

1 IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
2 IN AND FOR PALM BEACH COUNTY, FLORIDA
3 CASE No.50-2015-CA-005885XXXXMB

4 NITV FEDERAL SERVICES, LLC
5 a Florida limited liability company

6 Plaintiff,

7 -vs-

8 ELWOOD GARY BAKER, an individual
9 d/b/a BAKER GROUP INTERNATIONAL
10 EXPERTOS VSA, INC., a Florida corporation,
11 and MICHAEL SAVAGE, an individual,

12 Defendants.

13 DEPOSITION OF MICHAEL SAVAGE
14 BY VIDEOTAPE

15 Wednesday, March 29, 2017
16 2:17 - 4:56 p.m.

17 2925 PGA Boulevard
18 Suite 204
19 Palm Beach Gardens, Florida 33410

20 Reported By:
21 Kathleen Szabo, RPR
22
23
24
25

U.S. LEGAL SUPPORT
(561) 835-0220

APPEARANCES:

On behalf of the Plaintiff:

ADVISOR LAW, PLLC
2925 PGA Boulevard
Suite 204
Palm Beach Gardens, Florida 33410
561.622.7788
jdloughy@advisorlaw.com
BY: JAMES D'LOUGHY, ESQUIRE

On behalf of the Plaintiffs:

ZAPPOLO FARWELL ATTORNEYS AT LAW
7108 Fairway Drive
Suite 150
Palm Beach Gardens, Florida 33418
szappolo@zappolarfarwell.com
BY: SCOTT W. ZAPPOLO, ESQUIRE
JEFFREY G. FARWELL, ESQUIRE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

- - -
I N D E X
- - -

WITNESS:	DIRECT	CROSS	REDIRECT	RECROSS
MICHAEL SAVAGE				
BY MR. D'LOUGHY	4			
BY MR. FARWELL		92		

- - -
E X H I B I T S
- - -

(ORIGINAL EXHIBITS RETAINED BY MR. D'LOUGHY)

NUMBER	DESCRIPTION	PAGE
PLAINTIFF'S EX. 1	BANK STATEMENTS	65
PLAINTIFF'S EX. 2	PASSPORT PAGES	89

P R O C E E D I N G S

- - -

Video deposition taken before Kathleen Szabo,
Registered Professional Reporter and Notary Public in
and for the State of Florida at Large, in the above
cause.

- - -

MR. ZAPPOLO: All right. We are on the
record in the case of NITV Federal Services,
Inc. versus Elwood Gary Baker, et cetera, Palm
Beach County Circuit Case Number
50-2015-CA-005885 MBAG. It is March 29th, 2017
at 2:17 p.m. This is the deposition of Michael
Savage and this is Scott Zappolo recording.

The court reporter will swear the witness.
Thereupon,

(MICHAEL SAVAGE)

having been first duly sworn or affirmed, was examined
and testified as follows:

THE WITNESS: I do.

DIRECT EXAMINATION

BY MR. D'LOUGHY:

Q. Mr. Savage, my name is James D'Loughy. You
have just previously sat through Mr. Baker's deposition
that preceded yours.

1 I'm going to ask you a series of questions.
2 You are now under oath subject to penalty of perjury.
3 If you don't tell the truth -- I represent NITV Federal
4 Services, LLC. I'm going to ask some questions. If you
5 know the answer to those questions, please give them to
6 me truthfully. If you don't know the answer, you're not
7 required to guess or give me any conjecture. Just tell
8 me you don't know and I'll move on.

9 If you need to use the men's room, please do
10 so. Tell me and we'll stop. Likewise, the court
11 reporter is picking up whatever you say. She's creating
12 a written record and she can only pick it up if you
13 audibly speak it, so please just speak loudly, clearly.
14 No shrugging. She won't be able to pick that up. You
15 know the rules. You just sat through the deposition.
16 If you have any questions, you can call me or let me
17 know and I'll take -- I will explain it to you.

18 So I am going to ask some questions. First
19 off, your full name and address?

20 A. Michael William Savage, 10560 Mendocino,
21 M-e-n-d-o-c-i-n-o, Lane, Boca Raton, Florida 33428.

22 Q. And how long have you lived at the Boca Raton
23 address?

24 A. Since about 1994.

25 Q. And isn't it true you also live in Guatemala?

1 A. Yes.

2 Q. And which address in Guatemala do you reside?

3 A. I don't know the street address. I know the
4 address of my office.

5 Q. What's the address of your office?

6 A. It's Fifth Avenue, 15-45 Zone 10, Guatemala
7 City, Guatemala.

8 Q. And how much time do you spend in Guatemala
9 versus in the United States?

10 A. I spend approximately -- well, approximately
11 11 months of the year I'm in Guatemala or traveling in
12 Central America.

13 Q. And you spend approximately one month in the
14 United States?

15 A. Approximately. Yes.

16 Q. Okay. Out of curiosity, how is it that you
17 don't know your address in Guatemala? Do they have no
18 addresses in Guatemala, your home address?

19 A. I just -- no, there is a home address. It's
20 3-28 something, but I don't remember the exact --

21 Q. Okay.

22 A. -- the exact street name.

23 Q. What is your highest level of education?

24 A. I have a master's degree in Latin American
25 studies and I took post graduate courses in education.

1 Q. And what is the, where -- what institution is
2 your degree in Latin American studies?

3 A. University of South Carolina.

4 Q. And you graduated with a master's there?

5 A. Correct.

6 Q. And the other degree that you possess?

7 A. Is a bachelor of arts from the Ohio State
8 University.

9 Q. Okay. And is it true that you have also been
10 a member of the U.S. Military?

11 A. Correct.

12 Q. And during which years were you in the
13 Military?

14 A. From 1971 until 1992.

15 Q. And is it true that you achieved the rank
16 lieutenant colonel?

17 A. Yes.

18 Q. In which branch?

19 A. United States Army.

20 Q. And where were you stationed last as
21 lieutenant colonel?

22 MR. ZAPPOLO: Objection. I just want to
23 make sure, nothing you have -- you don't have
24 to disclose anything that's classified or still
25 classified. I have no idea.

1 THE WITNESS: My last posting was in
2 Panama.

3 BY MR. D'LOUGHY:

4 Q. What year would that have been?

5 A. 1992.

6 Q. So from the time you graduated at the
7 University of South Carolina, which year was that?

8 A. 1980.

9 Q. And after you graduated the University of
10 South Carolina, what did you do for a living?

11 A. I was in the United States Army.

12 Q. And how long were you in the Army for?

13 A. Approximately 22 years.

14 Q. And that would bring you to 2002. Was that
15 when you --

16 A. No. From 1971 to 1992.

17 Q. All right. And then during 1992 you were
18 discharged?

19 A. Yes.

20 Q. And was it an honorable discharge?

21 A. Yes. I retired. Honorable discharge.

22 Q. And what did you do at that point in terms of
23 your career?

24 A. For about a year I looked for a job
25 unsuccessfully, and then I started exporting cars. I

1 was living in my parents' house who had both died in
2 Ohio. I moved to Florida and stopped exporting cars.
3 And found a job at Florida Atlantic University.

4 Q. And let me just take a step back.

5 What was your role in the United States Army
6 for the last few years of your commission?

7 A. I had sort of a dual career. I worked in Army
8 Special Operations with the 75th Ranger Regiment Ranger
9 Regiment. And then I was selected for a program called
10 Foreign Area Officer, and that program, the Army sends
11 you and pays for your master's degree and sends you to a
12 language school. And then designates an area of the
13 world. In my case, I was designated for Latin America.
14 And after I finished my training, I started deploying to
15 Latin America.

16 Q. Okay. And what was the chosen language that
17 you studied?

18 A. Spanish.

19 Q. And would you say you're proficient in
20 Spanish?

21 A. Yes.

22 Q. Do you read Spanish?

23 A. Yes.

24 Q. Do you write Spanish?

25 A. Yes.

1 Q. Do you have a full understanding of Spanish?

2 A. Yes.

3 Q. Do you speak Spanish nearly as well as you
4 speak English?

5 A. Yes.

6 Q. All right. And then you were -- I don't know
7 the proper terminology, but I will say decommissioned,
8 is that a -- is that a term that you use when you leave
9 the Army?

10 A. Retired.

11 Q. Retired.

12 And for the first year after 1992 you exported
13 cars?

14 A. Yes.

15 Q. And then what did you do?

16 A. Then I started teaching at Florida Atlantic
17 University.

18 Q. Okay. And what did you teach?

19 A. English as a second language and Spanish.

20 Q. And was that your full-time job at that point?

21 A. Full-time in the sense that -- that I was only
22 working four to six hours a day. I, at the same time,
23 established a company called Team Translations, and
24 working from my home, took on contract translations,
25 primary English to Spanish or Spanish to English.

1 Q. And tell me when you stopped teaching at
2 Florida Atlantic, which year.

3 A. I believe it was 1996.

4 Q. And then what did you do?

5 A. Then I was hired as a teacher for the Palm
6 Beach County School District to teach high school.

7 Q. And in the languages, language arts?

8 A. No. In social studies.

9 Q. Okay. And was that a full-time job at that
10 point?

11 A. Yes.

12 Q. And how long did you do that for?

13 A. Until I believe 2002.

14 Q. And are you an Army Ranger?

15 A. Yes. So they had a pretty tough teacher, I
16 would say.

17 Q. All right in 2002, what did you do for a job?

18 A. Well, if I can back up.

19 In the year 2000 I -- I was -- I had a sort of
20 a gap in 1997. I was contracted by a company called
21 Diogenes. They wanted me to translate their training
22 materials into Spanish and they said the way to begin
23 was to go to their course. So I went to their course
24 and that's where I learned about voice stress analysis.

25 Q. Okay.

1 A. And approximately 1998, I continued working
2 for Diogenes.

3 Q. And this was a part-time position while you
4 were a school teacher?

5 A. Yes. Initially, yes.

6 Q. And the business case for Diogenes was to do
7 what?

8 A. Well, initially I was going to translate their
9 materials, but then the owner of Diogenes contracted me
10 to set up a company for him.

11 Q. And what type of company?

12 A. A voice stress analysis.

13 Q. What was the name of the company, do you
14 recall?

15 A. Yes. Diogenes of Columbia.

16 Q. And he asked you to set it up inside the
17 country of Columbia?

18 A. Yes. In Bogota.

19 Q. And I'm just going to harken back to
20 Mr. Baker's deposition now. And Mr. Baker claimed he
21 met you while you worked with Diogenes. Is that true?

22 A. Yes.

23 Q. And in what respect did he meet you, at which
24 point when you were translating or when you were setting
25 up your Colombian enterprise?

1 A. When I -- initially when I attended the course
2 at -- to learn about voice stress analysis, and then
3 later he visited Columbia and I saw him when he visited
4 there.

5 Q. Do you know in which capacity he visited
6 Columbia?

7 A. He came down as an instructor.

8 Q. In what?

9 A. In the -- in voice stress analysis.

10 Q. And at that point that's when you met him in
11 the class or prior to him visiting Columbia?

12 A. No. I initially met him when I went for the
13 class and then --

14 Q. In the U.S.?

15 A. -- and then in the U.S., in Kissimmee.

16 Q. Okay.

17 A. And then he, as an instructor for Diogenes,
18 was sent down to Columbia.

19 Q. Okay. And then after you set up Diogenes of
20 Columbia, what year was that approximately?

21 A. That was from -- and I worked off and on, I
22 would travel there and return to Florida. From 1998
23 until the beginning of 2000.

24 Q. And then from there, what did you do with your
25 career?

1 A. In the year 2000 I established the company
2 Expertos VSA SA in Guatemala.

3 Q. What does Expertos mean?

4 A. Expert.

5 Q. In Spanish?

6 A. Yes.

7 Q. And VSA, what does that mean?

8 A. Voice stress analysis.

9 Q. And SA is the equivalent of Inc. or I-n-c?

10 A. Yes.

11 Q. And in 2000, I take it you were no longer
12 working for the Palm Beach County School Board?

13 A. I was on a leave of absence.

14 Q. Okay. And what does Expertos VSA do or what
15 did it do when you established it in 2000 at least?

16 A. Initially, and still, the primary work is to
17 conduct preemployment interviews using the voice stress
18 analysis system to verify the honesty of the applicant.

19 Q. And do you still do that today?

20 A. Yes.

21 Q. And do you do anything else than that with
22 respect to, you know, Expertos --

23 A. The company --

24 Q. If I may, I'm going to refer to it, the
25 Guatemalan company as Expertos SA and the American

1 company to -- as Expertos, Inc., if that --

2 A. Fine.

3 Q. And that will keep it separate for you.

4 Yes. The Expertos SA, other than
5 preemployment screening, what else do you do?

6 A. They do reevaluations, for example, we
7 evaluate Scott for preemployment and maybe six months
8 later the company wants to reevaluate him to ensure that
9 he is working honestly now that he's inside the company.
10 And we do those reevaluations.

11 Q. Okay.

12 A. We do a very limited number of investigations,
13 for example, the company will call and say, well, you
14 know, Scott had 10,000 quetzales and he only turned in
15 nine so there's a thousand quetzales missing, we want
16 you to interview him to see if he can explain where the
17 missing money is.

18 MR. ZAPPOLO: Spell quetzales for the
19 court reporter, please.

20 THE WITNESS: Q-u-e-t-z-a-l-e-s. That is
21 the national currency of Guatemala.

22 BY MR. D'LOUGHY:

23 Q. Learn something new every day. Had no idea.

24 So from 2000, take me year to year how you
25 developed the company. You were the founder of

1 Expertos?

2 A. Correct.

3 Q. First employee of Expertos?

4 A. Yes. But I also had two partners. The law
5 requires a minimum of two people.

6 Q. And they were both nationals of the country of
7 Guatemala?

8 A. No. One was a national of Guatemala. One was
9 Columbian.

10 Q. Can you give me both their names?

11 A. The Guatemalan, his name is Jorge, J-o-r-g-e,
12 Estrada, E-s-t-r-a-d-a.

13 Q. How long has he been with the company?

14 A. Since 2000.

15 Q. And what does he do for the company?

16 A. He is the general manager.

17 Q. And --

18 A. And legal representative.

19 Q. Is that his full-time job?

20 A. Yes.

21 Q. And the second person from Columbia?

22 A. Her name was Ivonne, I-v-o-n-n-e, Delgado,
23 D-e-l-g-a-d-o.

24 Q. And she has been with the company for how
25 long?

1 A. She stayed with the company for about three
2 years and then left.

3 Q. So from 2000 to 2003?

4 A. About, yes.

5 Q. And what was her position?

6 A. She was a voice stress analysis interviewer.

7 Q. All right. So let's -- 2005, is the company
8 still doing preemployment screening and secondary
9 screening of employees?

10 A. Yes.

11 Q. 2010, same thing?

12 A. Yes.

13 Q. 2015 same?

14 A. Same.

15 Q. And what type of software do you use in your
16 voice stress analysis of these employees or clients, so
17 to speak, to evaluate their truthfulness?

18 A. Now?

19 Q. Uh-huh.

20 A. A program called FVAS, Forensic Voice Analysis
21 System.

22 Q. And where did that program originate?

23 A. It is proprietary software that was developed
24 by a programmer in India.

25 Q. And the name of the programmer?

1 A. Fahaad. Fahaad.

2 Q. Spell it, please.

3 A. F-a-h-a-a-d, Sayeed, S-a-y-e-e-d, I believe.

4 Q. And is this the same Fahaad Sayeed that worked
5 for Mr. Baker?

6 A. Yes.

7 Q. This Mr. Sayeed, was he based in the U.S. when
8 he worked for Mr. Baker?

9 A. I don't know.

10 Q. Have you ever met him?

11 A. No. I've talked to him by telephone but never
12 met him face-to-face.

13 Q. And when did he develop the FVAS for you or
14 for Expertos?

15 A. Approximately 2008.

16 Q. And prior to 2008, what type of program were
17 you using?

18 A. Diogenes Lantern.

19 Q. Diogenes Lantern, like the light?

20 A. Yes.

21 Q. And the FVAS, is that used exclusively by
22 Expertos SA?

23 A. No.

24 Q. And it's used by who else, do you know?

25 MR. ZAPPOLO: Objection to the extent that

1 it calls for confidential trade secret customer
2 list.

3 BY MR. D'LOUGHY:

4 Q. Do you sell it to people?

5 A. I license it to people. I do not sell it.
6 It's licensed for a specific period of time.

7 Q. Do you license it for a licensing fee?

8 A. Yes.

9 Q. Approximately how much?

10 MR. ZAPPOLO: Object to form.
11 Proprietary.

12 BY MR. D'LOUGHY:

13 Q. Not customers --

14 MR. ZAPPOLO: Is that something that your
15 company keeps confidential?

16 THE WITNESS: Yes.

17 BY MR. D'LOUGHY:

18 Q. So it's not on your website or in your --

19 A. I have a standard fee. Yeah. I'm sorry.

20 MR. ZAPPOLO: And that's public.

21 THE WITNESS: I send it out as if you
22 e-mail me I will send you the cost of it. Yes.
23 It is not listed on my website. No.

24 MR. D'LOUGHY: I'm not going to push the
25 point.

1 MR. ZAPPOLO: All right. We'll move on.

2 BY MR. D'LOUGHY:

3 Q. You do license the software out for a fee.

4 And who owns the FVAS software?

5 A. Expertos SA.

6 Q. And who owns Expertos SA?

7 A. It's owned by three people. I own part of it.

8 Q. Percentage-wise?

9 A. One third.

10 Q. And then the next person?

11 A. Jorge Estrada owns one third.

12 Q. Okay.

13 A. And a woman named Lorena, L-o-r-e-n-a, Lopez,
14 L-o-p-e-z owns one third.

15 Q. And who is Lorena Lopez to you?

16 A. She is the vice-president of Expertos SA.

17 Q. And is she related to Jorge?

18 A. No.

19 Q. Did -- how did Jorge become owner of one
20 third, did he pay for one third?

21 A. Yes.

22 Q. And did Lorena pay for one third?

23 A. Yes.

24 Q. And how long has Jorge owned one third?

25 A. Since about 2009.

1 Q. And Lorena?

2 A. Same thing.

3 Q. And do you have other employees of Expertos
4 SA?

5 A. Yes.

6 Q. And how many?

7 A. Five or six. I'm not sure.

8 Q. And are they based in Guatemala?

9 A. Yes.

10 Q. Do you have any programmers that work on
11 behalf of Expertos SA?

12 A. Yes. Not active, but I have had, yes.

13 Q. And where are they based?

14 A. Initially in India and later I have a
15 programmer who made modifications to the program and
16 he's based in Costa Rica.

