified fraud examiner is somebody who can go  
22 through the books and records of an institution with the eye  
23 towards finding fraud and some sort of other malfeasance from  
24 the financial records.

25 So when you think about an accountant, CPA, they're

1 looking to certify that the financial statements as a whole in  
2 total are fair and accurate. You know that there's no  
3 material misstatement. But usually, when there's fraud or  
4 some other problem, it may not necessarily be material, it  
5 might be a smaller number, but it could be significant  
6 nonetheless.

7 So, you know, what you call forensic accountants or  
8 Certified Fraud Examiners, they typically try to find the  
9 fraud that are buried in financial statements.

10 Q Can you give an example of some of the investigations  
11 you've worked on at the New York Fed?

12 A Yeah. I worked on many different, probably about ten  
13 different major sanction investigation cases. Those are the  
14 cases where the U.S. Treasury has a unit called the Office of  
15 Foreign Asset Control and then they put restrictions against  
16 U.S. financial institutions dealing with either certain  
17 countries like Iran or Sudan, or it could be against  
18 individuals themselves -- drug kingpins or people who are  
19 linked to weapons of mass destruction programs, things like  
20 that.

21 So one the big cases that I was involved in for  
22 quite a while was the investigation against BNP Paribas which  
23 ended up settling in 2014. And this is a parallel  
24 investigation with the regulators like the Federal Reserve and  
25 New York State Department of Financial Services and the

1 prosecutors from the Manhattan District Attorney as well as  
2 the federal prosecutors that ended up with a total settlement  
3 of a little over about \$9 billion, with a B.

4           And it also caused a cease and desist action to the  
5 Federal Reserve as part of their actions. In addition to  
6 monetary settlements, they would also have enforcement actions  
7 against the institution to make sure that they upgrade their  
8 control structure.

9           So that was a typical scenario that the Federal  
10 Reserve does, and to enter a cease and desist and possibly a  
11 civil monetary penalty as well. I've been on other cases,  
12 public enforcement actions. The most recent was an AML  
13 enforcement action with against Deutsch Bank.

14 Q    Mr. O'Malley, have you been a part of the investigative  
15 team in this case or no?

16 A    No.

17 Q    Have you done any work as part of this case?

18 A    Part of my unit is an embedded group. We have an analyst  
19 that responds to legal process. So if the Federal Reserve  
20 Bank of New York gets a subpoena for wire transfer  
21 information, they will respond to that. They'll work with our  
22 wire area and search our system to find wire transfers that  
23 would be consistent with the request of the subpoena and then  
24 we respond to those. So my unit has been involved in  
25 responding to subpoenas for this particular case.

1 Q Aside from that subpoena processing role you described,  
2 have you otherwise participated in the investigation of this  
3 case?

4 A No. Other than being subpoenaed and participating in it  
5 as somebody getting ready to be a witness in this trial, no.

6 Q For instance, have you conducted any interviews as part  
7 of this case?

8 A I have not.

9 Q And during your experience that you just described, have  
10 you become familiar with the international banking system  
11 including how U.S. Dollars are transferred globally?

12 A Yes.

13 Q Have you ever testified before using your expertise in  
14 this field?

15 A Yes.

16 Q Approximately how many times?

17 A I would say at least a dozen times.

18 Q In what courts?

19 A Mostly in federal courts, but I have testified in state  
20 courts as well.

21 Q Have you ever been denied qualification as an expert  
22 witness?

23 A No.

24 MR. EDELMAN: Your Honor, at this time, the  
25 Government offers Mr. O'Malley as an expert witness in the

1 field of international banking system including how  
2 U.S. Dollars are transferred globally.

3 THE COURT: Any objection or voir dire?

4 MR. PAPALARDO: Maybe a quick voir dire.

5 Your Honor, in the interest of time, I have no  
6 objection.

7 THE COURT: Okay. No objection from Mr. Napout's  
8 counsel.

9 MR. MITCHELL: No.

10 MR. STILLMAN: No, your Honor.

11 THE COURT: I am going to qualify you in the areas  
12 of international banking.

13 MR. EDELMAN: International banking system including  
14 how U.S. Dollars are transferred globally.

15 THE COURT: Okay. You are so qualified.

16 THE WITNESS: Thank you.

17 EXAMINATION BY

18 MR. EDELMAN:

19 (Continuing.)

20 Q Mr. O'Malley, you mentioned you work at the New York  
21 Federal Reserve.

22 Can you briefly describe what that entity does?

23 A Yes. The Federal Reserve System is itself the Federal  
24 Reserve is the central bank of the United States. So there's  
25 the Board of Governors, the main body which is located in

1 Washington, and then there are 12 Federal Reserve Banks that  
2 are located throughout the country.

3 The New York Fed is the largest of the Federal  
4 Reserve banks, and we are responsible for many particular  
5 actions in the Federal Reserve system.

6 So one of the actions that we just briefly discussed  
7 was the Fed Wire Funds Transfer System, the Federal Reserve  
8 Bank of New York is responsible, is the responsible reserve  
9 bank for Fed Wires. So if even if there's a wire transfer out  
10 of the Kansas City Fed or the San Francisco Fed, it will be  
11 processed through the same system. So we are basically the  
12 point of contact for law enforcement to send all requests for  
13 information through the New York Fed.

14 Q You mentioned the Fed Wire Funds Transfer System. Is  
15 that the right title?

16 A Yes.

17 Q Can you describe what that service is?

18 A Yeah, basically, any -- so one of the things -- so you  
19 asked me what the Federal Reserve does. They do many  
20 different things. Most people think about the Federal Reserve  
21 and they think about monetary policy because the Federal  
22 Reserve does execute monetary policy which raises and lowers  
23 the interest rate.

