

# Exhibit A

Guo Wengui

*Deposition of Wengui Guo [sic] In the Matter of Guo Wengui vs. Yeliang Xia*

United States District Court E.D. Virginia, 1:18-cv-174



Deposition of:  
**Wengui Guo**

*June 4, 2019*

In the Matter of:  
**Guo, Wengui Vs. Xia**

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IN THE UNITED STATES DISTRICT  
EASTERN DIVISION OF VIRGINIA

WENGUI GUO \*  
Plaintiff \*  
vs. \* Case No.: 1:18-CV-174  
YELLIANG XIA \*  
Defendant \*

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DEPOSITION OF:

WENGUI GUO  
Tuesday, June 4, 2019  
Washington D.C.  
10:16 A.M.

Job Number: 3409553  
Pages: 1-88  
Court Reporter: Stayce Lawson, Court Reporter

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19 Also Present: Amy Wong Luc, Interpreter for the

20 Plaintiff

21 Una Wilkinson, Interpreter for the

22 Defendant

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I N D E X

EXAMINATION BY: PAGE:  
Mr. Dennis 4

EXHIBITS: (No Exhibits Marked) PAGE

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P-R-O-C-E-E-D-I-N-G-S

WHEREUPON --

WENGUI GUO

a Witness called for examination, having been first duly sworn, was examined and testified as follows:

EXAMINATION BY MR. DENNIS:

Q. Do you prefer to be addressed as Mr. Guo or Mr. Kwok?

A. Mr. Guo, G.U.O.

Q. And you understand today that you're under oath, and that you're obligated to tell the truth?

A. Of course.

Q. And you understand that that means the full amount of truth? That it's, it's considered a lie if you don't include everything that you know in answering a question?

A. Yes.

Q. Do you have any medical or physical or mental health issues that would affect you today?

A. No.

Q. If you do not understand my questions, you can ask me to repeat the questions or rephrase them.

1 Do you understand that?

2 A. Yes. Okay.

3 Q. I will ask you to speak up a little bit so the  
4 interpreter can hear you also.

5 In you find that my questions are too long, you  
6 can ask me to cut to shorter ones if you prefer?

7 A. Okay.

8 Q. If you answer a question, it will be presumed  
9 that you understood the question. Do you understand  
10 that?

11 A. Yes.

12 Q. If you at any point in time would like to take a  
13 moment to confer with Mr. Morrissey, you are allowed to  
14 do that also. Are you ready?

15 INTERPRETER WILKINSON: The interpreter did  
16 not use a first person to address Mr. Guo. For example,  
17 counsel you asked, and she would tell him that you need  
18 to tell him as interpreter she should say "I." Do you  
19 understand what I'm saying?

20 She should be you when she is asking the  
21 question to Mr. Guo. So she should be using first  
22 person instead of third person in Chinese.

1 MR. DENNIS: So let me make this clear. So  
2 what you're saying is she needs to interpret literally?

3 INTERPRETER WILKINSON: She is literal, but  
4 what I'm just saying is she should be asking the  
5 question as you.

6 MR. DENNIS: Correct.

7 INTERPRETER WILKINSON: So she should be  
8 using first person. For example, Mr. Guo, do you have  
9 any --

10 MR. DENNIS: Physical issues.

11 THE INTERPRETER: -- disabilities or  
12 something like that interpreting.

13 So should you say, is there any problem you  
14 cannot testify truthfully and answer my question, right?  
15 So in Chinese, she will say do you have any disabilities  
16 that you cannot answer his question.

17 MR. DENNIS: Okay.

18 INTERPRETER WILKINSON: That would be in  
19 terms, like in court, you know, we usually would be  
20 using the first person instead of third person, that's  
21 all I'm saying to interpret for the plaintiff.

22 MR. DENNIS: Is that okay with you, Ms.



1 Wong?

2 INTERPRETER WONG: Yes.

3 INTERPRETER WILKINSON: You need to use the  
4 first person to interpret.

5 INTERPRETER WONG: I haven't been doing  
6 that. I have not gotten to the point that I have to do  
7 that.

8 MR. MORRISSY: Okay. It's noted on the  
9 record. We will continue. Thank you.

10 BY MR. DENNIS:

11 Q. If there is a confusion of what tense or person  
12 we are using, please note your confusion, and I will  
13 restate the question, and we will have it reinterpreted.

14 A. No problem so far.

15 Q. Okay. Are you ready?

16 A. Yes.

17 Q. For our purposes of the record, what is your  
18 legal name?

19 A. K.W.O.K, H.O.W.A.N. Yes. Correct.

20 Q. Do you have any aliases?

21 A. I used to have a nickname.

22 Q. Have you been known by any other names? I guess

1 it's easier to start this way. How many other names  
2 have you been known by?

3 A. Three names.

4 Q. There is one from pronunciation from Hong Kong  
5 pronunciation. And there is a name he mentioned earlier  
6 Hong Guo.

7 INTERPRETER WILKINSON: Also, the plaintiff  
8 said one pronunciation is from China, one pronunciation  
9 is from Hong Kong, and also an English name.

10 A. I.E.S., G.U.O. Hong Kong name, K.W.O.K,  
11 H.O.W.A.N, G.U.O, W.A.N.G.U.I.

12 BY MR. DENNIS:

13 Q. And you have not used any other names than that?

14 A. No.

15 Q. And why have you used different names?

16 A. Because when I went to Hong Kong, the  
17 pronunciation, so it was changing. Also, because I do  
18 international business, so I get the English name.

19 Q. Are you married?

20 A. Yes.

21 Q. And does your wife use any of your aliases?

22 A. No.

1 Q. Is she aware of them?

2 A. Yes.

3 Q. And you agree then, I'm assuming, that any  
4 judgment either for against you would be valid under any  
5 name?

6 MR. MORRISSY: Objection. Calls for a legal  
7 analysis by the deponent.

8 A. Understood.

9 Q. You are known internationally. Is that correct?

10 A. I don't understand what internationally known  
11 is. What does that mean?

12 Q. Do you have a large following of people?

13 A. Yes.

14 Q. Would you say that have almost a half-million  
15 followers on Twitter?

16 A. Half a million.

17 MR. MORRISSY: Not to interrupt, but may I  
18 ask one clarifying question? Do you have an operational  
19 Twitter account?

20 A. It's already stopped for a long time.

21 BY MR. DENNIS:

22 Q. How long has it been stopped?

1 A. About one year.

2 Q. So one year is a long time?

3 A. It's around one year, or maybe eight months to a  
4 year.

5 Q. But you consider that a long time?

6 A. Yes.

7 Q. Do you have something calmed Mr. Guo Media?

8 MR. MORRISSY: I'm sorry, can you say what  
9 you mean by do you have?

10 BY MR. DENNIS:

11 Q. Is there something you produce or have an  
12 ownership interest in what is called Guo Media?

13 A. No.

14 Q. Are you familiar with anything that is called  
15 Guo Media?

16 A. Yes.

17 Q. What is it that you are familiar with?

18 A. I'm the consultant.

19 Q. Okay. And what is Guo Media?

20 A. It's against the Communist.

21 INTERPRETER WILKINSON: It's a platform for  
22 the anti-Chinese Communist party.

1 Q. And are you a consultant on there?

2 A. Yes.

3 Q. Do you appear on that regularly?

4 A. Yes.

5 Q. So it would be fair to say you're a public  
6 figure?

7 MR. MORRISSY: Objection. Calls for legal  
8 access.

9 Q. Okay. Are you currently employed?

10 A. No.

11 Q. Do you have a source income?

12 A. No.

13 Q. How do you pay for any bills that you incur?

14 A. I borrow the money to pay all of them.

15 Q. And from where do you borrow it?

16 A. I borrow from my friend. From relative.

17 INTERPRETER WILKINSON: From family, family  
18 fund, family foundation.

19 Q. Do you have any assets that you pledge as  
20 collateral?

21 INTERPRETER WONG: Can you repeat that  
22 question?

1 Q. Do you have you any assets that you pledge as  
2 collateral for the loans?

3 A. I don't understand what you're saying. Is this  
4 before or now?

5 Q. You say that you get money through loans.  
6 Is that correct?

7 A. Uh-huh.

8 Q. Now, do you people give you loans just based on  
9 who you are, or do you promise them collateral? You do  
10 understand what collateral is, correct?

11 A. Some I do, some I don't.

12 Q. Okay. So how much would you say is  
13 collateralized? In other words, how much of your loans  
14 are based on collateral?

15 A. I could not tell you that. I couldn't answer  
16 that because I don't see what that is related to this  
17 case. The question that you are asking, if we want to  
18 talk about it, it's going to take all day long.

19 Q. Okay. We can talk all day long. Please answer  
20 the question.

21 A. You said we can take all day long? What's the  
22 question?

1 Q. How much of your loans are collateralized?

2 MR. MORRISSY: Are you seeking a dollar  
3 amount?

4 MR. DENNIS: I'm seeking a dollar amount.

5 A. Twelve billion to thirteen billion.

6 Q. Is that RMB or US dollars?

7 A. Dollars.

8 Q. And what are the assets that you use to  
9 collateralize that?

10 A. Some of them is our real estate, our family real  
11 estate in China, and some of them are my personal  
12 guarantee.

13 Q. Okay. The physical assets, where are those  
14 located?

15 A. Except for this one that I currently reside in  
16 New York, most of them are in China.

17 Q. And in China, do you know the mainland or Hong  
18 Kong or both?

19 A. That's including Hong Kong and China.

20 Q. Do you have any assets that are non-physical  
21 such as accounts receivables, bonds, any holding in  
22 other corporations, anything along those lines?