17 Q. And what is his name?

18 A. Fred -- give me a minute. I will think of the
19 last name.

20 Q. Take your time.

21 A. Can I give you the last name in a little bit?

22 Q. Does he have a company?

23 A. No. He's retired.

24 Q. He's freelance?

25 A. He's freelance.

1 Q. But he lives in Costa Rica?

2 A. He's lived in Costa Rica for 20 years.

3 Q. When was the last -- is he an American
4 citizen?

5 A. Yes.

6 Q. And when was last time he worked on a program
7 for you?

8 A. In 2015.

9 Q. What did he do?

10 A. He rewrote the program into a different
11 machine language. And I am not a computer expert, but
12 he wrote it into a different machine language. He made
13 additional modifications to the program. My program,
14 the FVAS program, not my program, the Expertos SA
15 program, they are the owners of the program, is oriented
16 for human resources. It uses some drop-down menus, but
17 they are all oriented for -- they are not oriented,
18 like, for criminal investigations. They are oriented
19 for types of questions that, you know, have you ever
20 been fired from a company for some wrongdoing.

21 Something. You know, there are -- they -- all of the --
22 our work is primarily, overwhelmingly primarily human
23 resources oriented.

24 Q. Where do you derive the majority of your
25 revenue from, the licensing of the FVAS or your work in

1 screening employees and then the subsequent screenings?

2 MR. ZAPPOLO: Object to form. When you
3 say "you," do you mean the company or --

4 BY MR. D'LOUGHY:

5 Q. I mean Expertos.

6 A. Expertos. All right. The vast majority is
7 through the interviews, the preemployment or the
8 follow-up interviews. The vast majority of it.

9 Q. And that preemployment is done mostly in the
10 country of Guatemala?

11 A. Mostly, yes.

12 Q. And you derive a salary from Expertos SA?

13 A. No.

14 Q. And what is the benefit of owning a third of
15 the Expertos SA to you?

16 A. Dividend. At the end of the year I will
17 receive a portion of the profit that they make. I no
18 longer actively work every day. About five or six years
19 ago I basically semi retired or retired, and so I no
20 longer draw a salary.

21 Q. I see. Now, the FVAS software that Expertos
22 SA licenses, is that patented?

23 A. There is what in Guatemala is considered a
24 common law patent. Can I expand?

25 Q. Yes.

1 A. I talked to our lawyer about going through the
2 formal process. And he said you will spend a lot of
3 money, it will take about 20 years and you will be no
4 better off than what is protected. It's recognized.
5 It's registered as a licensed program. So there is a
6 common law protection that says if somebody copies it,
7 you can sue them. But he said going through the formal
8 process is expensive and literally takes 20 years and
9 you're going to get no additional real protection. So
10 he told me not to bother.

11 Q. And that common law is based on Guatemalan
12 law?

13 A. Yes.

14 Q. Tell me about Expertos, Inc. That's a Florida
15 company?

16 A. Yes.

17 Q. And what is the connection -- because they
18 have got similar names -- between the Guatemalan company
19 and the Florida company, why are they -- why do they
20 have similar names? What's the connection between them?

21 A. I've told you that we do a lot of work in
22 human resources preemployment. One of our major
23 companies, one of our major clients said we -- I want to
24 pay you, but I'll pay you in dollars because the local
25 law reasons, they cannot accept a bill in the currency

1 of Guatemala, the quetzales because -- I don't know why.

2 Q. Who can't?

3 A. The client who was in Honduras.

4 Q. Okay.

5 A. And they said, but we can accept a bill in
6 dollars. Okay. Honduran law. I don't -- like I can't
7 explain it.

8 Q. Right.

9 A. And they said in order for us to pay you, we
10 need a U.S. dollar account, but -- and I said, well, I
11 have one in the United States, Michael Savage, and they
12 said, no, we cannot pay you as an individual. We have
13 to pay a corporation.

14 So since I had previously set up Team
15 Translations and knew how easy it was to set up a
16 corporation, I without, unfortunately, consulting a
17 lawyer, I set up Expertos VSA, Inc. because I called the
18 bank and they said in order to have a corporate bank
19 account, you need a corporation.

20 Q. Right.

21 A. So I set up Expertos VSA, Inc. in order to
22 establish the bank, the corporate bank account Citibank.

23 Q. Okay.

24 A. And I did that and then with that corporate
25 bank account, I gave the banking information to the

1 company, the client in Honduras. And they sent the
2 money to the corporate bank account in -- under the name
3 of Expertos, Inc. and then I transferred the money to
4 the quetzales account of Expertos SA. That is --
5 Expertos, Inc. does no business.

6 Q. Right.

7 A. I mean, the only reason I set it up was to
8 facilitate the payment so I could receive dollars in
9 payment.

10 Q. And you have had Expertos VSA, Inc. since
11 2007; is that right?

12 A. I believe so. Yes.

13 Q. And how many of these types of transactions
14 have you completed through Expertos VSA, Inc.?

15 A. I don't know exactly. I would estimate in
16 some years maybe eight or ten. In some years, one or
17 two.

18 Q. And the bank account statements that you
19 brought today will reflect these transactions that
20 you're describing?

21 A. Yes. Every one.

22 Q. Okay. And is it -- are the -- I'm going to
23 give you an example. So if Honduras, for instance, a
24 customer in Honduras sends a thousand dollars to the
25 Expertos, Inc. bank account, does a thousand then go

1 from that bank account to the Expertos SA bank account
2 in Guatemala or is there some amount removed by you?

3 A. There may be a small amount retained, but
4 generally it goes.

5 Q. So if I look --

6 A. Because I'm -- and the small amount, I mean,
7 you know, I have to pay a banking fee to receive the
8 wire and a banking fee to send the wire. And, you know,
9 I would generally deduct that amount of money since I'm
10 not going to pay out of my own pocket.

11 Q. Right.

12 A. To forward the money down to Expertos SA.

13 Q. But other than that, other than these
14 transaction fees, we'll call them, is there any money
15 retained from you and then paid to your wife or to
16 whomever or any expenses here in the United States?

17 A. When money comes in from a license sale or
18 sale, I don't know what the correct legal term is, but
19 if I license VSA to the court reporter here and she pays
20 me, I generally, as much as possible, try and send half
21 of that to Gary Baker in repayment. I -- when I say
22 "I," I mean Expertos SA, in repayment for the monies
23 that he provided to initially finance the development of
24 the FVAS program.

25 Q. Okay.

1 A. Other than that, no. None goes to my wife.
2 No.

3 Q. What was the turnover of Expertos VSA SA last
4 year approximately?

5 MR. ZAPPOLO: Object to form.

6 THE WITNESS: I'm not sure what turnover
7 means.

8 BY MR. D'LOUGHY:

9 Q. Gross income.

10 MR. ZAPPOLO: Do you keep that information
11 confidential?

12 THE WITNESS: Generally.

13 I mean, I'll answer.

14 BY MR. D'LOUGHY:

15 Q. Well, I'm not asking you for the specific
16 amount, but was it in the millions of dollars?

17 A. No, no, no. 150,000 to -- let's make it
18 \$200,000.

19 Q. And you split that three ways with your other
20 two partners?

21 A. Well, that is gross income.

22 Q. Right. I know you have income expenses.

23 A. A lot of expenses. Taxes are nearly
24 50 percent. Yes.

25 Q. So you're left with approximately \$75,000 --

1 A. Yes.

2 Q. -- after tax --

3 A. Yes.

4 Q. -- and expenses.

5 I don't know. I'm just ballparking it.

6 A. I mean -- well, I mean, after taxes -- sorry.

7 Q. You have got the stage.

8 A. And then -- and then I have a -- they are --

9 I -- I'm sorry, Expertos SA has a payroll and -- that
10 they pay every 15 days. And in addition to the payroll
11 there's rent, electricity, paper. I mean, all of the
12 office expenses --

13 Q. Right.

14 A. So --

15 Q. And does Expertos SA have an accountant?

16 A. Yes.

17 Q. And is that --

18 A. Part-time.

19 Q. Is it a subcontractor or does that accountant
20 sit in the office?

21 A. No. It's a -- I guess you would call it a
22 subcontractor. I don't know what the term is. But it's
23 a person that -- yeah, I guess subcontractor. We pay
24 them a monthly fee and they come by the office maybe
25 once a month or send a messenger over primarily with the

1 taxes that we have to pay each month. There's a ton of
2 different taxes.

3 Q. And what is the name of the accountant?

4 A. I don't know. I no longer manage the company
5 as -- like I used to -- you know, after 2009, I quit the
6 daily management of the company. And Scott asked me --
7 excuse me, Scott, but --

8 MR. ZAPPOLO: Whoa, whoa, whoa. Stop.
9 You're not to discuss anything that you
10 discussed with me.

11 THE WITNESS: Okay.

12 MR. ZAPPOLO: That's attorney-client
13 privileged communication.

14 THE WITNESS: Okay.

15 BY MR. D'LOUGHY:

16 Q. Okay.

17 A. Can I say something or not?

18 MR. ZAPPOLO: There's no question pending
19 so...

20 THE WITNESS: Okay.

21 BY MR. D'LOUGHY:

22 Q. You're welcome to. I mean, I'm -- if that --
23 if you feel that's going to facilitate this and I'm not
24 going to have to reask the questions, then you're
25 welcome to. If you don't want to, you...

1 A. I no longer manage the company. I don't go
2 to -- I went to the office last year two times. One was
3 for a Christmas party. Other than that, I no longer
4 have an active role in it.

5 Q. Do you have any other companies?

6 A. No.

7 Q. You don't work in other areas that has nothing
8 to do with Expertos VSA?

9 A. No.

10 Q. Do you --

11 A. I teach some courses. I do some -- there's a
12 lot of kidnapping. I do, because of my special
13 operations background, I provide training in the
14 prevention of kidnappings, or in the case of a
15 kidnapping, I may provide advice on how the family
16 should react. I may train or teach some kind of a
17 course like that, but, but -- and since I can't bill
18 individually in Guatemala, Expertos SA will bill for --
19 but that's -- that's a relatively small amount, but I
20 mean, I just want to be completely honest.

21 Q. Do you do -- do you train in voice stress
22 technology -- I'm sorry, strike that -- voice stress
23 analysis?

24 A. Yes.

25 Q. And do you do that actively?

1 A. Normally once a year.

2 Q. And where do you do the training?

3 A. Primarily Mexico.

4 Q. And when you -- when you train in voice stress
5 analysis, do you train in any particular voice stress
6 analysis software?

7 A. I train all of the general principles that
8 any -- any voice stress analysis system, whether it's
9 CVSA from NITV or other systems used, I mean, there's
10 some -- it's the same as -- there are a very -- a lot of
11 similarities including withing polygraph. I teach all
12 of those basic principles. In an effort to try to sell
13 FVAS licenses, I also -- I include some training on -- I
14 demonstrate how it works, and I show them how easy it is
15 to work, yes.

16 Q. And during these training courses, do you ever
17 solicit orders for the FVAS licensing -- licenses,
18 sorry --

19 A. Yes.

20 Q. -- programs?

21 So you sell the programs through your
22 training, is that a fair statement?

23 MR. ZAPPOLO: Object to the form.

24 THE WITNESS: I offer the licenses for a
25 specific period of time for sale -- for money.

1 Yes.

2 BY MR. D'LOUGHY:

3 Q. And you do this once a year?

4 A. Generally once a year. There may be one or a
5 couple of times where I would teach one course -- I can
6 remember maybe two years ago that I was scheduled to
7 teach one course. I taught that one course and then two
8 individuals said would you fly back up to Mexico just to
9 train us? And so I flew back. So in that case, I did
10 it twice that year, but normally it's once per year.

11 Q. And do you have a -- do you ever sell
12 Mr. Baker's software, the DVSA?

13 A. No.

14 Q. Do you ever license it?

15 A. No.

16 Q. When you train these individuals, do you --
17 how do you train, do you have any handouts or paperwork
18 or any type of training books that you offer them?

19 A. I use a PowerPoint presentation to train. I
20 do hand out -- well, I don't. The company that hires me
21 will hand out a training manual and I may have
22 occasional handouts that I will print for a specific
23 reason.

24 Q. And the training manual that the company that
25 hires you provides to the, let's call them students or

1 attendees, is that their training manual or is that your
2 training manual?

3 A. It's theirs.

4 Q. So you don't provide training --

5 A. I provide input to it.

6 Q. Right.

7 A. But I -- I don't print it. I don't license
8 it. I don't -- I will show up, for example, the course
9 will normally run Monday through Friday, I'll show up on
10 Monday and maybe Tuesday they will go around passing out
11 their manual.

12 Q. And each of your customers has their own
13 manual that they use to train from?

14 A. That's not exactly accurate. I, in all but
15 one or two cases, have always been contracted to do the
16 training by the same company in Mexico.

17 Q. And where in Mexico do you do the training?

18 A. It varies. It can -- I have trained in Mexico
19 City, Monterey, Guadalajara. G-u-a-d-a-l-a-j-a-r-a.
20 San Luis Potosi, S-a-n L-u-i-s P-o-t-o-s-i. Three
21 words.

22 Q. And the training is always based on the
23 Expertos SAV or FVAS software?

24 MR. ZAPPOLO: Object to form.

25 THE WITNESS: Generally, yes.

1 BY MR. D'LOUGHY:

2 Q. And Mr. Savage, what does, to the best of your
3 knowledge, FVSA --

4 A. No idea.

5 Q. -- stand for?

6 No idea.

7 A. Well, my understanding is it stands for
8 Forensic Voice Stress Analysis, but I'm not familiar
9 with it at all.

10 Q. Do you know if it -- is it something, to your
11 knowledge, that exists in this world or is it just a
12 general acronym like you would use the word Kleenex to
13 describe tissues?

14 A. I do not know.

15 MR. ZAPPOLO: Is this a good time for me
16 to just say on the record that I'm going to
17 have to excuse myself for a preexisting
18 condition and Mr. Farwell is going to take
19 over?

20 MR. D'LOUGHY: I guess there's no better
21 time.

22 MR. ZAPPOLO: All right. I didn't think
23 so.

24 So Jeff, you know what to do.

25 (Mr. Zappolo left the deposition room.)

1 MR. D'LOUGHY: Let me ask on the record
2 here, is there a privilege log that exists?

3 MR. FARWELL: No.

4 MR. ZAPPOLO: I think that was you guys
5 were going back and forth on that, whether one
6 had to be produced or what was going on with
7 that, right?

8 MR. FARWELL: No, I don't think so. He
9 had...

10 BY MR. D'LOUGHY:

11 Q. So I'm understanding you to say whenever you
12 go out and do a training seminar in voice stress
13 analysis, you take with you a PowerPoint and the rest of
14 the course is provided by whomever, in this particular
15 case that we were talking about, some Mexican company?

16 A. Correct.

17 Q. And your PowerPoint --

18 A. It's not mine. It belongs to Expertos SA.

19 Q. And who developed the PowerPoint?

20 A. It was developed -- I developed part of it.
21 Ivonne Delgado developed part of it. Jorge Estrada
22 developed part of it. And since 2009, Lorena Lopez
23 has -- has modified it.

24 Q. How do you transport this PowerPoint program?
25 Is it on your laptop, on a thumb drive?

1 A. On USB, on a thumb drive.

2 Q. So you take it with you, put it in your pocket
3 and travel with it?

4 A. Correct.

5 Q. And how many copies of the program exist, to
6 your knowledge?

7 A. Maybe three.

8 Q. And you yourself are always in control of one
9 of those?

10 A. Yes. Generally.

11 Q. And with respect to the -- these Acronyms are
12 just -- you know, I'm over it, but play by them. FVAS?

13 A. Yes.

14 Q. Is this something that's on a disk, hard drive
15 computer server? Where is it located?

16 A. It's -- it's a software program that generally
17 is located on a thumb drive.

18 Q. And when you license the program, do you send
19 the customer a thumb drive or do you send them a
20 download link? How is it done?

21 A. Generally I load the software for them.

22 Q. Okay. And is it an annual license fee?

23 A. It depends. I have some people who license it
24 on a 90-day basis and others who license it on a five-
25 year basis. And the fee depends on the length of the

1 term.

2 Q. Okay. We've asked for -- and that's the
3 reason we're here today, is that the plaintiff has asked
4 the defendants for a lot of information. The defendants
5 are claiming that it's privileged trade secret
6 information and therefore we're not entitled to see the
7 information. And that's why we're here today.

8 In your responses, you remark that this
9 information resides with Expertos SA -- and I'm not
10 being specific, but let's talk about the code for a
11 second -- that it resides for Expertos SA and that that
12 information is proprietary and confidential trade
13 secret, but you also go on to say that you have asked
14 Expertos PS- -- or Expertos SA for that information and
15 they have declined to provide it to you?

16 A. Correct.

17 Q. And how did you request that information from
18 Expertos SA?

19 A. Verbally.

20 Q. And who did you ask?

21 A. I asked Jorge Estrada and Lorena Lopez.

22 Q. Okay. And does Experto SA have an operating
23 agreement or a shareholders agreement or an owners
24 agreement?

25 A. I don't know whether you would call it that or

1 not. This is what in Guatemalan law is called a --
2 you're required to have what is called a patent for the
3 company. And the patent for the company comes with a
4 legal agreement which is probably what you're referring
5 to. For example, it specifies who the legal
6 representative is and what -- how long the term lasts
7 and what the company can and can't do. It's sort of
8 an --

9 Q. It governs your relationship between the
10 shareholders or stakeholders of the company?

11 MR. FARWELL: Objection to form.

12 THE WITNESS: I don't recall, truthfully.

13 Can I clarify something I just remembered?

14 BY MR. D'LOUGHY:

15 Q. Sure.

16 A. When I said that I requested it verbally, I
17 actually sent an e-mail.

18 Q. Okay.

19 A. But, I mean, to me that's --

20 Q. That's fine.

21 A. But I just -- I remember now, you know, when
22 I -- when I was asked about providing that, I sent an
23 e-mail to both of them because I wanted -- I wanted a
24 written reply and they said no, we decline. We --

25 Q. Now, do you -- do you work full-time?

1 A. No.

2 Q. You spend 11 months of the year in Guatemala
3 you testified?

4 A. Correct.

5 Q. Is your wife together with you there?

6 A. No.

7 Q. Give me an average day, what do you do all
8 day?

9 A. I normally get up, go out for a walk for about
10 an hour, an hour and a half. Come back, breakfast and
11 look at the e-mails. Watch the news. And then I do
12 e-mails off and on all day long with friends and family
13 and some -- some clients. For example, I will get
14 people who years ago when I was active that I provided a
15 license to, and they will say, oh, I've got this problem
16 or the license is going to expire, what do I do? And I
17 respond to that basically all day. But it's pretty much
18 like being basically retired.

19 Q. Right. So you're not getting paid for the
20 e-mail activity and responses?

21 A. No. Basically I live off my Social Security
22 and Military pension. I can afford to do that in
23 Guatemala. I can't here.