24 The New York Federal Reserve is the only reserve  
25 bank that has a Markets Group which actually buys and sells

1 treasury securities and other types of securities which helps  
2 execute the monetary policy. That's another reason why the  
3 New York Reserve Bank is considered the largest and probably  
4 the most influential reserve bank. The president of the  
5 New York Fed is a standing member of the FOMC which is the  
6 interest rate setting committee. So the New York Fed is  
7 always part of the interest rate setting process.

8 In addition to executing monetary policy, I  
9 mentioned earlier that we supervise banks. So the Federal  
10 Reserve is a supervisor of banks as well and depending on  
11 their charter and depending on their legal structure, we will  
12 be the regulator even in a direct capacity or sometimes in a  
13 holding company level.

14 Another thing that the Federal Reserve does is  
15 disburses currency. So when the U.S. -- they're sending up  
16 bank notes, every bank will actually get it from the Federal  
17 Reserve, so we are the bank for banks. And every bank in the  
18 United States they have the ability to get what's known as a  
19 Master Account. So they'll get it. If you think about on  
20 everyone's check there will be what is known as an ABA routing  
21 number. That routing number, right, that routing number is  
22 A-9-digit series of numbers. That's effectively their bank  
23 account number at the Federal Reserve.

24 So when they're going to move money in and out, or  
25 their customers are moving money, their accounts, if it's

1 coming out of their account, it gets debited; or if money is  
2 going into the accounts, it gets credited.

3 So the Federal Reserve has many different payment  
4 systems, so it's like the plumbing infrastructure of the  
5 payment system is provided by the Federal Reserve system.  
6 Fed Wire is the wire transfer service for that, you know, is  
7 the plumbing for the wire transfer service.

8 There's other types of clearing and payment  
9 mechanisms that the Federal Reserve executes as well.

10 One is known as Automated Clearing House or Fed ACH.  
11 If any of you get paychecks, you know, in the old days, I used  
12 to have to go to my bank to cash my check. Now, it goes in  
13 direct deposit right into my account. Well, the Federal  
14 Reserve ACH will allow -- that's the mechanism that they can  
15 use to execute ACH transfers, or if you're going to pay your  
16 ConEd bill or something like that, that all goes by ACH.

17 And checks, if you go by check clearing, the Federal  
18 Reserve has a service to allow banks to clear checks with each  
19 other. So the Fed provides all those types of clearing for  
20 the banks themselves.

21 Q And is one of those services that the Federal Reserve  
22 provides that Fed Wire Funds Transfer Service?

23 A Yes, it is.

24 Q Can you explain that service?

25 A Yes. As long as you have what's known as a Master



1 Account, which means the banks register with the Federal  
2 Reserve their routing number goes in and they have an account  
3 established at one of the Federal Reserve banks. And then  
4 they have the ability to execute transactions via the Fed Wire  
5 System which is really the ability to move wire transfers.

6           When you think about wire transfers, I mentioned ACH  
7 before. ACH is generally a free service and it might, if  
8 you've ever paid a bill electronically, usually they'll take  
9 the money out of your account right away but your vendor, your  
10 ConEd or whoever it is, might not be paid for another day or  
11 two.

12           Wire transfers are different. Wire transfers are  
13 generally immediate settlement. Usually, unless a wire  
14 transfer doesn't go through for some reason, it'll be done in  
15 about a second. And generally, banks charge a significant  
16 fee, could be \$35, \$60. Some sort of a fee that the banks  
17 will charge to execute that.

18           And there's also legal differences because wire  
19 transfers are, once you wire, you send a wire transfer it has  
20 a different legal equivalent than an ACH. An ACH, you can  
21 request the money back and you have certain rights and  
22 responsibilities as a consumer.

23           With a wire transfer once you send it, it's gone.  
24 Hopefully, you can get it back, but legally it's gone what you  
25 send.

1 Q Okay. So can you talk about the different steps involved  
2 in a wire transfer?

3 A Yes. So, generally, there's going to be one party is  
4 going to be the originator and the other party is going to be  
5 a beneficiary. And to be able to have the originator send  
6 money to the beneficiary, usually, they're going to be in  
7 different financial institutions. If they are in the same  
8 financial institution, it will be very easy.

9 But say it was a JPMorgan Chase. If the prosecutor,  
10 you and I, have both had accounts and I was going to send you  
11 money and we were both at JPMorgan Chase, once I requested the  
12 wire transfer to be executed they do what's known as a "book  
13 transfer." They could debit my account, take money out of my  
14 account, and then credit your account and then therefore  
15 putting money into your account and they wouldn't need any  
16 other service. They wouldn't need Fed Wire because they could  
17 do it on their own books and records as a book transfer.

18 But in most cases they don't have, you know, two  
19 people are not banking at the same bank. So then they're  
20 going to need to have an intermediary to execute the wire  
21 transactions so their bank will request that funds be moved on  
22 their behalf. So if they're part of the Fed Wire System, and  
23 they decide to execute it via the Fed Wire System, then there  
24 will be that bank will go on to their Fed Wire terminal,  
25 they'll request a wire transfer to be executed, they'll give

1 the Federal Reserve all the information and they'll he say who  
2 the customer is and their account number and their address and  
3 is stuff like that. And the Federal Reserve will say, okay,  
4 we're going to take money out of that account, we'll debit  
5 that account, the ABA routing number. We're going to credit  
6 the ABA routing number of the beneficiary and we'll provide an  
7 advice of credit. So that advice of credit will be  
8 notification to the receiving bank that the funds have been  
9 received and it's been to pay to credit the account of a  
10 particular beneficiary.

11 So that's typically the way a wire transfer would  
12 work. It can get more complicated from there but that's  
13 certainly a domestic wire transfer. That's generally how it  
14 works.