1 A. You mean personally do I have it?

2 Q. Yes. Do you have access to that?

3 A. No.

4 Q. And when you say that you borrowed the money and  
5 pledged those assets, do you actually have signed loans  
6 for those amounts?

7 A. Some I do, and some I don't.

8 Q. Okay. The ones that are collateralized, are  
9 those reduced to writing, those loans?

10 A. Most of them don't require my signature, but  
11 some I do.

12 Q. Okay. So the people who loaned you the money,  
13 how do they get you the money?

14 A. Most of them are based on the contract. Most of  
15 them are given to the loan account.

16 Based on the stipulation on the loan agreement,  
17 the loan will be provided to the account dated on the  
18 contract.

19 Q. Okay. When you don't have a contract, how does  
20 the money get transferred?

21 A. Those that have no contract, we will just orally  
22 agree.



1 Q. Right. But how do they know where to send the  
2 money?

3 A. Based on our oral agreement and instruction that  
4 they would just follow.

5 Q. And how do you pay these loans back?

6 A. It's based on my reputation, my personal  
7 reputation and the future.

8 Based on our verbal agreement, the conditions  
9 agree upon our verbal agreement. And also based on  
10 their trust on my future capability of making the  
11 repayment, and also based on the collateral pledged.

12 Q. Okay. And these are friends who loan you the  
13 money. Is that correct?

14 A. They are organizations.

15 Q. Okay. What organizations are they?

16 A. Personal investor.

17 Private funds and investment funds.

18 Q. Okay. And how long have you been using that as  
19 a source of income?

20 A. Two years.

21 Q. Okay. And do you file taxes in the United  
22 States?

1 A. Yes.

2 Q. And that's how listed your income from the taxes  
3 from loans?

4 A. Well, I filed the tax when I had income, so that  
5 was two years ago.

6 Q. So you have not filed taxes since then?

7 A. I don't have the income now, so I don't have  
8 anything to claim.

9 Q. So have you not filed. Is that correct?

10 A. Oh. I did file for two years continuously.

11 Q. Okay. And so these business interests that you  
12 have collateralized, these are located, with the  
13 exception of your house here, and all the rest of them  
14 are in China. Is that correct?

15 A. I have stated earlier that included Hong Kong.

16 Q. Okay.

17 A. Sorry. I have allergy.

18 MR. MORRISSY: Just also to clarify and  
19 hopefully to maybe cut off like one strain of questions,  
20 the ownership of the home in New York is public  
21 information that can be found, obviously, online.

22 MR. DENNIS: Right.

1 BY MR. DENNIS:

2 Q. Now, the business interest in China, do they  
3 suffer as a result of you being a dissident.

4 INTERPRETER WONG: Repeat your question,  
5 please?

6 Q. Does his business interest in China suffer as a  
7 result of him being a dissident?

8 A. Greatly.

9 Q. Pardon?

10 A. Greatly.

11 Q. They suffer as a result of that?

12 A. Yes.

13 Q. So Mr. Xia, when he says you're not a true  
14 dissident, that's beneficial to your business interest.

15 Is that correct?

16 A. Well, but the thing is that Xia is actually the  
17 crux of the problem. He's a hooligan and he's a liar.  
18 In fact, he's helping the Communist party.

19 Q. Okay. Could you answer the question, please?

20 A. They help the Communist to damage our asset.

21 Q. So you said that being a dissident hurt your  
22 assets, correct?

1 A. Yes.

2 Q. So if you're not a dissident, that helps your  
3 assets, correct?

4 A. I don't understand what you mean.

5 Q. Well, you're saying that you are a dissident and  
6 your assets are harmed. So if you're not a dissent,  
7 then your assets must not be harmed.

8 Is that correct?

9 A. Of course, yes.

10 Q. So when he says you're not a dissident, when Mr.  
11 Xia says you're not dissident, that's usually helpful to  
12 your assets, correct?

13 A. But I can tell you that, you know, there are two  
14 completely different things being a dissident or entity  
15 communist party.

16 I am a person that who is against all communist  
17 parties to anti-communist party. And I am the only one  
18 of this last.

19 So that I must ask you who has the more  
20 destruction, or who is more destructive being a  
21 dissident or being a person who is against the Communist  
22 party.

1           And then still I must tell you that, you know,  
2 I am the number one enemy listed by the Communist party.  
3 So I must ask you, so am I just dissident, or actually  
4 I'm the person who is against the communist party.

5           And that's the thing that Mr. Xia did not say  
6 that I am just a dissident. In fact, that he said I'm a  
7 liar, and he said that I am a rapist.

8           Q.     We will get to those things later?

9           MR. MORRISSY: Just in order to get an  
10 answer to the question on the record, tell me if I'm  
11 wrong in rephrasing this, did the defendant's comments  
12 that you are not a true dissident help you or help your  
13 business in China?

14          A.     No.

15          BY MR. DENNIS:

16          Q.     Did they have any effect on your business in  
17 China?

18          MR. MORRISSY: Did those particular  
19 comments?

20          Q.     Did his statements regarding were you being a  
21 dissident or not being a dissident have any affect on  
22 your business in China.

1           A.       But I must tell you, though, that Mr. Xia did  
2 not ever just mention that I was not a dissident alone.  
3 He always accompanying that I was not being a dissident.

4                   He also said that I was a criminal. I was a  
5 spy to the Chinese Communist party.

6           Q.       Okay.

7           A.       So you cannot just take that particular phrase  
8 alone.

9           Q.       Well, actually I can. That's why I'm asking you  
10 do you have any evidence that that particular accusation  
11 had any impact on your business, just the issue  
12 regarding your being a dissident?

13          A.       You can take a look at the evidence that we  
14 provided to you, then you would know.

15          Q.       You need to answer the question?

16                   MR. MORRISSY: Well, I think it's been asked  
17 and answered. He did say he couldn't separate the  
18 comments. So the deponent did say every time he was  
19 referred to --

20                   MR. DENNIS: He's unable to separate it.  
21 But what he can't tell me is whether that individual has  
22 impacted, those individuals statement have impacted the

1 business.

2 MR. MORRISSY: Well, right.

3 MR. DENNIS: If he's saying all of the  
4 statements are all part and parcel one in the same, then  
5 he has made no allegation in his filing, right? That  
6 any individual allegation or any individual statement by  
7 my client was harmful to him, that they all have to be  
8 taken together. Is that correct? Is that his position?

9 MR. MORRISSY: We're not stating our legal  
10 position on the record. I think the pleadings speaks  
11 for themselves. Do you any particular knowledge by your  
12 client that you want to ask if they damaged him or not?

13 MR. DENNIS: The ones about him being a  
14 dissident?

15 MR. MORRISSY: Which one? Can you reference  
16 the line item in the complaint, or the actual tweet by  
17 your client? That would be a way to go about it, but I  
18 don't think asking him in the abstract is possible if he  
19 already answered that he's unable to separate the  
20 various comments because they come to together. And in  
21 reviewing the tweets, that is correct.

22 BY MR. DENNIS:

1 Q. Were you born 1968 or 1970?

2 A. 1968.

3 Q. So you were actually born in 1968?

4 MR. MORRISSY: Asked and answered.

5 A. Yes.

6 Q. And do you hold yourself out as having been born  
7 in 1970?

8 A. Because my parents, because there was the time  
9 so my parents did redo the passport.

10 It was because of the cultural revolution, it  
11 was because it was a cultural revolution. So at the  
12 time my passport was only -- I only got my passport  
13 subsequently, so on the passport it states that I was  
14 born in 1970.

15 Q. I thought it was the other way around? I  
16 thought it your passport said 1968?

17 MR. MORRISSY: Is that a question?

18 MR. DENNIS: Yes, it is a question.

19 A. My passport does say 1968. But because of the  
20 cultural revolution, my parents redo the passport.

21 INTERPRETER WILKINSON: I believe that the  
22 witness stated during the cultural revolution, we did



1 not have passport, we only had household account book.  
2 And on the household account book, that it was stated  
3 1968. But the thing is that late, because at the time  
4 China had no passport, so my passport I got quite later  
5 on. And on that later on, so it stated that I should be  
6 actually born in 1970.

7 So that fact that my parents said should I  
8 be born in 1970 instead of 1968, although in the  
9 household account book states that it was 1968.

10 Q. Okay. So ultimately, the first passport that  
11 you had said 1968. Is that correct?

12 A. Yes.

13 Q. How many passports have you had in your life?

14 A. Three.

15 Q. Okay. Did you ever claim that you had passports  
16 from Middle Eastern countries and European countries?

17 A. I used to have one from the Middle East and one  
18 from Europe. But now they are voided, they will void  
19 it.

20 Q. Which Middle East country issued you a passport?

21 A. Abu Dhabi.

22 Q. Did you claim to be a citizen of Abu Dhabi?

1 A. Yes.

2 Q. When was that?

3 A. When Abu Dhabi?

4 Q. When?

5 A. 2013.

6 Q. Okay. And then you said this was the third  
7 passport. Who the third? China, one, Abu Dhabi, two.  
8 Who was the third passport?

9 A. Nolato.

10 Q. Where is that?

11 A. It's near on the side of Australia.

12 Q. Okay. And which passport are you currently  
13 using?

14 A. No, I'm U.S. asylum.

15 Q. So you currently have no passport. Is that  
16 correct, you currently have no passport?

17 A. Yes, I do have Hong Kong passport.

18 Q. You have a Hong Kong passport?

19 A. Yes.

20 Q. Is that separate from the Chinese passport?

21 A. Hong Kong is Chinese special administration.  
22 Hong Kong is special administrative region.

1 Q. So it does have a separate passport?

2 A. Yes.

3 Q. Backing up to the third country, which I can't  
4 pronounce its name, when did you claim to be a citizen  
5 of that country?