24 Q. When is the last time you saw the license for
25 the FVAS?

1 A. 2015.

2 Q. Was that outside the state -- or the country
3 of Guatemala?

4 A. Yes.

5 Q. Was it -- can you tell me which country it
6 was?

7 A. Mexico.

8 Q. Okay. Is there someone who is actively
9 selling licenses of the FVAS for Expertos SA outside of
10 the country of Guatemala?

11 A. Yes.

12 Q. And who would that be?

13 A. That would be Chris Nell in South Africa.

14 Q. Anybody else?

15 A. No.

16 Q. Mr. Baker ever sell one -- sell one of your
17 licenses?

18 A. No. He -- he contacted me when they had the
19 license issue where his program was pirated and whatever
20 it was done. And we agreed that I would provide FVAS
21 since it does not require -- I mean, since I can -- I
22 can provide that to South Africa and I can send it by
23 e-mail since he had the licensing problem with FVSA in
24 South Africa.

25 Q. And that was back in 2004, right?

1 A. Something like that. Yes. Well, I don't
2 remember the year truthfully.

3 Q. But it was quite a while ago?

4 A. Yes.

5 Q. Since then, have you ever sold DVSA on his
6 behalf?

7 A. No. I've never sold DVSA.

8 Q. If I'm to ask you to distinguish DVSA from
9 FVSA, what would you tell me? How do you compare and
10 contrast them, those two programs?

11 A. DVSA is oriented on criminal investigations.
12 Okay. FVAS is oriented on human resources preemployment
13 screening and honesty evaluations in the human resources
14 area. That is the major, major, major difference.

15 And I'll take it upon myself, even though I
16 was warned not to offer anything, many people have asked
17 me why did you set up your company in Guatemala instead
18 of in the United States?

19 I saw a niche market in Latin America, because
20 I lived there many years for the Army, in evaluating
21 people. And I had the vision at the time in 2000 to,
22 thinking that I could -- I could capture a niche market
23 and sell the VSA services to a company who wanted to
24 evaluate a candidate for employment, evaluate their
25 honesty in ways that you cannot do without either like a

1 polygraph or a voice stress analysis system.

2 For example, the, you know, I can -- everybody
3 wants to ask you, you know, have you ever stolen from a
4 company you work for before? Everybody is going to say
5 no.

6 Voice stress analysis lets you evaluate
7 whether the person is answering truthfully or not.

8 So I had the idea that if I could develop a
9 set of questions similar to that and I could go to a
10 company, Citibank, for example, and say, okay, you go
11 through all of your screening process. As a final step,
12 send your candidates to me and I will apply the voice
13 stress technology to evaluate whether or not they are
14 honest or whether they are lying to you.

15 Q. So what I hear you saying, and let me know if
16 you think this is fair, the DVSA and your program, the
17 FVAS, they detect deception, would that be a fair broad
18 statement?

19 MR. FARWELL: Objection, form.

20 THE WITNESS: Yes. Yes. They both, like
21 virtually any voice stress analysis technology,
22 starting with the old PSE that was from the
23 '70s, detect dishonesty or deception. The main
24 difference is is that DVSA, like all of the
25 programs in the United States, are oriented for

1 criminal investigations.

2 BY MR. D'LOUGHY:

3 Q. Okay.

4 A. Where I had the idea of adapting voice --
5 voice stress technology into the human resources field,
6 and...

7 Q. And in terms of the human resources field, are
8 you still selling this to the military, to governments
9 outside of the private sector? Do you still sell it to
10 the governments in terms of -- for military use or uses
11 other than human resources?

12 MR. FARWELL: Objection, form.

13 THE WITNESS: Answer?

14 MR. FARWELL: Yes.

15 THE WITNESS: I have never sold it to the
16 military. I have sold it the Attorney
17 General's office in Mexico. And they have in
18 another office that is like an internal
19 affairs division for the Mexican government,
20 and they conduct investigations of people who
21 are lying or involved in some kind of
22 dishonesty or deception within the government,
23 some kind of fraud or whatever that -- and they
24 have -- they purchased it.

25 Other than those two exceptions, all of my

1 licenses have gone to primarily human resources
2 companies like -- I don't know what one in the
3 States is, you know, I don't live here so -- I
4 mean, there must be a human resources, a national
5 chain of human resources companies that -- where
6 people hire -- to hire people. And those are the
7 types of clients that generally, you know, buy my
8 product.

9 BY MR. D'LOUGHY:

10 Q. And the individual who coded your voice, V --
11 I'm sorry -- FVAS program?

12 A. Yes.

13 Q. Sayeed.

14 A. Yes.

15 Q. Is that the same individual that worked on
16 Mr. Baker's program?

17 A. Yes.

18 Q. And did Mr. Baker's DVSA, correct?

19 A. Yes.

20 Q. And were you introduced to this individual by
21 Mr. Baker?

22 A. By e-mail. Yes.

23 Q. But you would have not known about him unless
24 Mr. Baker introduced him to you through e-mail, correct?

25 A. Correct. I initially contracted -- or

1 contacted a programmer in Guatemala and he came and I
2 explained what I wanted to do. I showed him the open
3 source algorithms that would be the part of the program.
4 And he said sure, I can do this. And it will cost you a
5 quarter of a million dollars.

6 Q. Okay.

7 A. And I said well, I don't have anywhere near
8 that kind of money.

9 Q. Right.

10 A. And I -- I knew that Mr. Baker had -- had
11 developed DVSA. And I contacted him and I said, you
12 know, have you got any suggestions for me because I
13 can't find a local programmer who will do it reasonably?
14 And he said, let me give you his e-mail. And I
15 contacted him and then we went back and forth with a
16 series of e-mails. I told him, I said, look, I need a
17 program oriented for human resources. These are the
18 kind of questions and things that, you know, so that he
19 would have an idea of what I was looking for.

20 And I said, you know, can you do it and about
21 what would it cost?

22 Q. And what did it cost?

23 A. About \$38,000.

24 Q. And did you pay the -- Mr. Sayeed to program
25 these?

1 A. No. I didn't have \$38,000.

2 Q. Who paid him?

3 A. Mr. Baker.

4 Q. In Guatemala, is there a technology hub in
5 Guatemala, meaning are there programmers, coders and is
6 it known for its technology?

7 A. No.

8 Q. It's more of an agrarian third world country,
9 isn't it?

10 A. Yes.

11 MR. FARWELL: Object to form.

12 BY MR. D'LOUGHY:

13 Q. You talk about an open source algorithm that
14 your program is premised on; is that fair to say?

15 A. Yes.

16 Q. And where did that open source algorithm
17 originate from?

18 A. I learned about it when I Googled and there
19 were a number of them that downloaded. And I basically
20 read about them and said this is the -- this algorithm
21 is the basis of virtually all of the same -- similar
22 types of programs.

23 Q. And did Mr. Baker share with you that
24 algorithm that he testified earlier was originated
25 through a study conducted by Dr. Hansen?

1 MR. FARWELL: Object to the form.

2 THE WITNESS: I don't remember. I may
3 have asked him, so look, I've got all these
4 algorithms, is there one that you recognize?
5 But I honestly don't remember.

6 BY MR. D'LOUGHY:

7 Q. Do you know if it's the same or similar
8 algorithm as used in the DVSA?

9 A. I believe it was.

10 Q. Do you --

11 A. Primarily because the same programmer did it.

12 Q. Okay. You talk about Mr. -- I'm going to call
13 him Mr. Sayeed because I think that's his last name.
14 Fahaad Sayeed. I'm not accustomed to that language so
15 I'm trying to keep it short and sweet. Mr. Sayeed, the
16 programmer from India.

17 A. Right.

18 Q. He quoted you \$38,000.

19 Was there some type of agreement that you
20 entered into with him to memorialize the scope of the
21 project that he was going to code and create for you?

22 A. I sent him a series of e-mails telling him
23 what I was trying to develop. What its purpose would
24 be. That -- that I initially I hadn't thought about
25 reselling it; that I wanted it for my own use and I gave

1 him, if you would, a scope of work: This is what I need
2 it to do.

3 Q. Was the scope ever memorialized in a written
4 agreement that was signed?

5 A. No.

6 Q. And this would have been which year?

7 A. 2007, 2008.

8 Q. Okay. And since 2000- --

9 A. I thought it was a little bit earlier, but
10 I've been hearing that date. I thought it was like
11 2005, 2006, but...

12 Q. And since the time that he created the FVAS on
13 your behalf, have you had any other dealings with
14 Mr. Sayeed over the years since 2008?

15 MR. FARWELL: Objection to form.

16 THE WITNESS: No.

17 BY MR. D'LOUGHY:

18 Q. Has he done any upgrades or next generation
19 software for you?

20 A. No.

21 Q. Who picked it up -- who picked up on it after
22 Mr. Sayeed?

23 A. A friend of mine in Costa Rica.

24 Q. Okay. Did you think of the name yet?

25 Sorry.

1 A. No, but I will.

2 Q. Okay. And that's the friend you're referring
3 to?

4 A. A friend of mine -- I contacted a friend of
5 mine who was in Delta Force, but initially a famous --

6 Q. Delta Force.

7 A. The 75th Ranger Regiment was the precursor to
8 Delta Force, and so we've known each other for a couple
9 of years, a couple of wars. And so I called him and I
10 said, hey, look, I'm -- the reason is I couldn't find
11 Fahaad. I e-mailed him and I never got any response.
12 He disappeared off the face of the earth. And so I
13 said, look, I have changes that I want to make. Do you
14 know anybody down there? And he said, I do. He's been
15 here for 20 years. He's retired. He's a U.S. citizen
16 and he is top, top, top of the line programmer. And he
17 put me in contact with him. The worse case, I will look
18 at my e-mail here and give you his name.

19 Q. And he's also based in Costa Rica?

20 A. Yes.

21 Q. Do you want to take a look for me, please?

22 A. Hand me my --

23 MR. D'LOUGHY: We're going to go off the
24 record.

25 Do you want to do your little videographer

1 spiel?

2 MR. FARWELL: We are going off the record
3 in the case of NITV Federal Services, Inc.
4 versus Elwood Gary Baker, et cetera. Case
5 Number 50-2015-CA-005885 in Palm Beach County.
6 And it is now 3:23 p.m.

7 (Brief recess.)

8 MR. FARWELL: All right. We are back on
9 the record in NITV Federal Services, Inc.,
10 versus Elwood Gary Baker, et cetera, Case
11 Number 50-2015-CA-005885. It is March 29, 2017
12 at approximately 3:40 p.m. This is Jeff
13 Farwell now recording instead of Scott Zappolo.

14 And Mr. Savage, you are still under oath.

15 MR. D'LOUGHY: Madam court reporter, can
16 you repeat what we last discussed, please?

17 (A portion of the transcript was read.)

18 BY MR. D'LOUGHY:

19 Q. All right. Mr. Savage, while we were on
20 break, you had graciously looked up your ongoing program
21 engineer designer coder. I don't know what you want to
22 call it, but there's a gentleman in Costa Rica that you
23 had mentioned that you had gone to look up his name on
24 your telephone.

25 A. Yes.

1 Q. What is the gentleman's name?

2 A. Fred Surl, S-u-r-l.

3 Q. And is he a freelance or does he work for a
4 company?

5 A. Freelance.

6 Q. And Mr. Surl does what for you?

7 A. Makes upgrades to the FVAS program -- not for
8 me, but for Expertos SA.

9 Q. And Mr. Surl, is he an American national?

10 A. Yes.

11 Q. And I wanted to go back and ask you, are you
12 also a permanent resident or citizen of the country of
13 Guatemala?

14 A. No.

15 Q. Are you living there on a tourist Visa or on a
16 permanent resident Visa?

17 A. I go in and out on a tourist Visa.

18 Q. And you had mentioned someone earlier, Fred
19 from Costa Rica. I'm going to assume that Fred Surl is
20 the same Fred that you had a memory lapse on his last
21 name earlier in the deposition.

22 A. Yes.

23 Q. Do you sell your program the FVAS in the
24 United States?

25 A. No.

1 Q. Is there --

2 A. I don't sell the program but -- I don't sell
3 any licenses --

4 Q. Is there --

5 A. No.

6 Q. And is there any strategic reason for not
7 doing that?

8 A. The FVAS program was developed outside the
9 United States and has never been in the United States.

10 Q. Is there any reason for why it's not in the
11 United States?

12 A. There's no reason to bring it here.

13 Q. Are there no customers for it in the United
14 States?

15 A. Expertos VSA does no business in the United
16 States. And Expertos, Inc. does no business in the
17 United States.

18 Q. But the question is, is there a market for
19 your program, to license your program in the United
20 States?

21 A. Not my knowledge.

22 Q. Is there any particular reason why you didn't
23 develop the U.S. market, you being American and having a
24 residence in Florida?

25 A. I have expertise in Latin America, and that's

1 the only market that I know. I've never marketed in the
2 United States.

3 Q. When you worked for Diogenes?

4 A. Yes.

5 Q. And after your contract translation work that
6 you did for them, you took classes in voice stress
7 analysis?

8 A. Correct.

9 Q. Here in the United States?

10 A. Correct.

11 Q. Did that translate -- did that course give you
12 a knowledge of the U.S. market at all?

13 A. No.

14 Q. Just on how to conduct a voice stress
15 analysis?

16 A. Yes.

17 Q. When Expertos SA licenses its software or the
18 V -- or the FVAS, what amount of time is generally
19 licensed, is it done within years or multiple years?

20 MR. FARWELL: Objection, form.

21 THE WITNESS: It depends on the client.

22 It varies from 30 days to maybe five years.

23 BY MR. D'LOUGHY:

24 Q. And if a license has expired, does the program
25 itself then stop to function?

1 A. Yes.

2 Q. And what would it require to restart the
3 program or renew the program?

4 A. I would have to reissue a new license code.

5 Q. And would you need to actually be physically
6 present near that computer where the program is located
7 to be able to reissue the code?

8 A. No.

9 Q. How would you reissue the code?

10 A. By e-mail.

11 Q. And do you do a lot of renewals, you yourself,
12 on behalf of Expertos SA?

13 A. I would say occasional. Maybe one a month,
14 two a month maybe. Not even that frequently.

15 Q. Okay. Let's talk about Mr. Baker's testimony
16 concerning the loan that he provided to Expertos SA. Do
17 you know what I'm talking about?

18 A. Yes.

19 Q. Did Mr. Baker provide Expertos SA a loan or
20 was it you yourself that was provided the loan by Mr.
21 Baker?

22 A. Expertos SA.

23 Q. And that loan was in the amount of how much?

24 A. To my recollection, approximately \$38,000.

25 Q. And what were the terms and conditions that

1 you and Mr. Baker -- I assume that it was you that was
2 representing Expertos SA in respect to the loan that
3 Mr. Baker was going to lend it?

4 A. Yes.

5 Q. So what were the terms and conditions of the
6 loan?

7 A. That I would repay him back gradually through
8 sales of licenses.

9 Q. Of licenses of what?

10 A. Of FVAS.

11 Q. Okay. And what were the terms of repayment?

12 A. That I would pay -- repay him up to a total of
13 \$50,000.

14 Q. Over how long?

15 A. There was no time limit specified.

16 Q. So for him lending you 38,000, your -- his
17 expectation was to receive an additional 12,000?

18 A. Correct.

19 Q. But it was an indefinite open-ended period of
20 repayment.

21 A. Yes.

22 Q. And have you paid him back in full?

23 A. Pretty close to full. If not in full, pretty
24 close to full.

25 Q. And is there a ledger book that you keep to

1 record the amounts of money you have paid Mr. Savage
2 (sic) and his company with respect to this loan?

3 Did you understand the question? I can repeat
4 it if you want.

5 A. Please.

6 Q. Do you maintain in your possession or anywhere
7 a record of the payments that you have made to
8 Mr. Savage -- Mr. Baker and Mr. Baker's company with
9 respect to the \$38,000 loan?

10 A. Expertos VSA in Guatemala maintains a record
11 of the money that is forwarded to him.

12 Q. You yourself do not?

13 A. Individually, no.

14 Q. So you said -- I don't recall, but you have
15 been to the office twice this past year to the Expertos
16 SA office in the City, I don't know which City it's in,
17 but I'm assuming Guatemala City.

18 A. Uh-huh.

19 Q. Is that correct?

20 A. Correct.

21 Q. Is there other ways that you are informed
22 about how much money you owe Mr. Baker and his company
23 for this loan?

24 A. Yes.

25 Q. And how is that?

1 A. With meetings with the other -- with Mr.
2 Estrada and Ms. Lopez.

3 Q. And to the best of your recollection, when was
4 the last meeting or when was the last discussion held on
5 the amount of money you owe Mr. Baker? When I say
6 "you," I mean Expertos.

7 A. Earlier January.

8 Q. And during that time, that meeting you spoke
9 with your other two partners, was that the others that
10 were involved?

11 A. Yes.

12 Q. And what was the amount owed to Mr. Baker's
13 company at that time?

14 A. I -- the amount owed, I remember them telling
15 me that we had paid approximately \$48,000, so about
16 \$2,000 or so.

17 Q. So from early January until now, you would be
18 required to pay Mr. Baker \$2,000 to fulfill your loan
19 obligations; is that right?

20 MR. FARWELL: Objection, form.

21 THE WITNESS: Correct.

22 BY MR. D'LOUGHY:

23 Q. Has Mr. Baker or his company provided
24 additional loans to Expertos SA or you personally?

25 A. No.

1 Q. Okay. In the deposition with Mr. Baker,
2 Mr. Baker provided some bank statements from his bank in
3 Panama City. I think it was First National Bank in
4 Panama City.

5 Those bank statements reflected payments that
6 were made to him from a South African company.
7 Mr. Baker testified that those payments were made to him
8 from the South African company in satisfaction of your
9 loan that he made to you.

10 A. Correct.

11 Q. And you agree with that?

12 MR. FARWELL: Form.

13 THE WITNESS: Yes.

14 BY MR. D'LOUGHY:

15 Q. And you also -- you were sitting next to
16 Mr. Baker, so I assume you heard the testimony, there
17 was also some documentation that Mr. Baker provided
18 where he received money directly from Expertos SA in
19 partial satisfaction of the loan. Is that also correct?

20 A. Yes.

21 Q. So not only did some of your customers pay
22 Mr. Baker back for the loan, but you also directly paid
23 him through Expertos SA?

24 MR. FARWELL: Form.

25 THE WITNESS: Correct.

1 BY MR. D'LOUGHY:

2 Q. And why is it that you, rather than paying him
3 directly from Expertos SA each and every time, had him
4 pay through a third party such as the South African
5 company, why did you do it that way?

6 A. Convenience, I would say.

7 Q. And did you explain to the South African
8 company that don't pay me, pay Mr. Baker instead?

9 A. Yes. I told them to send the money directly.

10 Q. And how did you communicate that?

11 A. E-mail.

12 Q. And you would have those e-mails?

13 A. Yes.

14 Q. Have you had a computer crash on you in the
15 last five to seven years?

16 A. Oh, yes. Several times.

17 Q. And do you have a backup for the computer?

18 A. Yes.

19 Q. So it's fair to say that you didn't lose any
20 data, did you?

21 A. To my knowledge, no.

22 Q. Besides the South African company -- and what
23 was the name of the company you recall, South African
24 company that you do business with?