15 Q Mr. O'Malley, have you here the term called a  
16 correspondent bank?

17 A Yes.

18 Q What does that mean?

19 A So I think I mentioned before to participate in the  
20 Fed Wire System you need to have the Master Account. The  
21 Federal Reserve will not give a Master Account to a foreign  
22 financial institution.

23 So if you're a domestic bank or a credit union, as  
24 long as you're a depository institution you can get an account  
25 at the are Federal Reserve. They will net give accounts to

1 broker-dealers or stock brokers and things like that. But if  
2 you're taking deposits, you can get that account. If you  
3 don't have a deposit taking ability, the Federal Reserve won't  
4 give you have the account and, therefore, you'll have to  
5 execute a wire transfer, if you want to do it on behalf of  
6 your customers, you're going to have to find a bank will that  
7 will do it on your behalf. And that relationship of one bank  
8 providing banking services to another bank known as  
9 correspondent banking.

10 Q Now, in the steps of a wire transfer, how do banks  
11 communicate amongst one another?

12 A Well, if it's be a domestic wire transfer, that  
13 communication will just be just through the Fed Wire System,  
14 right? So there will be the first wire transfer request into  
15 the Federal Reserve, Federal Reserve debits and credits, and  
16 then there's the advice of credit out so that's all within the  
17 Fed Wire System.

18 But in an international wire transfer situation,  
19 where a foreign bank wants to execute a U.S. dollar wire  
20 transfer, they do not have the ability to have an account  
21 directly with the Federal Reserve, so they have to find a  
22 U.S. bank to process that transaction. When they do,  
23 typically, they will send what's known as a Swift message to  
24 their U.S. correspondent requesting that a wire transfer be  
25 executed on their behalf or the behalf of their particular

1 customer.

2           The Swift messages is basically the secure standard  
3 messaging system that banks talk to each other throughout the  
4 globe and execute financial transactions.

5           If I could? So then the next step would be that  
6 bank deciding how they want to execute that wire transfer,  
7 right? We talked earlier that they can do it if they have the  
8 beneficiary, they could do it on a book transfer. But most  
9 likely, they're going to use another service because they're  
10 going to send it to another financial institution and then  
11 they would need the Fed Wire System to execute that wire  
12 transfer service.

13           There's also a competing wire transfer service that  
14 competes with Fed Wire. It's also known as an as CHIPS  
15 Clearinghouse Interbank System. So I'm going to keep most of  
16 my discussions to the Fed Wire System because that's the  
17 system that we operate, but I just wanted to make it clear  
18 that there were other ways to execute the transaction other  
19 than Fed Wire.

20           (Continued on the next page.)

21

22

23

24

25

1 BY MR. EDELMAN:

2 Q Okay. For all the wire transfers that are cleared  
3 through the Fed wire system, in what country are they  
4 cleared through?

5 A In the United States.

6 Q What about for chips, if you know?

7 A My understanding it's also the United States.

8 Q Can you give me an estimate as to the volume of  
9 transfers that the Fed wire service processes per day?

10 A We average about a half a million dollars -- a half a  
11 million transactions per day.

12 Q And in terms of amounts of dollars, what's the volume  
13 per day, approximately?

14 A Approximately \$3 trillion a day, so it's quite a lot of  
15 money going there.

16 Q Now, are there any instances in which U.S. dollar  
17 transfers are not routed through the United States?

18 A It could have.

19 Q How so?

20 A Well, there is a another system that operates in Hong  
21 Kong, known as CHAPS, C-H-A-P-S. That's another  
22 clearinghouse that's executed by the Hong Kong Monetary  
23 Authority. So if you had accounts, most of that activity is  
24 activity that occurs in Asia. But, you know, in theory --  
25 well, not in theory, it's every day U.S. dollars are

1 transacted or executed on the chaps system. That are not  
2 routed through the United States, so that would be separate.

3 Q How prevalent are the other the systems like chaps or  
4 the systems that are not routed through the United States  
5 compared to fed wire chips?

6 A Well, fed wire chips have the vast majority of the  
7 transactions, and that also lumps in U.S. financial  
8 institutions that specialize in corresponding banking in the  
9 United States that are executed book transfers. So that's  
10 also a huge volume. So chaps and other methods who hale in  
11 comparison to those three methods that are executed in the  
12 United States.

13 MR. EDELMAN: Your Honor, may I approach the  
14 witness?

15 THE COURT: Yes.

16 MR. EDELMAN: Thank you.

17 Q Mr. O'Malley, I'm going to show you  
18 Government's Exhibit 16 --

19 MR. EDELMAN: Which I'm showing the defense for  
20 identification.

21 Q -- do you recognize this, Mr. O'Malley?

22 A Yes, I do.

23 Q What is that?

24 A That's a diagram as to generally how wire transfers  
25 work in -- there's two way that they talk about it. But

1 generally this is a foreign originator with a foreign  
2 financial institution who want to execute U.S. dollars to a  
3 beneficiary who also, you know, has an account at a  
4 different foreign financial institution.

5 Q And does Government's Exhibit 1605 fairly and  
6 accurately portray the testimony you gave as it relates to a  
7 foreign to foreign wire transfer?

8 A Yes, it does.

9 MR. EDELMAN: Your Honor, the Government offers  
10 1605.

11 THE COURT: Any objection?

12 MS. PINERA-VAZQUEZ: None --

13 MR. PAPPALARDO: None, your Honor.

14 MS. PINERA-VAZQUEZ: Oh, sorry.

15 THE COURT: Very boisterously none from them.  
16 Yes?

17 MR. UDOLF: None.

18 THE COURT: Okay.

19 MR. STILLMAN: None.

20 THE COURT: All right. 1605 is admitted.

21 (Government's Exhibit Number 1605 so marked and  
22 received in evidence.)