6 MR. MORRISSY: Did he say that he claimed to  
7 be citizen?

8 MR. DENNIS: Let me ask.

9 BY MR. DENNIS:

10 Q. Did you claim to be a citizen of that country?

11 A. Yes.

12 Q. And when was that?

13 A. 2014. 2015.

14 Q. So that was the passport that you came to the  
15 U.S. on?

16 A. No.

17 Q. Which passport did you come to the U.S. on?

18 A. Hong Kong passport.

19 Q. Okay. Have you renounced your citizenship to  
20 any of these other countries?

21 A. Yes.

22 Q. And you said that you are seeking asylum in the

1 United States. Is that correct?

2 A. Yes.

3 Q. What is the state of that asylum?

4 A. I cannot tell you now.

5 Q. You cannot tell me because you don't know, or  
6 you cannot tell me because you won't tell me?

7 A. I'm unable to tell you.

8 Q. Okay. Again, is that because you don't know  
9 what the current status is because it's just pending?

10 A. Well, I really don't know about anything.

11 Q. All right. When did you apply for the asylum?

12 A. September 7, 2017.

13 Q. And prior to that, how long were you in the  
14 United States?

15 A. I think that, perhaps, I came 2016. I think  
16 about not that long. About six months, close to six  
17 months.

18 Q. Close to six months before you filed for asylum?

19 A. That's correct.

20 Q. Okay. And where were you before that?

21 A. Europe, England and the Middle East and Japan.

22 Q. Did you live in any of them, or were you just

1 there for a period of time?

2 A. So we were there sort of like traveling and  
3 hiding, basically we were escaping, fleeing.

4 Q. So you stated in your complaint that you are  
5 Chinese political dissident living in New York city,  
6 correct?

7 INTERPRETER WILKINSON: Repeat?

8 Q. You stated in your complaint that you were a  
9 Chinese political dissident living in New York.

10 Is that correct?

11 MR. MORRISSY: Is the statement, correct?

12 MR. DENNIS: Yes. Both, actually.

13 MR. MORRISSY: Well the pleading speaks for  
14 itself.

15 MR. DENNIS: It speaks for itself, right.

16 A. So you said that I claimed that I said that?

17 Q. Yes. Didn't you?

18 A. I never said that I was a dissident or am a  
19 dissident. I always claimed that I am a person that was  
20 trying to eliminating the Chinese Communist party. I am  
21 a person that who is eliminating, seek to eliminate the  
22 Communist party.

1           But I think that since because that I really  
2 cannot read English, I don't know English that much, so  
3 in some of the English documents it has written that I  
4 was a dissident. But since I don't know how to read  
5 them, so I can't tell.

6           Q.     Okay. Do you consider yourself a dissident?

7           A.     No. I'm a person that who is going to eliminate  
8 the Communist party to sort of take down the Communist  
9 party in China because I feel like the name, the term  
10 that dissident has already produced and insulted a lot  
11 in west or in the U.S.

12           People such as Mr. Xia, he was using the term  
13 that being a dissident out seeking donation. And so,  
14 therefore, I think it's synonym of being a scam.

15           Q.     So it's fair to say that you don't consider  
16 yourself a dissident?

17           A.     Well, okay, I must tell you that, counsel, that  
18 I said that already that I'm a person seeking to  
19 eliminate the Chinese Communist party.

20           But, of course, that will be including that I  
21 am sort of a dissident. But not only just a dissident  
22 now, so that I'm unlike Xia, who is a Communist party

1 member, and also claimed that he is a dissident, and  
2 also he is a supportive of the corrupting, a person of  
3 the corruption of Liu Yunshan.

4 Q. My question was only whether you considered  
5 yourself a dissident or not?

6 A. But the thing is --

7 Q. Could you answer yes or no?

8 MR. MORRISSY: Well, I think the record will  
9 reflect he does not believe it's a yes or no question.

10 He said, and we can read it back, I believe  
11 he said he is sort of dissident, but he believe more  
12 than that because of the word "dissident" has a  
13 connotation in the west that he does not agree with it.

14 So that's what I got from that, but we can  
15 read it back.

16 MR. DENNIS: I don't disagree with that, but  
17 it's a simple question whether he considers himself a  
18 dissident or not. He can answer yes, but or no, but.

19 But I'm taking that as he's saying yes, but.  
20 Is that correct, yes, that he's that and more?

21 MR. MORRISSY: Well, it's obviously asked  
22 and answered, but you can try it.

1           A.     You are rooting me in through this question,  
2 right?

3           Q.     Well, that's my job.

4           A.     So are you trying to trap me? In this right,  
5 it's your job?

6           Q.     It's not a trap.

7                   MR. MORRISSY: How about just speak one at a  
8 time. Is this a necessary element that we need to get  
9 bogged down in?

10                   MR. DENNIS: I don't see that it is.

11                   My problem is that every time he's  
12 uncomfortable, we are getting bogged down. And let's  
13 move on. I would actually like him to answer the  
14 question. I don't think it's terribly difficult.

15                   He can say I am a dissident, and I am more  
16 than a dissident, or I'm not a dissident, and I do all  
17 these other things. I don't care which one he picks,  
18 just pick one.

19                   MR. MORRISSY: Okay. I understand.

20                   Is there a way we go back in his in record  
21 that says read back "in a way I'm a dissident," and see  
22 if that satisfies counsel? We're off the record right



1 now.

2 (A discussion off the record.)

3 BY MR. DENNIS:

4 Q. I'm trying to make this as simple as possible.

5 Do you consider yourself a dissident? You may

6 consider yourself much more than that, but do you

7 consider yourself a dissident in addition to anything

8 else?

9 A. Yes.

10 Q. Okay. Good.

11 Have you ever been an affiliated with any

12 Chinese Communist leadership or organization?

13 A. No.

14 Q. Have you ever met any member of the North Korean

15 leadership?

16 A. Yes.

17 Q. Who did you meet?

18 A. Too many. I cannot recall now.

19 Q. Who is the highest ranking person?

20 MR. MORRISSY: I will object to this line of

21 questioning. It's irrelevant.

22 A. But they decide.

1 Q. Okay. Who was the highest ranking person that  
2 you met?

3 A. I make my promise that I cannot disclose the  
4 name.

5 Q. You don't have that choice.

6 MR. MORRISSY: Well, yes, he does. He  
7 absolutely does. Do you want to the call the Court and  
8 talk about this line of questioning?

9 MR. DENNIS: No. I will not get into that.

10 BY MR. DENNIS:

11 Q. What capacity were you in when you met this  
12 person?

13 A. Investor. And also that I was the person  
14 introducing some of the European investors to meet them.

15 Q. And have you ever publically said that you met  
16 the Premier of North Korea?

17 A. I never did specifically mention the name.

18 Q. Have you implied that you met him?

19 MR. MORRISSY: Who is he?

20 MR. DENNIS: He knows.

21 A. I don't know what you mean. But I don't know  
22 what you mean by implying. What is the definition of

1     implying?  What are you talking that I'm implying with  
2     my tone of voice?  With my eyes?  I can tell you my  
3     answer is no.

4           Q.     Then you didn't need to ask me that.

5                     So your complaint stated that since 2015, you  
6     have regularly spoken on YouTube and Twitter about  
7     Chinese politics and human rights issues.

8                     Is that correct?

9           A.     So I think that you're wrong.  When did you  
10    actually claim about 2015 or whatever.  I didn't say  
11    about 2015.

12                    MR. MORRISSY:  Okay.  How do you want to  
13    handle this?  He's answered the question, now can I  
14    speak to him?

15                    INTERPRETER WONG:  Do you wish me to repeat  
16    the question?

17                    MR. DENNIS:  No.

18                    MR. MORRISSY:  So before we go off the  
19    record, I will just request that when you ask a question  
20    about the pleading, can we be clear about whether you're  
21    asking whether he said it in the pleading or whether  
22    he's still saying it.

1 MR. DENNIS: Supporting what was in the  
2 pleading. Off the record.

3 (A discussion off the record.)

4 BY MR. DENNIS:

5 Q. So your complaint stated that since 2015, you  
6 had regularly spoke on YouTube and with Twitter about  
7 Chinese politics and issues. Do you still support that  
8 description?

9 A. I started to use Twitter platform to broadcast,  
10 to do my broadcasting since 2017 January.

11 Q. Okay. So that is a mistake in the complaint?

12 A. Yes.

13 Q. Okay. Do you recall stating in your complaint  
14 that you were a pioneer of using YouTube and Twitter to  
15 fight for the rule of law?

16 A. Yes.

17 Q. And how are you a pioneer?

18 A. Because the Chinese Communist party ranked me as  
19 their number one enemy.

20 Q. Okay.

21 A. So, therefore, I'm a pioneer.

22 Q. Okay. So do you understand in English that

1 pioneer means the first or the earliest to do something?

2 A. I said that in Chinese. I don't know about the  
3 English.

4 Q. Okay. So you were not one of the first people  
5 to use YouTube and Twitter to fight for the rule of law  
6 in China, were you?

7 A. Yes.

8 MR. MORRISSY: I'm sorry?

9 A. I am the first person.

10 MR. MORRISSY: Okay.

11 BY MR. DENNIS:

12 Q. Okay. What specific items have you advocated to  
13 advance the cause of the rule of law?

14 A. So social media, through social media. And I  
15 also reported the evidence that can -- evidencing the  
16 corruption Liu Yunshan in China. For example, the case  
17 of HNA.