25 A. Welcore.

1 Q. Besides Welcore, is there any other customer
2 of Expertos SA that pays directly to Mr. Baker instead
3 of you --

4 A. No.

5 Q. -- to satisfy the loan?

6 A. No.

7 Q. Why only Welcore? I assume you have a lot of
8 other customers, right?

9 A. Because Welcore had a previous direct
10 relationship or their previous companies in South Africa
11 with Mr. Baker. I mean, they -- they -- they knew him
12 before they knew me.

13 Q. So Mr. Baker referred them to you?

14 A. I don't -- referral, I'm not sure is the
15 correct word. But it was through Mr. Baker that I -- I
16 am in touch with the company in South Africa.

17 Q. And you do business with them?

18 A. Yes.

19 Q. And you license programs to them?

20 A. Yes.

21 Q. And are they a distributor on your behalf?

22 MR. FARWELL: Objection, form.

23 THE WITNESS: I'm not sure what --

24 BY MR. D'LOUGHY:

25 Q. Do they relicense your program, Expertos' FVAS

1 program?

2 A. FVAS.

3 They may find clients for me that I will
4 provide a license to.

5 Q. Okay. And you deal directly with the clients
6 that they find for you?

7 A. No.

8 Q. They do?

9 A. They do.

10 Q. Welcore?

11 A. Welcore.

12 Q. So they have the authority to license on
13 behalf of Expertos SA behalf?

14 MR. FARWELL: Objection, form.

15 THE WITNESS: They can do nothing with the
16 licenses without me. I mean, they cannot
17 independently do it, no.

18 BY MR. D'LOUGHY:

19 Q. And judging from the very narrow snapshot of
20 Mr. Baker's bank account statements, there's been a
21 number of transactions and, you know, in the last year
22 or so, for what I don't know. It says software
23 development. I assume from the testimony that they are
24 not doing software development in South Africa on your
25 behalf.

1 MR. FARWELL: Form.

2 BY MR. D'LOUGHY:

3 Q. Or am I incorrect in stating that?

4 A. I'm not sure what the question is.

5 Q. Does Welcore provide software development
6 services for Expertos SA?

7 A. No.

8 Q. Okay. Just give me one moment. I want to
9 look at some of the documents that you produced today so
10 I can determine if there's any examination I'd like to
11 take of them with regard to asking questions.

12 Susan Savage is your wife?

13 A. No.

14 Q. Who is Susan Savage?

15 A. My daughter.

16 Q. And she's a part of Expertos, Inc.?

17 A. She's listed as one of the company officers,
18 yes.

19 Q. And Expertos, Inc. does what?

20 A. Nothing.

21 Q. And Ruth Anne Perez, who is Ruth Anne Perez?

22 A. My daughter.

23 Q. And she is also listed as a company -- as
24 treasurer on here, but I assume she performs no duties
25 on behalf of the company.

1 A. No.

2 Q. And Beatrice Savage?

3 A. My wife.

4 Q. Listed as vice-president. And I, you know,
5 you had testified earlier this is a company that you
6 merely use to set up a bank account, that's true?

7 A. That's correct.

8 Q. Okay. Okay, you have provided us with bank
9 statements from Citibank CBO Services.

10 Expertos VSA, Inc. is that the bank for
11 Explorer VSA, Inc., Citibank?

12 A. Yes.

13 Q. And is there a particular branch that you use?

14 A. I do everything by e-mail, but I set it up in
15 Boca Raton.

16 Q. Okay. If you can turn to the bank statements
17 that you provided to us from Citibank, please, if you
18 will turn to the last page, and it says Service Charge
19 Summary from February 1st, 2010 through February 20- --
20 I think it's -- -8, 2010 and that's at the very top of
21 the last page.

22 A. Uh-huh.

23 Q. And madam court reporter, we're going to
24 designate this as Exhibit -- Plaintiff's Exhibit Savage
25 1.

1 (Plaintiff's Exhibit No. 1 was marked for
2 identification and retained by Mr. D'Loughy.)

3 BY MR. D'LOUGHY:

4 Q. All right. 3/1, going on down where it says
5 Checking Activity, it says, "Wire from Puma E. Salvador,
6 \$2070."

7 A. Yes.

8 Q. I don't -- you know, we're here today about,
9 you know, what you feel is privileged and confidential
10 information, so I'm sure your attorney is going to
11 object if I ask you a question with respect to your
12 privileged and confidential trade secrets, but who is
13 Puma E. Salvador?

14 MR. FARWELL: Is it somebody that Expertos
15 SA does business with?

16 THE WITNESS: Yes.

17 MR. FARWELL: That's a company?

18 THE WITNESS: Yes.

19 MR. FARWELL: Yeah, at this point in time,
20 James, still we're at that.

21 MR. D'LOUGHY: Understood. That's why I
22 prefaced it.

23 MR. FARWELL: Okay. Thank you.

24 BY MR. D'LOUGHY:

25 Q. There's credit in your account of \$2,070.

1 What would this be for? What are they paying you --
2 Puma E. Salvador paying you \$2,070 for?

3 THE WITNESS: Okay?

4 MR. FARWELL: I think so.

5 THE WITNESS: Preemployment evaluations.

6 BY MR. D'LOUGHY:

7 Q. Okay. And Puma E. Salvador, would that be
8 fair to say that they are located in San Salvador?

9 A. Yes.

10 Q. And why didn't they pay Expertos SA directly
11 rather than paying the Inc. here as in here?

12 A. Because they pay in dollars?

13 Q. Okay. And that's --

14 A. They cannot, like the company in Honduras,
15 they cannot accept -- Expertos SA in Guatemala can only
16 issue bills in quetzales. Same spelling. And they
17 needed a bill in dollars.

18 Q. Understood.

19 A. So -- or they pay in dollars, so --

20 Q. Is that true of all the Central American
21 countries?

22 A. Yes.

23 Q. Neither will exchange the other's money?

24 A. Well, in El Salvador, the dollar is the
25 currency.

1 Q. Okay.

2 A. It's a -- it's a dollarized company -- country
3 like Panama.

4 Q. Okay.

5 A. But they will not accept a bill in a foreign
6 currency like quetzales, so you -- they have to pay in
7 dollars.

8 Q. Understood.

9 And going on down from there, there's
10 redacted -- there's three line items redacted which seem
11 to be outgoing. None of those were to Mr. Baker, I
12 assume, or you would have -- if there's anything going
13 to Mr. Baker, has that been redacted out of these
14 checks, checking bank statements?

15 A. I don't know. I don't remember what the
16 redaction -- I do not believe so. No.

17 Q. Okay. So you have a \$600 credit coming from
18 Profes Onales En -- and, you know, I'm not a Spanish
19 speaker.

20 A. Right. In security. It's a Mexican company.

21 Q. Profes, space, O-n-a-l-e-s, E-n, space,
22 E-g-u-r-i-d-a-d, space, D-e-l, space, N-o.

23 And what would this have been for?

24 A. For a license, FVAS license.

25 Q. This is a license?

1 A. FVAS.

2 Q. And how can you distinguish on here, in the
3 essence -- in the interest of time, I'm trying to -- I
4 don't -- I prefer not to go through each and every one
5 of these with you, if I may, but how do you distinguish
6 in your mind between what is a service such as a
7 screening service, which you pointed out the first
8 credit for 2,070 was a screening service, and then you
9 have got a license on the second credit of \$6,000 or
10 \$600 --

11 A. \$600.

12 Q. Yes.

13 What is the -- how do you know the difference?

14 A. The only -- I have never sold a license to
15 Puma. So anything from Puma --

16 Q. Okay. So it's just by the name of the
17 company?

18 A. Basically, yes.

19 Q. All right. Now 3/31 "Funds Transfer wire from
20 Copor Tivo Rodrigues Cordova." That is a fund, an
21 incoming wire?

22 A. Yes.

23 Q. Where is this company located?

24 A. In Mexico.

25 Q. And why is the credit redacted?

1 A. I think it's a mistake.

2 Q. Then moving -- we're going back to front so
3 now we're on the May 1st, 2010 summary through May 31st,
4 2010.

5 A. Okay.

6 Q. Funds transfer from the same company in
7 Mexico, Onales En --

8 A. Right.

9 Q. For \$400. What would that be for?

10 A. FVAS license.

11 I will always use FVAS. I don't use any other
12 ones.

13 Q. Okay. Going to the next page front or back to
14 front July 1st, 2010 -- I'm missing March in here. I
15 don't know where March is. Do you know where March is?

16 A. If it's not -- these are the pages that I
17 extracted that had external --

18 Q. Okay.

19 A. -- so the March --

20 Q. It was nothing.

21 So I'm not following my own rules for the
22 deposition.

23 (Discussion off the record.)

24 BY MR. D'LOUGHY:

25 Q. He said that if the page -- if the summary is

1 not included in the stack of documents of these bank
2 statements, that means that they did not contain any
3 incoming wire transfers.

4 Mr. Savage, do you make outgoing wire
5 transfers from these, from this bank account?

6 A. Yes.

7 Q. So we're going to see in here a lot of
8 outgoing wire transfers to Expertos SA?

9 A. If they have not been redacted, yes.

10 Q. Would there be a reason they were redacted?

11 A. Only by error. I mean...

12 MR. FARWELL: If I can just say so. If
13 they were redacted it was because I told him to
14 leave only things in that had incoming money
15 from foreign. So if anything -- we can go back
16 and look and see them and bring them to you.
17 Whatever.

18 MR. D'LOUGHY: Would you, please.

19 MR. FARWELL: Yeah, sure. All right.

20 BY MR. D'LOUGHY:

21 Q. All right. So you have the first one on the
22 July 1st, 2010 to July 31st, 2010, you have a funds
23 transfer from H-e-n-a-o Catalina, 4,970.

24 What was that -- what does that represent?

25 A. FVAS license.

1 Q. Again, the Mexican company, the O-n-a-l-e-s,
2 is that an FVAS license for \$500?

3 A. Yes.

4 Q. And here's a new one, 8/18 dated, Wire from
5 Maquil, M-a-q-u-i-l, for \$4500.

6 Also an FVAS license?

7 A. Yes.

8 Q. Would that be multiple FVAS licenses?

9 A. No.

10 Q. Why would one be for 500 and the other be for
11 4,500?

12 A. Some clients negotiated to pay in quotas. I
13 don't know what the word in English is.

14 Q. Installments?

15 A. Installments. Okay.

16 Q. Okay.

17 And now we're going to -- I don't see the date
18 of this particular statement but it's the next page. I
19 see statement period rates, August 31st, 2010. So I'm
20 going to surmise this is for the month of August of 2010
21 since it's preceded by July of 2010.

22 And "Wire from Corpor Tivo De Se -- I'm so
23 sorry. I'm so sorry -- Corpor Tivo, T-i-v-o, D-e S-e,
24 Privada, P-r-i-v-a-d-a, L-i-e-h -- I'm sorry,
25 L-i-e-n-h-a, \$4,090."

1 What does that represent?

2 A. FVAS license. FVAS.

3 Q. 9/21 on that same page: "Wire from Centro" --
4 and where is Tivo De Se Privada, Privada located?

5 A. Mexico.

6 Q. Okay. And also same is true Mexico, they
7 won't accept Mexican pesos in Guatemala, is that --

8 A. Correct.

9 Q. Okay.

10 9/21, Funds Transfer, "Wire from Centro De
11 Evaluac," what -- you tell me what it is in your best
12 Spanish, please.

13 A. E-v-a-l-u-a-c-i-o-n. Sanfergo
14 S-a-n-f-e-r-g-o.

15 Q. And where is this company located or this --

16 A. Mexico.

17 Q. 3,500 again in FVAS --

18 A. FVAS license, yes.

19 Q. Now we skip on from August to October.

20 September is missing. A wire from Centro de E-v-a --

21 A. Same place. The one you just typed, Sanfergo.

22 Q. \$2,040. FVAS?

23 A. Yes.

24 Q. And during this time, are you also wiring out,
25 which we don't have that because it's -- I assume it's

1 been redacted, tell me if I'm wrong, but you have also
2 been paying Mr. Baker his loan money back out of
3 Expertos, Inc. out of this bank account in Boca Raton?

4 A. I believe so. Yes.

5 Q. And how would you make the decision on how
6 much to pay Mr. Baker?

7 A. Based on the amount that I received or that
8 the Expertos SA received.

9 Q. Let me -- go off the record for a second.

10 (Discussion off the record.)

11 BY MR. D'LOUGHY:

12 Q. Back on the record, please.

13 November 30th, are you following me on that?

14 A. Yes, sir.

15 Q. Okay. There's a wire from FEMSA E-R-V, M-O-T
16 \$3,500. F-E-M-S-A.

17 Where is that company based?

18 A. Mexico.

19 Q. Again, an FVAS license?

20 A. FVAS license. Yes.

21 Q. Okay. And then we go from November skipping
22 all the way to March. December, January, February, no
23 business?

24 And you have December, January -- or December,
25 January, February statements, he has?

1 A. Yes.

2 Q. Okay. If I find these to be familiar names,
3 I'm not going to ask you about them because you have
4 already answered and I will assume it's for the same
5 unless otherwise stated.

6 A. Yes, sir.

7 Q. Okay. On May 1st, 2011, there's a fund
8 transfer from OS General Sen Equipo, \$3,500.

9 A. Okay.

10 Q. Is that for an FVAS?

11 A. Yes.

12 Q. June 1st 2011, wire from Claudi Ernesto Lopez?

13 A. Yes.

14 Q. \$1,300.

15 Is that a company or a person?

16 A. That is a person.

17 Q. And that person is residing in?

18 A. Mexico.

19 Q. And the \$1,300 was for?

20 A. FVAS license.

21 Q. And then we go to July 2011, Wire from Technol
22 Gia En Pro E-c-c-i-o-n, \$6,500. Is this a company
23 located in Latin America?

24 A. Mexico.

25 Q. \$6,500 was for --

1 A. FVAS license.

2 Q. The 8/19 wire in \$1,400 from OS General, FVAS.
3 Juan Tonio Flor -- is that -- it's \$158. What was that
4 for?

5 A. For a class that I taught.

6 Q. Okay. And where is Juan Tonio?

7 A. In Mexico.

8 Q. And then we're jumping to August -- well, not
9 jumping, but to August 31st, 2011. I see 9/13 Fund
10 Transfer but it's redacted. Is there any particular
11 reason why it's redacted or --

12 A. Yes. That was a transfer between -- I saw
13 this. I did that one. That was a transfer between
14 savings and checking accounts. It was not an incoming
15 anything.

16 Q. So you have a savings account connected at the
17 same bank?

18 A. Yes.

19 Q. Any other accounts?

20 A. No.

21 Q. And you have these documents that are
22 un-redacted for the Special Master if he so desires?

23 MR. FARWELL: Yes.

24 BY MR. D'LOUGHY:

25 Q. All right.

1 All right. October 31st, we moved from August
2 to 31st, 2011. Wire from Juli Ta Addy Ga -- Juli,
3 G-u -- or I'm sorry, J-u-l-i, space T-a, space, A-d-d-y.
4 \$900, was that for --

5 A. FVAS license.

6 Q. Okay. And then we go from October to November
7 and this is a new one. 12/27. I don't understand,
8 maybe you can help me. This is November 2011 to
9 November 30th, 2011 and the date is 12/27. Do you know
10 why that is?

11 A. No.

12 Q. And it says Funds Transfer, Evalua,
13 E-v-a-l-u-a. And where is Evalua?

14 A. Mexico.

15 Q. Company?

16 A. Yes.

17 Q. \$4,500 to FVAS?

18 A. FVAS license.

19 Q. Okay. December 31st, 2011, same Juli Ta Addy,
20 2,100.

21 Is that an individual or a company?

22 A. Individual.

23 Q. FVAS?

24 A. Yes.

25 Q. And then below that 1/3, and I don't quite

1 understand this -- well, it doesn't have the range of
2 dates that this falls under, but the next one at 1/3 is
3 Centro De Confian, 2,250? A license as well?

4 A. Yes.

5 Q. And going over to April 4/2, \$800. Is that
6 also a license?

7 A. Yes.

8 Q. 4/20 to Centro De Confian, 2,250, a license?

9 A. Yes.

10 Q. Okay. When I say "license," I mean FVAS?

11 A. Correct.

12 Q. Now we go from April to June 2012. Wire from
13 Ta Addy, 1,600. FVAS?

14 A. Correct.

15 Q. The next page, I can't ascertain -- we go from
16 June 30th to September, 9/11. But I don't understand
17 how we've gone from June 30th, 2012 until 9/11 except
18 that this is 9/11/2012, but it doesn't have a date on
19 it.

20 Oh, I'm sorry. It does. Top right hand,
21 September 1st through September 30, 2012, Centro De
22 Confian, again, \$3,000, assuming FVAS?

23 A. FVAS license, yes.

24 Q. September 30th, 2012, I'm going to -- I don't
25 know what date this statement is, but it says,

1 10/12 wire from Centro De Con- -- I think this is the
2 same customer but the name is a little bit different.

3 A. Yes. Yes.

4 Q. \$3,000, FVAS?

5 A. Yes.

6 Q. Okay. Next page, November 8, 2016 -- I'm
7 sorry. November 16, 2012, ser icios pres -- will you
8 please help me with that, Mr. Savage?

9 A. It's S-e-r-v-i-c-i-o-s.

10 Q. The amount is 3,631.27?

11 A. Correct.

12 Q. And that was for FVAS?

13 A. Yes.

14 Q. And this company is located where?

15 A. Mexico.

16 Q. Now, I'm looking at November which I believe
17 to be 2012. There is a wire in and that's redacted?

18 A. Right. That was the same thing I -- that was
19 not --

20 Q. Savings account?

21 A. Yes. It was just a transfer.

22 Q. Is there -- okay. Okay. I believe this
23 statement is from January 1st, 2013, Luis Cente O'Bello,
24 \$1,903.75. FVAS?

25 A. FVAS license.

1 Q. And the location of Luis?

2 A. Mexico.

3 Q. Company?

4 A. Individual.

5 Q. Okay. We jumped from January of 2012 to
6 August of 2012. What happened between February and July
7 of 2012?

8 A. There were no sales of FVAS licenses.

9 Q. And you provided the un-redacted bank
10 statements to your counsel?

11 A. He has every one.

12 Q. He has the unbridged --

13 A. Yes.

14 Q. -- every single in sequential order?

15 A. Yes.

16 Q. All un-redacted?

17 A. Yes.

18 Q. Okay. 8/21/2013, Mariso -- Mariso Aguilar,
19 \$1,000. Was that FVAS?

20 A. FVAS license.

21 Q. And Mariso is located?

22 A. Mexico.

23 Q. And 8/27, 2013 from Mercur, M-e-r-c-u-r, O.
24 Segurida, \$2,000. FVAS?

25 A. FVAS license.

1 Q. Mexico?

2 A. Mexico.

3 Q. We're in August of 2000 -- well, actually
4 September of 2013. Wire from -- can you help me out
5 with this one because it's a little bit chopped up?