23 MR. EDELMAN: And may I publish, your Honor?

24 THE COURT: Yes.

25 One thing, too, Mr. Edelman. Next time you show



1 it to the witness you might want to, at the risk of being  
2 rude to the jury, give them your back a little bit more --

3 MR. EDELMAN: Oh, yes.

4 THE COURT: -- because we have a couple people  
5 sitting lower down.

6 MR. EDELMAN: All right, your Honor.

7 THE COURT: All right.

8 Q Okay. Now, Mr. O'Malley, can you see that from over  
9 there?

10 A Yes. Yes.

11 Q And can you explain what we see in this chart?

12 A Yes. So what we just described is how an originator  
13 overseas would like to send money to the U.S. dollar payment  
14 to a beneficiary overseas, so that would be -- the intent is  
15 the dotted line from the originator to the beneficiary.

16 Q This line on the bottom?

17 A Correct.

18 Q Okay. So then the other arrows that we see going  
19 around the board, what is the represented here?

20 A That would be the payment requests itself going through  
21 the -- this U.S. -- well, going through the financials.

22 Q So, for instance, in this first arrow from originator  
23 to the icon that's indicated originator bank foreign, what  
24 does that step?

25 A That's the step in which the originator would

1 communicate with his or her financial institution and  
2 explain that he or she would like to execute a wire transfer  
3 on her behalf, and that they would like to send it to a  
4 particular beneficiary on the other side of the diagram.

5 Q And what do we see in the next leg of the transaction  
6 on the left where it says instruction?

7 A Well, that foreign financial institution would not have  
8 an account, a direct account with fed wire, right, so they  
9 would typically have the correspondent banking relationship  
10 with the U.S. financial institution, so I think we described  
11 earlier that they would need to send an instruction to the  
12 U.S. correspondent that they would like to execute a wire  
13 transfer. That's typically done by this system.

14 Q And in the next leg we have the correspondent bank one  
15 to box that the Fed wire/chips USA. What is in this?

16 A That is the -- the request from the correspondent bank.  
17 That's the originating bank. They're asking you to fed wire  
18 or chips, depending on how they want to execute this wire  
19 transfer. They're asking them to make -- to make this  
20 payment on their behalf to the second correspondent bank in  
21 the United States, which is located on the right side of the  
22 diagram.

23 Q And underneath the green box we see clearing settlement  
24 for fed wire chips. What does that mean?

25 A Well, that means both of those financial institutions

1 would have an account within the Fed wire or the chip  
2 system, and so they would be -- if -- if the wire transfer  
3 requests is accepted for settlement, then in the case with  
4 fed wire we would debit correspondent Bank Number 1,  
5 correspondent Bank Number 2 and credit the funds into the  
6 account of correspondent Banking Number 2, from 1 to 2. And  
7 then we would give the advice of credit that I discussed.  
8 That advice of credit tells Correspondent Bank Number Two  
9 that that payment has been received on behalf of the foreign  
10 beneficiary bank on the right, and for the final credit to  
11 the ultimate beneficiary, which is the last box on the  
12 right.

13 Q So in other words, this is kind of a chain of events in  
14 a wire transfer from someone outside of the United States to  
15 also someone outside of the United States?

16 A That is correct.

17 Q Now, this dotted line here, for all the activity within  
18 this dotted line, in what country does that activity take  
19 place?

20 A The dotted line on the upper half of the diagram, that  
21 all occurs in the United States.

22 Q Now, Mr. O'Malley, what if correspondent Bank One, say,  
23 would have a relationship with this fiduciary bank, what  
24 could happen in that circumstance?

25 A Well, if -- they wouldn't need the green box. They

1 wouldn't need fed wire or chips to execute the wire  
2 transfer. So as we described earlier, they could have  
3 debited the originating bank accounts on their books and  
4 records in the United States, and they could credit the  
5 beneficiary bank, which would be another account that they  
6 have on their ledger in the United States. And then they  
7 would, in addition to crediting it, they would also provide  
8 the information explaining whose account to credit once they  
9 receive those funds.

10 Q So in other words, there could be, in essence, another  
11 arrow from Correspondent Bank Number one to beneficiary  
12 bank; is that correct?

13 A Yes. And that would be a book transfer.

14 Q And for that example, would that still clear through  
15 the United States?

16 A In this diagram where the correspondent account is  
17 located in the United States, yes, it would clear through  
18 the United States.

19 Q Mr. O'Malley, you mentioned that one of your duties at  
20 the Federal Reserve Bank of New York is to help produce  
21 records pursuant to *subpoenas*; is that right?

22 A That's correct. My -- my unit is responsible for that,  
23 yes.

24 Q And has your unit produced records in response to a  
25 request by the Government in this case?

1 A Yes.

2 Q Now, the information relating to wire transfers that  
3 are cleared through the Fed wire system, is that information  
4 maintained in the course of a regularly conducted activity  
5 of a business?

6 A Of a business of the Federal Reserve, yeah.

7 Q And is saving the information relating to those wire  
8 transfers a regular practice of that activity?

9 A Yes, it is.

10 Q And the information relating to those wire transfers  
11 that are processed through fed wire, is that information  
12 saved by the Federal Reserve Bank of New York at or near the  
13 time of the event that are reflected in the wire transfers  
14 themselves?

15 A Yes, it is.

16 Q And is that information maintained in the custody of  
17 the Federal Reserve Bank of New York?

18 A Yes, in the responsible reserve bank, yes.

19 MR. EDELMAN: Your Honor, could I have the Elmo  
20 for just the witness, please?

21 THE COURT: Yes.

22 Do you see something on your screen yet,  
23 Mr. O'Malley?

24 THE WITNESS: Now I do.

25 THE COURT: All right. Perfect.

1 Q Mr. O'Malley, I am showing you what has been marked for  
2 identification as Government's Exhibit 505 -- excuse me,  
3 525-B to 525-J. Do you recognize this CD?