18 Q. And this corruption that you exposed, how did  
19 you get the evidence?

20 A. A lot of the people in the Communist party  
21 provided such evidence to me anonymously.

22 Q. And if you have never been affiliated with the

1 Communist party, why did they trust you with this  
2 information?

3 A. Because inside the Chinese Communist party, and  
4 because of the corruption, a lot of the people are  
5 filled with hatred for such evilness and unfairness of  
6 this, so they are full of anger.

7 So that even in the United States, a lot of  
8 politicians have those regrets too. So the thing is  
9 that a lot of U.S. politicians express their regret, as  
10 well, and have some comments as well. Does that mean  
11 they have affiliation with the Chinese Communist party?

12 Q. You said that you used social media.

13 Is that correct?

14 A. Yes.

15 Q. And that social media is directed at people in  
16 China?

17 A. The whole world.

18 Q. Are you hoping that the people in China receive  
19 that message?

20 A. Yes.

21 Q. And does the Chinese government have a means of  
22 controlling access to social media?

1 MR. MORRISSY: Objection. Calls for  
2 speculation.

3 A. I don't know.

4 Q. So you don't know if your social media is being  
5 received by citizens of China?

6 A. But they definitely would receive them.

7 Q. But you just said you don't know if the  
8 government has a means of controlling that?

9 A. That's correct.

10 Q. So if you don't know if the government has a  
11 means of controlling it, how do you know whether they  
12 are receiving it?

13 A. The thing is that you see my social media  
14 broadcasting would have a data. And I have a record of  
15 data about how many viewers from China. And that would  
16 be a long-standing number of viewers in China, and so  
17 that is why.

18 Q. Like how many people would you say  
19 long-standing?

20 A. Every time is different.

21 Q. What is the lowest number?

22 A. So that you see there are too many times such a

1 long time of long-standing viewers. But in the last  
2 year, I think that number will be like several hundred  
3 thousand, several million to even tens of millions.

4 Q. Okay. You had made a statement, I'm curious if  
5 you still stand by this statement, that whistle-blower  
6 action have unprecedented impact on the international  
7 image and credibility of the Communist Chinese party?

8 A. Yes.

9 MR. MORRISSY: I wanted him to answer first,  
10 I'm sorry.

11 A. Yes.

12 MR. MORRISSY: But the complaint was  
13 verified, so each of the statements are in the complaint  
14 are as good as a witness.

15 MR. DENNIS: I still want to make sure he is  
16 still handing by that.

17 BY MR. DENNIS:

18 Q. What specifically is the impact of  
19 whistle-blower actions?

20 A. So that the U.S. and the world now are aware  
21 that the incident of HNA, and the real corruption of  
22 people in China, that Yelliang Xia, and also his



1 relationship HNA, and also that Yelliang stealing  
2 technologies, and the Chinese Communist party arresting  
3 lawyers and people, and also that the Chinese Communist  
4 parties' involvement with the HNA.

5 And so many and so on and so forth and so many  
6 that I cannot list them all.

7 Q. And how has that hurt the Communist party?

8 A. But the thing is that your questions today, are  
9 they relevant to the Chinese Communist or the case of  
10 Yelliang Xia because the questions seem to be all about  
11 Chinese Communist party?

12 Because the question that you're asking me,  
13 were actually the same questions that when I were  
14 actually being interrogated by the Chinese police,  
15 because I need to know exactly where your questions are  
16 coming from, because you see that your questions were  
17 exactly the same questions of when I and my family were  
18 interrogated by the Chinese police.

19 And then, also, you must be aware that I am the  
20 plaintiff. I am not the defendant. You know you must  
21 be clear about that.

22 Q. You are a cross-defendant. And you are the one

1 that made the statement about the impact on the CCP.  
2 And this is not a discussion of what my motives are, it  
3 is a deposition. And since you brought up the impact in  
4 your filings, I get to ask you about them.

5 You stated that you single-handedly challenged  
6 the Chinese regime's kleptocracy. Is that correct?

7 A. Yes.

8 Q. And you still believe that?

9 A. Yes.

10 Q. Have you ever stated that the issues such as the  
11 rule of law or democracy in China are not a pressing  
12 issue for the people of China?

13 A. I don't recall.

14 Q. Okay. Is it possible that you said that?

15 A. I don't recall.

16 Q. What widespread corruption in the Chinese  
17 Communist party have you exposed?

18 A. HNA.

19 Q. And what was your source of evidence?

20 A. Anonymous people. Public information.

21 Q. And what happened to the individuals that you  
22 exposed?

1 A. Don't know.

2 Q. Do you know if you're covered by the Chinese  
3 mass media?

4 MR. MORRISSY: Is that a defined term?

5 Q. I'm asking you.

6 MR. MORRISSY: Like, is it just term of art  
7 that you're using?

8 Q. Covered by Chinese news?

9 MR. MORRISSY: That's more of a personal  
10 question.

11 A. I know there was some reporting, however I did  
12 not read them because I know they were just creating  
13 rumors.

14 Q. Okay. You stated that Mr. Xia committed  
15 extortion against you. What was the form of extortion?

16 A. He talked about it over the phone. And, in  
17 fact, that he talked about it openly. He wanted a  
18 billion U.S. dollars from me.

19 Q. In return for what?

20 A. Okay. So that's exactly -- that is, you know,  
21 that he claimed that he was using this kind of extortion  
22 and using the deception. And telling me that he going

1 parade the CDO team like the U.S., and he's going to  
2 bomb Chen Yang Hi in China, and kill the members of the  
3 CCP, that's what he said.

4 Q. So if you paid him one billion U.S. dollars, he  
5 would not do that. Is that what the extortion was?

6 A. No. He was asking for that billion dollars so  
7 that he can go and do this crazy criminal act.

8 Q. Okay. But you said that he extorted you, that  
9 he committed extortion on you?

10 MR. MORRISSY: Do you have any reference to  
11 that statement?

12 MR. DENNIS: Yes. I believe in the  
13 plaintiff's complaint where it says Xia's extortion,  
14 threatening, defamatory and malicious post and YouTube  
15 videos, and continues to be substantially an irreparably  
16 harmed, and under intense fear for personal safety and  
17 potential severe and irremediable harm to his family.

18 MR. MORRISSY: So we're focusing on the  
19 lawyer?

20 MR. DENNIS: Right.

21 MR. MORRISSY: The prior's counsel word of  
22 extortion?

1 MR. DENNIS: Correct.

2 MR. MORRISSY: You don't want to focus on  
3 any particular tweet your client made that could have  
4 made that impression on the plaintiff?

5 MR. DENNIS: I'm asking why he thinks that  
6 was extortion since that was in the prior pleading? If  
7 he agrees with that it's incorrect, if there was no  
8 extortion, that's fine.

9 A. So your question is how do they manifest this  
10 extortion?

11 BY MR. DENNIS:

12 Q. Yes. How was Xia extorting from you? How was  
13 this extortion occurring?

14 MR. MORRISSY: To be clear, there is no  
15 cause of action for extortion.

16 MR. DENNIS: Okay. Since it was in there,  
17 does he believe he was extorting? If he doesn't, that's  
18 fine.

19 BY MR. DENNIS:

20 Q. Do you believe that you were extorted by Mr.  
21 Xia?

22 A. Yes.

1 Q. So in what form was the extortion? Actually,  
2 let me back up. How do you define extortion, let me  
3 start there?

4 A. So they want you to do something, and that you  
5 don't want to do. And then you if you don't do what  
6 they ask, then they are going to, you know, do something  
7 that is bad for you.

8 Q. And in this case, it leads you to believe that  
9 Mr. Xia was extorting you?

10 A. So you see that he wanted that I give him a  
11 billion U.S. dollars so that he can create a killer team  
12 and to go and kill people.

13 And since I don't give him this billion dollars  
14 that he requested, so he started to create a rumor and  
15 gossip to slander me. So they insulted my family, and  
16 he destroyed my reputation. And he also lobbied to the  
17 U.S. government all over the place, and wanted to  
18 repatriate me to China. And if he is truly a dissident,  
19 he would be aware that if I were repatriated, the  
20 Chinese government is going to have me killed.

21 So that since he is lobbying all over the place  
22 wanting to repatriate me so that will be threats to my

1 life. And because he is a dissident, he knows what the  
2 Chinese government would do to me.

3 Q. So that was after you wouldn't give him the  
4 billion. Is that correct?

5 A. Yes.

6 Q. Thank you. So what happened first, did Mr. Xia  
7 start calling you names, or did you start calling him  
8 names?

9 MR. MORRISSY: Objection. For the record,  
10 there is no evidence that the deponent called the  
11 defendant any names.

12 MR. DENNIS: Okay. Let me clarify.

13 BY MR. DENNIS:

14 Q. He's correct. Let me clarify that.

15 Did you start to make any actions against Xia  
16 before he started making accusations about you? Or who  
17 made the acquisition about the other first?

18 A. So if it was that after Xia did not get one  
19 billion dollars that he requested from me, he started to  
20 create gossip and rumors on Twitter insulting me, and  
21 that started it.

22 Q. And that request for the billion dollars, how

1 did he make that request to you?

2 A. So he mentioned it on Twitter, and also that he  
3 made the request over the phone to me as well.

4 Q. And then after he started doing that, you  
5 started accusing him of things. Is that correct?

6 MR. MORRISSY: Objection.

7 A. I'm only retaliating.

8 Q. That's fine. I'm just asking.

9 Did you accuse him of being a sexual predator?

10 A. I don't recall.

11 Q. Do you recall making a statement on YouTube and  
12 Guo Media that he had molested a restaurant owner in  
13 California?