6 A. Yeah, it's C-o-n-t-r-e-r-a-s. Okay?

7 Q. I think that's sufficient to identify it.
8 The amount is 4,478, FVAS?

9 A. FVAS license.

10 Q. And this is a company that you refer to?

11 A. Company.

12 Q. Mexico?

13 A. Yes.

14 Q. September -- or, I'm sorry, October of 2013,
15 1017, Mercur Segurida, a thousand. License?

16 A. Yes.

17 Q. Repeated 10/29 for a thousand dollars. The
18 same Mercur Segurida, a thousand. License?

19 A. Yes.

20 Q. And then 10/31 from Mariso Aguilar, a thousand.
21 License?

22 A. Yes.

23 Q. And now we are here 11, November 2013.
24 Statement line item 11/19 from Sinerg En Preve. Preve.
25 Is that pronounced correctly -- correctly?

1 A. It's S-i-n-e-r-g-i-a.

2 Q. And this company is located where?

3 A. Mexico.

4 Q. 3,830, is that a license?

5 A. No. That's a training course that I
6 conducted.

7 Q. And your training was based on what methods?

8 A. FVSA.

9 Q. Okay. All right. We go from November of 2013
10 to December of 2013. Company -- 12/9, company is from
11 Operad Ra Portuar a Centroamerica. \$4,059. Is that an
12 FVAS license?

13 A. No. That is preemployment screening.

14 Q. And the location of this company?

15 A. Honduras.

16 Q. And now we go from November of 2013 -- or I'm
17 sorry, I misspoke -- December of 2013 all the way to
18 August of 2014. Bad year?

19 A. (Witness nodding.)

20 Q. Okay. I see a fund transfer but I don't see
21 any --

22 A. Yes. That --

23 Q. -- personal --

24 A. That was savings to --

25 Q. Okay.

1 A. Same thing.

2 Q. And I will just say for the record that the
3 same thing is September 9th -- September 15th, 2014 is
4 redacted, Mr. Savage claims that this is a personal wire
5 transfer to his personal account or fund transfer?

6 A. Yeah. Not a wire transfer, just --

7 Q. It's an account transfer?

8 A. In the same bank, yes.

9 Q. Intrabank transfer?

10 A. Yes.

11 Q. All right. Now we're in October of 2014. A
12 fund transfer comes in on 10/21, Mariso Aguilar, \$500.
13 Does that represent a license?

14 A. Yes.

15 Q. And Mariso is again in Mexico?

16 A. Yes.

17 Q. We then go from October of 2014 to January of
18 2015, specifically January 29th wire transfer from
19 Operad Ra Portuar, Centroamerica, \$6,385.50.

20 A. Preemployment screen.

21 Q. Preemployment. And the company --

22 A. Honduras.

23 Q. Okay. A new one we have. March 2015
24 statement, 3/17 to be precise. From nadro Sapi De CV
25 5,980. FVAS?

1 A. FVAS license.

2 Q. And the company's location?

3 A. Mexico.

4 Q. Okay. And we jump all the way from March of
5 2015 to September of 2013. And, again, these are
6 redacted. Would you explain, please?

7 A. Funds transfer is the intrabank transfer
8 between savings and checking.

9 Q. Okay. Now, you testified earlier that you
10 didn't receive a salary from the company. In fact, you
11 received a dividend at the end of the year split by you,
12 know, amongst your two other partners?

13 A. Correct.

14 Q. How were you booking this money when you do a
15 fund transfer? Was there other money coming into this
16 account that have nothing do with Expertos?

17 A. Into this account?

18 Q. Yes.

19 A. No.

20 Q. So this is only monies that are coming from
21 companies and individuals outside of the United States
22 that cannot pay in their local currency to Guatemala so
23 they need to send U.S. dollars to your account in Bank
24 Atlantic?

25 A. Citibank.

1 Q. Citibank.

2 A. Yes.

3 Q. So my question is then how are you
4 transferring money into your personal savings account
5 during these years when you said you're not taking a
6 salary?

7 A. This -- this is not a personal savings
8 account. This is a corporate savings account.

9 Q. Right. But you have redacted lines on here
10 where you have testified that these transfers which are
11 redacted are an interbank transfer into your savings
12 account?

13 A. Into the company savings account.

14 Q. So Expertos --

15 A. Expertos has a savings account and a checking
16 account.

17 Q. I see.

18 A. These transfers are from Expertos savings to
19 Expertos checking, or vice versa.

20 Q. And how would you decide when you're going to
21 transfer money into the Expertos savings account?

22 A. When I knew that I was going to need money to
23 purchase equipment for Expertos SA in the United States
24 and carry it down. I buy all the computers, for
25 example, or laptops here in the United States and I

1 carry them down as part of my luggage.

2 Q. I see. And the savings account, do you
3 transfer money out of the savings account as well?

4 A. I made transfer between the savings and the
5 checking or the checking to the savings, either way.

6 Q. But when you wire money out to Expertos SA or
7 to Mr. Baker, where does that money go, does it come out
8 of your -- the company savings account or the checking
9 account?

10 A. Normally the checking account.

11 Q. Is there a time that it ever came out of the
12 savings that you're aware of?

13 A. That I remember, no.

14 Q. Did you bring copies of the savings account,
15 the statements of the savings account with you today?

16 A. Yes. They are -- they are all listed
17 together. Citibank, the -- the Citibank statements that
18 I brought show both savings and checking on the same --
19 on the same sheet.

20 Q. How am I supposed to distinguish which one is
21 which?

22 A. Let me see if I can find one. If you -- on
23 these pages it's hard to see because of the Xerox, but
24 it says checking activity, savings activity.

25 Q. Okay.

1 A. They list the -- both accounts on the same --
2 on the same statement page.

3 Q. I see. All right. What is the purpose of
4 having two accounts for Expertos, Inc., a company that
5 really doesn't do anything other than use itself as a
6 conduit for people that need to pay in dollars?

7 A. I just set it up so that I was hoping that I
8 could build up money in the savings account to use for
9 expenses and use the checking account to move the money
10 back and forth.

11 Q. Okay.

12 MR. D'LOUGHY: Can you tell me, madam
13 court reporter off the record, can you tell me
14 what the last statement date we refer to is,
15 please?

16 (Discussion off the record.)

17 BY MR. D'LOUGHY:

18 Q. Well, I have a note here on 9/11/2015, so I'm
19 going to just -- we may duplicate something, but at
20 least I'm confident that that's -- at least I've been
21 over this.

22 November of 2015, fund transfer Seguri Dad
23 Tecnol, O-g-i-c-a Rives, R-i-v-e-s, 4,185? FVAS?

24 A. FVAS license, yes.

25 Q. Is this a Mexican company?

1 A. Yes.

2 Q. S-e-g-u-r-i, space, D-a-d, space, T-e-c-n-o-l,
3 space, O-g-i-c-a, space, R-i-v-e-s. Okay?

4 December we skip over -- no, we don't.
5 December of 2015, Seguri Dad Tecnol, repeat 4,235. Is
6 that a license fee?

7 A. Yes.

8 Q. And that's a Mexican company?

9 A. Mexican company. Same one.

10 Q. Okay. And the last page is July 1st, through
11 July 31st, 2016. And there's nothing -- everything has
12 been redacted. Is this also an interbank transfer?

13 A. Yes.

14 Q. Okay. What happened from July until now,
15 July 16 until now, business?

16 A. None.

17 Q. And within this stack of bank statements you
18 have provided, is it your testimony that you have
19 transferred money from either your savings or business
20 account to Mr. Baker in paying off the loan?

21 A. Yes.

22 Q. Do you know how much?

23 A. Not exactly.

24 Q. Do you think you can find out by Friday?

25 A. Yes.

1 Q. Okay. And with respect to the business
2 checking account, not the savings but the business, any
3 transfers out, would they have been only to Expertos SA
4 and to Mr. Baker and his company? Would there be any
5 other transferees that money would have gone to?

6 A. No.

7 Q. With respect to the savings account, were the
8 transfers only to SA, Mr. Baker or a check to you so you
9 can purchase equipment?

10 A. Yes.

11 Q. And the documents would reflect one of those
12 three scenarios?

13 A. Yes.

14 Q. And we're marking this as Plaintiff's
15 Exhibit 2 for Mr. Savage -- or, I'm sorry, we've already
16 marked it as Plaintiff's Exhibit 1 for Mr. Savage. So
17 pardon me.

18 Mr. Savage, do you still do quite a bit of
19 traveling, flying in and out of Guatemala?

20 A. Yes.

21 Q. And how often do you travel in an out of the
22 country of Guatemala?

23 A. Eight or ten times a year.

24 Q. And do you have customers that visit you in
25 Guatemala from outside of the country of Guatemala?

1 A. Very rarely, but yes.

2 Q. So I want ask you first of all, I see that
3 your passport was renewed on January 9th, 2015; is that
4 correct?

5 A. I'd have to look but --

6 Q. Would you agree with that of course?

7 A. Yes.

8 MR. D'LOUGHY: This is going to be
9 Plaintiff's Exhibit 2, please for Mr. Savage.
10 And it's a copy of the contents pages of his
11 passport.

12 (Plaintiff's Exhibit No. 2 was marked for
13 identification and retained by Mr. D'Loughy.)

14 BY MR. D'LOUGHY:

15 Q. Let me assume that the possible hundreds of
16 stamps in here are representative of trips in and out of
17 the country of Guatemala. Would that be a correct
18 assessment?

19 A. Yes.

20 Q. Assumption.

21 Okay. And I'm not going to ask you about each
22 and every trip you have taken out of Guatemala because I
23 don't know that you would be helpful in recalling. But
24 let's go to the most recent. March 22nd, 2016 or '17.
25 Can you tell me what that stamp represents?

1 A. This is the exit from Guatemala to fly here.

2 Q. Okay. And then March 7, 2017 what does that
3 represent?

4 A. Entry into Guatemala.

5 Q. And where did you come into Guatemala from?

6 A. Mexico.

7 Q. And what were you doing in Mexico?

8 A. I went to teach a course, but no students
9 showed up so I did not teach the course.

10 Q. Sell any licenses?

11 A. No.

12 Q. And then prior to that November of 2016, and I
13 guess DIC means December of 2016.

14 A. Yes.

15 Q. You traveled, where did you travel?

16 A. To the United States.

17 Q. And for personal reasons?

18 A. For Christmas, yes.

19 Q. And what is -- what does ENE mean?

20 A. January.

21 Q. And that's your -- what is January
22 representing in that travel?

23 A. That is when I returned to Guatemala after
24 Christmas.

25 Q. Okay. And do you still have the passport that

1 preceded the -- this passport? Do you still have a copy
2 of that passport?

3 A. No.

4 Q. Where is it?

5 A. The Embassy retained it.

6 Q. And when you got this renewed, you renewed it
7 at which Embassy?

8 A. In Guatemala.

9 Q. You didn't do it inside the United States, you
10 were there in Guatemala at the time?

11 A. Correct.

12 Q. Have you ever traveled to South Africa?

13 A. No.

14 Q. UK?

15 A. Yes.

16 Q. How long ago?

17 A. 2015.

18 Q. What was the nature of the visit?

19 A. Vacation.

20 Q. No selling of licenses?

21 A. No.

22 Q. What about Australia?

23 A. Yes.

24 Q. Recently?

25 A. I think it was four years ago. I went to

1 visits my daughter who lives in Australia.

2 Q. Not a business related trip?

3 A. No.

4 Q. Where does the majority of your travels take
5 you?

6 A. Mexico.

7 Q. And most of that is business related?

8 A. Yes.

9 Q. Thank you for that.

10 A. Okay.

11 Q. I am missing my copy of this passport.

12 MR. FARWELL: There's an extra one here.

13 MR. D'LOUGHY: I'll take it. Thank you.

14 MR. FARWELL: Sure.

15 BY MR. D'LOUGHY:

16 Q. Mr. Savage, I have no further questions of
17 you. Your attorney may want to cross-examine on some of
18 the areas that I've examined you on or he may not.

19 CROSS (MICHAEL SAVAGE)

20 BY MR. FARWELL:

21 Q. I just have a couple of quick follow-up
22 questions. Just to clarify a couple of things,
23 Mr. Savage, there was a lot of talk that you, you, you
24 you, for example, you licensed the FVAS. Was it you
25 licensed the FVAS or was it Expertos VSA SA?

1 A. Expertos VSA SA.

2 Q. Same question with regards to selling, there
3 was mention of you selling. Who actually was selling,
4 if indeed there was sales taking place, you or Expertos
5 VSA SA?

6 A. Expertos VSA SA.

7 Q. And then you talked about -- the exact words
8 were "my product." Was that your product or Expertos
9 VSA SA's product?

10 You said, "my product." When you said your
11 product or my product, whose product did you mean?

12 A. Expertos, the product of Expertos VSA SA,
13 Guatemala.

14 Q. And then finally one final question, you
15 talked about you or I repaying Mr. Baker gradually back.
16 Again, was that you or was that Expertos VSA SA of
17 Guatemala?

18 A. Expertos VSA SA of Guatemala.

19 MR. FARWELL: I have no further questions
20 at this point.

21 MR. D'LOUGHY: Read or waive?

22 MR. FARWELL: We'll read, and if we can do
23 so tomorrow we will, and if it doesn't work out
24 we'll deal with the court reporter then
25 depending on how much time.

1 MR. D'LOUGHY: I just want to say thank
2 you for cooperating. I appreciate it.

3 MR. FARWELL: Yes, and then I'm going to
4 do this one final time.

5 We are going off the record in NITV Federal
6 Services, Inc. versus Elwood Gary Baker, et cetera
7 Case Number 50-2015-CA-005885. It is still
8 March 29th, 2017 and it is 4:54 p.m. And we are
9 now off the record.

10 MR. D'LOUGHY: I want the rough and the
11 final tomorrow.

12 I am retaining all of the originals.

13 (Witness excused.)

14 (Deposition was concluded.)

15

16

17

18

19

20

21

22

23

24

25

CERTIFICATE OF OATH

THE STATE OF FLORIDA

COUNTY OF PALM BEACH

I, the undersigned authority, certify that
MICHAEL SAVAGE personally appeared before me and was
duly sworn on the 29th day of March, 2017.

Dated this 30th day of March, 2017.



Kathleen M. Szabo, RPR
Notary Public - State of Florida
My Commission Expires: 4/22/2019
My Commission No.: FF205570

C E R T I F I C A T E

THE STATE OF FLORIDA

COUNTY OF PALM BEACH

I, Kathleen Szabo, Registered Professional Reporter and Notary Public in and for the State of Florida at large, do hereby certify that I was authorized to and did report said deposition in stenotype; and that the foregoing pages are a true and correct transcription of my shorthand notes of said deposition.

I further certify that said deposition was taken at the time and place hereinabove set forth and that the taking of said deposition was commenced and completed as hereinabove set out.

I further certify that I am not attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party connected with the action, nor am I financially interested in the action.

The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.

Dated this 30th day of March, 2017.



Kathleen Szabo, RPR

1 DATE: March 29, 2017

2 TO: MICHAEL SAVAGE
3 c/o SCOTT W. ZAPOLLO, ESQUIRE
4 ZAPPOLO FARWELL ATTORNEYS AT LAW
5 7108 Fairway Drive, Suite 150
6 Palm Beach Gardens, Florida 33418

7 DEPOSITION OF: MICHAEL SAVAGE
8 TAKEN: 3/29/17 JOB NO.: 1552911
9 IN RE: NITV Federal Services, LLC vs. Baker

10 The transcript of the above proceeding is now
11 available for your review.

12 Please call to schedule an appointment between
13 the hours of 9:00 a.m. and 4:00 p.m., Monday through
14 Friday, at a U.S. Legal Support office located nearest
15 you.

16 If you are a party in this action and your
17 attorney has ordered a copy of this transcript, you may
18 wish to read his/her copy of the transcript. In that
19 event, please execute the Errata Sheet, found at the
20 back of the transcript, and return it to us for
21 distribution. A self-addressed envelope is enclosed for
22 your convenience

23 Please complete your review within a
24 reasonable amount of time/30 days.

25 Very truly yours,
26 *Kathleen Szabo*

27 _____
28 Kathleen Szabo, RPR
29 U.S. Legal Support
30 444 West Railroad Avenue
31 Suite 300
32 West Palm Beach, Florida 33401

33 I do hereby waive my signature.

34 _____
35 MICHAEL SAVAGE
36 cc: Via transcript: James D'Loughy, Esquire

C E R T I F I C A T E

- - -

THE STATE OF FLORIDA

COUNTY OF PALM BEACH

I hereby certify that I have read the
foregoing deposition by me given, and that the
statements contained herein are true and correct to the
best of my knowledge and belief, with the exception of
any corrections or notations made on the errata sheet,
if one was executed.

Dated this ____ day of _____,
20 ____ .