4 A Yes, I do.

5 Q And how do you recognize it?

6 A It's a CD that your office provided to me so that I  
7 could go back and look at the wire transfers to make sure  
8 that each of the wire transfers on the disk were consistent  
9 with the records that we provided to you in response to the  
10 *subpoena*.

11 Q And have you reviewed the contents of this CD prior to  
12 your testimony today?

13 A Yes.

14 Q And is the contained extractions of certain wire  
15 transfer records that were requested by the Government in  
16 this case?

17 A Yes.

18 MR. EDELMAN: Your Honor, the Government offers  
19 525-B to 525-J.

20 THE COURT: Any objection.

21 MR. PAPPALARDO: None, your Honor.

22 MR. UDOLF: None.

23 MR. STILLMAN: None.

24 THE COURT: Okay. 525-B through 525-J are  
25 admitted.

1 (Government's Exhibit Numbers 525-B, 525-C, 525-D,  
2 525-E, 525-F, 525-G, 525-H, 525-I, and 525-J so marked and  
3 received in evidence.)

4 MR. EDELMAN: Thank you, your Honor.

5 THE COURT: Do you want to publish them or --

6 MR. EDELMAN: Not right this second.

7 THE COURT: Okay.

8 Q Mr. O'Malley, approximately how many wire transfers are  
9 on this CD?

10 A I believe it's close to 900, but between 8 and 900.

11 Q And sitting here today, do you recall what entity those  
12 wire transfers relate to or no?

13 A A couple, but I probably need to refresh my  
14 recollection for all of these.

15 Q If I were to show you a letter that was provided by the  
16 Federal Reserve Bank of New York, would that help refresh  
17 your recollection as to that?

18 A Yes, it would.

19 MR. EDELMAN: May I publish for the witness, your  
20 Honor?

21 THE COURT: Yes.

22 Q Just for the record, I am showing you a document that  
23 ends in Bates Number 93117. Can you take a look at this  
24 document?

25 A Yes.

1 Q And having looked at this document, does that refresh  
2 your recollection as to the entities for whom wire transfers  
3 were pulled and are contained on 525-B to 525-J?

4 A Yes, it does.

5 Q And can you tell us what those entities are?

6 A Yes. Bayan Group; Cross Trading; FPT Sports; Full Play  
7 Group; ARCO Business & Development; Datisa, like capital D;  
8 T & T Sports Marketing, Expertise Travel, and  
9 Support Travel.

10 Q Just to be clear, Mr. O'Malley, do you have any idea  
11 what those entities are?

12 A I'm not sure exactly what they are.

13 Q All right.

14 Okay. Now, of those wire transfers that are on  
15 the CD, how many have been cleared through the  
16 United States?

17 A Every one of them.

18 Q All right. I just want to walk through a couple  
19 transaction with you.

20 MR. EDELMAN: If we can switch over to the laptop  
21 and I will publish Government's Exhibit 513 -- excuse me  
22 525-C, starting at Page 5 to 6.

23 THE COURT: Your laptop?

24 MR. EDELMAN: Yes, please.

25 THE COURT: Oh, I'm sorry.



1           Go ahead.

2   Q     And I'm showing you one of the wire transfers from this  
3   CD, and I will see if I can zoom in.

4           But can you see that in front of you?

5   A     I cannot read it right now, no. There's a number close  
6   to the top?

7           MR. EDELMAN: My laptop's not working.

8           THE COURT: There you go.

9           MR. EDELMAN: All right. I think this will work.

10          (Pause in proceedings.)

11          MR. EDELMAN: Actually, you know what? Your  
12   Honor, can I switch back to the Elmo for one minute?

13          THE COURT: Yes.

14          MR. EDELMAN: Thank you.

15          THE COURT: It looks like your paralegal was  
16   saving you on this one, so she gave you a hard copy.

17          MR. EDELMAN: That's all right.

18   Q     Mr. O'Malley, I'm going to show you now what is already  
19   in evidence as Government's Exhibit 513F, Page 8, and I will  
20   start with the foreign-language version. And if anything  
21   becomes clear, just let me know, and I can switch to the  
22   translation.

23           Just first, take a look at this document. What is  
24   this type of document?

25   A     When we talked earlier about how banks securely send

1 messages to each other, that's done via the Swift system.  
2 This is a Swift message, a 103 type message. Swifts does  
3 all sorts of messages depending on what type of activity you  
4 want to do. Generally the 100 and 200 Series Swift messages  
5 are payment messages. So this is one of the 100 Series, so  
6 this is a payment message asking for payment to be executed.

7 Q And if we take a look at entry sender and receiver,  
8 what do we see here?

9 A Well, this is -- the sender is Julius Baer in Zurich,  
10 Switzerland; and they're sending it to Andorra Banc Agricol  
11 in Andorra, which is a small country in Europe. And so this  
12 is basically telling the Banc of Andorra that they are  
13 attempting to execute a wire transfer on behalf of -- on  
14 behalf of their client for -- that will -- that will  
15 implicate one of their customers.

16 Q Okay. So looking down, does this indicate what the  
17 date of the transfer is underneath 32A?

18 A Yes. That's the -- the date is -- it looks like  
19 July 5th to me of 2013, and the currency is U.S. dollars and  
20 the value is \$3 million.

21 Q And then in the Section 50K, can you see FPT Sports,  
22 what is reflected here?

23 A So 50K is the area on this message where it represents  
24 the originator. So in this case, FPT Sports from -- in  
25 Uruguay is the originating client on this document. And if

1 you look at CH number on the top, that's what's known as an  
2 IBAN, an international bank account number. So that is --  
3 is their number in Switzerland with Julius Baer.