14 MR. MORRISSY: Objection to relevance.

15 A. I don't recall.

16 Q. Did you ever publically state that he had a  
17 sexually transmitted disease?

18 A. I don't recall either.

19 Q. So I would guess that you would mean that you  
20 don't know if he has a sexually transmitted disease?

21 A. I don't recall.

22 Q. Did you ever offer a cash award of one hundred



1 thousand dollars to any woman who had claimed that has  
2 been assaulted by him?

3 MR. MORRISSY: Objection. Relevance.

4 A. Yes.

5 Q. Okay. And did anybody answer that offer of an  
6 award?

7 A. Well, because we signed all of the confidential  
8 agreement, I cannot really disclose that here.

9 Q. You don't have to tell me who, you just have to  
10 tell me whether somebody did?

11 A. Yes.

12 Q. Let me ask you who is me ask you who is Guo  
13 Baosheng?

14 A. Another democratic liar, same category as Xia.

15 Q. Do you have any sort of relationship with him?

16 A. Our relationship is that I was being lied to and  
17 being extorted.

18 Q. By him?

19 A. Yes.

20 Q. Did he ever work for you?

21 A. No.

22 Q. Okay. Do you recall ever referring to Mr. Xia

1 as a beast?

2 A. I don't recall.

3 Q. Do you recall accusing him of raping a student  
4 at Beijing University?

5 A. Yes. Okay, but I did not say that he raped, I  
6 only said that he assaulted.

7 Q. Okay.

8 MR. MORRISSY: I'm sorry. Can we read the  
9 back the question or restate the question?

10 Q. Did you ever accuse Xia of raping a student at  
11 Beijing?

12 MR. MORRISSY: The accused part I think was  
13 lost on the deponent between you and me.

14 MR. DENNIS: Right.

15 MR. MORRISSY: So however you want to handle  
16 that is fine.

17 BY MR. DENNIS:

18 Q. Did he ever say that he had raped a woman?

19 A. No.

20 Q. Did you ever say that he sexually assaulted a  
21 student while he was in the Beijing University?

22 A. Yes.

1 Q. Okay. It's noon. Did you want to break at noon  
2 or keep going?

3 A. Keep going.

4 MR. DENNIS: It's up to you and the court  
5 reporter.

6 MR. MORRISSY: I will leave it up to the  
7 clients. Before we do that -- well, this might  
8 influence your decision. I want to speak my client  
9 before you ask another question, if you don't mind, just  
10 for literally thirty seconds.

11 MR. DENNIS: Yes.

12 MR. MORRISSY: Does that influences the  
13 timing?

14 MR. DENNIS: No. Take two minutes.

15 (A brief recess.)

16 A. Can repeat your question?

17 BY MR. DENNIS:

18 Q. Did you ever accuse, or worse, assaulting a  
19 student while he was a professor at Beijing University?

20 A. Correct. Because at the time that I heard from  
21 the president of the Beijing University, all the party  
22 committee members of the university told me that Xia did

1 that, and so he would be arrested and put into prison.

2 Q. And was it the president of the university who  
3 told you that he would be arrested or the party  
4 representative or both?

5 A. Both.

6 Q. Okay. And how did they tell you of this?

7 A. It is because I was the second largest  
8 shareholder of the company of the Peking University.

9 Q. Okay. I didn't mean why, I meant how did they  
10 tell you.

11 A. After we were all drunk.

12 Q. So it wasn't in an e-mail or text or any form  
13 like that?

14 A. Face-to-face.

15 Q. And when did they tell you this?

16 A. Approximately, around 2013.

17 But I can't quite recall.

18 Q. And did they say when that occurred?

19 A. 2011. 2012.

20 MR. MORRISSY: I will just note my objection  
21 to this line of relevance.

22 Q. Do you agree that Mr. Xia's actions are similar

1 to the use of "unrestricted warfare" by a Chinese  
2 Communist party. Do you agree with that statement?

3 MR. MORRISSY: Where did that quotation come  
4 from?

5 MR. DENNIS: Page 12 of the complaint.

6 MR. MORRISSY: I just want to be clear about  
7 who we are quoting and what we are quoting if you are  
8 asking the deponent about statement that contains a  
9 quote.

10 MR. DENNIS: Do you see it?

11 MR. MORRISSY: I don't. If this page 12 of  
12 the complaint, I admittedly gave it a cursory skim.

13 MR. DENNIS: All right.

14 MR. MORRISSY: One of the first paragraphs  
15 is similar to what you asked?

16 MR. DENNIS: Right. Right.

17 MR. DENNIS: Let me restate it then so I am  
18 consistent with that.

19 MR. MORRISSY: Thank you.

20 BY MR. DENNIS:

21 Q. Do you believe that Xia's actions are similar to  
22 those used by the Chinese Communist party against you?

1 A. Yes.

2 Q. Okay.

3 MR. DENNIS: Check page 3.

4 MR. MORRISSY: Yes, would you like me to  
5 repeat?

6 MR. DENNIS: Sure.

7 MR. MORRISSY: Paragraph 15 of the complaint  
8 does say Xia's action are similar to the alleged use of,  
9 and then there are quotations in the complaint  
10 "unrestricted warfare," by the Chinese Communist party.

11 A. Yes.

12 BY MR. DENNIS:

13 Q. And what do you mean when you say unrestricted  
14 warfare?

15 A. That is exactly what you were doing to me now,  
16 that like you are harassing me. You are wasting my time  
17 and my money and insulting my reputation so that you  
18 distract me from my ultimate goal, that is to eliminate  
19 the Chinese Communist party.

20 Q. So let me get this straight. Use of the  
21 judicial system in your opinion were unrestricted  
22 warfare?

1                   MR. MORRISSEY: Objection. That's not what  
2 he said.

3           A.       I did not say that.

4           Q.       You said that this is questioning you the same  
5 as unrestricted warfare. Is that correct?

6           A.       No.

7           Q.       So wasting your time is the same as unrestricted  
8 warfare?

9           A.       But you are designed to harm me, and that is  
10 unrestricted warfare. But then the thing is that you  
11 can question me, but then you cannot actually getting  
12 fabricated questions and designed fabricated questions  
13 to ask me.

14          Q.       And so questioning you is a form of unrestricted  
15 warfare?

16                   MR. MORRISSY: Objection.

17          A.       No.

18          Q.       Okay. Have you ever publically stated that you  
19 were a U.S. citizen?

20          A.       I stated, I said that I was thinking of saying  
21 that I was U.S. resident, so I stated wrongfully.

22          Q.       Okay. So you meant to say you were a U.S.

1 resident, but you did say you were a U.S. citizen?

2 A. Yes.

3 Q. Okay.

4 MR. DENNIS: Let's take a break here.

5 Actually, the next set will be more problematic.

6 (A lunch recess.)

7 BY MR. DENNIS:

8 Q. Back on the record.

9 Mr. Guo, do you remember -- I will just show  
10 you the screen shot. Do you remember doing this  
11 interview?

12 A. Yes.

13 Q. Do you remember saying in this interview that in  
14 1989 you spent a whole year in the U.S.?

15 A. Yes.

16 Q. Okay. 1989, was that when Tiananmen Square  
17 occurred?

18 A. I actually said 1999 that I was in America, not  
19 1999.

20 Q. All right. So this is a mistranslation?

21 MR. MORRISSY: What is a mistranslation?

22 MR. DENNIS: I have translation in English



1 of the transcript.

2 A. Prove it's a mistranslation.

3 MR. MORRISSY: What English translation are  
4 you referring to? Do you know where this translation  
5 came from?

6 MR. DENNIS: It had subtitles with it, with  
7 the interview. So...

8 MR. MORRISSY: Right. So someone did it?

9 MR. DENNIS: Someone did it.

10 A. Same one as my family. You know, they abused my  
11 family. It was 1989. I was in America all year. And  
12 same thing, I really, you know, I feel shock. Oh, my  
13 God. Really shock.

14 MR. MORRISSY: I mean, this does not have to  
15 do with the pleadings. So...

16 MR. DENNIS: No, where he says he was in  
17 1989 is in the pleadings, I guess?

18 A. United States. You can use my words. 1999.

19 MR. DENNIS: Where he says what happened  
20 with Tiananmen Square.

21 MR. MORRISSY: We can move on then.

22 BY MR. DENNIS:

1 Q. When did Tiananmen Square occur?

2 INTERPRETER WILKINSON: Is that a question  
3 to Mr. Guo?

4 Q. Yes. The incident?

5 A. Today, 30 years ago.

6 You see, the thing is -- you see, that you  
7 actually -- I am spending my June 4th, this Memorial Day  
8 in here. And, in fact, you are helping the Chinese  
9 Communist party to help them.

10 And then to put me in here for questionings,  
11 and then, in fact, that that is actually to solidify my  
12 will to target against the anti-Communist party.

13 You see, that the 30 years ago today in  
14 Tiananmen Square that the Communist party has sent out  
15 tanks to actually roll over people. And then on that  
16 day, I was arrested and put in prison, and then they  
17 then also killed my younger brother.

18 So today, in the United States of America, I'm  
19 the assistant professor. And, you know, of the Chinese  
20 Communist party, and to bring me here for a deposition,  
21 a tortious deposition.

22 Q. All right. I'm just a pawn. Did you sell your

1 motorcycle at that point?