MICHAEL SAVAGE

		78:23 87:10	2014 81:18 82:3,11,17
\$	-	2	2015 17:13 22:8 41:1 82:18,23 83:5 86:22 87:5 89:3 91:17
\$1,000 79:19	-8 64:20	2 88:15 89:9, 12	2016 78:6 87:11 89:24 90:12,13
\$1,300 74:14, 19	1	2,070 68:8	2017 4:12 51:11 90:2 94:8
\$1,400 75:2	1 64:25 65:1 88:16	2,100 76:20	22 8:13 22nd 89:24
\$1,903.75 78:24	1,600 77:13	2,250 77:3,8	29 51:11
\$158 75:3	1/3 76:25 77:2	20 22:2 24:3, 8 50:15	29th 4:12 82:18 94:8
\$2,000 58:16, 18 79:24	10 6:6	20- 64:19	2:17 4:13
\$2,040 72:22	10,000 15:14	2000 11:19 13:23 14:1, 11,15 15:24	
\$2,070 65:25 66:2	10/12 78:1	16:14 17:3 42:21 80:3	
\$200,000 28:18	10/21 82:12	2000- 49:8	
\$2070 65:6	10/29 80:17	2002 8:14 11:13,17	
\$3,000 77:22 78:4	10/31 80:20	2003 17:3	
\$3,500 73:16 74:8	1017 80:15	2004 41:25	
\$38,000 46:23 47:1 48:18 55:24 57:9	10560 5:20	2005 17:7 49:11	3,500 72:17
\$4,059 81:11	11 6:11 40:2 80:23	2006 49:11	3,631.27 78:10
\$4,090 71:25	11/19 80:24	2007 26:11 49:7	3,830 81:4
\$4,500 76:17	12,000 56:17	2008 18:15,16 49:7,14	3-28 6:20
\$400 69:9	12/27 76:7,9	2009 20:25 30:5 36:22	3/1 65:4
\$4500 71:5	12/9 81:10	2010 17:11 64:19,20 69:3,4,14 70:22 71:19, 20,21	3/17 82:24
\$48,000 58:15	15 29:10	2011 74:7,12, 21 75:9 76:2, 8,9,19	3/31 68:19
\$50,000 56:13	15-45 6:6	2012 77:12, 17,21,24 78:7,17 79:5, 6,7	30 54:22 77:21
\$500 71:2 82:12	150,000 28:17	2013 78:23 79:23 80:4, 14,23 81:9, 10,16,17 83:5	30th 73:13 76:9 77:16, 17,24
\$6,000 68:9	15th 82:3		31st 69:3 70:22 71:19 75:9 76:1,2, 19 87:11
\$6,385.50 82:19	16 78:7 87:15		33428 5:21
\$6,500 74:22, 25	17 89:24		38,000 56:16
\$600 67:17 68:10,11	1971 7:14 8:16		3:23 51:6
\$75,000 28:25	1980 8:8		3:40 51:12
\$800 77:5	1992 7:14 8:5,16,17 10:12		
\$900 76:4	1994 5:24		
	1996 11:3		
	1997 11:20		
	1998 12:1 13:22		
	1st 64:19 69:3,14 70:22 74:7,12 77:21		

<p>4</p> <p>4,185 86:23 4,235 87:5 4,478 80:8 4,500 71:11 4,970 70:23 4/2 77:5 4/20 77:8 4:54 94:8</p> <hr/> <p>5</p> <p>5,980 82:25 50 28:24 50-2015-CA-005885 4:12 51:5,11 94:7 500 71:10</p> <hr/> <p>7</p> <p>7 90:2 70s 43:23 75th 9:8 50:7</p> <hr/> <p>8</p> <p>8 78:6 8/18 71:4 8/19 75:2 8/21/2013 79:18 8/27 79:23</p> <hr/> <p>9</p> <p>9/11 77:16,17 9/11/2012 77:18 9/11/2015 86:18 9/13 75:9 9/21 72:3,10</p>	<p>90-day 37:24 9th 82:3 89:3</p> <hr/> <p>A</p> <p>A-D-D-Y 76:3 absence 14:13 accept 24:25 25:5 66:15 67:5 72:7 account 25:10,19,22, 25 26:2,4,18, 25 27:1 62:20 64:6 65:25 70:5 73:3 75:16 78:20 82:5,7 83:16, 17,23 84:4,8, 12,13,15,16, 21 85:2,3,8, 9,10,14,15 86:8,9 87:20 88:2,7 accountant 29:15,19 30:3 accounts 75:14,19 86:1,4 accurate 34:14 accustomed 48:14 achieved 7:15 acronym 35:12 Acronyms 37:11 active 21:12 31:4 40:14 actively 23:18 31:25 41:8 activity 40:20 65:5 85:24 adapting 44:4</p>	<p>addition 29:10 additional 22:13 24:9 56:17 58:24 address 5:19, 23 6:2,3,4,5, 17,18,19 addresses 6:18 Addy 76:2,19 77:13 advice 31:15 affairs 44:19 affirmed 4:18 afford 40:22 Africa 41:13, 22,24 61:10, 16 62:24 91:12 African 59:6, 8 60:4,7,22, 23 agrarian 47:8 agree 59:11 89:6 agreed 41:20 agreement 38:23,24 39:4 48:19 49:4 Aguilar 79:18 Aguilar 80:20 82:12 algorithm 47:13,16,20, 24 48:8 algorithms 46:3 48:4 America 6:12 9:13,15 42:19 53:25 74:23 American 6:24 7:2 14:25 22:3 52:9 53:23 66:20 amount 27:2, 3,6,9 28:16</p>	<p>31:19 54:18 55:23 58:5, 12,14 73:7 78:10 80:8 amounts 57:1 analysis 11:24 12:12 13:2,9 14:8, 18 17:6,16,20 31:23 32:5,6, 8 35:8 36:13 43:1,6,21 54:7,15 Anne 63:21 annual 37:22 answering 43:7 applicant 14:18 apply 43:12 approximately 6:10,13,15 8:13 12:1 13:20 18:15 19:9 28:4,25 51:12 55:24 58:15 April 77:5,12 area 9:10,12 42:14 areas 31:7 92:18 Army 7:19 8:11,12 9:5, 7,10 10:9 11:14 42:20 arts 7:7 11:7 ascertain 77:15 assessment 89:18 assume 52:19 56:1 59:16 61:7 62:23 63:24 67:12 72:25 74:4 89:15</p>
--	---	---	---

<p>assuming 57:17 77:22</p> <p>Assumption 89:20</p> <p>Atlantic 9:3 10:16 11:2 83:24</p> <p>attended 13:1</p> <p>attendees 34:1</p> <p>attorney 44:16 65:10 92:17</p> <p>attorney- client 30:12</p> <p>audibly 5:13</p> <p>August 71:19, 20 72:19 75:8,9 76:1 79:6 80:3 81:18</p> <p>Australia 91:22 92:1</p> <p>authority 62:12</p> <p>Avenue 6:6</p> <p>average 40:7</p> <p>aware 85:12</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p>bachelor 7:7</p> <p>back 9:4 11:18 12:19 33:8,9 36:5 40:10 41:25 46:15 51:8 52:11 56:7,22 59:22 69:2,13 70:15 73:2,12 86:10 93:15</p> <p>background 31:13</p> <p>backup 60:17</p> <p>Bad 81:18</p> <p>Baker 4:10 12:20 18:5,8</p>	<p>27:21 41:16 45:21,24 46:10 47:3,23 51:4,10 55:19,21 56:1,3 57:8, 22 58:5,18,23 59:1,2,7,16, 17,22 60:8 61:2,11,13,15 67:11,13 73:2,6 85:7 87:20 88:4,8 93:15 94:6</p> <p>Baker's 4:24 12:20 33:12 45:16,18 55:15 57:8 58:12 62:20</p> <p>ballparking 29:5</p> <p>bank 25:18, 22,25 26:2, 18,25 27:1 59:2,3,5 62:20 64:6,8, 10,16 67:14 70:1,5 73:3 75:17 79:9 82:8 83:23 87:17</p> <p>banking 25:25 27:7,8</p> <p>based 18:7 21:8,13,16 24:11 34:22 50:19 73:7,17 81:7</p> <p>basic 32:12</p> <p>basically 23:19 40:17, 18,21 47:19 68:18</p> <p>basis 37:24, 25 47:21</p> <p>Beach 4:11 11:6 14:12 51:5</p>	<p>Beatrice 64:2</p> <p>begin 11:22</p> <p>beginning 13:23</p> <p>behalf 21:11 42:6 49:13 55:12 61:21 62:13,25 63:25</p> <p>belongs 36:18</p> <p>benefit 23:14</p> <p>bill 24:25 25:5 31:17,18 66:17 67:5</p> <p>bills 66:16</p> <p>bit 21:21 49:9 78:2 80:5 88:18</p> <p>Board 14:12</p> <p>Boca 5:21,22 64:15 73:3</p> <p>Bogota 12:18</p> <p>book 56:25</p> <p>booking 83:14</p> <p>books 33:18</p> <p>bother 24:10</p> <p>branch 7:18 64:13</p> <p>break 51:20</p> <p>breakfast 40:10</p> <p>bring 8:14 53:12 70:16 85:14</p> <p>broad 43:17</p> <p>brought 26:19 85:18</p> <p>build 86:8</p> <p>business 12:6 26:5 53:15,16 60:24 61:17 65:15 73:23 87:15,19 88:1,2 92:2,7</p> <p>buy 45:7 84:24</p>	<hr/> <p style="text-align: center;">C</p> <hr/> <p>C-O-N-T-R-E-R- A-S 80:6</p> <p>call 5:16 15:13 27:14 29:21 33:25 38:25 48:12 51:22</p> <p>called 9:9 10:23 11:20 17:20 25:17 39:1,2 50:9</p> <p>calls 19:1</p> <p>candidate 42:24</p> <p>candidates 43:12</p> <p>capacity 13:5</p> <p>capture 42:22</p> <p>career 8:23 9:7 13:25</p> <p>Carolina 7:3 8:7,10</p> <p>carry 84:24 85:1</p> <p>cars 8:25 9:2 10:13</p> <p>case 4:9,11 9:13 12:6 31:14 33:9 36:15 50:17 51:3,4,10 94:7</p> <p>cases 34:15</p> <p>Catalina 70:23</p> <p>CBO 64:9</p> <p>Cente 78:23</p> <p>Central 6:12 66:20</p> <p>Centro 72:3, 10,20 77:3,8, 21 78:1</p> <p>Centroamerica 81:11 82:19</p>
---	--	--	--

<p>cetera 4:10 51:4,10 94:6 chain 45:5 Charge 64:18 check 88:8 checking 65:5 67:14 75:14 83:8 84:15,19 85:5,8,10,18, 24 86:9 88:2 checks 67:14 chopped 80:5 chosen 9:16 Chris 41:13 Christmas 31:3 90:18,24 Circuit 4:11 Citibank 25:22 43:10 64:9,11,17 83:25 84:1 85:17 citizen 22:4 50:15 52:12 City 6:7 34:19 57:16, 17 59:3,4 claimed 12:20 claiming 38:5 claims 82:4 clarify 39:13 92:22 class 13:11, 13 75:5 classes 54:6 classified 7:24,25 Claudi 74:12 client 25:3 26:1 54:21 clients 17:16 24:23 40:13 45:7 62:3,5 71:12 close 56:23, 24</p>	<p>code 38:10 48:21 55:4,7, 9 coded 45:10 coder 51:21 coders 47:5 colonel 7:16, 21 Columbia 12:15,17 13:3,6,11,18, 20 16:21 Columbian 12:25 16:9 commission 9:6 common 23:24 24:6,11 communicate 60:10 communication 30:13 companies 24:23 31:5 45:2,5 61:10 83:21 company 10:23 11:20 12:10, 11,13 14:1, 23,25 15:1,8, 9,13,25 16:13,15,24 17:1,7 19:15 21:22 22:20 23:3 24:15, 18,19 26:1 30:4,6 31:1 33:20,24 34:16 36:15 39:3,7,10 42:17,23 43:4,10 52:4 57:2,8,22 58:13,23 59:6,8 60:5, 8,22,23,24 61:16 63:17, 23,25 64:5</p>	<p>65:17 66:14 67:2,20 68:17,23 69:6 71:1 72:15 73:17 74:15, 22 76:15,21 78:14 79:3 80:10,11 81:2,10,14 82:21 83:10 84:13 85:8 86:4,25 87:8, 9 88:4 company's 83:2 compare 42:9 completed 26:14 completely 31:20 computer 22:11 37:15 55:6 60:14,17 computers 84:24 Con- 78:1 concluded 94:14 condition 35:18 conditions 55:25 56:5 conduct 14:17 44:20 54:14 conducted 47:25 81:6 conduit 86:6 Confian 77:3, 8,22 confident 86:20 confidential 19:1,15 28:11 38:12 65:9,12 conjecture 5:7 connected</p>	<p>75:16 connection 24:17,20 considered 23:23 consulting 25:16 contact 50:17 contacted 41:18 46:1, 11,15 50:4 contents 89:10 continued 12:1 contract 10:24 54:5 contracted 11:20 12:9 34:15 45:25 contrast 42:10 control 37:8 Convenience 60:6 cooperating 94:2 copies 24:6 37:5 85:14 Copor 68:20 copy 89:10 91:1 92:11 Cordova 68:20 Corpor 71:22, 23 corporate 25:18,22,24 26:2 84:8 corporation 25:13,16,19 correct 7:5, 11 16:2 27:18 36:16 37:4 38:16 40:4 45:18,24,25 54:8,10 56:18 57:19,20</p>
--	--	--	--

58:21 59:10, 19,25 61:15 64:7 72:8 77:11,14 78:11 83:13 89:4,17 91:11 correctly 80:25 cost 19:22 46:4,21,22 Costa 21:16 22:1,2 49:23 50:19 51:22 52:19 counsel 79:10 countries 66:21 country 12:17 16:6 23:10 41:2,5,10 47:8 52:12 67:2 88:22,25 89:17 County 4:11 11:6 14:12 51:5 couple 33:5 50:8,9 92:21, 22 courses 6:25 31:11 32:16 court 4:15 5:10 15:19 27:19 51:15 64:23 86:13 93:24 crash 60:14 create 48:21 created 49:12 creating 5:11 credit 65:25 67:17 68:8,9, 25 criminal 22:18 42:11 44:1 CROSS 92:19	cross-examine 92:17 curiosity 6:16 currency 15:21 24:25 66:25 67:6 83:22 customer 19:1 26:24 37:19 61:1 78:2 customers 19:13 34:12 53:13 59:21 61:8 88:24 CV 82:24 CVSA 32:9 <hr/> D <hr/> D'LOUGHY 4:22,23 8:3 15:22 19:3, 12,17,24 20:2 23:4 28:8,14 30:15,21 33:2 35:1,20 36:1, 10 39:14 44:2 45:9 47:12 48:6 49:17 50:23 51:15, 18 54:23 58:22 59:14 60:1 61:24 62:18 63:2 65:2,3,21,24 66:6 69:24 70:18,20 73:11 75:24 86:12,17 89:8,13,14 92:13,15 93:21 94:1,10 D-A-D 87:2 D-E 71:23 D-E-L 67:22 D-E-L-G-A-D-O 16:23	Dad 86:22 87:5 daily 30:6 data 60:20 date 49:10 71:17 76:9 77:18,25 86:14 dated 71:4 dates 77:2 daughter 63:15,22 92:1 day 10:22 15:23 23:18 40:7,8,12,17 days 29:10 54:22 de 71:22 72:4,10,20 77:3,8,21 78:1 82:24 deal 62:5 93:24 dealings 49:13 December 73:22,24 76:19 81:10, 17 87:4,5 90:13 deception 43:17,23 44:22 decide 84:20 decision 73:5 decline 39:24 declined 38:15 decommissioned 10:7 deduct 27:9 defendants 38:4 degree 6:24 7:2,6 9:11 Delgado 16:22 36:21	Delta 50:5,6, 8 demonstrate 32:14 depending 93:25 depends 37:23,25 54:21 deploying 9:14 deposition 4:3,13,24 5:15 12:20 35:25 52:21 59:1 69:22 94:14 derive 22:24 23:12 describe 35:13 describing 26:20 designate 64:24 designated 9:13 designates 9:12 designer 51:21 desires 75:22 detect 43:17, 23 determine 63:10 develop 18:13 43:8 48:23 53:23 developed 15:25 17:23 36:19,20,21, 22 46:11 53:8 development 27:23 62:23, 24 63:5
--	---	--	--

DIC 90:13	dollar 25:10	46:16 48:22	enterprise
died 9:1	66:24	60:12	12:25
difference	dollarized	E-N 67:21	entitled 38:6
42:14 43:24	67:2	E-R-V 73:15	Entry 90:4
68:13	dollars 24:24	E-S-T-R-A-D-A	equipment
Diogenes	25:6 26:8,24	16:12	84:23 88:9
11:21 12:2,6,	28:16 46:5	E-V-A 72:20	Equipo 74:8
9,15,21	66:12,17,19	E-V-A-L-U-A	equivalent
13:17,19	67:7 80:17	76:13	14:9
18:18,19 54:3	83:23 86:6	E-V-A-L-U-A-C-	Ernesto 74:12
direct 4:21	download	I-O-N 72:13	error 70:11
61:9	37:20	earlier 47:24	essence 68:3
directly	downloaded	49:9 52:18,21	establish
59:18,22	47:19	58:7 64:5	25:22
60:3,9 61:2	draw 23:20	83:9	established
62:5 66:10	drive 36:25	early 58:17	10:23 14:1,15
disappeared	37:1,14,17,19	earth 50:12	estimate
50:12	drop-down	easy 25:15	26:15
discharge	22:16	32:14	Estrada 16:12
8:20,21	dual 9:7	education	20:11 36:21
discharged	duly 4:18	6:23,25	38:21 58:2
8:18	duplicate	effort 32:12	Evalua 76:12,
disclose 7:24	86:19	El 66:24	13
discuss 30:9	duties 63:24	electricity	Evaluac 72:11
discussed	DVSA 33:12	29:11	evaluate 15:7
30:10 51:16	42:5,7,8,11	Elwood 4:10	17:17 42:24
discussion	43:16,24	51:4,10 94:6	43:6,13
58:4 69:23	45:18 46:11	Embassy 91:5,	evaluating
73:10 86:16	48:8	7	42:20
dishonesty		employee 16:3	evaluations
43:23 44:22	E	employees	42:13 66:5
disk 37:14	E-C-C-I-O-N	17:9,16 21:3	exact 6:20,22
distinguish	74:22	23:1	93:7
42:8 68:2,5	E-G-U-R-I-D-A-	employment	examination
85:20	D 67:22	42:24	4:21 63:10
distributor	e-mail 19:22	En 67:18 69:7	examined 4:18
61:21	39:17,23	74:22 80:24	92:18
District 11:6	40:20 41:23	end 23:16	exceptions
dividend	45:22,24	83:11	44:25
23:16 83:11	46:14 50:18	ENE 90:19	exchange
division	55:10 60:11	engineer	66:23
44:19	64:14	51:21	exclusively
documentation	e-mailed	English 10:4,	18:21
59:17	50:11	19,25 71:13	excuse 30:7
documents	e-mails	ensure 15:8	35:17
63:9 70:1	40:11,12	entered 48:20	excused 94:13
75:21 88:11			