4 Q And then looking at 53A, we have JPMorgan Chase Bank,  
5 New York, New York; 54-A Wells Fargo Bank, New York,  
6 New York. What are these banks?

7 A Those are the two U.S. correspondents in the  
8 transaction. So if we look at the diagram, JPMorgan Chase  
9 is going to be Correspondent Bank Number One and Wells Fargo  
10 would be Correspondent Bank Number Two.

11 Q Looking further down Government's Exhibit 513F at  
12 Page 8, you then see Number 59. There are some number that  
13 begin AD.

14 A Uh-huh.

15 Q And then an entry under here. What does this mean?

16 A So Field 59 is the beneficiary field. So if -- and so  
17 the ultimate beneficiary to this transaction is in Field 59,  
18 which is Support Travel, Inc.; and that AD Number, AD 82  
19 with that long string of numbers, that again is their IBAN,  
20 or their international bank account number, and that would  
21 be the account number for Support Travel at the bank in  
22 Andorra.

23 Q And I'm going show you the hard copy of  
24 Government's Exhibit 525-C at Page 5.

25 What are we looking at here?

1 A This is another transaction. Before we were looking at  
2 a Swiss message, right? And that Swift message, I think we  
3 described it earlier, but just to make it clear, that is a  
4 request to execute a wire transfer. The actual wire  
5 transfer is not executed until we debiting and crediting  
6 either the chips debit wire system or in a book transfer,  
7 right? That's what actually moves the money, that debiting  
8 and crediting.

9 So here what we are looking at is a wire transfer  
10 that the Federal Reserve did execute a debiting and  
11 crediting transaction on behalf of the Bayan Group.

12 Q Okay. Is this a different transaction than the  
13 document that we were just looking at?

14 A Yes. It's a totally different transaction, yes. And  
15 this is a fed wire document.

16 Q And can you tell us what the date of the wire transfer  
17 is?

18 A Yeah. April 16th, 2014. And you can see that date at  
19 the top, but it's also embedded in the 1520, which is behind  
20 that first character. This is 2014, and then it's  
21 April 16th.

22 Q Going down to the originator. What is reflected here?

23 A The originator is Bayan Group, USA with a Panama --  
24 with an address in Panama. If you look, the first string of  
25 numbers, at D, designates the depository account. And then

1 that CH number, CH1908 and then it keeps going, that, again,  
2 is the international bank account number for the Bayan Group  
3 at their financial instruction. Their financial institution  
4 is located in Field 5100, which is the originator FI, or  
5 originator financial institution. And that string of  
6 alphanumeric -- well, it's actual just alpha characters  
7 there, is the Swift code for Banco Hapoalim in Switzerland.  
8 And there's a reply.

9 Q Okay. So who's --

10 A So -- so --

11 Q So who is Bayan Group's bank?

12 A Bayan Group's bank Hapoalim in Switzerland. So this  
13 account is for an account at Hapoalim in Zurich,  
14 Switzerland.

15 Q And how much is this wire transfer for, looking up to  
16 the top where it says Amounts?

17 A Yeah. It looks like it's 180,000 less \$35,000.

18 Q And who is the ultimate beneficiary of this wire  
19 transfer?

20 A And that's located at Field 4200, José Luis Chiriboga.

21 Q Now, does this transfer -- at the top we have sender  
22 DI, CitiBank, NA; receiver's DI, a string of numbers and  
23 letters. What's reflected here?

24 A So we described earlier that Correspondent Bank Number  
25 One and Correspondent Bank Number Two that -- on the top,

1 those are the customers of the Fed wire system. So the  
2 sender DI is the one that's asking the Fed to move the  
3 money, in this case it's CitiBank. And the receiver DI is  
4 where the Fed is going to credit that account to. And that  
5 string of numbers, as I described earlier would be ABA  
6 routing number, so that their account number at the Fed.  
7 And this is Independent Bankers Bank located in Florida,  
8 that's their ABA routing number.

9 Q And then the next step in the chain, what is the  
10 beneficiary?

11 A Yeah. So in this instance, we talked about how foreign  
12 banks needed to have corresponding banking relationship. A  
13 lot of times, smaller banks also, they don't have the back  
14 office infrastructure to execute financial transactions, so  
15 they find it easier to -- to enter through correspondent  
16 banking relationships with a bigger U.S. institution. So in  
17 this case many small banks use bankers banks or bigger banks  
18 to clear transactions for them.

19 So in this case, the beneficiary's financial  
20 institution is actually Biscayne Bank in Florida, but  
21 Biscayne Bank -- you can see the F and then the 066, they --  
22 they -- that's their ABA routing number. So they could HAVE  
23 actually been the direct beneficiary on this, but they were  
24 not in this transaction. In this transaction there was  
25 another layer and the Federal Reserve actually credited the

1 account of Independent Bankers Bank who then had to further  
2 credit to Biscayne Bank who is their customer, and then  
3 Biscayne Bank's customer, who is the ultimate beneficiary,  
4 is located in Field 4200. Right.

5 Q And that's José Luis Chiriboga?

6 A Yes.

7 MR. EDELMAN: I have no further question.

8 THE COURT: All right. Thank you very much,  
9 Mr. Edelman.

10 Any cross-examination?

11 MR. PAPPALARDO: Yes, your Honor.

12 THE COURT: All right. Do you want any exhibits  
13 up on the screen?

14 MR. PAPPALARDO: No, thank you, your Honor.

15 CROSS-EXAMINATION

16 BY MR. PAPPALARDO:

17 Q Good afternoon, Mr. O'Malley.

18 A Good afternoon.

19 Q Sir, as Vice President and Chief Investigator of the  
20 Financial Intelligence and Investigation's Unit within the  
21 Enforcement Division of the Federal Reserve Bank  
22 of New York, much of your time is spent investigating  
23 activity like high-yield investment schemes that are brought  
24 to your attention by investors who lost money or banks who  
25 detect irregular activity; isn't that true?