2 MR. DENNIS: It's in his pleading.

3 MR. MORRISSY: Where? I'm sorry.

4 MR. DENNIS: Under the factual background  
5 where he tells about what he did about his upbringing.

6 MR. MORRISSY: He talks about him selling  
7 his motorcycle in 1989?

8 MR. DENNIS: Yes, yes, for 500 U.S. 36 RMB.

9 BY MR. DENNIS:

10 Q. Do you recall stating that your sold your  
11 motorcycle for about 500 U.S. dollars?

12 A. Yes.

13 Q. And you donated that money. Is that correct, to  
14 student protestors?

15 A. Yes.

16 Q. And was that a significant amount of money to  
17 you?

18 A. Extremely significant amount.

19 Q. And you stated that you were then incarcerated  
20 from 1989 to 1991. Is that correct?

21 A. Yes.

22 Q. And when you came out in 1991, you also stated

1 in your pleadings that you built a 300 million dollar  
2 hotel. Is that correct?

3 INTERPRETER WILKINSON: Counsel, did you say  
4 RMB?

5 Q. No. U.S. dollars.

6 A. Yes.

7 Q. And so how did you come up with 300 million  
8 while you were locked up for two years?

9 MR. MORRISSY: Objection. First of all, he  
10 didn't say he built it. And he didn't say he came up  
11 with 300 million.

12 Q. Let me ask you how did you get to be involved in  
13 building for three hundred million dollars when you were  
14 locked up for the two previous years?

15 A. At the time, it was a actually foreign  
16 investment in the Hunan Province. The investors were  
17 actually coming from Japan, Hong Kong, U.S. and Europe  
18 countries.

19 Q. And then how did you get involved with that?

20 A. They actually requested me to be the general  
21 manager.

22 Q. And how did you meet them?

1           A.       So it was at the time that while I was  
2 imprisoned in the same room of the -- in the same room  
3 where I was imprisoned, there was a roommate then who  
4 was supposedly sentenced to death, and later on being  
5 released. And thing is that he introduced me to get to  
6 know one of his relatives in Hong Kong.

7                   And that relative also introduced me to get to  
8 know the investor in Hong Kong, so that is how I got  
9 involved.

10          Q.       Who was the cellmate?

11          A.       I cannot tell you.

12          Q.       Who was the relative that you were introduced  
13 to?

14          A.       I cannot tell you that either.

15          Q.       Well, let me ask you Xia Ping, does that mean  
16 anything to you?

17          A.       My investor.

18          Q.       And what was the 2007 Chinese law regarding  
19 private property ownership?

20          A.       I don't know.

21          Q.       Okay. Is it your position that private property  
22 was held prior to 2007 by individuals?

1 MR. MORRISSY: Objection.

2 A. I don't know.

3 Q. Okay. And you say that you spent two years in  
4 jail. What was the crime that the Chinese said that you  
5 committed?

6 A. So there are three accusations: One, was that I  
7 was involved with in anti-revolutionary action. Second,  
8 I was inciting the anti-revolutionary actions. And also  
9 that the third is that I was obstructing the public  
10 duties.

11 Q. What were the public duties that they claimed  
12 you were obstructing?

13 A. I don't know, something about the  
14 anti-revolution. I don't know what exactly what they  
15 are talking about.

16 Q. Okay. So you're saying that you were not  
17 arrested or sent to jail for cheating on a diesel  
18 contract?

19 A. It is actually a rumor spread by the Communist  
20 party.

21 Q. Let me back up. What did the Chinese say that  
22 you were convicted of? I'm not asking what you actually

1 were convicted of. I am asking what did they say you  
2 were convicted of? Did they say you were convicted of  
3 cheating on a diesel contract?

4 A. Anti-revolution.

5 Q. That's what the Chinese were saying that you  
6 were convicted for?

7 A. Yes.

8 Q. All right. And you're saying that now they are  
9 saying it's for something else?

10 A. But they never actually did accuse me.

11 But the thing is that they really never did get  
12 accuse me of anything. You see, that these are the  
13 accusation named by or Yelliang Xia or the Communist  
14 party people.

15 Q. Okay. Do you have any documentation that shows  
16 what your sentence was?

17 A. No. I actually wanted -- so, in fact that no, I  
18 don't, I didn't. In fact, I actually wanted them to  
19 show me such document.

20 The fact that you ask me this question, perhaps  
21 that you can show me the document.

22 Q. No. You're telling me. You're the one telling

1 me what it was for.

2 In your complaint, you say that you were arrested  
3 for commercial fraud?

4 A. No, that is wrong.

5 Q. Okay. Did you review the complaint before it  
6 was it filed?

7 A. I did read it, but I did not understand it.

8 Q. Do you have the ability to hire translators?

9 A. But then sometimes they make mistakes.

10 Q. Do you routinely enter into contracts that you  
11 are uncertain of what they say?

12 MR. MORRISSEY: Objection. Relevance.

13 A. Often.

14 Q. Subsequently, have you been charged for any  
15 criminal activity in Hong Kong?

16 A. No.

17 Q. Has the government seized any of your assets?

18 A. No.

19 Q. Are you familiar with the this document? I will  
20 show it to you first?

21 A. No. We need to know where this document from.

22 MR. MORRISSY: We don't know where this



1 document came from.

2 A. I think this is a fake document. It is one  
3 hundred percent fake.

4 MR. MORRISSY: Are you marking this as an  
5 exhibits?

6 MR. DENNIS: No. Just curious if he's  
7 familiar.

8 A. We need to sue him back, counter back.  
9 We need to know where this document.

10 Q. It's not an exhibit.

11 A. You give it to me. You need to give us.

12 Q. Why would he need a copy? You deny that it's  
13 relevant?

14 A. Where is this from? You're asking if this is  
15 public? This is fake.

16 MR. MORRISSY: You have not produced it.

17 A. So I just need to know to know where the source  
18 of this information, and where did you get this  
19 information from?

20 Q. If you do a Google search of Hong Kong and Miles  
21 Kwok, it will pop relatively early on that 4.2 billion  
22 dollars has been seized by the Hong Kong government, and

1 that he is wanted in connection with this.

2 MR. MORRISSY: So there is no objection of  
3 us making a copy of this?

4 MR. DENNIS: No.

5 MR. MORRISSY: We will make a copy. But do  
6 you mind if I just hold it right here?

7 MR. DENNIS: No, that's fine.

8 BY MR. DENNIS:

9 A. You said 4.2 million, right?

10 Q. I believe it's 4.2 billion.

11 A. It's fake.

12 Q. Did you did you sue the BBC over this report?

13 A. No.

14 Q. Is this first time you have ever heard of this?

15 A. Yes. In fact, I heard -- actually, I misspoke.  
16 I heard about that prior to today. However, I did not  
17 know that's where the fabricated document came from, so  
18 I'm investigating it. So we must get a copy and we must  
19 see this.

20 Q. You will get a copy.

21 A. We must request our attorney, our counsel to  
22 actually ask about this question while on trial that

1 where this document came from.

2 Q. And so you're unfamiliar with the report that  
3 your daughter is contesting that seizure?

4 MR. MORRISSY: Objection. Relevance.

5 A. But they are all fake.

6 Q. I understand that. I'm just asking the question  
7 that are you familiar with your daughter is contesting  
8 that?

9 A. I don't know.

10 Q. Are you familiar with Eastern Profit  
11 Corporation?

12 INTERPRETER WILKINSON: Is there an  
13 attorney's name, do you know?

14 Q. I have no attorney's name.

15 A. Yes.

16 Q. And are you familiar with the lawsuit between  
17 them and Strategic Vision?

18 A. Yes.

19 Q. And were you brought into that lawsuit --

20 MR. MORRISSY: Clarify "brought in"?

21 MR. DENNIS: Interplead.

22 MR. MORRISSY: Fair enough.

1           A.       But that was a lawsuit between themselves. I'm  
2 not -- I don't know about that. And I know that the  
3 lawsuit is in the process, and I know that that was  
4 fraud involving a million dollars.

5           Q.       Were you interplead into the lawsuit?

6                   MR. MORRISSY: It should be a public record.

7                   MR. DENNIS: Right. I want to make sure  
8 that he knows that he was.

9           A.       Yes.

10          Q.       And who is Huntu Wong?

11          A.       A partner.

12          Q.       In the Eastern Profit?

13          A.       Yes.

14          Q.       Okay. And what was the contract between Eastern  
15 Profit and Strategic Vision, do you recall?

16                   MR. MORRISSY: Objection to relevance.

17          A.       I don't know.

18          Q.       So you don't know why you -- well, let me back  
19 up. Were you involved in hiring Strategic Vision  
20 International?

21                   MR. MORRISSY: Sir, we are getting out of  
22 the scope of this lawsuit.

1                   MR. DENNIS: We're not. Strategic Vision,  
2 our position is that Strategic Vision was hired to spy  
3 on our client.

4                   MR. MORRISSY: And how is that relevant to  
5 this lawsuit?

6                   MR. DENNIS: I think it goes to, obviously,  
7 motivation of truth telling and the slinging of errors  
8 back and forth.

9           A.       Yes.

10                  MR. MORRISSY: Yes what? Hold on because we  
11 just said a lot.

12                  MR. DENNIS: Was he involved?

13                  MR. MORRISSY: I'm sorry?

14           A.       In fact, it's one hundred percent lie. And that  
15 has nothing to do with our scope of questioning today,  
16 that the Strategic Vision was hired to actually  
17 investigate the CCP corruption, so that you are actually  
18 helping them in doing the corruption here.

19                  So that we need to ask you to provide us  
20 evidence because you are claiming that we, in hiring  
21 Strategic Vision to spy on your client, you need to  
22 provide us evidence why you would actually make such a

1 claim.

2 Q. That what I'm asking.

3 Did you hire them though spy on Mr. Xia?

4 A. No.

5 Q. So now you say that you left China because you  
6 were critical, and you were fearful for your health and  
7 your life. Is that correct?