Exhibit 64:24 65:1 88:15,16 89:9,12 exist 37:5 exists 35:11 36:2 exit 90:1 expand 23:24 expectation 56:17 expenses 27:16 28:22, 23 29:4,12 86:9 expensive 24:8 expert 14:4 22:11 expertise 53:25 Experto 38:22 Expertos 14:2,3,14,22, 25 15:1,4 16:1,3 18:14, 22 20:5,6,16 21:3,11 22:14 23:5,6,12,15, 21 24:14 25:17,21 26:3,4,5,10, 14,25 27:1, 12,22 28:3 29:9,15 31:8, 18 34:23 36:18 38:9, 11,14,18 41:9 52:8 53:15,16 54:17 55:12, 16,19,22 56:2 57:10,15 58:6,24 59:18,23 60:3 61:2 62:13 63:6,16,19 64:10 65:14 66:10,15 70:8 73:3,8 83:16	84:14,15,18, 19,21,23 85:6 86:4 88:3 92:25 93:1,4, 6,8,12,16,18 Expertos' 61:25 expire 40:16 expired 54:24 explain 5:17 15:16 25:7 60:7 83:6 explained 46:2 Explorer 64:11 exported 10:12 exporting 8:25 9:2 extent 18:25 external 69:17 extra 92:12 extracted 69:17 <hr/> F <hr/> F-A-H-A-A-D 18:3 F-E-M-S-A 73:16 face 50:12 face-to-face 18:12 facilitate 26:8 30:23 fact 83:10 Fahaad 18:1,4 48:14 50:11 fair 32:22 43:16,17 47:14 60:19 66:8 falls 77:2	familiar 35:8 74:2 family 31:15 40:12 famous 50:5 Farwell 35:18 36:3,8 39:11 43:19 44:12, 14 47:11 48:1 49:15 51:2,8, 13 54:20 58:20 59:12, 24 61:22 62:14 63:1 65:14,17,19, 23 66:4 70:12,19 75:23 92:12, 14,20 93:19, 22 94:3 February 64:19 73:22, 25 79:6 Federal 4:9 5:3 51:3,9 94:5 fee 19:7,19 20:3 27:7,8 29:24 37:22, 25 87:6 feel 30:23 65:9 fees 27:14 FEMSA 73:15 field 44:5,7 final 43:11 93:14 94:4,11 finally 93:14 finance 27:23 find 46:13 50:10 62:3,6 74:2 85:22 87:24 fine 15:2 39:20 finished 9:14 fired 22:20	five- 37:24 flew 33:9 Flor 75:3 Florida 4:5 5:21 9:2,3 10:16 11:2 13:22 24:14, 19 53:24 fly 33:8 90:1 flying 88:19 follow-up 23:8 92:21 Force 50:5,6, 8 foreign 9:10 67:5 70:15 Forensic 17:20 35:8 form 19:10 23:2 28:5 32:23 34:24 39:11 43:19 44:12 47:11 48:1 49:15 54:20 58:20 59:12,24 61:22 62:14 63:1 formal 24:2,7 forward 27:12 forwarded 57:11 found 9:3 founder 15:25 fraud 44:23 Fred 21:18 52:2,18,19,20 freelance 21:24,25 52:3,5 frequently 55:14 Friday 34:9 87:24 friend 49:23 50:2,4
---	---	---	--

friends 40:12 front 69:2, 13,14 fulfill 58:18 full 5:19 10:1 56:22, 23,24 full-time 10:20,21 11:9 16:19 39:25 function 54:25 fund 68:20 74:7 75:9 81:20 82:5,12 83:15 86:22 funds 68:19 69:6 70:22 72:10 76:12 83:7 FVAS 17:20 18:13,21 20:4 22:14,25 23:21 27:24 32:13,17 34:23 37:12 40:25 41:9,20 42:12 43:17 45:11 49:12 52:7,23 53:8 54:18 56:10 61:25 62:2 67:24 68:1 69:10,11 70:25 71:2,6, 8 72:2,17,18, 22 73:19,20 74:10,20 75:1,2 76:5, 17,18,23 77:10,13,22, 23 78:4,12, 24,25 79:8, 19,20,24,25 80:8,9 81:12 82:25 83:1 86:23,24 92:24,25	FVSA 35:3 41:23 42:9 81:8 <hr/> G <hr/> G-U 76:3 G-U-A-D-A-L-A- J-A-R-A 34:19 Ga 76:2 gap 11:20 Gary 4:10 27:21 51:4,10 94:6 gave 25:25 48:25 general 16:16 32:7 35:12 74:8 75:2 General's 44:17 generally 27:4,9,20 28:12 33:4 34:25 37:10, 16,21 45:7 54:18 generation 49:18 gentleman 51:22 gentleman's 52:1 Gia 74:22 give 5:5,7 16:10 21:18, 21 26:23 40:7 46:14 50:18 54:11 63:8 good 35:15 Googled 47:18 government 44:19,22 governments 44:8,10 governs 39:9	graciously 51:20 gradually 56:7 93:15 graduate 6:25 graduated 7:4 8:6,9 gross 28:9,21 Guadalajara 34:19 Guatemala 5:25 6:2,6,7, 8,11,17,18 14:2 15:21 16:7,8 21:8 23:10,23 25:1 27:2 31:18 40:2,23 41:3, 10 42:17 46:1 47:4,5 52:13 57:10,17 66:15 72:7 83:22 88:19, 22,25 89:17, 22 90:1,4,5, 23 91:8,10 93:13,17,18 Guatemalan 14:25 16:11 24:11,18 39:1 guess 5:7 29:21,23 35:20 90:13 guys 36:4 <hr/> H <hr/> H-E-N-A-O 70:23 half 27:20 40:10 hand 33:20,21 50:22 77:20 handouts 33:17,22 Hansen 47:25 happened 79:6 87:14	hard 37:14 85:23 harken 12:19 hear 43:15 heard 59:16 hearing 49:10 held 58:4 helpful 89:23 hey 50:10 high 11:6 highest 6:23 hire 45:6 hired 11:5 hires 33:20, 25 home 6:18,19 10:24 Honduran 25:6 Honduras 25:3 26:1,23,24 66:14 81:15 82:22 honest 31:20 43:14 honestly 15:9 48:5 honesty 14:18 42:13,25 honorable 8:20,21 hoping 86:7 hour 40:10 hours 10:22 house 9:1 hub 47:4 human 22:16, 22 24:22 42:12,13 44:5,7,11 45:1,4,5 46:17 hundreds 89:15
--	---	---	---

<p>I</p> <p>I-N-C 14:9</p> <p>I-V-O-N-N-E 16:22</p> <p>icios 78:7</p> <p>idea 7:25 15:23 35:4,6 43:8 44:4 46:19</p> <p>identification 65:2 89:13</p> <p>identify 80:7</p> <p>include 32:13</p> <p>included 70:1</p> <p>including 32:11</p> <p>income 28:9, 21,22</p> <p>incoming 68:21 70:3,14 75:14</p> <p>incorrect 63:3</p> <p>indefinite 56:19</p> <p>independently 62:17</p> <p>India 17:24 21:14 48:16</p> <p>individual 25:12 45:10, 15,20 76:21, 22 79:4</p> <p>individually 31:18 57:13</p> <p>individuals 33:8,16 83:21</p> <p>information 25:25 28:10 38:4,6,7,9, 12,14,17 65:10</p> <p>informed 57:21</p>	<p>initially 12:5,8 13:1, 12 14:16 21:14 27:23 45:25 48:24 50:5</p> <p>input 34:5</p> <p>inside 12:16 15:9 91:9</p> <p>Installments 71:14,15</p> <p>instance 26:23</p> <p>institution 7:1</p> <p>instructor 13:7,17</p> <p>interbank 84:11 87:12</p> <p>interest 68:3</p> <p>internal 44:18</p> <p>interview 15:16</p> <p>interviewer 17:6</p> <p>interviews 14:17 23:7,8</p> <p>intrabank 82:9 83:7</p> <p>introduced 45:20,24</p> <p>investigations 15:12 22:18 42:11 44:1,20</p> <p>involved 44:21 58:10</p> <p>issue 41:19 66:16</p> <p>item 80:24</p> <p>items 67:10</p> <p>Ivonne 16:22 36:21</p>	<p>J</p> <p>J-O-R-G-E 16:11</p> <p>J-U-L-I 76:3</p> <p>James 4:23 65:20</p> <p>January 58:7, 17 73:22,24, 25 78:23 79:5 82:17,18 89:3 90:20,21</p> <p>Jeff 35:24 51:12</p> <p>job 8:24 9:3 10:20 11:9,17 16:19</p> <p>Jorge 16:11 20:11,17,19, 24 36:21 38:21</p> <p>Juan 75:3,6</p> <p>judging 62:19</p> <p>Juli 76:2,19</p> <p>July 69:14 70:22 71:21 74:21 79:6 87:10,11,14, 15</p> <p>jump 83:4</p> <p>jumped 79:5</p> <p>jumping 75:8, 9</p> <p>June 74:12 77:12,16,17</p> <p>K</p> <p>Kathleen 4:3</p> <p>kidnapping 31:12,15</p> <p>kidnappings 31:14</p> <p>kind 31:16 44:21,23 46:8,18</p>	<p>Kissimmee 13:15</p> <p>Kleenex 35:12</p> <p>knew 25:15 46:10 61:11, 12 84:22</p> <p>knowledge 35:3,11 37:6 53:21 54:12 60:21</p> <p>L</p> <p>L-I-E-H 71:24</p> <p>L-I-E-N-H-A 71:25</p> <p>L-O-P-E-Z 20:14</p> <p>L-O-R-E-N-A 20:13</p> <p>L-U-I-S 34:20</p> <p>Lane 5:21</p> <p>language 9:12,16 10:19 11:7 22:11,12 48:14</p> <p>languages 11:7</p> <p>Lantern 18:18,19</p> <p>lapse 52:20</p> <p>laptop 36:25</p> <p>laptops 84:25</p> <p>Large 4:5</p> <p>lasts 39:6</p> <p>Latin 6:24 7:2 9:13,15 42:19 53:25 74:23</p> <p>law 16:4 23:24 24:6, 11,12,25 25:6 39:1</p> <p>lawyer 24:1 25:17</p> <p>learn 13:2 15:23</p>
--	--	--	--

<p>learned 11:24 47:18</p> <p>leave 10:8 14:13 70:14</p> <p>ledger 56:25</p> <p>left 17:2 28:25 35:25</p> <p>legal 16:18 27:18 39:4,5</p> <p>lend 56:3</p> <p>lending 56:16</p> <p>length 37:25</p> <p>lets 43:6</p> <p>level 6:23</p> <p>license 19:5, 7 20:3 27:17, 19 33:14 34:7 37:18,22,23, 24 40:15,16, 24 41:19 53:19 54:24 55:4 61:19 62:4,12 67:24,25 68:9,14 69:10 70:25 71:2,6 72:2,18 73:19,20 74:20 75:1 76:5,18 77:3, 6,8,10,23 78:25 79:20, 25 80:9,15, 18,21 81:4,12 82:13 83:1 86:24 87:6</p> <p>licensed 19:6 24:5 54:19 92:24,25</p> <p>licenses 23:22 32:13, 17,24 41:9,17 45:1 53:3 54:17 56:8,9 62:16 71:8 79:8 90:10 91:20</p>	<p>licensing 19:7 22:25 32:17 41:23</p> <p>lieutenant 7:16,21</p> <p>light 18:19</p> <p>Likewise 5:10</p> <p>limit 56:15</p> <p>limited 15:12</p> <p>lines 84:9</p> <p>link 37:20</p> <p>list 19:2 86:1</p> <p>listed 19:23 63:17,23 64:4 85:16</p> <p>literally 24:8</p> <p>live 5:25 40:21 45:3</p> <p>lived 5:22 22:2 42:20</p> <p>lives 22:1 92:1</p> <p>living 8:10 9:1 52:15</p> <p>LLC 5:4</p> <p>load 37:21</p> <p>loan 55:16, 19,20,23 56:2,6 57:2, 9,23 58:18 59:9,19,22 61:5 73:2 87:20</p> <p>loans 58:24</p> <p>local 24:24 46:13 83:22</p> <p>located 37:15,17 55:6 66:8 68:23 72:4,15 74:23 78:14 79:21 81:2</p> <p>location 79:1 81:14 83:2</p>	<p>log 36:2</p> <p>long 5:22 8:12 11:12 16:13,25 20:24 39:6 40:12 56:14 91:16</p> <p>longer 14:11 23:18,20 30:4 31:1,3</p> <p>looked 8:24 51:20</p> <p>Lopez 20:13, 15 36:22 38:21 58:2 74:12</p> <p>Lorena 20:13, 15,22 21:1 36:22 38:21</p> <p>lose 60:19</p> <p>lot 24:2,21 28:23 31:12 32:10 38:4 55:11 61:7 70:7 92:23</p> <p>loudly 5:13</p> <p>luggage 85:1</p> <p>Luis 34:20 78:23 79:1</p> <p>lying 43:14 44:21</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>M-A-Q-U-I-L 71:5</p> <p>M-E-N-D-O-C-I-N-O 5:21</p> <p>M-E-R-C-U-R 79:23</p> <p>M-O-T 73:15</p> <p>machine 22:11,12</p> <p>madam 51:15 64:23 86:12</p> <p>made 21:15 22:12 57:7</p>	<p>59:6,7,9 85:4</p> <p>main 43:23</p> <p>maintain 57:6</p> <p>maintains 57:10</p> <p>major 24:22, 23 42:14</p> <p>majority 22:24 23:6,8 92:4</p> <p>make 7:23 23:17 28:17 50:13 70:4 73:5</p> <p>Makes 52:7</p> <p>manage 30:4 31:1</p> <p>management 30:6</p> <p>manager 16:16</p> <p>manual 33:21, 24 34:1,2,11, 13</p> <p>Maquil 71:5</p> <p>March 4:12 51:11 69:14, 15,19 73:22 82:23 83:4 89:24 90:2 94:8</p> <p>Mariso 79:18, 21 80:20 82:12,15</p> <p>marked 65:1 88:16 89:12</p> <p>market 42:19, 22 53:18,23 54:1,12</p> <p>marketed 54:1</p> <p>marking 88:14</p> <p>Master 75:22</p> <p>master's 6:24 7:4 9:11</p> <p>materials 11:22 12:9</p> <p>MBAG 4:12</p>
--	---	---	---

meaning 47:5	military 7:10,13 40:22 44:8,10,16	months 6:11 15:7 40:2	94:7
means 28:7 70:2 90:13	million 46:5	move 5:8 20:1 86:9	<hr/> O <hr/>
meet 12:23	millions 28:16	moved 9:2 76:1	O'BELLO 78:23
meeting 58:4, 8	mind 68:6	moving 69:2	O-G-I-C-A 86:23 87:3
member 7:10	mine 36:18 49:23 50:4,5	multiple 54:19 71:8	O-N-A-L-E-S 67:21 71:1
memorialize 48:20	minimum 16:5	<hr/> N <hr/>	oath 5:2 51:14
memorialized 49:3	minute 21:18		object 19:10 23:2 28:5
memory 52:20	missing 15:15,17 69:14 72:20 92:11	N-O 67:22	32:23 34:24 47:11 48:1 65:11
men's 5:9	misspoke 81:17	nadro 82:24	Objection 7:22 18:25 39:11 43:19 44:12 49:15 54:20 58:20 61:22 62:14
Mendocino 5:20	mistake 69:1	named 20:13	obligations 58:19
mention 93:3	modifications 21:15 22:13	names 16:10 24:18,20 74:2	occasional 33:22 55:13
mentioned 51:23 52:18	modified 36:23	narrow 62:19	October 72:19 76:1,6 80:14 82:11,17
menus 22:16	moment 63:8	national 15:21 16:8 45:4 52:9 59:3	offer 32:24 33:18 42:16
Mercur 79:23 80:15,18	Monday 34:9, 10	nationals 16:6	office 6:4,5 29:12,20,24 31:2 44:17,18 57:15,16
messenger 29:25	money 15:17 24:3 26:2,3 27:9,12,14,17 32:25 46:8 57:1,11,22 58:5 59:18 60:9 66:23 70:14 73:2 83:14,15 84:4,21,22 85:3,6,7 86:8,9 87:19 88:5	nature 91:18	Officer 9:10
met 12:21 13:10,12 18:10,12	monies 27:22 83:20	needed 66:17	officers 63:17
methods 81:7	Monterey 34:19	negotiated 71:12	Ohio 7:7 9:2
Mexican 36:15 44:19 67:20 71:1 72:7 86:25 87:8,9	month 6:13 29:25 30:1 55:13,14 71:20	Nell 41:13	Onales 67:18 69:7
Mexico 32:3 33:8 34:16, 17,18 41:7 44:17 68:24 69:7 72:5,6, 16 73:18 74:18,24 75:7 76:14 78:15 79:2,22 80:1, 2,12 81:3 82:15 83:3 90:6,7 92:6	monthly 29:24	niche 42:19, 22	ongoing 51:20
michael 4:13, 17 5:20 25:11 92:19		NITV 4:9 5:3 32:9 51:3,9 94:5	open 46:2 47:13,16
		nodding 81:19	open-ended 56:19
		Notary 4:4	
		note 86:18	
		November 73:13,21 76:6,8,9 78:6,7,16 80:23 81:9,16 86:22 90:12	
		number 4:11 15:12 47:19 51:5,11 62:21	