1 A Usually those are brought to me by prosecutors, but...

2 Q Well, you have complaints directly by investors who  
3 lose money or banks who detect irregular activity, correct?

4 A There's a lot of financial schemes that impact  
5 individuals, so we -- we have a fraudulent scam section on  
6 the New York Fed's website, and, yes, we have a report fraud  
7 location, so one of my investigators will respond to the  
8 public when they have a problem like that, yes.

9 Q And in this case, in this case you were brought into  
10 this case by the receipt of a *subpoena* from the  
11 Federal Government?

12 A That's correct.

13 Q Now, you're a member of the American Institute of CPAs?

14 A The New York State Society of CPAs.

15 Q And you're a -- you testified on direct examination  
16 you're a Certified Fraud Examiner?

17 A Yes.

18 Q And isn't it true, sir, that a Certified Fraud Examiner  
19 looks at books and records of a company or an individual and  
20 financial support or such as invoices for that information  
21 usually?

22 A Yes. If you are conducting an investigation --

23 Q Right.

24 A -- invoices are quite often are one of the documents  
25 you will be able to look at.



1 Q You look at financial information, and then based upon  
2 that financial information, you conduct interviews; isn't  
3 that right?

4 A So the type of investigation you're talking about with  
5 invoices and conducting interviews was very similar to the  
6 type I did -- the type of work I did before I came to the  
7 Fed Reserve which at my former employer, yes.

8 Q Did you conduct an independent review of the  
9 transactions in this case?

10 A I guess I need you to define "independent."

11 Q Well, did you look at the -- did you look at the  
12 financial documents; did you look at the supporting  
13 documentation; did you base -- did you form some opinions  
14 and then conduct interviews?

15 A No, absolutely not. The only thing I did was look at  
16 wire transfers in this case.

17 Q Wire transfers that were the subject matter of the  
18 *subpoena* to you?

19 A Correct. That were processed through the Federal  
20 Reserve Bank of New York.

21 Q So to be clear --

22 A The Fed wire funds transfer system.

23 Q Right, right. And you testified about that?

24 A Yes.

25 Q So you never interviewed any individual?

1 A That is correct.

2 Q Are you familiar with Mr. Napout?

3 A I am not, sir.

4 Q Did you review any of his accounts?

5 A No.

6 Q Isn't it true that you have absolutely no information  
7 concerning any wire transfers to Mr. Napout or any account  
8 he has a direct or indirect control over?

9 A The answer is I've never conducted an investigation  
10 related to him. Whether one of these 8 to 900 wires has his  
11 name in one of these wires, it's possible, but I don't -- I  
12 don't know. I don't recall it offhand.

13 Q None were brought to your attention, right?

14 A Not that I can recall.

15 Q Did you prepare a report in connection with your  
16 efforts in this matter?

17 A I did not.

18 MR. PAPPALARDO: Thank you, Mr. O'Malley.

19 THE WITNESS: Thank you.

20 THE COURT: All right. Thank you, Mr. Pappalardo.  
21 Any questions from Mr. Marin's attorney?

22 MR. STILLMAN: None, your Honor.

23 THE COURT: Mr. Udolf?

24 MR. UDOLF: No questions.

25 THE COURT: All right. Thank you.

1 Redirect?

2 MR. EDELMAN: No, your Honor.

3 THE COURT: Thank you very much, Mr. O'Malley.

4 (Witness exits the witness stand.)

5 THE COURT: Okay. Looking at the Government, are  
6 we breaking a little earlier or are we going to --

7 MR. EDELMAN: I think we are, particularly in  
8 light of the upcoming holiday.

9 We can move -- we would like to move in some other  
10 bank records --

11 THE COURT: All right.

12 MR. EDELMAN: -- pursuant to either the  
13 certifications -- all pursuant to the certifications that  
14 are listed. I can go through the list of all of the  
15 exhibits, but it's all the remaining exhibits in the 500  
16 series.

17 THE COURT: Okay. Does everyone know what  
18 Mr. Edelman is referencing?

19 MS. PINERA-VAZQUEZ: Yes, your Honor.

20 THE COURT: Okay.

21 MS. PINERA-VAZQUEZ: We have no objection as long  
22 as the certificates go into the record.

23 THE COURT: Okay.

24 All right. Is there a range? You don't need to  
25 name every single one, but is there a contiguous range of

1 those documents.

2 MR. EDELMAN: It is not entirely contiguous.  
3 There are one or two numbers missing. It begins at -- I  
4 believe it's 500 even.

5 THE COURT: Okay.

6 MR. EDELMAN: And then the last one is 561 -- or  
7 excuse me, 562, including all the subexhibits in that range.

8 THE COURT: Okay. And are there any missing  
9 numbers in the 500 to 562?

10 MR. EDELMAN: There are a few missing numbers that  
11 I can identify.

12 THE COURT: Great. Why don't you tell us what  
13 those are?

14 MR. EDELMAN: Sure.

15 So 507 was actually previously admitted pursuant  
16 to a separate investigate -- separate testimony.

17 506 was previously admitted when Mr. Chiriboga was  
18 on the stand.

19 513 was just admitted with Mr. O'Malley on the  
20 stand.

21 There's no 518.

22 There's no 525. That was actually what was just  
23 admitted with Mr. O'Malley.

24 THE COURT: Okay. Give me a second.

25 MR. EDELMAN: There is no 540, five, four, zero.

1 THE COURT: All right.

2 MR. EDELMAN: And I believe that's it.

3 THE COURT: So is there any objection to the  
4 admission of all the exhibits, 500 to 560, except for those  
5 that were previously admitted, and also 518 and 540, for  
6 which I believe there are no exhibits?