8 A. It has caused great threat to our lives.

9 Q. And you claimed through counsel that you needed  
10 to get documentation that was of a sensitive nature, and  
11 that that was stored in Beijing. Is that correct?

12 A. Yes.

13 MR. MORRISSY: Just to clarify, I don't  
14 think that the word Beijing was used.

15 MR. DENNIS: Okay. In China.

16 MR. MORRISSY: Correct.

17 BY MR. DENNIS:

18 Q. And when did you move those sensitive materials  
19 to Beijing or to China?

20 MR. MORRISSY: I don't believe that was the  
21 what was said?

22 MR. DENNIS: It is stored there.

1 MR. MORRISSY: I don't think the words  
2 "sensitive material" was ever used.

3 MR. DENNIS: No, I believe it was  
4 confidential information and documentation.

5 MR. MORRISSY: Are you talking about  
6 something that came through my office? Like, you said  
7 something said through counsel, I'm just curious what  
8 communication?

9 MR. DENNIS: Last Friday when you sent the  
10 response.

11 MR. MORRISSY: So that's related to  
12 information. There was never a statement that the  
13 deponent moved information there. That was related to  
14 evidence of actual monetary damage.

15 MR. DENNIS: So there was not documentation  
16 regarding that?

17 MR. MORRISSY: The statement to your office  
18 was that that documentation was in China, not that he  
19 had moved it there.

20 MR. DENNIS: Let me back up and go down  
21 there.

22 BY MR. DENNIS:

1 Q. Was any documentation of a sensitive nature  
2 including relevant to this case ever outside of China?

3 MR. MORRISSY: The word "sensitive" was  
4 never used. It's just evidence of the damage.

5 MR. DENNIS: Well, okay.

6 MR. MORRISSY: So you're saying that we  
7 communicated through my office? I just want to clarify?

8 MR. DENNIS: No, I am a not saying through  
9 your office. Let me remove "your office" from it.

10 MR. MORRISSY: Okay.

11 BY MR. DENNIS:

12 Q. Have you ever had sensitive materials that you  
13 are now storing in China outside of China?

14 A. I'm unable to tell you this answer because that  
15 is answer that was sought by the Chinese police.

16 Q. I'm not asking where in China, I'm asking what  
17 it ever out of China?

18 MR. MORRISSY: For the record, we don't even  
19 know what we're talking about here, right?

20 A. I don't know what you're saying. I don't know  
21 the answer.

22 MR. MORRISSY: The interrogatories.



1 MR. DENNIS: I'm sorry?

2 MR. MORRISSY: The RFPs.

3 MR. DENNIS: The RFRs.

4 MR. MORRISSY: The request for production.

5 It's just my term of art.

6 MR. DENNIS: Yes. Yes.

7 MR. MORRISSY: The one that we were ordered  
8 to respond to?

9 MR. DENNIS: Right. But it was also  
10 responding to 14.

11 MR. MORRISSY: Yes, I think that was the  
12 number.

13 MR. DENNIS: So we're requesting  
14 documentation regarding the damages of all the  
15 documents, assessment accounting breakdown, et cetera.

16 And then he says: "After a diligent search,  
17 documents potentially responsive to his requests are  
18 located in China."

19 MR. MORRISSY: So what you're quoting is the  
20 old response?

21 MR. DENNIS: Correct.

22 MR. MORRISSY: Not new?

1 MR. DENNIS: But it's still there.

2 MR. MORRISSY: It still remains, but there  
3 is an additional component to the newer response that's  
4 the new response.

5 MR. DENNIS: Correct. What I'm trying to  
6 figure out, it says "they are currently located in  
7 China," that implies that they were not always located  
8 in the China.

9 MR. MORRISSY: That does not imply anything,  
10 that just say where they currently are.

11 MR. DENNIS: Fair enough. But again, when I  
12 asked him were they ever located anywhere outside of  
13 China.

14 MR. MORRISSY: Yes, you can ask that.

15 INTERPRETER WILKINSON: Counsel, should I  
16 ask this question?

17 BY MR. DENNIS:

18 Q. Were any of those documents that were referenced  
19 in the RFR?

20 MR. MORRISSY: May I give an attempt to  
21 asking the question, and you tell me before he answers  
22 if I you think it's incorrect?

1 MR. DENNIS: Sure.

2 MR. MORRISSY: So we have stated that  
3 documents that demonstrate actual monetary damage to you  
4 based on the defendant's defamatory comments are located  
5 in China. Were those documents ever outside of China?

6 A. No.

7 BY MR. DENNIS:

8 Q. You stated that Mr. Xia said that you were a  
9 rapist. Is he the first person to have accused you of  
10 this?

11 A. I don't know.

12 I need to stand up for a bit because my leg was  
13 injured.

14 Q. That's fine.

15 A. It's recently that I am actually standing up in  
16 during my deposition.

17 Q. That's fine.

18 So are you familiar with the a former worker of  
19 yours accusing you of rape?

20 A. I might --

21 INTERPRETER WILKINSON: I'm sorry, do you  
22 mind if I ask him to repeat his answer, I'm not sure I

1 got his words?

2 A. So that was a former employee, Ma Rai, that made  
3 the accusation that I was a rapist. But she was under  
4 instruction of the CCP to make that accusation that I  
5 was the rapist. And the thing is that Ma Rai has not  
6 been able to show her face for the last two years to  
7 make that accusation. She can't show her face in New  
8 York for the last two years.

9 Q. And did you sue any of news organizations that  
10 reported it?

11 A. Currently, it was ongoing, yes.

12 Q. Had you ever been offered an award from the  
13 Chinese government for actions from the MSS?

14 A. I did not have any action with the MSS.

15 Q. Have you ever claimed that you were awarded or  
16 recognized for your work on behalf the Chinese  
17 government?

18 A. No.

19 Q. Were you offered and declined an award, or were  
20 you just never offered an award?

21 A. It was they that offered to give me the award,  
22 and I declined because I felt that was an insult.

1 Q. And who was it? Which organization offered it  
2 to you?

3 A. I can't quite recall. There were some many  
4 different government departments in China that I cannot  
5 recall.

6 Q. You were friends with Ma Jian. Is that correct?

7 A. Very good friends.

8 Q. And Ma Jian, was he not the deputy minister of  
9 the MSS?

10 A. Yes.

11 Q. And did you spend billions of Hong Kong dollars  
12 to entice the Dalai Lama to come to China?

13 MR. MORRISSY: Objection to relevance.

14 What are we talking about here?

15 A. Well, the thing is so that you know you're using  
16 the word, you're using lure, right?

17 Q. No. I said entice.

18 A. The word that you use, entice, it is actually  
19 not a good lawyer. As a lawyer, you should not use such  
20 word. And no, I did not entice him.

21 MR. DENNIS: Let me show him that.

22 MR. MORRISSY: Okay.

1 BY MR. DENNIS:

2 Q. Do you recognize this letter?

3 A. I can't really see that. I cannot recognize  
4 whether this is a letter, if this is from the Chinese  
5 Communist party. It's definitely familiar, fabricated  
6 material.

7 Q. It references in August 26th the date. So I'm  
8 assuming that what you're saying is that you have not  
9 written any letter to the Communist on August 26th dated  
10 August 26th?

11 A. That was a time August, that was time that in  
12 August 26th that I was trying to exchange the release of  
13 my family, and also my employees who were being  
14 imprisoned with a Chinese government, and that was a  
15 letter for that purpose.

16 However, that I did not know whether this letter  
17 is that letter. I cannot read that. So that the  
18 Chinese government did provide me a letter, so that they  
19 wanted me to put my signature on it.

20 However, I find this letter illegible, so I  
21 cannot confirm this is that letter, although it looks  
22 like it.

1 Q. Did you, in fact, endorse that letter, the  
2 August 26, 2017, letter?

3 A. Of course I did put my signature on that letter  
4 because I must rescue, seek to rescue my family and my  
5 employees who were being kidnapped and who were being  
6 imprisoned.

7 Q. And were you successful in saving your family  
8 and employees?

9 A. No. That is why I said that the Chinese  
10 Communist party were always lying, and why we have to  
11 eliminate. And, you know...

12 Q. And the letter, did you read it before you  
13 signed it?

14 A. I read that.

15 Q. And the letter, in that letter, you promised  
16 loyalty to the Premier Xi? I can't pronounce that name.

17 INTERPRETER WILKINSON: Premier or president  
18 you're talking about?

19 Q. Premier Xi.

20 A. I cannot recall.

21 Q. Okay. But you would have signed whatever they  
22 put in front of you. Is that correct?

1 A. Yes.

2 Q. Okay. Do you know who Li Xiopeng is?

3 A. He is the secretary.

4 Q. Oh. Deputy minister?

5 A. Deputy minister. Secretary of the Committee of  
6 the Chinese MSS.

7 Q. MSS. Okay.

8 Do you have a relationship with him?

9 A. No.

10 Q. Okay. The letter that you signed, did you send  
11 a copy of that to any of your asylum paperwork?

12 MR. MORRISSY: Just to clarify, do you mean  
13 send it to the U.S. Government as far as an application?

14 MR. DENNIS: Right.

15 MR. MORRISSY: To clarify, sent to the U.S.  
16 State Department as part of the asylum application?

17 A. I cannot recall.

18 BY MR. DENNIS:

19 Q. Do you remember whether you gave it to any U.S.  
20 government agency?

21 A. Yes, I remember I did.

22 Q. Do you remember which agency?



1 A. I cannot tell you. I'm unable to tell you.

2 Q. Okay. You're unable because you don't remember,  
3 or unable because you're forbidden from telling?

4 A. Yes, I'm forbidden to tell you.

5 Q. Okay. Are you familiar with the term business  
6 anchor?

7 MR. MORRISSY: They're both stumped.

8 A. It's very CCP English.

9 Q. Are you familiar with the term that describes  
10 the Chinese government asking wealthy businessmen for  
11 their assistance overseas?