Operad 81:11 82:19 operating 38:22 operations 9:8 31:13 order 25:9, 18,21 79:14 orders 32:17 oriented 22:15,17,18, 23 42:11,12 43:25 46:17 originals 94:12 originate 17:22 47:17 originated 47:24 OS 74:8 75:2 other's 66:23 outgoing 67:11 70:4,8 overwhelmingly 22:22 owe 57:22 58:5 owed 58:12,14 owned 20:7,24 owner 12:9 20:19 owners 22:15 38:23 owning 23:14 owns 20:4,6, 11,14	paid 27:15 40:19 47:2 56:22 57:1 58:15 59:22 Palm 4:10 11:5 14:12 51:5 Panama 8:2 59:3,4 67:3 paper 29:11 paperwork 33:17 pardon 88:17 parents' 9:1 part 20:7 36:20,21,22 46:3 63:16 85:1 part-time 12:3 29:18 partial 59:19 partners 16:4 28:20 58:9 83:12 party 31:3 60:4 passing 34:10 passport 89:3,11 90:25 91:1,2 92:11 past 57:15 patent 23:24 39:2,3 patented 23:22 pay 20:20,22 24:24 25:9, 12,13 27:7,10 29:10,23 30:1 46:24 56:12 58:18 59:21 60:4,8 66:10, 12,19 67:6 71:12 73:6 83:22 86:6 paying 60:2 66:1,2,11	73:2 87:20 payment 26:8, 9 payments 57:7 59:5,7 payroll 29:9, 10 pays 9:11 27:19 61:2 penalty 5:2 pending 30:18 pension 40:22 people 16:5 19:4,5 20:7 37:23 40:14 42:16,21 44:20 45:6 86:6 percent 28:24 Percentage- wise 20:8 Perez 63:21 performs 63:24 period 19:6 32:25 56:19 71:19 perjury 5:2 permanent 52:12,16 person 16:21 20:10 29:23 43:7 74:15, 16,17 personal 81:23 82:4,5 84:4,7 90:17 personally 58:24 pesos 72:7 physically 55:5 pick 5:12,14 picked 49:21 picking 5:11 pirated 41:19	place 72:21 93:4 plaintiff 38:3 plaintiff's 64:24 65:1 88:14,16 89:9,12 play 37:12 pocket 27:10 37:2 point 8:22 10:20 11:10 12:24 13:10 19:25 65:19 93:20 pointed 68:7 polygraph 32:11 43:1 portion 23:17 51:17 Portuar 81:11 82:19 position 12:3 17:5 possess 7:6 possession 57:6 post 6:25 posting 8:1 Potosi 34:20 Powerpoint 33:19 36:13, 17,19,24 preceded 4:25 71:21 91:1 precise 82:24 precursor 50:7 preemployment 14:17 15:5,7 17:8 23:7,9 24:22 42:12 66:5 81:13 82:20,21 preexisting 35:17
---	--	---	---

prefaced 65:22	12	41:20,22	quick 92:21
prefer 68:4	Profes 67:18,	55:19 62:4	quit 30:5
premised 47:14	21	63:5	quotas 71:12
pres 78:7	Professional 4:4	provided 27:23 36:14	quoted 48:18
present 55:6	proficient 9:19	40:14 55:16,	
presentation 33:19	profit 23:17	20 58:23	R
pretty 11:15	program 9:9,	59:2,17 64:8,	R-I-V-E-S
40:17 56:23	10 17:20,22	17 79:9 87:18	86:23 87:3
Preve 80:24	18:16 21:15	providing 39:22	Ra 81:11
prevention 31:14	22:6,10,13,	PS- 38:14	82:19
previous 61:9,10	14,15 24:5	PSE 43:22	range 77:1
previously 4:24 25:14	27:24 36:24	public 4:4	Ranger 9:8
primarily 22:22 29:25	37:5,16,18	19:20	11:14 50:7
32:3 45:1	41:19 43:16	Puma 65:5,13	rank 7:15
48:11	45:11,16	66:2,7 68:15	rarely 89:1
primary 10:25	46:3,17,24	purchase 84:23 88:9	rates 71:19
14:16	47:14 51:20	purchased 44:24	Raton 5:21,22
principles 32:7,12	52:7,23 53:2,	purpose 48:23	64:15 73:3
print 33:22	8,19 54:24	86:3	react 31:16
34:7	55:3,6 61:25	push 19:24	read 9:22
prior 13:11	62:1	put 37:2	47:20 51:17
18:16 90:12	programmer 17:24,25	50:17	93:21,22
Privada 71:24	21:15 46:1,13	Q	real 24:9
72:4	48:11,16	Q-U-E-T-Z-A-L-	reask 30:24
private 44:9	50:16	E-S 15:20	reason 26:7
privilege 36:2	programmers 21:10 47:5	quarter 46:5	33:23 38:3
privileged 30:13 38:5	programs 32:20,21	question 30:18 53:18	50:10 53:6,
65:9,12	42:10 43:25	57:3 63:4	10,12,22
Pro 74:22	47:22 61:19	65:11 84:3	70:10 75:11
problem 40:15	project 48:21	93:2,14	reasons 24:25
41:23	pronounced 80:25	questions 5:1,4,5,16,18	90:17
process 24:2,	proper 10:7	22:19 30:24	recall 12:14
8 43:11	proprietary 17:23 19:11	43:9 46:18	39:12 57:14
produced 36:6	38:12	63:11 92:16,	60:23
63:9	protected 24:4	22 93:19	recalling 89:23
product 45:8	protection 24:6,9	quetzales 15:14,15,18	receive 23:17
93:8,9,10,11,	provide 31:13,15	25:1 26:4	26:8 27:7
	34:4,5 38:15	66:16 67:6	56:17 83:10

recess 51:7	4:4 24:5	representing 21:23 23:19	
recognize 48:4	reissue 55:4, 7,9	56:2 90:22	40:18 50:15
recognized 24:4	related 20:17	represents 89:25	return 13:22
recollection 55:24 58:3	relationship 39:9 61:10	request 38:17	returned 90:23
record 4:9	relicense 61:25	requested 39:16	revenue 22:25
5:12 35:16	remark 38:8	require 41:21	rewrote 22:10
36:1 50:24	remember 6:20	55:2	Rica 21:16
51:2,9 57:1,	33:6 39:21	required 5:7	22:1,2 49:23
7,10 69:23	42:2 48:2,5	39:2 58:18	50:19 51:22
73:9,10,12	58:14 67:15	requires 16:5	52:19
82:2 86:13,16	85:13	reselling 48:25	Rives 86:23
94:5,9	remembered 39:13	reside 6:2	Rodrigues 68:20
recording 4:14 51:13	removed 27:2	residence 53:24	role 9:5 31:4
redacted 67:10,13	renew 55:3	resident 52:12,16	room 5:9
68:25 70:9,	renewals 55:11	resides 38:9,	35:25
10,13 73:1	renewed 89:3	11	rough 94:10
75:10,11	91:6	residing 74:17	rules 5:15
78:17 82:4	rent 29:11	resources 22:16,23	69:21
83:6 84:9,11	repay 56:7,12	24:22 42:12,	run 34:9
87:12	repaying 93:15	13 44:5,7,11	Ruth 63:21
redaction 67:16	repayment 27:21,22	45:1,4,5	
reevaluate 15:8	56:11,20	46:17	S
reevaluations 15:6,10	repeat 51:16	respect 12:23	S-A-N 34:20
refer 14:24	57:3 87:5	14:22 37:11	S-A-N-F-E-R-G-
80:10 86:14	Repeated 80:17	56:2 57:2,9	O 72:14
referral 61:14	reply 39:24	65:11 88:1,7	S-A-Y-E-E-D 18:3
referred 61:13	reporter 4:4,	respond 40:17	S-E 71:23
referring 39:4 50:2	15 5:11 15:19	response 50:11	S-E-G-U-R-I 87:2
reflect 26:19	27:19 51:15	responses 38:8 40:20	S-E-R-V-I-C-I-
88:11	64:23 86:13	rest 36:13	O-S 78:9
reflected 59:5	93:24	restart 55:2	S-I-N-E-R-G-I-
regard 63:11	represent 5:3	retained 27:3,15 65:2	A 81:1
Regiment 9:8,	70:24 72:1	89:13 91:5	S-U-R-L 52:2
9 50:7	82:13 90:3	retaining 94:12	SA 14:2,9,25
registered	representative 16:18 39:6	retired 8:21	15:4 18:22
	89:16	10:10,11	20:5,6,16
			21:4,11 22:14
			23:12,15,22
			26:4 27:1,12,
			22 28:3 29:9,
			15 31:18
			36:18 38:9,

11,14,18,22 41:9 52:8 54:17 55:12, 16,19,22 56:2 57:16 58:24 59:18,23 60:3 61:2 62:13 63:6 65:15 66:10,15 70:8 73:8 84:23 85:6 88:3,8 92:25 93:1,5, 6,12,16,18 SA's 93:9 salary 23:12, 20 83:10 84:6 sale 27:17,18 32:25 sales 56:8 79:8 93:4 Salvador 65:5,13 66:2, 7,8,24 San 34:20 66:8 Sanfergo 72:13,21 Sapi 82:24 sat 4:24 5:15 satisfaction 59:8,19 satisfy 61:5 SAV 34:23 Savage 4:14, 17,23 5:20 25:11 35:2 51:14,19 57:1,8 63:12, 14 64:2,24 70:4 78:8 82:4 88:15, 16,18 89:9 92:16,19,23 savings 75:14,16 78:20 81:24 83:8 84:4,7, 8,11,13,15,	18,21 85:2,3, 4,5,8,12,14, 15,18,24 86:8 87:19 88:2,7 Sayeed 18:3, 4,7 45:13 46:24 48:13, 14,15 49:14, 22 scenarios 88:12 scheduled 33:6 school 9:12 11:6 12:4 14:12 scope 48:20 49:1,3 Scott 4:14 15:7,14 30:6, 7 51:13 screen 82:20 screening 15:5 17:8,9 23:1 42:13 43:11 68:7,8 81:13 screenings 23:1 secondary 17:8 secret 19:1 38:5,13 secrets 65:12 sector 44:9 security 40:21 67:20 Seguri 86:22 87:5 Segurida 79:24 80:15, 18 selected 9:9 sell 19:4,5 32:12,21 33:11 41:16 42:23 44:9	52:23 53:2 90:10 selling 41:9 44:8 91:20 93:2,3 semi 23:19 seminar 36:12 Sen 74:8 send 19:21,22 27:8,20 29:25 37:18,19 41:22 43:12 60:9 83:23 sends 9:10,11 26:24 sense 10:21 separate 15:3 September 72:20 77:16, 21,24 80:4,14 82:3 83:5 sequential 79:14 ser 78:7 series 5:1 46:16 48:22 server 37:15 service 64:18 68:6,7,8 services 4:9 5:4 42:23 51:3,9 63:6 64:9 94:6 set 12:10,16 13:19 25:14, 15,17,21 26:7 42:17 43:9 64:6,14 86:7 setting 12:24 share 47:23 shareholders 38:23 39:10 sheet 85:19 short 48:15 show 32:14 34:8,9 85:18	showed 46:2 90:9 shrugging 5:14 sic 57:2 signed 49:4 similar 24:18,20 43:9 47:21 48:7 similarities 32:11 Sinerg 80:24 single 79:14 sir 73:14 74:6 sit 29:20 sitting 59:15 skip 72:19 87:4 skipping 73:21 small 27:3,6 31:19 snapshot 62:19 social 11:8 40:21 software 17:15,23 20:3,4 23:21 32:6 33:12 34:23 37:16, 21 49:19 54:17 62:22, 24 63:5 sold 42:5,7 44:15,16 68:14 solicit 32:17 sort 9:7 11:19 39:7 source 46:3 47:13,16 South 7:3 8:7,10 41:13, 22,24 59:6,8 60:4,7,22,23
--	---	--	---

<p>61:10,16 62:24 91:12 space 67:21, 22 76:3 87:2, 3 Spanish 9:18, 20,22,24 10:1,3,19,25 11:22 14:5 67:18 72:12 speak 5:13 10:3,4 17:17 speaker 67:19 special 9:8 31:12 75:22 specific 19:6 28:15 32:25 33:22 38:10 specifically 82:18 specifies 39:5 Spell 15:18 18:2 spelling 66:16 spend 6:8,10, 13 24:2 40:2 spiel 51:1 split 28:19 83:11 spoke 58:8 stack 70:1 87:17 stage 29:7 stakeholders 39:10 stamp 89:25 stamps 89:16 stand 35:5 standard 19:19 stands 35:7 started 8:25 9:14 10:16 starting 43:22</p>	<p>state 4:5 7:7 41:2 stated 74:5 statement 32:22 43:18 71:18,19 77:25 78:23 80:24 82:24 86:2,14 statements 26:18 59:2,5 62:20 64:9,16 67:14 70:2 73:25 79:10 85:15,17 87:17 States 6:9,14 7:19 8:11 9:5 25:11 27:16 42:18 43:25 45:3 52:24 53:9,11,14, 16,17,20 54:2,9 83:21 84:23,25 90:16 91:9 stating 63:3 stationed 7:20 stayed 17:1 step 9:4 43:11 stolen 43:3 stop 5:10 30:8 54:25 stopped 9:2 11:1 strategic 53:6 street 6:3,22 stress 11:24 12:12 13:2,9 14:8,17 17:6, 16 31:21,22 32:4,5,8 35:8 36:12 43:1,6, 13,21 44:5 54:6,14</p>	<p>strike 31:22 students 33:25 90:8 studied 9:17 studies 6:25 7:2 11:8 study 47:25 subcontractor 29:19,22,23 subject 5:2 subsequent 23:1 sue 24:7 sufficient 80:7 suggestions 46:12 summary 64:19 69:3,25 supposed 85:20 Surl 52:2,6, 9,19 surmise 71:20 Susan 63:12, 14 swear 4:15 sweet 48:15 sworn 4:18 system 14:18 17:21 32:8 43:1 systems 32:9 Szabo 4:3</p> <hr/> <p>T</p> <hr/> <p>T-A 76:3 T-E-C-N-O-L 87:2 T-I-V-O 71:23 Ta 76:2,19 77:13 takes 24:8 taking 84:5 93:4</p>	<p>talk 38:10 47:13 48:12 55:15 92:23 talked 18:11 24:1 93:7,15 talking 36:15 55:17 taught 33:7 75:5 tax 29:2 taxes 28:23 29:6 30:1,2 teach 10:18 11:6 31:11,16 32:11 33:5,7 90:8,9 teacher 11:5, 15 12:4 teaching 10:16 11:1 Team 10:23 25:14 Technol 74:21 technology 31:22 43:13, 21 44:5 47:4, 6 Tecnol 86:23 87:5 telephone 18:11 51:24 telling 48:22 58:14 ten 26:16 88:23 term 10:8 27:18 29:22 38:1 39:6 terminology 10:7 terms 8:22 44:7,10 55:25 56:5,11 testified 4:19 40:3 47:24 59:7 64:5 83:9</p>
---	---	--	---

84:10 testimony 55:15 59:16 62:23 87:18 thing 17:11 21:2 78:18 82:1,3 things 46:18 70:14 92:22 thinking 42:22 thought 48:24 49:9,10 thousand 15:15 26:24, 25 80:15,17, 18,20 thrumb 37:17 thumb 36:25 37:1,19 time 6:8 8:6 10:22 19:6 21:20 22:6 32:25 35:15, 21 40:24 42:21 49:12 54:18 56:15 58:8,13 60:3 65:19 68:3 72:24 85:11 91:10 93:25 94:4 times 31:2 33:5 60:16 88:23 tissues 35:13 Tivo 68:20 71:22,23 72:4 today 14:19 26:19 38:3,7 63:9 65:8 85:15 told 24:10,21 46:16 60:9 70:13 tomorrow 93:23 94:11	ton 30:1 Tonio 75:3,6 top 50:16 64:20 77:20 total 56:12 touch 61:16 tough 11:15 tourist 52:15,17 trade 19:1 38:5,12 65:12 train 31:16, 21 32:4,5,7 33:9,16,17,19 34:13 trained 34:18 training 9:14 11:21 31:13 32:2,13,16,22 33:18,21,24 34:1,2,4,16, 17,22 36:12 81:5,7 transaction 27:14 transactions 26:13,19 62:21 transcript 51:17 transfer 68:19 69:6 70:23 72:10 74:8 75:10, 12,13 76:12 78:21 81:20 82:5,6,7,9, 12,18 83:7,15 84:11,21 85:3,4 86:22 87:12 transferees 88:5 transferred 26:3 87:19 transferring 84:4	transfers 70:3,5,8 84:10,18 88:3,8 translate 11:21 12:8 54:11 translating 12:24 translation 54:5 translations 10:23,24 25:15 transport 36:24 travel 13:22 37:3 88:21 90:15,22 traveled 90:15 91:12 traveling 6:11 88:19 travels 92:4 treasurer 63:24 trip 89:22 92:2 trips 89:16 true 5:25 7:9,15 12:21 64:6 66:20 72:6 truth 5:3 truthfully 5:6 39:12 42:2 43:7 truthfulness 17:17 Tuesday 34:10 turn 64:16,18 turned 15:14 turnover 28:3,6 type 12:11 17:15 18:16 33:18 48:19	typed 72:21 types 22:19 26:13 45:7 47:22 <hr/> U <hr/> U.S. 7:10 13:14,15 18:7 25:10 50:15 53:23 54:12 83:23 Uh-huh 17:19 57:18 64:22 UK 91:14 un-redacted 75:22 79:9,16 unbridged 79:12 understand 57:3 76:7 77:1,16 understanding 10:1 35:7 36:11 Understood 65:21 66:18 67:8 United 6:9,14 7:19 8:11 9:5 25:11 27:16 42:18 43:25 52:24 53:9, 11,13,15,17, 19 54:2,9 83:21 84:23, 25 90:16 91:9 University 7:3,8 8:7,9 9:3 10:17 unsuccessfully 8:25 upgrades 49:18 52:7 USB 37:1
--	---	---	--

<p>V</p> <p>Vacation 91:19</p> <p>varies 34:18 54:22</p> <p>vast 23:6,8</p> <p>verbally 38:19 39:16</p> <p>verify 14:18</p> <p>versa 84:19</p> <p>versus 4:10 6:9 51:4,10 94:6</p> <p>vice 84:19</p> <p>vice-president 20:16 64:4</p> <p>Video 4:3</p> <p>virtually 43:21 47:21</p> <p>Visa 52:15, 16,17</p> <p>vision 42:21</p> <p>visit 88:24 91:18</p> <p>visited 13:3, 5</p> <p>visiting 13:11</p> <p>visits 92:1</p> <p>voice 11:24 12:12 13:2,9 14:8,17 17:6, 16,20 31:21, 22 32:4,5,8 35:8 36:12 43:1,6,12,21 44:4,5 45:10 54:6,14</p> <p>VSA 14:2,7,14 25:17,21 26:10,14 27:19 28:3 31:8 42:23 53:15 57:10 64:10,11</p>	<p>92:25 93:1,5, 6,9,12,16,18</p> <p>W</p> <p>waive 93:21</p> <p>walk 40:9</p> <p>wanted 11:21 39:23 42:23 46:2 48:25 52:11</p> <p>warned 42:16</p> <p>wars 50:9</p> <p>Watch 40:11</p> <p>ways 28:19 42:25 57:21</p> <p>website 19:18,23</p> <p>Welcore 60:25 61:1,7,9 62:10,11 63:5</p> <p>whoa 30:8</p> <p>whomever 27:16 36:14</p> <p>wife 27:15 28:1 40:5 63:12 64:3</p> <p>William 5:20</p> <p>wire 27:8 65:5 68:19,21 70:3,4,8 71:4,22 72:3, 10,20 73:15 74:12,21 75:2 76:2 77:12 78:1,17 80:4 82:4,6,18 85:6</p> <p>wiring 72:24</p> <p>withing 32:11</p> <p>woman 20:13</p> <p>word 35:12 61:15 71:13</p> <p>words 34:21 93:7</p> <p>work 14:16 21:10 22:22,</p>	<p>25 23:18</p> <p>24:21 31:7</p> <p>32:15 39:25</p> <p>43:4 49:1</p> <p>52:3 54:5</p> <p>93:23</p> <p>worked 9:7 12:21 13:21 18:4,8 22:6 45:15 54:3</p> <p>working 10:22,24 12:1 14:12 15:9</p> <p>works 32:14</p> <p>world 9:13 35:11 47:8</p> <p>worse 50:17</p> <p>write 9:24</p> <p>written 5:12 39:24 49:3</p> <p>wrong 73:1</p> <p>wrongdoing 22:20</p> <p>wrote 22:12</p> <p>X</p> <p>Xerox 85:23</p> <p>Y</p> <p>year 6:11 8:4,7,24 10:12 11:2,19 13:20 14:1 15:24 23:16 28:4 31:2 32:1 33:3,4, 10 37:25 40:2 42:2 49:6 57:15 62:21 81:18 83:11 88:23</p> <p>years 7:12 8:13 9:6 17:2 22:2 23:18 24:3,8 26:16</p>	<p>33:6 40:14</p> <p>42:20 49:14</p> <p>50:9,15</p> <p>54:19,22</p> <p>60:15 84:5</p> <p>91:25</p> <p>Z</p> <p>Zappolo 4:8, 14 7:22 15:18 18:25 19:10, 14,20 20:1 23:2 28:5,10 30:8,12,18 32:23 34:24 35:15,22,25 36:4 51:13</p> <p>Zone 6:6</p>
---	--	---	---