7 MR. EDELMAN: I'm sorry, your Honor. I believe  
8 518 was actually admitted separately with Mr. Haggerty from  
9 Bank of America.

10 THE COURT: Okay. So I think 540 is the only one  
11 for which there is no exhibit; is that right?

12 MR. EDELMAN: I believe that is correct, your  
13 Honor.

14 THE COURT: Okay. Any objection to the admission  
15 of those records?

16 MS. PINERA-VAZQUEZ: No objection, your Honor.

17 MR. SPILLMAN: No objection, your Honor.

18 MR. UDOLF: No objection.

19 THE COURT: Okay. And I guess as long as  
20 the certification --

21 MS. PINERA-VAZQUEZ: The certification.

22 THE COURT: -- is admitted as well.

23 And that is what number, did you say?

24 MR. EDELMAN: For each number, the A Exhibit is  
25 the certification that is referenced for that account.

1 THE COURT: Okay. So we have a series of 500 to  
2 560 plus 500A to 560 with the exception of -- I'm sorry. I  
3 forgot now.

4 MS. PINERA-VAZQUEZ: 540.

5 THE COURT: -- 540?

6 MR. EDELMAN: I'm sorry. Just --

7 THE COURTROOM DEPUTY: 562, your Honor.

8 THE COURT: 552. What did I say -- oh, I'm sorry.  
9 To 562.

10 MR. EDELMAN: I'm sorry, your Honor, just to be  
11 clear.

12 THE COURT: Yes.

13 MR. EDELMAN: In each of these numbers, there are  
14 a multiple subexhibits, including A -- it goes B, C, and D.  
15 It varies a little bit account to account. But there are a  
16 number of subexhibit letters in each number.

17 THE COURT: Okay. Are the defendants aware of  
18 that?

19 MS. PINERA-VAZQUEZ: Yes, your Honor.

20 THE COURT: Okay. Any objection to admitting all  
21 of these exhibits and the subparts?

22 MS. PINERA-VAZQUEZ: Not on behalf of Mr. Napout,  
23 your Honor.

24 MR. STILLMAN: No, your Honor.

25 MR. UDOLF: No, your Honor.

1 THE COURT: Okay. Terrific. So those are all  
2 admitted.

3 (Government's Exhibit Numbers 500 through 505, 508  
4 through 512, 514 through 517, 519 through 524, 526 through  
5 539, and 541 through 562 with all associated subexhibits A,  
6 B, C and D, included so marked and received in evidence.)

7 MR. EDELMAN: Thank you, your Honor.

8 THE COURT: All right, ladies and gentlemen, with  
9 that, I am going to release you for the holiday. However,  
10 let me give was a slightly expanded version of my legal  
11 warning, because I know there will be festivities and  
12 potential crowds. So bear in mind what I said repeated, do  
13 not talk about this case at all. Do not even raise the  
14 topic. If anyone says what kind of case it is, say that you  
15 have been instructed not to even mention the topic.  
16 Because, unfortunately, I think if you do, and if you are in  
17 a group of people, especially with everyone having a very  
18 good time, people might be inclined to blurt out things to  
19 you, and you cannot, per my usual instruction, leave your  
20 own home, for example, or leave your family's home, so it  
21 will be harder for you to avoid the conversation. So just  
22 don't open that door to any conversation.

23 Do not mention what this case is about at all to  
24 anyone you are spending your time with now and Monday when  
25 we see you again. Do not do any research. Do not try to

1 look up anything at all. Keep an open mind. We have a long  
2 way to go and a lot more evidence to be heard. Do not give  
3 any thoughts to this whatsoever from now until Monday.

4 Have a good weekend, everyone. Enjoy the  
5 holidays. Happy Thanksgiving. Do not eat too much.

6 THE COURTROOM DEPUTY: All rise.

7 (Jury out exits the courtroom at 5:20.)

8 (The following matters occurred outside the  
9 presence of the jury.)

10 THE COURT: Please be seated everybody or if you  
11 want to leave now you can. So we done for the week but be  
12 back in on Monday.

13 Anything that we need to discuss before I let you  
14 all go? Any scheduling issues or anything like that?

15 The Government is prepared, obviously, to put on  
16 more witnesses. Do you have any sense of how many on Monday  
17 is likely?

18 MR. NITZE: We are still considering that. I  
19 actually want to sort of reassess the list in general.

20 THE COURT: Okay.

21 MR. NITZE: You know, we have sort of tried to  
22 keep our options open on our number, and so we are going to  
23 take a close look at that and we will be in touch with  
24 defense counsel for sure in the next day or so and give them  
25 an idea of who is coming up.



1 THE COURT: Okay. Good.

2 Anything that we need to address from the defense  
3 before we --

4 MS. PINERA-VAZQUEZ: One thing, your Honor. Just  
5 to confirm. We have got a witness list early on --

6 THE COURT: Right.

7 MS. PINERA-VAZQUEZ: -- not early on, but in the  
8 middle of the case, and I understand there are three names  
9 missing only, but we -- we would like to know when names are  
10 going to be forth coming?

11 THE COURT: Well, you are going to get them in  
12 advance of their testimony, but not more than a day or so in  
13 advance. So until you see them, you don't see team.

14 MR. NITZE: We submitted at the latest, and it may  
15 be before then, but no later than two days before the  
16 witness testifies will we be turning over the 3500 material.

17 THE COURT: Okay.

18 All right. Have a nice holiday everyone.

19 (Matter adjourned to Monday, November 27, 2017 at  
20 9:00 a.m.)

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