12 INTERPRETER WILKINSON: Are you saying noose  
13 or anchor?

14 Q. No, like foot in the door.

15 So it would be the Chinese government asking  
16 business people for their assistance while they are  
17 doing their businesses overseas. Is there a term for  
18 that?

19 A. I don't know.

20 Q. Okay. Did you ever act in the capacity on  
21 behalf the of Chinese government while conducting your  
22 business?

1 A. No.

2 Q. Did you ever introduce foreign government  
3 leaders to Chinese government leaders?

4 A. No.

5 Q. How many lawsuits have you filed as a plaintiff?

6 A. I cannot quite recall, perhaps 20 or 30.

7 In fact, that even now currently there is still  
8 tons of them are being in the process of it.

9 Q. Are you the plaintiff on all of those?

10 A. No, no. And some of them I was actually a  
11 defendant. In fact, that the Chinese Communist party  
12 was actually suing me, and then they were saying that I  
13 was a rapist. And then, you know, like I say, they were  
14 using the unrestricted warfare against me.

15 And, for example, the most famous woman in China  
16 Xu Jinglei, and also the famous actress Fan Bingbing,  
17 that even the HNA, the corporate, they are all suing me  
18 for defamation. And, of course, they all think now they  
19 were all being canceled and withdrawn.

20 But then, of course, they are just the, they  
21 were just like helpers in the doings for the CCP. And  
22 that were all friends of Yelliang Xia.

1 Q. Okay. Do you know Tony Blair?

2 A. I know a lot of people.

3 But then I know about a lot people that I  
4 cannot even tell that you.

5 Q. Have you ever met Tony Blair?

6 MR. MORRISSY: How is that relevant?

7 Objection to relevance.

8 A. Yes. Yes.

9 Q. Okay. And when you met him, in what capacity?

10 A. Friends, personal friends.

11 Q. All right. Did you ever introduce him to  
12 anybody in the Chinese government?

13 A. No.

14 Q. Okay. Did he ever come to China as your friend?

15 A. Well, the thing is that he often went to China  
16 in his own capacity as his own person. That has nothing  
17 to do with me.

18 Q. Right. But did you ever have him there as your  
19 friend?

20 A. No.

21 Q. Did you ever publically say that if you were not  
22 able to cause Mr. Xia, Mr. Zong and Mr. Wei to end in a

1 U.S. jail by the end on 2017, you would commit suicide  
2 by jumping off the top of your 18th floor through the  
3 window.

4 A. I don't recall.

5 Q. Okay. Have you stated publically that you were  
6 you were able to successfully to torpedo the Dalai Lama  
7 visit to the U.K., or interfere with Dailai Lama's visit  
8 to the U.K.?

9 A. I don't recall.

10 Q. Do you recall making a list of 92 people that  
11 you felt were your enemies?

12 A. I don't recall.

13 I believe that's more than that number.

14 Q. Okay.

15 A. My enemy.

16 Q. And you now claim that you have a one dollar of  
17 actual business loss. Is that correct?

18 INTERPRETER WILKINSON: Counsel, do you mind  
19 to repeat your question?

20 Q. I'll let him clarify.

21 MR. MORRISSY: Yes, let me put an objection  
22 on record to that. The statement in the response to the

1 request for production was that because we were unable  
2 to produce at that time documents that evidenced the  
3 actual monetary business loss that stem from the  
4 defendant's defamatory comment about the plaintiff, that  
5 we sought one dollar as a symbolic amount of damages for  
6 those actual losses.

7 Q. All right. Let me back it up and restate it as  
8 do you have any evidence to show the business has  
9 actually grown as a result of Mr. Xia's statements?

10 INTERPRETER WILKINSON: Grown?

11 Q. Grown.

12 A. Grown, no. They have damaged my business.

13 MR. MORRISSY: I think that might not have  
14 been communicated back and forth correctly.

15 MR. DENNIS: So he has no evidence of what  
16 the damage was, right?

17 MR. MORRISSY: No, no, there's no document,  
18 there is no evidence of damage that we are able to  
19 produce to you at this time.

20 MR. DENNIS: Correct.

21 MR. MORRISSY: So that's the extent of the  
22 statement that we made in response to RFP.

1 BY MR. DENNIS:

2 Q. And you stated that you used diligent efforts to  
3 get those documents. What were those efforts that you  
4 used?

5 A. So that is the question, right?

6 Q. What were the diligent efforts?

7 A. Well, I have been the liaison with my Beijing  
8 office that to get the evidence relevant to the damage  
9 caused by the Yelling Xia's defamation, and then his  
10 insult to my family.

11 And so that my family needed to actually go for  
12 treatment, and then the medical bills. And then also  
13 because his harmful speeches to my employees. As a  
14 result, they had monetary money being confiscated. And  
15 all these losses, and we are funding documents to prove  
16 that.

17 But then, of course, the Chinese police at the  
18 moment is helping Yelling Xia, so we are still not able  
19 to get those information, but we are doing our best to  
20 do that.

21 Q. So if Mr. Xia is as bad as you say he is,  
22 doesn't having him being against you help your

1 reputation?

2 A. So you can actually imagine the case if that is  
3 your way of thinking, your logic, then you should try to  
4 be the target of Yelliang Xia, then you can be target of  
5 the defamation target that spoken by such a bad person  
6 and see whether he would cause you harm.

7 So imagine, okay, even if Yelliang Xia is, even  
8 imagine that you were saying that, okay, Yelliang Xia is  
9 definitely a bad person. And yet he described you as  
10 animal. He described you as a rapist. He described you  
11 as a liar. He said that you were a spy. He wants you  
12 to be repatriated. He wants the Chinese government to  
13 kill you. So is that a good thing to me?

14 Q. Well, my question is doesn't that make your  
15 reputation better because he's such a bad person?

16 A. So that you are really basically telling white  
17 is black, and then, you know, that they are absolutely  
18 talking rubbish. That is why I would insisting not  
19 settling because I want to show the judge, show the jury  
20 what he is.

21 Yes, so imagine that he is a assistant  
22 professor for the Chinese Communist Party in Beijing,

1 and then he was teaching in Peking University, and then  
2 yet that he got fired, and now that he's in U.S. every  
3 day. He was out seeking for donations, at the same time  
4 he's slandering me and saying bad things about me and  
5 defaming me. How can that be a good thing to me?

6 Now, if he claimed to be a dissident of the  
7 Chinese Communist party, how is that his wife his  
8 children, family living happily, and are quite well in  
9 Beijing. And yet, I, my family, my employees were all  
10 locked in prison. How is that a good thing to me?

11 Q. In your correcting, you reminded me a question  
12 that I forgot to ask. Did your wife cut off two of her  
13 fingers?

14 A. I cannot answer you this question.

15 Q. Did you publically state that the reason she did  
16 that was because she was angry at you because she  
17 believed that you were having an affair?

18 A. I cannot recall.

19 MR. DENNIS: Let me step out for a moment.

20 (A brief recess.)

21 BY MR. DENNIS:

22 Q. Were you ever at something called Spring



1 Festival?

2 A. What do you mean?

3 INTERPRETER WILKINSON: Can you please ask  
4 me the question?

5 Q. There is program called Spring Festival, is my  
6 understanding?

7 A. Yes.

8 Q. And you were at that program?

9 A. Yes.

10 Q. And do you recall trading insults with Mr. Xia  
11 then?

12 A. I cannot recall.

13 Q. Okay.

14 MR. DENNIS: I think that's it.

15 (Reading and signing having not been waived,  
16 the deposition of Wengui Guo concludes at 1:54 P.M.)

17

18

19

20

21

22

1 DISTRICT OF COLUMBIA; to wit

2

3 I, Stacey Lawson, a Notary Public, in and for the  
4 District of Columbia, do hereby certify that the  
5 within-named witness personally appeared before me at  
6 the time and place sworn herein set out, and having  
7 been, duly sworn by me, according to law, examined by  
8 counsel.

9 I further certify that the examination was  
10 reported stenographically by me, and this transcript is  
11 a true record of the proceeding.

12 I further certify that I am not of counsel to any  
13 of the parties, nor in any way interested in the outcome  
14 of this action.

15 As written as my hand and notarial seal this 16th  
16 day of June 2019.

17

18

19

20

A handwritten signature in cursive script that reads "Stacey Lawson". The signature is written in black ink and is positioned above a horizontal dashed line.

21

Stacey Lawson, Court Reporter

22

My Commission Expires: April 30, 2024

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Rules of Supreme Court of Virginia

Part Four - Pretrial Procedures

Depositions and Production at Trial

Rule 4.5

(e) Submission to Witness; Changes; Signing.

When the testimony is fully transcribed, the deposition shall be submitted to the witness for examination and shall be read to or by him, unless such examination and reading are waived by the witness and by the parties. Any changes in form or substance which the witness desires to make shall be entered upon the deposition by the officer with a statement of the reasons given by the witness for making them. The deposition shall then be signed by the witness, unless the parties by stipulation waive the signing or the witness is ill or cannot be found or refuses to sign. If the deposition is not signed by the witness within 21 days of its submission to him, the officer shall sign it and state on the record the fact of the waiver or of the illness or absence of the witness or the fact of the refusal to sign together with the reason, if any, given therefor; and the deposition may then be used as fully as though signed unless on a motion

to suppress under Rule 4:7(d)(4) the court holds that the reasons given for the refusal to sign require rejection of the deposition in whole or in part.

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